

**SUPPORT STATEMENT
SUPPLEMENTAL JUSTIFICATION
TITLE 49 U.S.C. § 44703(h) RECORDS OF EMPLOYMENT OF PILOT APPLICANTS
(PILOT RECORDS IMPROVEMENT ACT OF 1996 (PRIA))
PUBLIC LAW 104-264**

2007 JUSTIFICATION

1. *Explain the circumstances that make the collection of information necessary.*

a. Title 49 United States Code (49 U.S.C.) § 44703(h) mandates that all U.S. air carriers operating under Title 14 of the Code of Federal Regulations (14 CFR) part 121 or 135, or any U.S. air operator under 14 CFR part 125, request and receive FAA records, air carrier and other records, and National Driver Register records before allowing an individual to begin service as a pilot. All requestors are heretofore referred to as “air carriers.”

b. Title 49 U.S.C. § 44703(h)(8) requires that the Administrator shall promulgate standard forms for use by the air carrier to: request the records; inform the individual who is the subject of the request; obtain the individual’s written consent; and, inform the individual of the individual right of that individual to receive a copy of any records furnished in response to the request. All current FAA PRIA forms may be found at: http://faa.gov/pilots/lic_cert/pria/

c. The collection of this information falls under the Safety Strategic Goal of the United States Department Of Transportation Strategic Plan by working toward the elimination of transportation-related deaths and injuries.

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

An air carrier may use these forms to request the applicable records of all applicants for the position of pilot with their company. The information collected on these forms will be used only to facilitate search and retrieval of the requested records. Air carriers then “may use such records only to assess the qualification of the individual in deciding whether or not to hire the individual as a pilot.” (49 U.S.C. § 44703(h)(11)).

3. *Describe any consideration of information technology to reduce burden as well as any technical or legal obstacles to reducing burden.*

a. The PRIA forms are all available for downloading from the PRIA Web site for use by the air carrier. At the present time any submission that does not contain a written signature on these or other acceptable forms, cannot be accepted for processing. As a result, none of the material collected is submitable electronically. Paragraph ‘c’ below contains additional information concerning the use of electronic submission within the PRIA program.

b. Currently, AFS-620 (PRIA) utilizes the U.S. mail service, fax capabilities, and email attachment to receive requests from air carrier and third party customers. The authorized forms are available on-line for the customer to complete and then to forward to FAA in either one of

the previous methods. Once completed, requests are all returned by the U.S. mail service, with the occasional use of fax capabilities when the customer has requested expedited service.

c. To lessen the public burden and make use of current technology, and in accordance with Title 49 U.S.C. § 44703(h)(15) that would allow electronic submission of requests for FAA records, AFS-620 began development of an electronic request process (called ePRIA). This program was approximately 75% completed in 2006 and nearly ready for testing when the Division office, AFS-600, restructured its approach to IT projects. This and a loss of funding caused ePRIA to be cancelled indefinitely, and to date, remains cancelled. Attempts to revive ePRIA are being made; however, it appears that the program will remain cancelled. ePRIA would have allowed selected customers to submit their requests and then receive the reports back via the Internet, thereby affecting a substantial savings to AFS-620 in printing paper, mailing envelopes, postage, and printer cartridges, while providing an improved service to its customers.

d. Until such undetermined time that ePRIA is revived and completed, transmission of requests and the return of reports to the customer will remain with the U.S. mail service and occasional fax capabilities. As of this report, the amount of information available to be electronically received by the FAA and then transmitted to the customer remains at 0%.

e. Faced with this setback, however, office efficiency at AFS-620 (PRIA), remains extremely high. All work is processed and returned to the customer within 2 working days and no backlog of work exists, with the rare exception of extreme cases. Initially, the processing time for reports was as high as 69 days. With access to the current required data systems, however, one complete report could be processed in 3 to 5 minutes, from receipt to mail-out.

4. Describe efforts to identify duplication, and show why any similar information already available cannot be used or modified for use for the purposes(s) described in 2.

Currently, there are no other federal forms available for use in requesting PRIA-related records. The FAA PRIA forms, 8060 series, are the only forms needed for this application.

5. If the collection of information impacts small businesses or other small entities, describe the methods used to minimize burden.

This collection could impact small businesses. The burden is reduced by a provision at 49 U.S.C. § 44703(h)(14)(A) PILOTS OF CERTAIN SMALL AIRCRAFT allowing a pilot to be placed into immediate service and then have 90 days to complete the PRIA request process.

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 the burden.

Implementation of the information collection process, as facilitated by the PRIA forms, is statutorily mandated. Failure to collect and use the information collected may have a significant impact on air safety, the well-being of the flying public, and the general perception of the FAA.

7. Explain any special circumstances that require the collection to be conducted in a manner:

- *Requiring respondents to report information to the agency more often than quarterly:*

Does not apply.

- *Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it:*

Title 49 U.S.C. § 44703(h)(5) requires a person receiving a request for records (a completed form) to furnish those records not later than 30 days after receiving the request.

- *Requiring respondents to submit more than an original and two copies of any document:*

Does not apply.

- *Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years:*

Title 49 U.S.C. § 44703(h)(4) requires the Administrator and air carriers to maintain pilot records described in 49 U.S.C. § 44704(h)(1)(A)(B) and (C) for at least 5 years. Third Party Agents (TPAs) working on behalf of their air carrier customers are authorized to complete the PRIA request process; however, may not – under any circumstances – maintain a PRIA records system of their own. They may only fulfill the requests of their air carrier customer and forward those results to them within 30 days.

- *In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study:*

Does not apply.

- *Requiring the use of a statistical data classification that has not been reviewed and approved by OMB:*

Does not apply.

- *That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible use:*

Does not apply.

- Or, requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

Does not apply.

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. Summarized 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. Further, 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 record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

a. Notice of intent to request renewal of the forms was published on page 13855 of the Federal Register, March 23, 2007, Vol 72 #56. One comment with four areas of concern was received as follows:

COMMENT ONE: *“Air carriers should make pilots who fly in-state also furnish this. This form needs to be changed. There is no reason why in-state flights are not protected by safe pilots.”*

RESPONSE: I believe what the comment is referring to is the ‘intra-state’ operation of an air carrier, primarily existing in the state of Alaska. As the statute is written now, the formal definition of ‘air transportation’ must be fulfilled before PRIA will apply. In other words, is: (1) foreign air transportation (flag operation) being provided? Is: (2) inter-state service and transportation of U.S. mail being provided? Is: (3) common carriage (holding out) being provided? Is: (4) transportation of U.S. mail being provided on an inter-state or intra-state basis? According to the law – as we understand it today, if any of these provisions are NOT being provided, the definition of ‘air transportation’ is not being met and therefore, PRIA does NOT apply. All PRIA forms, last revised in October 2005, are perfectly adequate for the collection of the required PRIA-related records, and there is no compelling need for their revision. The only improvement would be if Congress made the use of these forms mandatory and not optional.

COMMENT TWO: *“I also note that there should be no flying by any pilot until all records are approved. No 90 day free run should be given to any pilots of small aircraft or to anybody else. Get the records to show you are safe.”*

RESPONSE: This was the original intent of Congress. However, when PRIA was first enacted, many small air carriers were literally going out of business waiting for the PRIA requests to be completed. Congress almost immediately saw the error of this statute and amended it to allow for certain small operators to put their new-hire pilots to work immediately and then have 90 days to complete their request processes. This is a sound policy which should

not be changed, and one that provides a measure of fairness to the smaller air carriers who cannot afford the 30 day delay of making PRIA requests for records. (49 U.S.C. § 44703(h)(14)(A))

COMMENT THREE: *“I note that the regulations seem exceedingly loose to me for people who could be flying jumbo jets that can wipe out parts of a city. I think the agency itself needs to go back over this and update for 2007. Much time has elapsed since 1996.”*

RESPONSE: This is an extremely abstract remark – one whose lack of specific and detailed information does not lend itself to any manner of commendable response. There are, however, several areas of the PRIA statutes that could be amended to bring it more in-line with today’s modern world; however, in no way can the PRIA statutes, either all or any part thereof, be considered “loose” or “at fault” of possibly causing parts of “cities to be wiped out.”

COMMENT FOUR: *“Do we know that what they keep records on actually makes for safe pilots?”*

RESPONSE: The records that are required by PRIA include areas of: (1) training; (2) proficiency; (3) route checks; (4) airplane qualifications; (5) release from employment and disqualification; (6) disciplinary actions; and (7) drug and alcohol testing. What better records than these can be used to determine the overall basic suitability of a pilot for employment, and to give a basic ‘snapshot’ of how safe that pilot is? Further requirements would become extremely burdensome to both the air carrier and to the pilot/applicant, and be a detriment to the program.

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

Does not apply.

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

Title 49 U.S.C. § 44703(h)(11) provides that an air carrier may use such records only to assess the qualifications of the individual in deciding whether or not to hire the individual as a pilot. The air carrier is directed to take such actions as may be necessary to protect the privacy of the pilot and the confidentiality of the records. This holds true with the one exception of the FAA inspectors who, during the course of their normal duties for the FAA, cannot be denied access to the PRIA-related records of any air carrier for the purpose of surveillance or inspection.

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. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given persons from whom the information is requested, and any steps to be taken to obtain their consent.

Not Applicable.

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

a. **Number of active air carriers.** The following numbers were obtained by data query at AFS-620 of the National Vital Information System (NVIS) on March 27, 2007, and represents the actual number of **active** and **pre-certification** air carriers at the time of query.

(1) Active carriers **2,700** as follows:

- (A) Part 121 – 108
- (B) Part 135 – 2553 and
- (C) Part 121/135 -- 39

(2) Pre-certification¹ -- **207** as follows:

- (A) Part 121 – 12
- (B) Part 135 – 195 and
- (C) Part 121/135 – 0

(3) Total active and pre-certification air carriers – **2,907**

b. **Frequency of requests.** For Tables A and B below, the figures are predicated on a three-year average of requests received by AFS-620 for the period October 1, 2004, through September 30, 2006 (Fiscal years 2004, 2005, and 2006). These figures were obtained from historical tables at AFS-620 indicating the actual number of requests. For tables C and D below the figures are also based on a three-year average of requests received by the FAA for the same time period, also obtained from historical tables at AFS-620 indicating the actual number of requests. Figures for all tables have been rounded to the nearest whole number.

IMPORTANT CONSIDERATION: The total requests for the previous reporting period (2001-2003) had been dramatically decreased due to the tragedy on 9-11-2001. As indicated below, however, during this current reporting period (2004-2006) the numbers have significantly recovered. As a result, total requests, as well as total number of pilots for the current 3 year time period, have increased as follows:

Requests by FY:	2004: 17,142	Pilots by FY:	2004: 17,142
	2005: 19,297		2005: 19,297
	2006: 18,341		2006: 18,341
	TOTAL: 54,780		TOTAL: 54,780
	AVERAGE: 18,263		AVERAGE: 18,263

¹ Pre-certification refers to entities currently in the process of application for air carrier certification. They are potential respondents, but there is no way to determine how many will complete certification. For the purpose of this report, pre-certification applicants are included in the count for the “number of air carriers” column in Tables A and C.

(1) FAA Form 8060-10 and FAA Form 8060-10A, FAA Records Requests (PRIA) are forms used by active and pre-certification air carriers to request FAA records as mandated by Title 49 U.S.C. § 44703(h)(1)(A). Since the beginning of operations under PRIA (February 1997 through September 2006), the FAA has processed **170,742 requests from air carriers** for FAA records for **174,898 individual pilots**. The difference between these two figures is a result of requests, early in the PRIA operation, where as many as 20 or more pilots were listed on only one request form. This was before the requirement for only one pilot to be listed on only one request form, and as a result, has permanently skewed the request/pilot ratio.

IMPORTANT: The figures just mentioned of PRIA activity ending on September 30, 2006 terminate that cumulative count with the figures shown in the previous paragraph. The report began again on October 1, 2006 which re-started the cumulative activity count from the zero point, to eliminate the former skewing problem.

(2) The multipliers concerning the number of hours per request were retained from the previous report since much research was completed at that time to arrive at the figures of .1666 and .0833 respectively, and conditions have not changed enough to require a new multiplier. However, an inflation rate of 6.29%, computed for the period of October 2004 through September 2006, was applied to the average cost per hour figures of \$50.00 and \$45.00 respectively, from the previous report. (Inflation calculator from <InflationData.com>)

(A) **Table A** -- Burden To Air Carriers (Projected), FAA Form 8060-10 and FAA Form 8060-10A, FAA Records Request (PRIA).

Table A ANNUAL BURDEN TO AIR CARRIERS (Projected) FAA FORM 8060-10 and FAA Form 8060-10A, FAA RECORDS REQUEST (PRIA)							
I	II	III	IV	V	VI	VII	VIII
Number of Air Carriers	Average Number of Requests Per Year Per Air Carrier	Number of Pilots Per Request	Average Number of Requests	Hrs. Per Request	Total Hours	Average Cost Per Hour	Total Cost
2,907	6	1	18,263	.1666	3043	\$53.15	\$161,765

(B) **Table B** -- Burden To Pilots (Projected), FAA Form 8160-10 and FAA Form 8060-10A, FAA Records Request (PRIA). The average cost per hour is based on a pilot's pay per flight hour and a per monthly flight schedule of 85 flying hours.

Table B ANNUAL BURDEN TO PILOTS (Projected) FAA FORM 8060-10 and FAA Form 8060-10A, FAA RECORDS REQUEST (PRIA)						
I	II	III	IV	V	VI	VII
Number Of Pilots Per Year	Number of Request Per Pilot	Average Number of Requests	Hrs. Per Request	Total Hours	Average Cost Per Hour (See Note 1)	Total Cost
18,263	1	18,263	.0833	1521	\$47.83	\$72,749

(2) FAA Form 8060-11 and FAA Form 8060-11A, Air Carrier and Other Records Request (PRIA) are forms used by active and pre-certification air carriers to request records from other air carriers and persons that have employed the individual as a pilot at any time during the 5-year period preceding the date of the application as mandated by Title 49 U.S.C. § 44703(h)(1)(B). FAA Form 8060-12 is also included here to request those identified as “other records.” The average number of requests per pilot was determined through consultation with industry groups to determine: (a) the number of requests per pilot; (b) the average time required to respond to a request; and, (c) the average hourly salary of employees responding to the requests. According to industry representatives, the number of previous employers for pilot applicants during the preceding 5-year period ranges from 1 to 7, with the average being 3.

(A) **Table C -- Burden To Air Carriers (Projected), FAA Form 8060-11 and FAA Form 8060-11A, Air Carrier and Other Records Request (PRIA).** Processing FAA Form 8060-11 and FAA Form 8060-11A is a two-part process that requires action on both the gaining air carrier [prospective employer] and the losing air carrier [previous employer].

(i) **Part 1 – Prospective Employer.** The prospective employer must complete the records request, mail it to the previous employer(s), gather and evaluate records provided by the previous employer(s); and, follow-up on requests that have not been complied with. Based on information provided by industry, a prospective employer spends approximately 0.5 hours per request.

(ii) **Part 2 – Previous Employer.** The previous employer gathers, copies, and forwards records required by Title 49 U.S.C. § 44703(h)(B)(i) and (ii) to the prospective employer, including: proficiency and route checks; airplane and route qualifications; training records; any required physical examinations; records of each action taken concerning the release from employment or physical or professional disqualification of the flight crewmember; drug testing program records; and alcohol misuse prevention program records. Based on information provided by industry, a previous employer spends approximately 0.5 hours per request.

Table C							
ANNUAL BURDEN TO AIR CARRIERS (Projected)							
FAA FORM 8060-11, FAA FORM 8060-11A, AIR CARRIER AND OTHER RECORDS REQUEST (PRIA), and FAA FORM 8060-12, AUTH FOR RELEASE OF DOT D AND A TESTING RECORDS							
I	II	III	IV	V	VI	VII	VIII
Number of Air Carriers	Average Number of Requests Per Year Per Air Carrier	Average Number of Previous Employers Per Pilot (See Note 1)	Average Number of Requests	Average Hrs. Per Request	Total Hours	Average Cost Per Hour	Total Cost
<u>Prospective</u> 2,907	6	NA	18,263	0.5	9132	\$53.15	\$485,366
<u>Previous</u> 2,907	19	3	54,789	0.5	27,395	\$53.15	\$1,456,044
TOTAL (See Note 2)	24		73,052	0.5	36,527	\$53.15	\$1,941,410

Note 1. Requests for records must be sent to all previous employers for the preceding 5-year period. The number of previous employers for pilot applicants during the preceding 5-year period ranges from 1 to 7. Consultation with industry indicates the average number of previous employers is 3.

Note 2. The figures in this row accounts for the time spent by both the prospective and previous employers in requesting, gathering, copying, forwarding, and evaluating records.

(B) **Table D** -- Burden To Pilots (Projected), FAA Form 8060-11, FAA Form 8060-11A, Air Carrier and Other Records Request (PRIA) and FAA Form 8060-12, Auth For Release of DOT Drug and Alcohol Testing Records.

Table D ANNUAL BURDEN TO PILOTS (Projected) FAA FORM 8060-11, FAA FORM 8060-11A, AIR CARRIER AND OTHER RECORDS REQUEST (PRIA) and FAA FORM 8060-12, AUTH FOR RELEASE OF DOT D AND A TESTING RECORDS						
I	II	III	IV	V	VI	VII
Number Of Pilots Per Year	Average Number of Request Per Pilot	Number of Requests	Hrs. Per Request	Total Hours	Average Cost Per Hour	Total Cost
18,263	3	54,789	.0833	4,564	\$47.83	\$218,296

c. **Table E** -- Total Number of Responses, Annualized Hour Burden, and Total Cost Burden. Based on the totals in Tables A through D above, the total number of requests was **164,367**; the annualized hourly burden was **45,655**; and the cost burden was **\$2,394,220** as indicated below. **Total number of responses will be 1 per 18,263 total of airman responding which is divided into the four different categories.**

Table E ANNUAL TOTAL PUBLIC BURDEN (Projected)			
TABLE	TOTAL REQUESTS	TOTAL HOURS	TOTAL COSTS
A	18,263	3,043	\$ 161,765
B	18,263	1,521	\$ 72,749
C	73,052	36,527	\$1,941,410
D	54,789	4,564	\$ 218,296
TOTALS	164,367	45,655	\$2,394,220

13. Provide an estimate of the total annual cost burden to respondents or record keepers 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 cost 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 also may aggregate cost estimates from items 12, 13, and 14 in a single table.

a. The Federal Aviation Administration originally divided the major impact of Public Law 104-264 between three organizations within the FAA. These three organizations reside within the Flight Standards Service at the Mike Monroney Aeronautical Center and are identified as: (1) the Regulatory Support Division (AFS-600) including the Aviation Data Systems Branch (AFS-620); (2) the Civil Aviation Registry (AFS-700) including the Airmen Certification Branch (AFS-760); and: (3) the Civil Aeromedical Institute (AAM-300) including the Aeromedical Certification Division (AAM-301).

b. In 1997 a Memorandum of Understanding between the three organizations was adopted to designate AFS-620 as the focal point for all PRIA record requests and to have the primary responsibility for the release of all the related FAA records. An intense effort by AFS-620 to streamline the record search process has reduced the processing time for record requests to a one-to-three day period. This Memorandum was re-executed on Nov 18, 2003.

c. Early in 2004, AFS-600 was notified by AFS-200 that they would soon be assigning the additional responsibility of plans and policy management of PRIA to AFS-620 at MMAC in Oklahoma City, OK. As of 2-24-2004, AFS-600 and AFS-620 was assigned, and has assumed the responsibility as the program office and program manager for the Pilot Records Improvement Act for the FAA.

d. **Table F** – Federal Government Financial Burden. The estimated annual financial burden to the Federal Government is indicated in the following table.

Table F					
ANNUAL FEDERAL GOVERNMENT FINANCIAL BURDEN					
Description Of Action	Cost Per Hour	# Hours Per Employee Per Year	Number Employees	% Of Time	Total Cost
Receiving and Sorting	\$24.61	2,080	2	25%	\$25,594
Examine and Processing	\$24.61	2,080	2	25%	\$25,594
Printing and Mailing	\$24.61	2,080	2	25%	\$25,594
Filing and Archiving	\$24.61	2,080	2	25%	\$25,594
Program Management	\$37.46	2,080	1	50%	\$39,094
Program Plans and Policy	\$37.46	2,080	1	50%	\$39,094
TOTAL					\$180,564

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

a. Again referring to the tragedy of 9-11-2001 occurring in the previous reporting period, the number of requests dramatically decreased primarily due to the temporary downturn in airline travel at the time. However, during this reporting period, the airline industry has demonstrated a dramatic recovery as indicated by the steady increase in PRIA requests.

b. In addition, PRIA is very unique in that the number of requests received by the FAA is a direct indicator relating to the state of health of the U.S. airline industry. Therefore, PRIA can be considered as a very reliable indicator of the airline industry in this respect.

c. During the previous two reporting periods, the PRIA function at AFS-620 has become a fully mature, capable, and viable office system, with an experienced staff capable of resolving most issues without supervision. Any problem issues are handed off to the PRIA program manager for resolution. This has resulted in a high level of production efficiency, completing more work in a shorter period of time. All work is completed on the day received, with no backlog. All PRIA staff are also cross-trained to assist with Privacy Act and FOIA requests.

d. This reporting period has also seen vast improvements in the areas of Program Plans and Policy, with the issue of FAA Order 8000.88 PRIA Guidance For FAA Inspectors, a complete revision of the PRIA Advisory Circular (AC) 120-68D, and many self-help documents that may be found and downloaded from the customer oriented PRIA Web site. This has resulted in a significant decrease in the volume of telephone traffic requesting assistance as the PRIA customer has become well-versed and informed in their request process. The PRIA program manager has also established a direct link with many customers through an email notification group mail list, by which the customer is immediately notified of any changes or additions on the PRIA Web site. This has proven to be a valuable tool for the well-informed PRIA customer.

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.

Not Applicable.

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.

a. We are seeking approval to not display the expiration date because all PRIA forms are used on a recurring basis by the customer. The forms are no longer provided in an appendix to Advisory Circular 120-68 since they are available to all users electronically through the Internet.

b. Because the forms are used on a recurring basis, the FAA therefore requests an exemption from placing the expiration date on the forms.

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.

Attachments:

1. Supporting Statement
2. 30 Day Notice
3. 60 Day Notice
4. Form 8060-10
5. Form 8060-10A
6. Form 8060-11
7. Form 8060-11A
8. Form 8060-12
9. Form 8060-13
10. 49 USC 44703
11. 14 CFR Part 121
12. 14 CFR Part 125
13. 14 CFR Part 135