

## **The Supporting Statement for OMB 0596-0015**

Airplane Pilot Qualifications and Approval Record, Helicopter Pilot Qualifications and Approval Record, Airplane Data Record, and Helicopter Data Record  
March 2008

### **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.**

Laws, Statutes, and Regulations

- Public Law 106-181 (April 5, 2000) – Wendell H. Ford Aviation Investment and Reform Act for the 21<sup>st</sup> Century
- Forest Service Manual (FSM) 5700 – Aviation Management
- Forest Service Handbook (FSH) 5709.16 – Flight Operations Handbook
- Title 14 CFR – Federal Aviation Administration Regulations

The Forest Service (FS) is the largest operator of aircraft in the Federal government outside of the Department of Defense. The FS uses 27 agency owned aircraft with 286 aircraft on loan to 17 states for fire suppression activities. The majority of Forest Service flying is in support of wildland fire suppression.

In addition to agency-owned aircraft, the Forest Service contracts with aviation service vendors for approximately 700 aircraft used in resource protection and administration of projects. The total use of contract aircraft and pilots was approximately 86,000 flying hours for FY 2007.

Contractor aircraft and pilots place water and chemical retardants on fires, provide aerial delivery of firefighters to fires (such as smokejumpers with parachutes and rappellers from helicopters), search for lost personnel, and perform reconnaissance, resource surveys, and fire detection. They transport firefighting personnel in all weather conditions over long distances to small airports/helicopter landing sites in small to airline-size aircraft.

Contracts for such services include rigorous qualification requirements for pilots and specific conditions/equipment/performance requirements for aircraft. Forest Service Aviation policy is the basis for contract requirements. Agency policy is set forth in FSM 5700 and FSH 5709.16, which cite specific Federal Aviation Administration Regulations in Title 14 (Aeronautics and Space) of the Code of Federal Regulations. Title 14 CFR is specific to aeronautics and identifies the Federal Aviation Administration (FAA) as the regulatory agency for all aviation activities. These requirements are necessary to maintain an acceptable level of safety, mission preparedness, and cost effectiveness in aviation operations. Of particular importance are the standards relating to fire suppression missions, as such missions are conducted under extremely adverse conditions of weather,

**The Supporting Statement for OMB 0596-0015**

Airplane Pilot Qualifications and Approval Record, Helicopter Pilot Qualifications and Approval Record,  
Airplane Data Record, and Helicopter Data Record  
March 2008

---

terrain, turbulence, smoke reduced visibility, minimally improved landing areas, and congested airspace around wildfires.

It is critical that Agency contracting officers executing these contracts have assurance that the pilots and aircraft offered meet these special Forest Service qualifications and other requirements. The only practical way to accomplish this is to require prospective contract pilots to provide the certified information. The Forest Service uses forms FS-5700-20 and FS-5700-20a to obtain such certified information from prospective contract pilots.

Forest Service aviation maintenance inspectors use forms FS-5700-21 and FS-5700-21a as worksheets and approval documentation when checking aircraft for contract compliance. The maintenance inspectors provide a copy of a portion of the completed form to the contractor as proof of compliance.

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

**a. What information will be collected - reported or recorded? (If there are pieces of information that are especially burdensome in the collection, a specific explanation should be provided.)**

The information collected documents specific requirements for a particular contract. Data collected includes pilot flight-hour experience and particulars regarding personal information and their FAA certificates. Forms FS-5700-20 (Airplane Pilot Qualifications and Approval Record) and FS-5700-20a (Helicopter Pilot Qualifications and Approval Record) collect the following information from pilots:

- (1) Name, date of birth, and contact information
- (2) Current and previous employment history
- (3) Medical Certification
- (4) Previous Agency approval information
- (5) Airman Certificate
- (6) Date last Agency evaluation flight and inspector
- (7) Pilot-In-Command Flight Time and Type of Flying
- (8) Aircraft Accidents/FAA Violations
- (9) Pilot Certification

Airplane and helicopter information collected provides the Forest Service with aircraft maintenance and inspection history. Such information informs Agency officials as to how well the aircraft is equipped to meet specific contract requirements. Forms FS-5700-21, Parts 1 and 2 (Airplane Data Record) and FS-5700-21a (Helicopter Data Record) collect the following information from contractors for aircraft considered for Forest Service use:

**The Supporting Statement for OMB 0596-0015**

Airplane Pilot Qualifications and Approval Record, Helicopter Pilot Qualifications and Approval Record,  
Airplane Data Record, and Helicopter Data Record  
March 2008

---

- (1) Operator's address and contact information
- (2) Aircraft make, model, FFA Registration Number, Manufacturer's Serial Number
- (3) Gross Weight, Number of Passenger Seats, and other aircraft specifications
- (4) Authorized Uses
- (5) Airframe Information
- (6) Engine Information
- (7) Equipment
- (8) Avionics

**b. From whom will the information be collected? If there are different respondent categories (e.g., loan applicant versus a bank versus an appraiser), each should be described along with the type of collection activity that applies.**

Businesses offering pilots and aircraft contracts to the Forest Service provide the information.

**c. What will this information be used for - provide ALL uses?**

The data supplied provides rationale for approval of contracted pilots and aircraft used in specific Forest Service aviation missions, documenting compliance with requirements of the contract.

Contractors (pilots and aircraft) issued approval cards based upon documentation on the aforementioned forms. Forest Service personnel using these pilots and aircraft verify possession of properly approved cards. Without the information supplied on these forms, Forest Service contracting officers, aircraft inspectors and pilot inspectors cannot document and determine if pilots and aircraft meet the detailed qualifications, equipment, and condition requirements essential to safe, efficient accomplishment of Forest Service specified special missions for which the aircraft and pilots are being offered.

**d. How will the information be collected (e.g., forms, non-forms, electronically, face-to-face, over the phone, over the Internet)? Does the respondent have multiple options for providing the information? If so, what are they?**

The information is collected via the following forms:

- FS-5700-20 - Airplane Pilot Qualifications and Approval Record
- FS-5700-20a - Helicopter Pilot Qualifications and Approval Record
- FS-5700-21 - Airplane Data Record
- FS-5700-21a - Helicopter Data Record

These forms are available electronically and in hard copy. Contract pilots

**The Supporting Statement for OMB 0596-0015**

Airplane Pilot Qualifications and Approval Record, Helicopter Pilot Qualifications and Approval Record,  
Airplane Data Record, and Helicopter Data Record  
March 2008

---

usually provide information via face-to-face meetings, during which the forms are completed and signed. Aircraft information is collected onsite at the aircraft's location.

The completed forms are maintained by Forest Service approved Agency Pilot and Aircraft Inspectors.

**e. How frequently will the information be collected?**

Collection occurs annually as contractors offer aircraft or pilot(s) for use on a Forest Service contract.

**f. Will the information be shared with any other organizations inside or outside USDA or the government?**

Sharing of the collected information occurs on a case-by-case basis with the United States Department of the Interior, Aviation Management Directorate (AMD), which accepts contract inspections conducted by the US Forest Service.

**g. If this is an ongoing collection, how have the collection requirements changed over time?**

The requirements are unchanged from the currently approved information collection.

**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 burden.**

The forms are currently available on the Forest Service Intranet in Microsoft Excel. In the future, the Agency will consider whether to make these forms available on the World Wide Web. The Agency must bear in mind the legal and technical aspects of making the forms available electronically to the public prior to doing so, and determine what is in the best interest of the Agency as well as the public. Currently, the Agency finds face-to-face contact a vital component of the process, as this allows the Agency Inspector to access the physical condition of the asset offered.

**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.**

Use of forms associated with this information collection is coordinated with other Federal land management agencies handling procurement of aviation services such as the Department of the Interior, Aviation management Directorate (AMD). These agencies are not included in the burden hour total, as they accept the forms as completed by the Forest Service and have their own versions of these forms that are in turn accepted by the Forest Service.

**The Supporting Statement for OMB 0596-0015**

Airplane Pilot Qualifications and Approval Record, Helicopter Pilot Qualifications and Approval Record,  
Airplane Data Record, and Helicopter Data Record  
March 2008

---

Under interagency agreement, pilots and aircraft approved by the Forest Service or other signatory agencies may be used for approved missions by any other signatory without further information gathering.

Additionally, a joint study with the Department of Transportation determined that operator inspections conducted by the Federal Aviation Administration would suffice for airport-to-airport transportation missions but not for compliance with special purpose resource protection and management missions. This reduces the field inspection burden on the agency while increasing cooperation efforts with the Federal Aviation Administration.

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

Impact on small entities is reduced through coordination with other land management agencies and the Federal Aviation Administration. Completion of minimal paperwork to certify contract compliance is a legitimate cost of doing business.

**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.**

Aviation contracts are typically Call-When-Needed for one year, with two to three year renewal periods. Very few aircraft contracts operate year round. Extensive changes to equipment often occur while not on contract with the Forest Service. The annual check of the aircraft is vital to assure that the Federal government is getting full value, while maintaining the safety and mission preparedness as required in the contract. Less frequent collection of this information, or no information collection, would work against the purpose of the contract and the interest of the Federal government.

If the Agency were not able to collect this information, Forest Service contracting officers and pilot/aircraft inspectors could not determine if pilots and aircraft meet the detailed qualification, equipment, and condition requirements essential for safe, efficient accomplishment of Forest Service specific flying missions, which are included in contract specifications. Without a reasonable basis to determine pilot qualifications and aircraft capability, Forest Service and other Federal agency employees would be exposed to unnecessary hazards.

**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, medical,**

**The Supporting Statement for OMB 0596-0015**

Airplane Pilot Qualifications and Approval Record, Helicopter Pilot Qualifications and Approval Record,  
Airplane Data Record, and Helicopter Data Record  
March 2008

---

**government contract, grant-in-aid, or tax records for more than three 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 a 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 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.**

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

- 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.**

Notice of the 60-day comment period was published in the Federal Register in Volume 72, No. 238 on Wednesday, December 12, 2007 on page 70566. The Agency received one inquiry from a business that contracts to the Forest Service for helicopter services. After learning that the Federal Register Notice was for the renewal of the contract inspection forms, the operator felt no need to comment.

**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.**

**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.**

Contact was made with the following vendors, who were asked to provide

**The Supporting Statement for OMB 0596-0015**

Airplane Pilot Qualifications and Approval Record, Helicopter Pilot Qualifications and Approval Record,  
Airplane Data Record, and Helicopter Data Record  
March 2008

---

comment on the renewal of this information collection:

**1. Kachina Aviation**

Doug Barkley, Director of Maintenance  
4130 Heliport Road  
Nampa, Idaho 83687  
Phone: (208) 318-0100

**2. Middle Fork Aviation**

Pete Nelson, Owner/Chief Pilot  
P.O. Box 656  
Challis, ID 83226  
Phone: (208) 879-5728

**3. Falcon Executive Aviation**

Mike Kuhns, Chief Pilot  
4766 E. Falcon Drive  
Mesa, Arizona 85215  
Phone: (480) 832-0704

**4. Air West Inc**

Mark Wilkison/Chief Pilot  
5133 East Roadrunner Drive  
Mesa, Arizona 85215  
Phone (480) 396-0688

**5. Safford Aviation Services**

Doug Benson Owner/Director, Firefighting and Sales  
4550 E Aviation Way  
Safford, Arizona 85546  
Phone: (928) 428-7670

**6. Classic Helicopters**

Mario Nichols, Chief Pilot  
2244 S 1640 W  
Woods Cross, UT  
Phone: (801) 295-5700

Of the operators contacted, five of the six believed that the information collected, whether for pilot or aircraft approvals, asked for information that they were already gathering to maintain their FAA certifications, with very little additional burden to furnish the information. A few did remark that filling out the forms for the first time did take longer, but after that the time required for the data collection was typical.

There was one contractor of the six contacted that believed all of the data collection under this approval was an excessive burden to their business and that their other customers (non-Federal) did not require such information.

**The Supporting Statement for OMB 0596-0015**

Airplane Pilot Qualifications and Approval Record, Helicopter Pilot Qualifications and Approval Record,  
Airplane Data Record, and Helicopter Data Record  
March 2008

---

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

The only payment is for services rendered under the contract. No payment rendered for collection of information.

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

The information provided is only for internal Federal government use. However, apart from protection of pilot information records required by PL 93-579 and 5 USC 552A, no assurance of confidentiality is given. Forest Service Privacy Act System of Records USDA/FS-44 (Pilot Qualification Records) covers collection, storage, maintenance, and use of pilot information collected, and public requests for information collected processed according to Freedom Information Act and Privacy Act regulations.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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 to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

No such questions are included in the forms.

**12. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.**

- **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.**

- a) **Description of the collection activity**
- b) **Corresponding form number (if applicable)**
- c) **Number of respondents**
- d) **Number of responses annually per respondent,**
- e) **Total annual responses (columns c x d)**
- f) **Estimated hours per response**
- g) **Total annual burden hours (columns e x f)**

(a) Description of the Collection Activity	(b) Form Number	(c) Number of Responden ts	(d) Number of responses annually per Responde nt	(e) Total annual respons es (c x d)	(f) Estimate of Burden Hours per response	(g) Total Annual Burden Hours (e * f/60)
Airplane Pilot	FS-5700-20	750	1	750	.42	315



**The Supporting Statement for OMB 0596-0015**

Airplane Pilot Qualifications and Approval Record, Helicopter Pilot Qualifications and Approval Record,  
Airplane Data Record, and Helicopter Data Record  
March 2008

(a) Description of the Collection Activity	(b) Form Number	(c) Number of Responden ts	(d) Number of responses annually per Responde nt	(e) Total annual respons es (c x d)	(f) Estimate of Burden Hours per response	(g) Total Annual Burden Hours (e * f/60)
Record						
Helicopter Pilot Record	FS-5700-20a	800	1	800	.42	336
Airplane Approval Record	FS-5700-21	700	1	700	.5	350
Helicopter Approval Record	FS-5700-21a	450	1	450	.5	225
Totals	---	2700	---	2700	---	1226 Hours

- **Record keeping burden should be addressed separately and should include columns for:**
  - a) **Description of record keeping activity:** None
  - b) **Number of record keepers:** None
  - c) **Annual hours per record keeper:** None
  - d) **Total annual record keeping hours (columns b x c):** Zero
- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

(a) Description of the Collection Activity	(b) Estimated Total Annual Burden on Respondents (Hours)	(c) Estimated Average Income per Hour	(d) Estimated Cost to Responden ts
Airplane Pilot Record, FS-5700-20	315	28.52	\$8,983.80
Helicopter Pilot Record, FS-5700-20a	336	28.52	9,582.72
Airplane Approval Record, FS-5700-21	350	28.52	9,982.00
Helicopter Approval Record, FS-5700-21a	225	28.52	6,417.00
Totals	1226	---	\$34,965.52

The FS-5700-20 and FS-5700-20a forms go to vendors for completion of pilot data prior to agency inspector verification and approval. Completion of forms FS-5700-21 and FS-5700-21a are nearly the sole responsibility of agency inspectors, with vendors providing aircraft logbooks during inspections. Wages based on Department of Labor Occupation code 31010 Pilot, \$25.35/hr wage + \$3.16/hr health and welfare.

- 13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not**

**The Supporting Statement for OMB 0596-0015**

Airplane Pilot Qualifications and Approval Record, Helicopter Pilot Qualifications and Approval Record,  
Airplane Data Record, and Helicopter Data Record  
March 2008

---

**include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.**

There are no capital operation and maintenance costs.

- 14. Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.**

**The response to this question covers the actual costs the agency will incur as a result of implementing the information collection. The estimate should cover the entire life cycle of the collection and include costs, if applicable, for:**

**Employee labor and materials for developing, printing, storing forms**

**Employee labor and materials for developing computer systems, screens, or reports to support the collection**

**Employee travel costs**

**Cost of contractor services or other reimbursements to individuals or organizations assisting in the collection of information**

**Employee labor and materials for collecting the information**

**Employee labor and materials for analyzing, evaluating, summarizing, and/or reporting on the collected information**

<b>GOVERNMENT EMPLOYEE ACTIVITY</b>	<b>NUMBER OF RESPONSES</b>	<b>ESTIMATED TIME TO REVIEW/CERTIFY AIRCRAFT AND/OR PILOT</b>	<b>AVERAGE HOURLY COST TO GOVERNMENT</b>	<b>ANNUAL COST TO THE GOVERNMENT PER IC</b>
Review/ Finalization of FS-5700-20	750	.42 hour	\$44.59	\$14,045.85
Review/ Finalization of FS-5700-20a	800	.42 hour	\$44.59	14,982.24
Review/ Finalization of FS-5700-21	700	.58 hour	\$44.59	18,103.54
Review/ Finalization of FS-5700-21a	450	.58 hour	\$44.59	11,637.99
Total Cost to the	---	---	---	\$58,769.62

**The Supporting Statement for OMB 0596-0015**

Airplane Pilot Qualifications and Approval Record, Helicopter Pilot Qualifications and Approval Record,  
Airplane Data Record, and Helicopter Data Record  
March 2008

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Forest Service employees responsible for inspecting aircraft and certifying forms are at the GS-12 or GS-13 wage scale. Based on current OPM GS wage tables found at [http://www.opm.gov/oca/08tables/pdf/g\\_s\\_h.pdf](http://www.opm.gov/oca/08tables/pdf/g_s_h.pdf), a GS-12/step 5 earns \$31.34 per hour and a GS-13/step 5 earns \$37.27 per hour. The average wage is \$34.30 per hour. Cost to the Government is determined by multiplying \$34.30 by 1.3, which equals \$44.59 per hour.

Annual cost to the government is **\$58,769.62.**

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

The increase of 538 hours in the burden hour estimate is due to an adjustment in response times from previous submissions and recalculation of response times for forms FS-5700-21 and FS-5700-21a (correcting previous calculation errors). In 2005, the estimated burden hours were 688; the estimated burden hours for this renewal are 1,226.

**16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.**

The Forest Service publishes a summarized list of approved aircraft under contract. In addition, each Forest Service Region includes the list in the Region's Mobilization Guide. A national summary of large transport, smokejumper, and air tanker aircraft, as well as Type I and Type II helicopters, is included in the National Interagency Mobilization Guide.

These summaries are prepared and updated as contracted aircraft receive their contract awards and pre-work inspections. Lists of approved aircraft and pilots are on the internet within the Forest Service Aviation Resource Database, located at: <http://www.aviation.fs.fed.us/carding/index.asp>

**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 Forest Service is requesting approval to omit the OMB expiration date. These forms historically change little if any between approval periods. Inclusion of an expiration date can confuse contractors and employees as to expiration of the aircraft or pilot certification.

**18. Explain each exception to the certification statement identified in item 19, "Certification Requirement for Paperwork Reduction Act."**

The Forest Service does not request any exceptions.

**B. Collections of Information Employing Statistical Methods**

This information collection does not employ statistical methods.