INFORMATION COLLECTION SUPPORTING STATEMENT

MARYLAND-Three AIRPORTS: ENHANCED SECURITY PROCEDURES AT CERTAIN AIRPORTS IN THE WASHINGTON, DC AREA
OMB Control Number: 1652-0029

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 statue and regulation mandating or authorizing the collection of information. (Annotate the CFR parts/sections affected).*

   The Maryland-Three program was put into effect as a result of the September 11, 2001, terrorist attacks with the intent of creating greater safety for the Washington, DC airspace while allowing access to the Maryland-Three airports. Subpart A of 49 CFR part 1562 requires security measures to protect important national assets in the Washington, DC, area while allowing flight operations in Maryland-Three airports (College Park Airport (CGS), Potomac Airfield (VKX), and Washington Executive/Hyde Field (W32)), which are located in the DC Metropolitan Area Flight Restricted Zone. Under part 1562, subpart A, TSA requires that all individuals who seek to fly a general aviation aircraft from, to, or between any of the Maryland-Three airports submit personal information to TSA and fingerprints for a criminal history records check. With this information, TSA can conduct a security threat assessment to determine whether the applicant can fly to, from, or between the Maryland-Three airports.

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.*

   TSA collects the following information and make the following determinations regarding the applicants:

   - Personal information from applicants, including full name, Social Security Number, home address, home and work telephone numbers, date of birth, email address, emergency contact number, and airman certificate number. (Provision of a Social Security Number is voluntary, but encouraged in order to avoid delays in application processing.)
   - Applicants must also submit other information such as aircraft make/model, Federal Aviation Administration (FAA) Registration number, and the name, telephone number, and signature of the appropriate FAA Flight Standards District Office (FSDO) Official.
   - The applicant must submit this information to either the Maryland-Three airport from/to which the applicant wishes to fly, or directly to TSA via the TSA web site. The Personal Identification Number (PIN) Issuance Form is available at TSA's website, http://www.tsa.gov.
   - Agents of the Metropolitan Washington Airports Authority at Ronald Reagan Washington National Airport will collect each applicant's fingerprints. Applicants must go to this airport to submit their fingerprints.
   - The FAA will make a determination that the applicant's airman credentials are valid and that the holder has not been involved in certain kinds of aviation related incidents. Applicants must present themselves in person at one of the specified FAA FSDO for this determination. The FBI will check applicants' fingerprints for any past criminal history and the FAA will check its records to determine whether the applicants' records contain any aviation-related transgressions. Should either the FBI or FAA find discrepancies in an applicant's record, further adjudication will be have to be made by TSA.

- When the applicant is satisfactorily vetted, TSA will issue the applicant a PIN that will permit him/her to fly to, from, or between the Maryland-Three airports.

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. [Effective 03/22/01, your response must SPECIFICALLY reference the Government Paperwork Elimination Act (GPEA), which addresses electronic filing and recordkeeping, and what you are doing to adhere to it. You must explain how you will provide a fully electronic reporting option by October 2003, or an explanation of why this is not practicable.]*

The collection method from applicants for this information at the three airports is currently conducted manually. The applicant must submit the information to the Maryland-Three airport from/to which the applicant wishes to fly or by fax directly to TSA. The information is collected through the TSA Personal Identification Number (PIN) Issuance Form, which is available at TSA's website, http://www.tsa.gov.

Note: All PIN applicants must go to one of two Fight Standards District Offices (Glen Burnie, Maryland, or Washington Dulles International Airport) for their FAA credential check, as described above, and all fingerprinting is completed at Ronald Reagan Washington National Airport.

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 Item 2 above.*

This information is not collected in any form, and therefore is not duplicated elsewhere.

5. *If the collection of information has a significant impact on a substantial number of small businesses or other small entities (Item 5 of the Paperwork Reduction Act submission form), describe the methods used to minimize burden.*

General aviation airports are small businesses, and typically employ or host other small businesses such as restaurants, maintenance shops, flight schools, and charter operations. Even though this information collection will impact small businesses, TSA does not believe this collection will have a significant impact on a substantial number of small businesses. Further, as a result of the collection of information, applicants are allowed to operate aircraft to or from the Maryland-Three airports; this benefits general aviation airports by providing business opportunities that otherwise would be unavailable.

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.*

Collecting this information is part of the process that permits properly vetted pilots to fly to or from the Maryland-Three airports located in the Washington, DC, Flight Restricted Zone. If the program and information collection did not exist, these pilots would not be permitted to fly to or from these airports.

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

Presently, the duration of the program is unknown. The Maryland-Three airport operators are required to maintain records relating to this program for more than three years (5 CFR 1320.5 (d)(2) (iv)). This is because once an applicant is vetted and has received a PIN, they have permission to fly to-from-between the subject airports indefinitely or until the permission is revoked. Therefore, in order to maintain current records of all the persons concerned, the Maryland-Three airports are required to maintain records of their vetted pilots indefinitely. This is in support of their own day-to-day operational requirements, as well as required during the periodic inspections of each airport by TSA personnel.

8. *Describe efforts to consult 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 the data elements to be recorded, disclosed, or reported. If applicable, provide a copy and identify the date and page number of publication in the <u>Federal Register</u> 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.*

As required by 5 CFR 1320.8(d), TSA published in the <u>Federal Register</u> a 60-day notice soliciting comments on September 2, 2008 (73 FR 51313).   TSA did not receive any comments or objections to this notice.

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

TSA does not provide any gifts or payments to respondents in exchange for a benefit sought.

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

TSA does not provide any such assurances of confidentiality to the respondents of this collection.

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

TSA does not ask questions of a sensitive nature.

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

The entering assumption is that TSA will issue 400 PINs annually.

Airports	Potomac	Hours/Year College Pk	Hyde
Review applicant paperwork	0 (Note)	208	130
Answer miscellaneous requests for Information regarding the program (Telephone, email, walk-ins, etc.)	52	78	26
Processing applications, corresponding with TSA regarding applications	104	52	130
Preparing for and undergoing monthly inspections	13	15.6	20.8
Showing applicants the security brief	52	10.4	260
Totals:	**221**	**364**	**566.8**
Grand Total:	**1,151.8**		

Note: Potomac Airfield has a highly automated website/information system that greatly reduces the day-to-day human action required to administer this program. The system cost Potomac Field over $100,000 to put in place, a number that is not reflected in the above figures.

Public (Per Individual PIN Application)	Time (Hours)
Read program directions/familiarize self with the process	.5
Travel time to/from the Maryland-Three airport to initiate process	4.0
Travel time to/from a Flight Standards District Office for the purpose of airman and medical certificate examination	4.0
Fill out required forms	.3
Travel to time to/from Reagan National Airport for fingerprinting	4
Fingerprinting process	.4
View security video at Maryland-Three airport	.7
Total	**13.9**

Note: All PIN applicants must go to one of two Fight Standards District Offices (Glen Burnie, Maryland, or Washington Dulles International Airport) for their FAA credential check, and all fingerprinting is done at Ronald Reagan Washington National Airport. While most applicants are from the greater Washington, DC area, some are from areas as far away as New York City.

Thus, the estimated total annual hour burden for respondents is 1,165.7 (1,151.8 + 13.9).

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

Using the framework created for question 12 above, the cost for this collection is as follows:

Airports

Cost to:

Potomac Airfield:	[221 hrs x $30.00/hr]	$6,630
College Park Airfield	[364 hrs x $10.60/hr]	$3,858
Hyde Field	[566.8 hrs x $25.00/hr]	$14,170
	Total	**$24,658**

Public

Cost to each individual applicant:

Travel to/from a Maryland-Three airport to initiate the process	$24
Travel to/from specified FSDO for airman certificate check	$24
Travel to/from Reagan National Airport for fingerprinting	$24
Fingerprinting	$31
Total per individual	**$103**
Total for 400 applicants	**$41,200**

14. *Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, and other expenses that would not have been incurred without this collection of information.*

Annual Cost to Federal Government Agencies:

<u>Transportation Security Administration</u>:

Supervisor [174 hrs x $52/hr]	$9,048
Supervisor travel to inspections [$.405/mi. x 80 miles x 12 insp/yr]	$389
Program Manager [304 hrs x $48/hr]	$14,592
Program Mgr. Assistant/Record keeper [.2 hrs/app. x $22/hr x 400 apps.]	$1,760
Technician conducting background checks [.2 hrs/app x $16.00/hr x 400 apps/yr.]	$1,280

<u>Metropolitan Washington Airports Authority</u>:

Fingerprinting technician at Reagan National Airport [.25 hrs/app. x $16/hr x 400 applicants/year]	$1,600
Federal Aviation Administration Flight Standards District Office official who conducts FAA records checks on applicants [.25 hrs/app. x $32/hr x 400 applicants/yr]	$3,200

<u>Federal Bureau of Investigation</u>:

Technician who conducts the criminal history background check on applicants' fingerprints [$16/hr x .25 hr/app. x 400 applicants/yr)	<u>$1,600</u>
Total	**$33,469**

The methodology of these estimates was to determine number of man-hours per year various agencies would expend on their part of the PIN issuing process, multiplied by the hourly rate of those performing the tasks.

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

There is a slight decrease in burden hours due to the availability of the form electronically. A correction has also been posted in regards to the Annual Burden Cost from the previous submission, which shows there has been adjustment, not a correction. The previously approved Annual Burden Cost is incorrect.

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.***

TSA does not anticipate this information will be published for statistical purposes.

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.*

TSA will display the expiration date for OMB approval on this information collection.

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

TSA does not request an exception to the certification of this information collection.