

SUPPORTING STATEMENT

OMB 2120-0708

Evaluate a part 121 Air Carriers Listing of Leading Outsource Maintenance Providers:
The Quarterly Utilization Report

Justification:

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

Title 49, United States Code, Section 44713, **Inspection and maintenance**, empowers the Administrator of the Federal Aviation Administration to develop **Automated Surveillance Targeting Systems**. The Administrator shall give high priority to developing and deploying a fully enhanced safety performance analysis system that includes automated surveillance to assist the Administrator in prioritizing and planning surveillance and inspection activities of the Federal Aviation Administration.

Part 121 of Title 14, Code of Federal Regulations (14 CFR) prescribes the requirements for a certificate holder to establish and maintain a system for the continuing analysis and surveillance of the performance and effectiveness of its inspection program. Due to the increase of outsourced maintenance by air carriers, the FAA is requesting that an operator submit a quarterly report that will list their leading outsource maintenance providers. Additionally, an air carrier certificate holder is required to maintain this information as part of their Continuing Analysis and Surveillance System (CASS).

In addition to the statutory and regulatory basis, the submittal and collection of this data is necessary to ensure that the data collection will target those leading outsource maintenance providers that may have a higher risk level due to the amount of work which in turn would merit an increase of FAA surveillance to ensure areas of potential risks are mitigated.

This project is in support of the Office of Inspector General Final Report on review of Air Carriers use of 14 CFR part 145 repair stations to perform outsource maintenance, and supports the DOT Strategic Goal of Safety.

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

The information may be transmitted to the Certificate Holder District Office (CHDO) Principal Inspector (PI) via electronic means. The Quarterly Utilization Report (QUR) is requested from air carriers and is to be utilized to support FAA surveillance activity of leading outsource maintenance providers (LOMP). The report is to be submitted quarterly to the CHDO. The data from the QUR will be used to target those leading outsource maintenance providers that may

have a higher risk level which in turn would merit an increase of FAA surveillance to ensure areas of potential risks are mitigated.

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.

In accordance with the Government Paperwork Elimination Act, this action allows air carrier certificate holders to submit information or transact with the FAA 100% electronically.

4. Describe efforts to identify duplication.

We have reviewed other public use reports and find no duplication. Also, we know of no other agency requiring this information from air carriers for the purpose of data collection of LOMPs. The information collected is only available from the air carrier's CASS program and is not available from any other source.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.

The information submittal/collection burden is related to part 121 air carriers only. These requirements are the absolute minimum necessary to ensure effective compliance with Part 121 requirements. There is no burden to small business organizations.

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 consequences to the FAA's inability to analyze the QUR data could result in degraded surveillance analysis and delay the identification of an outsource maintenance provider that may be a high-level risk provider. The QUR would serve as a tool to identify those high-risk providers.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner in consistent with guidelines.

The collection of information is conducted in accordance and in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2)(i)-(viii).

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

A 60 day notice for public comments was published in the Federal Register on December 3, 2008, vol. 73, no. 233, page 73688. No comments were received.

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

No payments or gifts are made to respondents.

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

Respondents have not been given an assurance of confidentiality

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 questions of a sensitive nature.

12. Provide estimates of the hour burden of 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 is 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 air carrier is currently required by their CASS program to generate the information requested in the Quarterly Utilization Report that lists the leading outsource maintenance providers, which they utilize in the performance of maintenance programs. The air carrier would only require minimal clerical support to transmit the report to the FAA.

Estimated burden hours to transmit QUR by air carriers are 1 hour per occurrence.

	<u>Total</u>
Estimated number of air carriers	121
Average hours per quarter to transmit QUR	1 X 121
Total estimated burden hours per quarter	121

Total estimated burden hours per year: **484** (121 x 4)

The hours for clerical personnel submitting this information, at \$15 per hour for 121 responses per quarter at 1 hour each, comes to \$726. ($\$15 \times 121 \times 1 \times 4 = \7260)

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 associated with this collection.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method use to estimate cost, which should include quantification of hours, operational expenses and any other expense that would not have been incurred without this collection of information.

This cost is determined based on FAA principal maintenance inspector’s time to review and evaluate the QUR. The typical inspector is a FG-14, having a fully loaded hourly wage of \$50.00 (est). The table shows the burden in the initial year that the task needs to be done; any years thereafter the cost will be a multiple of initial estimate and subsequent cost of future pay increases.

Initial Year: Description of Action	Quantity	Hours per report	Total Hours	Total Cost
Review of Quarterly Utilization Report (one carrier)	4	0.5	2.0	100.00
Review of Quarterly Utilization Report Total Air Carriers (121)	484	0.5	242	\$12100.00
Total				\$12,200.00

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

There is no change.

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

NA

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 are not requesting an exemption.

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

There appears to be no exceptions.