

## Supporting Statement for NPRM, Extended Operations (ETOPS) of Multi-Engine Airplanes

### A. Justification

1. *Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.*

Current section 121.161 prohibits operators from flying over a route that contains a point that is more than 1 hour flying time from an adequate airport, except through a deviation. Over the past 20+ years the FAA has issued deviations to the rule to allow for long-range flights up to 207 minutes. This rule will codify the current practices that permit certificated air carriers to operate two-engine airplanes over these long-range routes and will extend the procedures for extended operations to all passenger-carrying operations on routes beyond the 180 minutes from an alternate airport. This option is voluntary for operators and manufacturers. Because the proposal is voluntary, the FAA provides here an estimate of the paperwork burden for those who may participate in the future. The paperwork burden is associated with safety requirements to enable the FAA to assess the safety of long-range extended operations (ETOPS). These requirements require changes to parts 21, 25, 33, 121, and 135.

This rule is necessary to support the following elements of the DOT's Strategic Plan:

- **Safety: Enhance public health and safety by working toward the elimination of transportation-related deaths and injuries.** The safety of long-range, or extended, operations depends on the risk of critical loss of engine thrust, additional system failures during a diversion, the distance from an adequate airport used in a diversion, and the conditions encountered upon arrival at the diversion airport. This rule contains requirements for engine monitoring, additional maintenance procedures, and the specific designation of adequate airports for diversions. Taken together, these requirements will increase the safety of flight for operations that go great distances around the world.
- **Mobility: Advance accessible, efficient, intermodal transportation for the movement of people and goods.** Long-range operations are more efficient in that they utilize shorter routes, use less fuel, and eliminate the need for multiple take-offs and landings. These extended operations are simply a more efficient way of moving passengers long distances in less time. Competition in international travel will increasingly depend on extended flights. From its inception as a task for an Aviation Rulemaking Advisory Committee (ARAC) working group, the concepts and requirements of this rule have been coordinated with ICAO and the JAA.
- **Global Connectivity: Facilitate a more efficient domestic and global transportation system that enables economic growth and development.** As mentioned before, because long-range operations require fewer take-offs and landings, and incorporate practical efficiencies in areas of security, movement through airports,

economy of time, and less disruption of airport facilities, they greatly facilitate economic growth and development.

This rule will also support the FAA's Strategic Plan:

- **Global leadership-** The worldwide aviation industry is interested in extended operations. Civil aviation authorities of other countries and international aviation organizations are carefully watching the FAA's efforts to develop rules to govern extended operations. This proposed rule will enhance worldwide air travel safety and efficiency.
- **System efficiency-** Allowing extended operations allows operators to take more direct routes to long-range destinations and improves overall system efficiency.
- **Safety-** The proposed rule addresses the safety aspects of extended operations through increased engine and fuel monitoring, maintenance training and procedures, and planning for the adequacy of alternate airports in case of a diversion.

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

The FAA will use this information collection to ensure that aircraft for long range flights are equipped to minimize diversions, to preclude and prevent diversions in remote areas, and to ensure that all personnel are trained to minimize any adverse impacts of a diversion.

*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. Also describe any consideration of using information technology to reduce the burden.*

The FAA continues to encourage the use of automated, electronic collection methods whenever possible. In this proposal, air carriers may utilize existing maintenance, monitoring, and training data bases wherever they exist to assist in the reporting of this information. The FAA estimates that electronic collection techniques can be utilized for 95% of the records.

*4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.*

There is no duplication in the requirements of this proposal. In most cases, where we have added an additional requirement, there are existing record-keeping requirements already in place. For example, this proposal would add ETOPS training to training requirements that already exist, but only for those operators who wish to participate in ETOPS operations. Likewise, there are existing maintenance records. ETOPS would add certain entries to these existing records.

It is the FAA's anticipation, that as the record-keeping requirements for parts 21, 25, 33, 121, and 135 are reviewed in the future, these additional requirements would be incorporated into those control number totals.

*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 FAA does not believe that this proposal will impact small entities. The efficiencies gained by the rule are those most applicable to large, international air carriers. Even under part 135, these are not regional operators.

*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.*

If the collection of information is not received, the FAA will not be able to proceed with this program because there would be no way to ensure its safety. The FAA has sought to minimize the collection burden to the extent that safety is not compromised.

*7. Explain any special circumstances that would cause an information collection to be conducted in a manner INCONSISTENT WITH 5 CFR 1320.5(D)(2):*

Because of the nature of extended operations, operators must report emergency conditions that cause a diversion immediately (within 72 hours). Note that this is only a notification; it is not a plan for correcting the deficiency, which may take more time.

*8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. 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 on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.*

In the NPRM, published November 14, 2003 (68 FR 64730), the FAA explained in extensive detail the estimated paperwork burden and asked for comments on the burden. (See pages 64782-64784 of the NPRM) Although many comments were received on the need for some of the requirements, such as developing recovery plans, maintenance checks, etc., there were no comments on the paperwork associated with those requirements. It is the nature of the aviation industry to collect information on training,

maintenance, certification, and other means of verification. This rule only adds certain requirements to ensure the safety of flights that go long distances from an adequate airport.

The recordkeeping burden estimated in the NPRM has been considerably reduced in the final rule. For example, recovery plans are not now required for all extended operations, only those that exceed 180 minutes from a suitable airport. Regional recovery plans, included in the NPRM, have been dropped from the final rule. Activity levels for extended operations in the final rule are based on actual FAA records rather than estimates of possible operations. Certain “grandfathering” provisions, such as the 8 years for part 135 operators, have essentially reduced the burden for these operators to zero. Finally, all-cargo operations using three- and four-engine airplanes are excluded from this rule.

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

There are no payments or gifts to respondents.

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

There is no assurance of confidentiality. The information submitted is a matter of public record in the interest of safety. Obtaining such information, however, would be subject to 5 U.S.C 552(b)(4). Specific areas of proprietary information may be held as confidential to the extent possible.

*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 questions associated with this rule of a sensitive nature.

*12. Provide estimates of the hour burden of the collection of information and the cost for those hours. (Note: The burden is expressed in current dollars for a 16-year period based on the total extended compliance periods. That is, 10 years plus the 6-year compliance for fire suppression.)*

ETOPS requirements only apply to operators that exceed the “180-minutes from an alternate airport” threshold. Therefore, there are few operators that meet this criteria. We estimate that there is one Part 121 operator in the South Pacific, two Part 121 operators in the South Polar area, and one Part 135 operator in the South Pacific that would be affected. Plus, there is one manufacturer that would incur information collections for certification of airplanes for ETOPS operations and one engine manufacturer who would incur information collection costs for engine monitoring. Thus, there are a total of 6 respondents. The collection of information includes seven

areas, but not all seven areas apply to each operator or manufacturer. We list the areas specifically. All of these information requirements are considered *reporting* because they are required to gain extended operation or “ETOPS” authority.

1. One Part 121 operator who conducts extended operations in the South Pacific would be required to prepare a passenger recovery plan applicable to the designated ETOPS alternate airport listed in the carrier’s operations specifications; we estimate that there would be two such plans. A passenger recovery plan includes how a carrier would deal with a diversion to the alternate airport – what emergency vehicles (ambulance, fire fighting, etc.) are available; hotels or facilities for protecting passengers, etc.

Initial: 1 operator x 2 plans x 100 hrs. = 200 hrs. x \$103 = \$20,600 .

Total over next 14 years: 2 plans x 40 hrs. x \$103 = \$8,240 x 14 yrs. = \$115,360. + \$20,600. = \$135,960.

This operator is also required to provide training for diversions. Pilots, dispatchers, and flight attendants would be trained to deal with the special situation in which a diversion requiring extraordinary procedures.

Initial:

1 operator x 50 pilots x 1hr. = 50 hrs. x \$173 = \$8,650.

1 operator x 5 dispatchers x 1 hr. = 5 hrs.x \$62 = \$310.

Total Initial Hrs. = 55            Total = \$8,960.

Years 3-16 = \$890 (estimated 10% turnover) x 14 = \$12,544

Total: \$8,960. + \$12,544. = \$21,504.

2. The two Part 121 operators in the South polar region would have to plan for communication disruptions caused by solar flare activity and thus would incur planning costs. These operators would also have special fuel considerations requiring reporting fuel freeze strategies.

Solar flare: 2 operators x 100 hours x \$100. = \$20,000.

(Years 3-16) 2 x 40 hours x \$100. = \$8,000 x 14 years = \$112,000.

Total: \$20,000. + \$112,000. = \$132,000.

Fuel strategies: 2 operators x 100 hours x \$100. = \$20,000.

(Years 3-16) 2 operators x 40 hours x \$100. = \$112,000.

Total: \$20,000. + \$112,000. = \$132,000.

Total for South polar = \$264,000.

3. Part 21, specifically § 21.4 contains reporting requirements for problem reporting and tracking, including in-flight engine shutdowns. One manufacturer of airplanes suitable for ETOPS will make such reports to prove the reliability of engines for ETOPS. This manufacturer will also be required to investigate causes of engine shut-downs in flight.

## Reporting

### Initial:

1 manufacturer x 2 staff members x 2080 hrs. = 4,160 hrs. x \$45 = \$187,200.

Total: 16 years x \$187,200. = \$2,995,200.

## Investigations (also a reporting requirement)

### Initial:

1 operator x 1,000 hrs. x \$90 (engineer) + 1,000 hrs. x \$56 (technician) = 2,000 hrs.  
at cost of \$146,000

### Total:

2,000 hrs. x 16 yrs.=32,000 hrs \$146,000 x 16 yrs. =\$2,336,000.

4. Part 25, which contains the certification requirements for large airplanes, requires certification of fire suppression systems, electrical systems design, fuel system design, and system assessments for ETOPS. One manufacturer will incur these costs. Because of the reliability required for long range flights, these are information collections beyond what is normally required for certification purposes.

Fire suppression: 1 manufacturer x 21,000 hours (13 engineers) x \$90 = \$1.9 M

Electrical system: 1 manufacturer x 30,000 hours (15 engineers) x \$90 = \$2.25 M

Fuel system design 1 manufacturer x 30,000 hours (15 engineers) x \$90 = \$2.25 M

System assessment: 1 manufacturer x 10,000 hours ( 5 engineers) x \$90 = \$898,000.

Total: \$7,798,000.

5. The final rule adds engine requirements for an engine manufacturer seeking ETOPS approval. Part 33 requires oil tank design requirements to prevent oil loss and that the manufacturer develop an engine monitoring program. One engine manufacturer would incur these costs.

## Engine monitoring.

1 manufacturer x 1 technician x 5,000 hrs. x \$75. = \$375,000.

6. One operator has pilots and dispatchers who will require training on ETOPS specific procedures to comply with the existing provisions of Section 121.415 that require training on the provisions of the operating certificate and operating manual.

## Training:

50 pilots x 4 hours x \$173 = \$34,600.

3 dispatchers x 4 hours x \$62. = \$4,464.

Years 2-16, assume 10% replacement cost of \$3,906. x 15 = \$58,596.

Total: \$97,660.

Flight planning: One operator conducting 1,460 flights per year.

\$20 per flight x 1,460 = \$29,200. x 15 years = \$438,000.

7. Most of the Part 135 operators would plan their flight to avoid going over 180 minutes from an airport so as to avoid ETOPS requirements. (Flights from the West coast to Hawaii, for example.) There is the possibility, however, of one Part 135 South Pacific operation that may exceed the 180-minute exclusion.

1 operator x 16 pilots for 4 hours initial and 1 hour recurrent training.

16 pilots x 4 hours x \$72 = \$4,608

(Years 3-16) 16 pilots x 1 hour x \$72. x 14 years = \$16,128.

Total: \$20,736.

### Summary of Initial and Total Paperwork Hours and Costs

Category	Initial Hours	Initial Cost	Sixteen Year Hours	Sixteen Year Cost
<i>Part 121</i>				
Passenger Recovery Plans	200	\$20,600.	1320	\$135,960.
Passenger Recovery Training	55	\$8,960.	1320	\$21,504.
South polar – flare planning	200	\$20,000.	1320	\$132,000.
South polar – fuel strategies	200	\$20,000.	1320	\$132,000.
Section 121.415 training				
Pilots	4	\$34,600.	9.6	\$86,500.
Dispatchers	4	\$744.	9.6	\$11,160.
121.415 computer planning		\$29,200.		\$438,000.
<i>Part 21</i>				
ETOPS Reporting	4,160	\$187,200.	66,560	\$2,995,200.
Investigations	2,000	\$146,000.	32,000	\$2,336,000.
<i>Part 25</i>				
Fire suppression	21,000	\$1,900,000.	21,000	\$1,900,000.
Electrical system design	30,000	\$2,250,000.	30,000	\$2,250,000.
Fuel system design	30,000	\$2,250,000.	30,000	\$2,250,000.
System assessment	12,000	\$898,000.	12,000	\$898,000.
<i>Part 33</i>				
Engine monitoring	5,000	\$375,000.	5,000	\$375,000.
<i>Part 135</i>				
South Pacific operations	64	\$4,608.	224	\$20,736.
<b>TOTAL</b>	<b>83,987</b>	<b>\$8,146,912.</b>	<b>181,083</b>	<b>\$13,982,060.</b>

For the purposes of the 3-year approval of this information collection, we added the first, second and third year hours and costs for a total of –  
(Total respondents – 6 (4 operators, 1 airplane manufacturer, and 1 engine manufacturer))  
Total hours (3 years) – 83,987 + 22,600 (years 2 and 3) = 106,587  
Total cost (3 years) - \$8.147 M + \$1.748 M (years 2 and 3) = \$9.895 M

*13. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).*

There are no additional costs not already included in question 12.

*14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.*

Because ETOPS operations have been on-going for 20+ years, inspectors are familiar with the overall requirements. Only minimal training in new requirements will be necessary.

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

There are no changes or adjustments.

*16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.*

There are no plans for publication.

*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.*

The expiration of the OMB number would be displayed in 14 CFR part 11.

*18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.*

There are no exceptions.



