

**Supporting Statement
Aircraft Registration Renewal
OMB 2120-AI89**

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 and authorizing the collection of information.

This information collection supports the Department of Transportation's strategic goals on safety and security. The information collected will be necessary to obtain a renewal of aircraft registration.

Title 49, U.S.C. Section 44101(a) provides that a person may operate an aircraft only when it is registered under section 44013 of this title.

Currently aircraft registration does not expire. In the forthcoming Notice of Proposed Rulemaking, Re-registration and renewal of aircraft registration, the FAA proposes to amend 14 CFR part 47, requiring a 3-year renewal for certificates of registration. An aircraft owner would complete the Aircraft Registration Renewal form to renew their registration. This requirement would be added in §47.40 Re-registration and renewal registration.

This proposed procedure is intended to increase the accuracy and reliability of aircraft registration information by compelling the aircraft owners to provide information regarding changes in registration periodically. It will benefit all users of the Civil Aviation Registry, Aircraft Registration database, including security and law enforcement agencies.

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.

Under the proposed rule, a Certificate of Aircraft Registration issued the final date of the rule and thereafter will have a 3-year expiry. Each holder of a Certificate of Aircraft Registration containing an expiration date must apply for renewal by completing and submitting an Aircraft Registration Renewal at least 90 days before expiration. The holder will verify the existing registration information, and report any changes. The Civil Aviation Registry, Aircraft Registration Branch (Registry), will use the information to update aircraft ownership information and place the form in the aircraft record.

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.

We will mail the form with a notice 120 days before the expiration date. The form mailed with the notice will have a unique web access code to that aircraft. If there is no change in information, with the use of the web access code, the Aircraft Registration Renewal and fee may be submitted via our website. It is expected that 50% of these forms will be submitted to the Registry through the website. The other 50% will be mailed in, incurring some costs.

If the owner did not receive the form or it's lost, it will be available for download through our website. The aircraft owner may complete the form and mail it to the Registry with the fee.

When the forms are received and accepted at the Registry, the information will be entered into the Aircraft Registration database and will be retrievable by any user. The forms will be scanned, imaged, and added to the aircraft records. The images will be retrievable in the database by imaging system software.

4. Describe efforts to identify duplication. Show specifically why any similar information already available can be used for the purpose described in Item 2 above.

Much of the information is similar to the Aircraft Registration Triennial Report. The proposed renewal requirements would

supersede and eliminate the need for the information obtained via the Aircraft Registration Triennial Report.

Much of the information is also similar to that collected on the Aircraft Registration Application. The applicant completes the Aircraft Registration Application to provide information for initial registration. Acceptance of the application (along with evidence of ownership) will result in a 3-year registration certificate. The Aircraft Registration Renewal will be required to operate the aircraft after that time, requiring the current registration information be verified and any changes be reported.

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

The burden is the same for all holders of aircraft registration.

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 is not conducted, the aircraft registration cannot be renewed. The proposed rulemaking will create a 3-year expiration for registration certificates. Collection could not be conducted less frequently.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with 1320.5(d)(2)(i)-(viii).

There are no special circumstances.

8. 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 data elements to be recorded, disclosed, or reported.

We have shared our proposals with a few law enforcement agencies outside the FAA. They are in agreement with the 3-year collection.

The Notice of Proposed Rulemaking was published in the Federal Register on February 28, 2008, vol. 73, no. 40, page 10701. All comments received will be taken into consideration.

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

There is no payment or gift to respondents.

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

No confidentiality is provided to the respondents since these are public records.

11. Provide additional justification for any questions of a sensitive nature.

There are no questions of a sensitive nature.

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

The FAA estimates the number of registration renewals would be 64,489 annually. This is based upon the estimate of 239,049 actively registered aircraft and actions updating registration information (i.e., address changes, etc.) processed on an annual basis and the number of aircraft that re-register through the normal process. The aircraft owners would be renewing their aircraft registration triennially. In the normal course of business each year, 15.41% of actively registered aircraft would be re-registered. Over 20 years, the FAA estimates 1,289,786 forms would need to be completed, averaging 64,489 per year. The time to complete the single page Aircraft Registration Renewal

form is estimated at 30 minutes. Therefore, 32,244.5 hours would be spent completing the required form. As described in the Regulatory Evaluation, the FAA estimates the hourly rate of an aircraft owner's time at \$37.20 in 2005 dollars, so half an hour would equate to \$18.60 per owner per form. Thus, the average cost per year equals \$599,747.70 (32,244.5 hours times \$18.60 per hour).

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

There are no additional costs already included in question 12.

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

Over 20 years, the FAA estimates 1,289,786 forms would need to be processed - of these forms, 188,379 would be for re-registration and 1,101,407 would be for renewal. As described in the Regulatory Evaluation, the FAA estimates processing costs of \$12.32 and \$9.26, respectively. Over 20 years, these costs sum to \$12,519,856.52 (calculation: 188,379 times \$12.32 plus 1,101,407 times \$9.26), for an annual cost of \$625,992.83 (calculation: \$12,519,856.52 divided by 20). The FAA estimates that it will take 0.391 hours to process each reregistration form and 0.320 hours to process each renewal form. This difference comes from FAA's assumption that the time needed for certain tasks in the renewal process would be less than in the reregistration process as these tasks would be done on-line, eliminating the need for paper to be processed. Over 20 years, the time to process all the re-registration and the renewal forms equals 73,656.19 hours and 352,450.19 hours, respectively, for a total burden of 426,106.37 hours, and an average annual burden of 21,305.32 hours.

15. Explain reasons for program changes or adjustments reported in Items 13 or 14 of OMB Form 83-1.

This is a new program and the annual costs are estimates. Subsequent cost is subject to change with actual receipts from year to year.

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.

There are no publications planned.

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.

We will seek approval to not display the expiration date. The Aircraft Renewal form is a recurring form that is generated for continuous use. The form is automatically generated 120 days prior to the expiry date of an aircraft registration and will be available for download at our website. The form will be a permanent form for the collection of information. If an expiration date of the OMB approval of the information collection is displayed and time has passed, a user may assume that the form itself cannot be used. If the form is not submitted on time, it may lead to the aircraft registration being cancelled. The FAA, therefore, requests an exemption from placing the expiration date on the form.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-1.

There are no exceptions.