

Supporting Statement
OMB 2120-0033
14 CFR part 183 Representative of the Administrator

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

Title 49, United States Code, Section 44702 states that the Secretary of Transportation may, subject to such regulations as he may prescribe, delegate to any properly qualified private person, the examination and testing necessary for the issuance of certificates under Title VI of the Federal Aviation Act.

Title 14, Code of Federal Regulations, part 183 (14 CFR part 183), Representatives of the Administrator, implements the provisions of section 314 of the Federal Aviation Act. 14 CFR part 183 (part 183) describes the requirements for delegating to any properly qualified private person, the examination and testing necessary for the issuance of airmen certificates.

In addition to the regulatory basis, the purpose of this information collection is to make designated examiners readily available to the public, especially in those areas where the Federal Aviation Administration (FAA) inspector resources are limited.

This collection of information supports the Department of Transportation's strategic goal on safety.

2. Indicate how, by whom, how frequently, and for what purpose the information is to be used.

The collection of information is for the purpose of obtaining essential information concerning the applicant's professional and personal qualifications. The FAA uses the information provided to screen and select designees who act as representatives of the FAA Administrator in performing various certification and examination functions under Title VI of Federal Aviation Act.

The collection of information is accomplished by the use of the following forms:

- (a) FAA Form 8110-14, Statement of Qualifications (DAR, DMIR, and DER) is designed to collect information necessary to evaluate an applicant's qualifications to be a designee. The FAA uses the information provided to screen and select the designees who act as representatives of the Administrator in performing various certification and examination functions. These designated representatives are: DAR – Designated Airworthiness Representatives (Manufacturing), DMIR – Designated Manufacturing Inspection Representatives, and DER – Designated Engineering Representative.
- (b) FAA Form 8110-28, Statement of Qualifications (DME, DPRE, DAR, and ODAR) is designed to collect information necessary to evaluate an applicant's qualifications to be a designee. The FAA uses the information provided to screen and select the designees who act as representatives of the Administrator in performing various certification and examination functions. These designated representatives are: DME – Designated Mechanic Examiner, DPRE – Designated Parachute Rigger Examiner, DAR –

Designated Airworthiness Representative (Maintenance), and ODAR – Organizational Designated Airworthiness Representative (Maintenance).

(c) FAA Form 8710-6, Statement of Qualifications (DPE, PPE, ACR) is designed to collect information necessary to evaluate an applicant's qualifications to remain as an Air Carrier DPE, PPE, and ACR. The FAA uses the information provided to screen designees who are seeking renewal of their designation status. [For new designee applications or reinstatements, the FAA uses Form 8710-10 per FAA Order 8700.1 and 8710.3E. See item (d) below.]

(d) FAA Form 8710-10, Statement of Qualifications (DPE) is designed to collect information necessary to evaluate the applicant's qualifications to be a designated pilot designee (DPE). Form 8710-10 is used for new, reinstatement, and renewal of General Aviation DPEs. Form 8710-10 is also used for new, reinstatement of Air Carrier DPEs, PPEs, and ACRs. The FAA also uses the information provided to screen pilot examiner designees who are seeking renewal of their designation status, with the exception of Air Carrier DPEs, PPEs, and ACRs in which Form 8710-6 is still used [see item 2. (c) above].

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection.

FAA Forms 8710-6, 8710-10, 8110-14 and 8110-28 are only in paper form and may only be submitted as such, as they require original signatures.

4. Describe efforts to identify duplication.

We have reviewed the other FAA public use reports and find no duplication. The forms covered by this submission are not duplicative since they request information from designee applicants with varied technical/professional backgrounds and areas of responsibility. We know of no other agency collecting this information.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

The collection of information involves individuals only.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The information is collected only when the applicant wishes to apply for a designee position, and such designation is necessary to provide adequate certification service. If the frequency of the collection was diminished, fewer applicants could apply. Therefore, the FAA would not be able to support public demand for certifications services, and the aviation public and industry would be adversely impacted economically.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with guidelines.

This collection of information is conducted in a manner consistent with 5 CFR section 1320.5 (d) (2) (i) (viii).

8. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions, and recordkeeping, disclosure, or reporting format (if any), and the data elements to be recorded, disclosed, or reported.

A notice soliciting public comment was published in the Federal Register on September 14, 2006, vol. 71, no. 178, pages 54330-54331. No comments were received. A copy is attached for your convenience. The FAA receives recommendations and input from each designee attending the mandatory biennial recurrent standardization courses. In addition, the FAA Office of Aviation Safety (AVS) has formed a Delegation Oversight Office with each service within AVS having its own Designee Oversight program office.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Respondents are not provided any payment or gift, other than remuneration of contractors or grantees.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Respondents have not been given any assurance of confidentiality.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

There are no sensitive questions on the forms. Questions asked are only used for determining the qualifications and suitability of the designee applicants.

12. Provide estimates of the hour burden of the collection of information. The statements should: Indicate the number of respondents, frequency of response, annual hour burden and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form.

Provide estimates of annualized cost to respondents for the hour burden for collection of information, identifying and using appropriate wage categories.

New Applications

NOTE: The National Examiner Board uses Form 8710-10 for both Air Carrier and General Aviation DPE applicants.

Form #	# of Applications	Hrs per Application	Total Hours	Cost per Hour	Total Cost
8110-14	320	1.5	480	\$34	\$16,320
8110-28	190	1.5	285	\$34	\$ 9,690
8710-10	320	1.5	480	\$34	\$16,320
Totals	830		1,245		\$42,330

Renewal Applications

NOTE: Form 8110-14 is not used for renewals.

Form 8710-6 is only used for the renewing Air carrier DPEs

Renewal By Letter of DER, DMIR, Manufacturing DAR, and Manufacturing ODAR:

# of Letters	Hrs per Letter	Total Hours	Cost per Hour	Total Cost
850	1.0	850	\$34	\$28,900

Renewal By Form:

Form #	# of Applications	Hrs per Application	Total Hours	Cost per Hour	Total Cost
8110-28	990	1.5	1,485	\$34	\$50,490
8710-6	510	1.5	765	\$34	\$26,010
8710-10	1,835	1.5	2,753	\$34	\$93,602
Totals	4,185		5,853		\$199,002

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information, including total startup costs.

For respondents (applicants), the total estimated hour burden is 7,098 (1,245 for new applications and 5,853 for renewal applications). The total estimated cost burden is \$241,332 (\$42,330 and \$199,002 for new and renewal applications respectively). There is no additional start-up cost not already included in Item 12 above.

14. Provide estimates of the annualized cost to the Federal Government. Also, provide description of the method used to estimate cost, which should include a quantification of hours, operational expenses and any other expense that would not have been incurred without this collection of information.

New Applications

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8110-28	190	1.5	285	\$34	\$ 9,690
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Totals	830	1,245	\$42,330
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Renewal By Letter of DER, DMIR, Manufacturing DAR, and Manufacturing ODAR:

# of Letters	Hrs per Letter	Total Hours	Cost per Hour	Total Cost
850	0.5	425	\$34	\$14,450

Renewal By Form:

Form #	# of Applications	Hrs per Application	Total Hours	Cost per Hour	Total Cost
8110-28	990	1.5	1,485	\$34	\$ 50,490
8710-6	510	1.5	765	\$34	\$ 26,010
8710-10	1,835	1.5	2,753	\$34	\$ 93,602
Totals	4,185		5,428		\$184,552

The total estimated annual cost to the Federal Government is \$226,882 (\$42,330 and \$184,552 for new and renewal applications respectively).

15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of the OMB Form 83-I.

Changes in the reported burden and costs are primarily due to the increase in the *Cost per Hour* it takes to complete and review each form. In addition, there has been a change in the number of new and renewal applicants due to the changes in employment and business opportunities.

16. For collections of information in which results will be published, outline plans for tabulation and publication.

There are no plans to publish this information for statistical or other purposes.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We shall seek approval to not display the expiration date. The subject FAA forms are recurring forms that are in printed form and stocked for continuous use as well as available for downloading from the FAA's Internet Website. For the stocked printed forms, it would not be cost effective to destroy unused, dated stock. Therefore, the FAA requests a continuation of the exemption from placing the expiration date on the forms.

18. Explain each exception to the certification statement identified in item "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

No exception to the certification statement of OMB Form 83-I is requested.

Attachments:

1. Supporting Statement
2. 30 Day Notice
3. 60 Day Notice
4. Form 8110-14
5. Form 8110-28
6. Form 8710-6
7. Form 8710-10
8. 49 USC 44702
9. 14 CFR Part 183