MISSION STATEMENT

The Department of Transportation (DOT) relies on the on-time flight performance data to fulfill its strategic plan. The DOT monitors and studies the movement of aircraft through the national air space system to ensure safe and efficient operations. DOT is committed to guiding and overseeing America's air transportation system today and into the future by recognizing statistical trends that identify recurring delays and bottlenecks in air traffic control.

DOT is committed to developing transportation policies and programs that foster fast, safe, efficient, and convenient transportation at the lowest cost. On-time data are used in assessing long-term air traffic control and airport development needs. Air traffic delays cost the airline industry, air travelers, and the government billions of dollars each year. ATA estimates that its annual costs for delays is over $7.5 billion (see http://www.airlines.org/economics/specialtopics/ATC+Delay+Cost.htm). The Department is proposing to expand the on-time data reporting system to include tarmac delays that occur before a flight is cancelled and after a flight lands at an alternate airport when there is a flight diversion. The additional information will be used by the Federal Aviation Administration (FAA) to identify problem areas within their control and develop an action plan to address these problem areas

Economic growth prospers when the real economic cost of transportation is reduced. DOT recognizes that the collection of delay data is critical to identifying and solving air congestion problems effectively reducing transportation costs. DOT performs an essential role as a catalyst for improving the quality of decisions affecting the transportation sector. In this role, the Bureau of Transportation Statistics serves as a facilitator in providing missing critical data to the FAA. Four economic trends impact transportation: (1) the globalization of commerce, (2) a growing attention to logistics in the production process, (3) a greater reliance on private investment in transportation industry, and (4) the rise of competing and complementary technologies. The accelerated application of advanced information technologies, competitive techniques, and traffic flow information systems affect the transportation industry. Adoption of these information-related technologies will facilitate the collection, management, integration, and distribution of more transportation information in less time with better accuracy and broader application

DOT's information systems are being integrated into an agency-wide activity. Reflective of this one DOT approach in meeting the challenges faced by our national transportation system is a coordinated effort by the Office of the Secretary, the Federal Aviation Administration, the Bureau of Transportation Statistics (BTS), and Office of the Inspector General Office to reduce airline delays.

BTS has advanced the precepts of the Clinger-Cohen Act and the Paperwork Reduction

Act by re-engineering its data processing system. BTS migrated from a mainframe computer processing system to a more functional mid-tier data processing system. This migration produced a data processing environment that is more efficient and cost effective. BTS is responsible for planning, managing, and maximizing the results of its IT investments. In this process, BTS is committed to working with its transportation partners to ensure the successful transition of its Information Technology (IT) systems. BTS' objectives are to improve the quality, reliability and accessibility of transportation-related information. BTS' resources will also be used to mitigate the paperwork burden imposed on the air transportation industry and the public.

SUPPORTING STATEMENT

A. Justification

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

In the past year there have been long tarmac delays exceeding 5 hours in duration which received widespread media attention. Many of these delays were not reported to the Department of Transportation because the tarmac delays occurred on flights which were ultimately cancelled or occurred after a flight was diverted to an alternate airport. Both these situations highlighted data gaps in the current reporting system. The Bureau of Transportation Statistic held an open public meeting in June 2007 to discuss if there is a problem with the current reporting system and, if so, the best way to rectify the system. All in attendance agreed that the Department should collect more data to advise the public of service problems. In the Department's proposed budget, Congress has language requiring the collection of tarmac delays on cancelled and diverted flights.

2. Indicate how, by whom, and for what purpose the information is to be used. Indicate the actual use the agency has made the information received from the current collection.

On-time data are collected from air carriers that account for at least 1 percent of domestic scheduled passenger revenues. Currently, these carriers are:

> Air Tran Airways
> Alaska Airlines
> American Airlines
> American Eagle Airlines
> America West Airlines (Combined with USAirways)
> Atlantic Coast Airlines
> Atlantic Southeast Airlines
> Comair
> Continental Airlines
> Delta Air Lines
> ExpressJet Airlines
> JetBlue Airways
> Northwest Airlines
> Pinnacle
> Skywest Airlines
> Southwest Airlines
> United Air Lines
> US Airways.

Aloha and Hawaiian Airlines files on-time data reports voluntarily.

The Federal Aviation Administration use on-time data collected and processed by BTS to pinpoint and analyze air traffic delays that occur under FAA control. By being able to focus on delays that are attributed to the national aviation system and eliminating the delays that were caused by extreme weather, the air carriers or by the late arrival of an aircraft delayed on a previous flight, the Department is able to focus its attention on solving problem areas within its domain. Aircraft tail number, wheels-up and wheels down time provides FAA valuable data for pinpointing and analyzing air traffic delays. BTS is proposing to collect tarmac delay data for flights that are ultimately cancelled and tarmac delays at alternate airport after a flight has been diverted. This additional data will give the FAA a more complete picture of what is happening at the airports especially at times when operations have service difficulties caused by bad weather.

Wheels-up and wheels-down time are used in conjunction with departure and arrival times

to show the extent of ground delays. Elapsed flight time reveal delays experienced in the air. The reporting of the aircraft tail number allows the FAA to track an aircraft through the air network, which enables the FAA to study the ripple effects of delays at hub airports. Data by aircraft type allows the FAA to calculate the capacity impacted by air traffic congestion

Originally, on-time data and mishandled baggage report system was developed as a consumer protection reporting system. While the utility of the reporting system has gone far beyond its original purpose, it remains one of primary resources used by consumers to make air carrier selections. Since Part 234 has been effective, air carriers' quality of service has improved resulting in a decrease in the number of consumer complaints with an exception for the year 2000. The Department discloses the air carriers' on-time performances, the reasons for delays and cancellations, and carriers' ratio of mishandling passenger baggage. Airline passengers are now more informed to make carrier selections based on the quality of service provided.

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 submissions of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

The on-time flight performance reporting requirements are in compliance with the Government Paperwork Reduction Act - 100% of the data elements are submitted electronically. The reporting system is designed to take advantage of automated data processing. Most of the carriers send in their data via the internet. The Department has removed the requirement that on-time data must be submitted on ADP computer tape, thus permitting the air carriers to take advantage of electronic reporting medium.

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

We looked at OPSNET data as a substitute data source.   OPSNET data are collected by air traffic controllers to track air traffic control delays of 15 minutes or more. We determined the OPSNET cannot be used because it captures only about 25% of delays. There is also a question concerning the accuracy of the data.

5. If the collection of information impacts small businesses or other small entities,

describe efforts to minimize burden.

The carriers that are required to submit causal data are all large air carriers with over $650 million in annual operating revenues.

6. Describe the consequence to the Federal Program or policy activities if the collection were not collected or conducted less frequently.

Less frequent filing of on-time data would not reduce reporting burden. Airlines collect data on an individual flight segment basis. Less frequent reporting would not change this practice. On-time data can become stale over time and lose their usefulness.

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

·   **requiring respondents to report information to the agency more often than quarterly;**

·   **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

·   **requiring respondents to submit more than an original and two copies of any document;**

·   **requiring respondents to retain records, other than health, government contracts, grant-in-aid, or tax records for more than 3 years;**

·   **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;**

·   **requiring the use of statistical data classification that has not been reviewed and approved by OMB;**

·   **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 confidential use; or**

·   **requiring respondents to submit proprietary trade secrets, 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.

Because of the time-sensitive nature of the on-time performance data, carriers submit monthly reports within 15 days after the end of the applicable month. Most of the air carriers use a computer system called the ACARS system that amasses the data for on-time reporting. ACARS allows for almost real-time data submission.

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 the notice and describe actions taken by the agency in response to these comments.

On May 17, 2007, BTS published a notice in the Federal Register FR 72 volume 72, page 27771, that it was holding a public meeting to discuss the reporting of flights that experience gate-return and flights that experience tarmac delays which are not now reported to BTS. Docket # OST 2006-28522 was established to receive comments from interested parties. While it was unanimous that BTS should collect additional data to close some data gaps, there was a difference of opinion on exactly what additional data should be collected. One consumer group went so far as to request that air carriers track the delay minutes of each passenger, especially those passengers that miss connecting flights and those passengers that have their flights cancelled. We believe that the cost of such a tracking system would be prohibitive and may be in conflict with confidentiality policies.

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

There are no payments or gifts to respondents.

10. Describe any assurances of confidentiality provided to respondents.

There are no assurances of confidentiality.

11. Are there any questions of a sensitive nature?

There are no questions of a sensitive nature.

12. Provide estimates of reporting burden.

We estimated the current reporting burden is approximately 159 hours per year per air carrier. One carrier estimated that a worse case scenario of 900 hours to reprogram its system to capture the new reporting elements. Therefore, we are estimating a first year burden of 1,060 hours per carrier and a burden of 175 hours per carrier in succeeding

years. With 20 reporting carriers, the industry's first year burden is estimated at 21,200 hours.

13. Provide an estimate of cost to the respondents. Do not include the cost of any hour burden shown in items 12 and 14. General estimates should not include purchase of equipment or services or portions thereof made prior to October, 1995.

Other than the hourly burden costs, there are no additional costs. The carriers would not make any purchases to report the data items.

14. Provide estimates of annualized cost to the Federal Government.

Cost to the Government is estimated to be about $21,000 per year. This estimate includes computer time $10,000, personnel costs $11,000.

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

The increase in total reporting burden is due the proposed changes to collect tarmac delays for cancelled and diverted flights.

16. Is the information received published?

Yes. DOT's Office of the Secretary publishes the monthly *Air Travel Consumer Report*. The Bureau of Transportation Statistics exhibits on-time data on its web site.

B. <u>Collection of Information Employing Statistical Methods</u>

This data collection does not employ statistical methods.