

SUPPORTING STATEMENT
Reduced Vertical Separation Minimum
OMB CONTROL NO. 2120-0679

A. JUSTIFICATION

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

The authority to collect data from aircraft operators seeking operational approval to conduct RVSM operations is contained in Part 91, Section 91.180. Aircraft operators seeking operational approval to conduct RVSM operations within the 48 contiguous States of the United States (U.S.), Alaska and that portion of the Gulf of Mexico where the FAA provides air traffic services must submit their application to the Certificate Holding District Office (CHDO). The CHDO registers RVSM approved airframes in the FAA RVSM Approvals Database to track the approval status for operator airframes. RVSM supports the Operational Evolution Plan (OEP) to reduce en route congestion, which supports the DOT strategic goals of Mobility, Economic Growth, and Human & Natural Environment.

2. Explain how, by whom, how frequent and for what purpose the information will be used.

Aircraft operators seeking operational approval to conduct RVSM operations initially submit application to their CHDO. The CHDO registers RVSM approved airframes in the FAA RVSM Approvals Database. When operators complete airworthiness, continued airworthiness and operations program requirements, the CHDO grants operational approval.

3. Describe whether and to what extent the collection of information involves the use of automated, electronic, or mechanical, or other technological techniques or other forms of information technology.

The Government Paperwork Elimination Act (GPEA) is an important tool to improve customer service and governmental efficiency through the use of information technology. This improvement involves transacting business electronically with Federal agencies and widespread use of the Internet and its World Wide Web. The FAA RVSM Web Page permits operators to obtain electronic copies of an example operator application, guidance material, and related documentation. The website provides a suitable mechanism for dissemination of information via downloading of materials relating to RVSM operational approval in accordance with the GPEA. Using the documents provided on the RVSM Webpage, operators can develop and submit their application for RVSM authority to the FAA 100% electronically.

4. **Describe the efforts to identify duplication.**

Some elements of the application package such as a minimum equipment list are furnished to the FAA when the operator applies for other operating authorities. However, duplication in data collection is necessary because the data must be modified to reflect the specific requirements of RVSM. The duplicate data elements are easily provided by the respondents without additional search of existing data sources. The duplicate data collection therefore would not require a significant burden.

5. **If the collection of data involves small businesses or other small entities, describe the methods to minimize the burden.**

The information requested does not pose a significant burden.

6. **Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

If this collection is not approved, operators will be unable to initiate the process to receive operational approval by submitting their application to their respective CHDO.

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 is consistent with the guidelines.

8. **Provide a copy of the Federal Register notice that solicited public comments on the information collection prior to the submission.**

A notice was published in the Federal Register soliciting public comment on May 15, 2008, vol. 73, no. 95, page 28182. No comments were received. A copy of the notice is attached for your convenience.

9. **Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.**

There are no payments or gifts to respondents.

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

We do not provide any assurance of confidentiality for this submission.

11. **Provide additional justification for any question of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.**

No questions of a sensitive nature are asked.

12. Provide an estimate in hours of the burden of the collection of information, and provide estimates of annualized cost to respondents for the hour burdens for the information collection.

The estimated preparation time for an operator to complete and submit an application for operational approval to their CHDO would be 16 hours. The 2,275 operators estimated to seek operational approval would result in 36,400 hours in preparation time. These 16 hours are broken down into 8 hours for an engineer and 8 hours for an operations specialist; as their fully loaded (with fringe benefits) salaries average \$26.10, the total cost for all operators, for this work, sums to \$950,040.

All pilots would need to be trained to ensure familiarity with RVSM operations. Each organization would have a navigation specialist prepare a document; as the document costs about \$500 to prepare and as the fully loaded salary equals \$35.80, the FAA anticipates that it would take this specialist approximately 14 hours to prepare the document. Given 2,275 operators, the total time and cost sum to 31,850 hours and \$1,140,230.

Each pilot would have to receive a copy of the 4-page training document. To be conservative with costs, the FAA is assuming that each pilot's document has been photostated; at a cost of \$0.10 per page, total costs for 141,956 pilots sum to \$56,782.40.

The total paperwork burden, in terms of time and cost for this proposed rule, is **68,250 hours** at a cost of \$2,147,052.40.

In the future, some operators may increase the number of aircraft in their fleet. Any addition of airframes for a currently operated type would not generate additional paperwork; all RVSM-related information would be covered in this package. The additional paperwork for RVSM-related work for an operator adding a new aircraft type to their fleet would be negligible; the operators would have existing paperwork burdens for the new aircraft type and the amount of time needed for RVSM-related information would be very small.

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection.

There are no costs in addition to those listed in question 12.

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

The FAA assumes that it would take either an avionics inspector or an operations inspector 8 hours to process each applicant submission. Assuming each inspector at a

GS-14 level, the time and cost to the Federal Government for processing 2,275 application packages is 18,200 hours and \$981,162.00.

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

There are no changes.

16. **For collections whose results will be published, outline the plans for tabulation and publication.**

Results will not be published except for a listing of airframes that have received operational approval.

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

Not applicable.

18. **Explain each exception to the certification statement identified in Item 19 of the OMB 83-I.**

There are no exceptions.

**Paperwork Reduction Act Passage From Reduced Vertical Separation Minimum NPRM
Published in Federal Register on May 10, 2002**

Paperwork Reduction Act of 1995

This proposal contains the following new information collection requirements. As required by the Paperwork Reduction Act of 1995 (44 U.S.C. § 3507(d)), the Department of Transportation has submitted the information requirements associated with this proposal to the Office of Management and Budget for its review.

Title: Reduced Vertical Separation Minimum

Summary: This proposal requires aircraft operators seeking operational approval to conduct RVSM operations within the 48 contiguous States of the United States (U.S.), Alaska and that portion of the Gulf of Mexico where the FAA provides air traffic services to submit application to their CHDO.

Use of: This proposal would support the information needs of the operator's CHDO as they register RVSM approved airframes in the FAA RVSM Approvals Database. When operators complete airworthiness, continued airworthiness and operations program requirements, the CHDO grants operational approval.

Respondents; The 2,275 likely respondents to this proposed information requirement are scheduled and non-scheduled commercial air carriers, and corporations or individuals operating RVSM-capable aircraft.

Frequency: The FAA estimates that this proposed information requirement would ~~be a one-time~~ involve an initial submission of application for operational approval. ~~Thus, the frequency of an-~~

annual requirement is zero. Operators could potentially add aircraft to their fleet in the future.

Annual Burden Estimate: This proposal would result in a ~~one-time~~ recordkeeping and reporting burden as follows:

The proposed rule, while imposing additional reporting and recordkeeping requirements on those operators, would have the following impacts:

- The estimated preparation time for an operator to complete and submit an application for operational approval to their CHDO would be 16 hours;
- All pilots would need to be trained to ensure familiarity with RVSM operations. Each organization would have a navigation specialist prepare a document; the FAA anticipates that it would take this specialist approximately 14 hours to prepare the document; and
- Each pilot would have to receive a copy of the 4-page training document; to be conservative, the FAA is assuming that each pilot's document has been photostated.

Each organization would need to spend 30 hours on paperwork at a cost of approximately \$950 each. The total hours and costs sum to 68,250 hours and \$2,147,052.40.

All aircraft equipped with TCAS version 6.04 would need to upgrade to TCAS II Version 7. In addition, there will be additional equipment costs involved with the commercial and general aviation aircraft upgrade; it is impossible to accurately assess the dollar value of this equipment, so the FAA estimates that it will be about half the cost of this aircraft upgrade. Total equipment costs are estimated at \$334,755,550.

The FAA is soliciting comments to--(1) evaluate whether the proposed information requirement is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility; (2) evaluate the accuracy of the agency's estimate of the burden; (3) enhance the quality, utility, and clarity of the information to be collected; and(4) minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

Individuals and organizations may submit comments on the information collection requirement by July 30, 2002, and should direct them to the address listed in the **ADDRESSES** section of this document.

According to the regulations implementing the Paperwork Reduction Act of 1995, (5 CFR 1320.8(b)(2)(vi)), an agency may not conduct or sponsor, a person is not required to respond to a collection of information unless it displays a currently valid OMB control number. The OMB control number for this information collection will be published in the Federal Register, after the Office of Management and Budget approves it.