

## **Supporting Statement For Paperwork Reduction Act Justification**

**SUBJECT: Organization Designation Authorization-Part 183, Subpart D. OMB-2120-0704**

**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.**

The purpose of Title 49, U.S.C. Subtitle VII - Aviation Programs, is to provide for a safe, secure, and efficient aviation system that contributes to national security and encourages civil aviation.

49 U.S.C. Section 40113(a) empowers the Secretary of Transportation (or the Administrator of the Federal Aviation Administration) to issue such regulations as he/she shall deem necessary to carry out the provisions of the Act.

49 U.S.C. Section 44701 empowers the Administrator of the Federal Aviation Administration to prescribe reasonable rules and regulations, or minimum standards necessary for safety in air commerce.

49 U.S.C. Section 44702(a) empowers the Administrator of the Federal Aviation Administration to issue and amend type certificates, and supplemental type certificates for aircraft, aircraft engines, propellers, and appliances. The section specifies that applications shall be as the Secretary prescribes as to form, content, retention, and manner served.

49 U.S.C. Section 44702(d) empowers the Administrator of the Federal Aviation Administration to delegate to any properly qualified private person functions related to the examination, inspection, and testing necessary to the issuance of certificates.

Subpart D to part 183 establishes the Organization Designation Authorization. This rule allows the Federal Aviation Administration to appoint organizations as representatives of the administrator. As authorized, these organizations perform certification functions on behalf of the FAA. These functions may include approving data, issuing various kinds of aircraft and organization certificates, and any other functions the Administrator may deem necessary. Application, reporting, and recordkeeping requirements are contained in the rule.

This information collection supports the Department of Transportation strategic goal on safety. This is accomplished by promoting the public health and safety by working toward the elimination of transportation – related deaths, injuries, and property damage.

**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.**

The application form is submitted to the appropriate Federal Aviation Administration (FAA) office by an interested organization. The applications are reviewed by the FAA to determine whether the applicant meets the qualification requirements necessary to be authorized as a representative of the Administrator.

Procedures manuals are submitted and approved by the FAA as a means to ensure the organizations utilize the correct processes when performing functions on behalf of the FAA. The management of such activity is provided for in 49 USC 44702(d).

Reporting and recordkeeping requirements are necessary to manage the various approvals issued by the organization. The reporting and recordkeeping requirements are necessary to document approvals issued and must be maintained in order to address future safety issues which may arise.

**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.**

In compliance with the Government Paperwork Elimination Act (GPEA), applications and notifications may be submitted 100% electronically, at the discretion of the authorization holder. Electronic storage arrangements are acceptable providing the applicant has an FAA-approved agreement addressing the means of storage.

**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.**

This information collection is not a duplication of other reporting but will reduce reporting by granting applicants authority to make approvals with fewer submittals than required under other reporting requirements. The information substantiating an applicants qualifications is not available elsewhere.

**5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.**

The information required is the minimum needed to appoint and manage the activities of organizations authorized as a representative of the administrator. The collection is necessary to ensure the safety of the aircraft transportation system.

**6. Describe the consequences 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.**

This collection is required to ensure the future safety of products on which delegated organizations perform functions. Failure to collect the information would impact the FAA's ability to respond to and correct aviation safety deficiencies.

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

This information collection is consistent with the guidelines in Title 5 CFR 1320.5(d)(2)(i)-(viii).

**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.**

A notice was published in the Federal Register on June 19, 2008, vol. 73, no. 119, page 34973 requesting public comments. No comments were received.

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

We do not provide any payments or gifts.

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

We do not assure confidentiality, other than that provided for proprietary business information.

**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.**

There are no sensitive questions in this collection of information.

**12. Provide estimates of the hour burden of the collection of information.**

The estimated reporting burden imposed by the rule is 2218 hours.  
The estimated recordkeeping burden imposed by the rule is 2940 hours.

A section-by-section breakdown of the proposed rule follows, showing frequency of response, burden and how the burden has been established.

Estimates of the burden created by the rule are based on the following. The rule will phase-out by November 2009, the existing Designated Alteration Station and Delegation Option Authorization rules contained in Subparts J and M of part 21, as well as Special Federal Aviation Regulation No. 36. The collection and recordkeeping requirements imposed by those rules will transition to the requirements contained here over the initial 3-year period. In addition, existing Organization Designated Airworthiness Representatives, which are currently managed under part 183 will also be converted to Organization Designation Authorization by November 2009. Therefore the burden before the 2009 deadline will be large, with a smaller burden over the life of the program. It is expected that approximately 70 more applications will be processed before November 2009, with 10 applications per year being submitted over the life of the program.

The Organization Designation Authorization rule imposes the following burdens:

Section 183.43. Application. The applicant for an authorization must submit an application and proposed procedures manual to the FAA.

Estimated number of annual applications	30
Estimated reporting burden hours per application	5 hours
Estimated reporting burden for proposed procedures manual	<u>60</u> hours
Estimated annual reporting burden	1950 hours

Section 183.45. Issuance of Organization Designation Authorizations. An authorization holder must apply to and obtain approval for any changes to the authorized functions or limitations.

Estimated application for changes	10
Estimated preparation time	<u>1</u> hours
Estimated annual reporting burden	10 hours

Section 183.53. Procedures manual. An authorization is not issued until the applicant submits and obtains approval of a procedures manual. The manual submission requirements are included in Section 183.43.

Section 183.55. Limitations. An authorization holder may not perform an authorized function if there has been a change in the authorization holder's staff or organization until the FAA is notified of the change and it is documented in the approved procedures manual.

Estimated procedures manual changes	10
Estimated preparation time	<u>1</u> hours
Estimated annual reporting burden	10 hours

Section 183.57. Responsibilities of an ODA Holder. Each authorization holder shall continue to meet the requirements for issuance of the authorization or shall notify the Administrator within 48 hours of any change that could affect meeting those requirements.

Estimated notifications	3
Estimated time per notification	<u>1</u> hours
Estimated annual reporting burden	3 hours

Section 183.61. Records. Each authorization holder shall maintain at its facility current records that document the approvals they perform for the FAA. Each authorization holder must submit reports as required by the FAA. The recordkeeping requirements are dependent on the type of authorization holder. The following estimates are based on the assumption that there will be 3 organizations with large ODA systems covering multiple ODA types, 15 organizations with significant ODA systems covering multiple approvals, and 42 organizations with very limited authority.

Estimated large authority authorization holders maintaining records	3
Estimated recordkeeping burden per holder	<u>200</u> hours
Estimated recordkeeping burden	600 hours

Estimated significant authority authorization holders	15
Estimated recordkeeping burden per holder	<u>100</u> hours
Estimated recordkeeping burden	1500 hours

Estimated limited authority authorization holders	42
Estimated recordkeeping burden per holder	<u>20</u> hours
Estimated recordkeeping burden	840 hours

These recordkeeping numbers will double, then triple over the next three years.

Section 183.63 Continuing Requirements: Products, parts or appliances. If requested by the FAA, the authorization holders must investigate safety concerns and report the results of

investigation to the FAA. If requested, the ODA holder must submit the information required for corrective action.

Estimated safety concerns requiring investigation	5
Estimated reporting burden per investigation	<u>48</u> hours
Estimated total reporting burden	240 hours
Estimated items requiring corrective	3
Estimated reporting burden per corrective action	<u>40</u> hours
Estimated total reporting burden	120 hours

These reporting requirements will double, then triple over the next 3 years.

Section 183.65 Continuing Requirements: Operational approvals. Authorization holders that issue operational approvals must notify the FAA of errors it makes in issuing certificates and if it finds out it issued a certificate to a unqualified applicant.

Estimated notifications of errors made or unqualified applicants	5
Estimated reporting burden per notification	<u>1</u>
Estimated total reporting burden	5

These reporting requirements will double, then triple over the next 3 years.

We estimate the proposed rule imposes an annual public reporting burden of \$121,990 based on 2218 hours at \$55.00 per hour. The estimated recordkeeping costs are \$161,700, based on 2940 hours at \$55.00 per hour.

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

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

**14. Provide estimates of annual cost to the Federal Government and to the respondents.**

The annual cost to the Federal Government to analyze and process the information received is estimated to be \$36,300 per year. This estimate is based on 660 hours at \$55.00 per hour.

Estimated number of Applications/Procedures Manuals	30
Estimated hours to review/approve	<u>20</u>
Estimated total hours	600
Estimated changes in functions	10
Estimated hours to review/approve	<u>1</u>

Estimated total hours	10
Estimated procedures manual changes	10
Estimated hours to review/approve	<u>5</u>
Estimated total hours	50

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

There is a decrease in the number of expected applicants.

**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. 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.**

Numbers/descriptions of approvals issued by the organization may be published in on-going FAA data products. Tabulation and publication are not specific to this data collection, but follow FAA standard practice for the publication of such data. For example, the FAA routinely publishes a description of certificates issued. Certificates issued by these organizations will be included in such a publication.

**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.**

No request for seeking approval not to display expiration date for OMB.

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

No exceptions to Item 19.