

**Department of Transportation
Office of the Secretary**

**Supporting Statement
OMB-2105-0552**

Reports by Carriers on Incidents Involving Animals During Air Transport

Introduction

This is to request that the Office of Management and Budget's (OMB) renew the three-year approved clearance for the information collection entitled "Reports by Carriers on Incidents Involving Animals During Air Transport (OMB Control No. 2105-0552), which is currently due to expire on March 31, 2008.

Justification

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

14 CFR Part 234.13 requires that air carriers report incidents involving the loss, injury or death of an animal during air transport, as mandated by Section 710 of the Wendell H. Ford Aviation Investment and Reform Act for the 21st Century (AIR-21). See PL 106-810. This information collection supports the DOT strategic goal of mobility by providing the public information on the death, injury and loss of pets during air transport. More specifically, the goals of this collection of information include the increased mobility of pets; the safer and more efficient transport of pets; and the greater accountability of air carriers for any potential incidents involving the transport of pets.

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

Air carriers submit a monthly report of incidents involving the loss, injury or death of an animal during air transport to DOT's Aviation Consumer Protection Division (ACPD). ACPD processes the information gathered and publishes the information on a monthly basis in its electronic version of the Air Travel Consumer Report. The information is available to the public to determine an air carrier's reliability and performance when transporting animals.

- 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.***

ACPD allows for the use of electronic format reporting for all reports. Digital data collection is preferable because it quickens the reporting process for respondents. Hard copy is also accepted if electronic format is not possible. As required by the Government Paperwork Elimination Act, 100% of this information can be submitted electronically to

ACPD. Indeed, thus far, all the reporting carriers have provided the required reports electronically.

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

DOT does not have any similar information reports at this time.

- 5. If the collection of information has a significant impact on a substantial number of small businesses or other small entities (item 5 of OMB Form 83-1), describe the methods used to minimize burden.**

This rule will not have a significant impact on a substantial number of small entities.

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

The collection of information called for in Section 234.13 is specifically outlined in Public Law 106-181. The law requires air carriers that provide scheduled passenger air transportation to submit a monthly report on incidents of loss, injury, or death of an animal. The regulation, in accordance with Public Law 106-181, asks that reports be submitted within 15 days of the end of each month.

- 7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with 5 CFR 1320.5(d)(2)(i)-(viii).**

The collection of information is consistent with 5 CFR 1320.5(d)(2), except for (i) and (ii).

- (i) Information must be reported more frequently than quarterly because Section 710 of AIR-21 (i.e., Public Law 106-181) mandates that “An air carrier that provides scheduled passenger air transportation shall submit monthly to the Secretary a report on any incidents involving the loss, injury, or death of an animal.”
- (ii) Section 710 of AIR-21 (i.e., Public Law 106-181) also directs the Secretary of Transportation to “publish data on incidents and complaints involving the loss, injury, or death of an animal during air transport in a manner comparable to other consumer complaint and incident data.” Collection of comparable data and statistics asks for information within 15 days of the end of the month in which the incident occurred. The reporting requirement is therefore consistent with the mandate in the law.

- 8. 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.**

DOT solicited comments on the information collection requirement 2105-0552, Reports by Carriers on Incidents Involving Animals During Air Transport, with a 60 day notice in the Federal Register on Wednesday, October 10, 2007. See 72 FR 57631. No comments were received. A subsequent 30-day public comment period was initiated with the publication in the Federal Register of *Notice of Request for Renewal of a Previously Approved Collection*, on March xx, 2008, volume xx, page xxxx.

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

Not applicable

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

There are no such assurances.

- 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 to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

There are no questions of this nature.

- 12. Provide estimates of the hour burden for the collection of information. The statements should: indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

The recordkeeping and reporting burden imposed by this rule is very small. They are as follows:

Respondents: Air carriers that transport pets.

Estimated Number of Respondents: 30.

Frequency: 12 reports per year for each respondent

Estimated Annual Burden on Each Respondent: 12 hours a year for each respondent [time to prepare and submit each report (1 hour) multiplied by frequency (12)]

Estimated Total Burden on Respondents: 360 hours [Respondents (30) x Estimated Annual Burden on Each Respondent (12 hours per year)]

It is worth noting that the reporting burden is based on a worst-case scenario of every airline carrying pets having to submit one report per month. However, it is possible that an airline would not submit a report for any month of the year. During the past few years, on average only 2 to 4 airlines have submitted a report in a given month.

This report, as called for in the rule, requires eight fields of information that include flight information (carrier, flight number, date of incident, etc.), pet and owner information (names, addresses, contact info, etc.), and a narrative of the incident, cause of the incident, and corrective action taken in response to the incident. We estimate that it should take no more than one hour to complete a monthly report of such incidents.

In our worst-case scenario estimate, it should take one hour per month, per airline to complete this reporting. That equates to a maximum of 12 hours per year for each airline that carries pets. We estimate there are about 30 airlines that allow carriage of pets. Total hours would equal 360 per year.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

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

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

Only a small number of reports are submitted per year, and therefore will not impose a significant additional cost burden on the Federal Government. Information provided in the reports is published in a current monthly publication, therefore adding no additional distribution costs.

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

There are no program changes or adjustments.

16. For collections of information whose results are planned to 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.

Public Law 106-81 requires a monthly report from air carriers that provide scheduled passenger air transport. Section 234.13 calls for each report to be submitted to ACPD within 15 days of the end of each month. ACPD processes each report and publishes it in its electronic version of the Air Travel Consumer Report. This publication is issued monthly, usually within the first week of each month. There is usually a 40-day lag processing data. The publication can be found on-line at <http://airconsumer.ost.dot.gov>.

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

No such approval is being sought.

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.