

May 2009

SUPPORTING STATEMENT
PPQ Form 816 - Contract Pilot and Aircraft Acceptance
OMB NO. 0579-0298

A. Justification

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

The Animal and Plant Health Inspection Service (APHIS) contracts for aerial application services for emergency pest outbreaks when they occur, and for the control of grasshoppers and/or Mormon crickets in the 17 Western states between April and July. After award of contract, a Plant Protection and Quarantine (PPQ) pilot or other trained PPQ employee checks in the contract pilot and aircraft.

This information collection activity is necessary to assure that the pilot and aircraft meets contract specifications. The PPQ Form 816 is used to document this information. The purpose for signature of the Pilot/Contractor in block number 58 of the form is acknowledgement and agreement to blocks 54, 55, and 56.

The Plant Protection Act (7 U.S.C. 7701 et seq.) authorizes the Secretary of Agriculture, either independently or in cooperation with States, to carry out operations or measures to detect, eradicate, suppress, control, prevent, or retard the spread of plant pests and noxious weeds that are new to or not widely distributed within the United States. APHIS contracts for these services, and prior to any aerial applications, requests certain information from the contractor and/or contract pilots to ensure that the work will be done according to contract specifications. Among other things, APHIS asks to see aircraft registration, the aircraft's airworthiness certificate, the pilot's license, the pilot's medical certification, the pilot's proof of flight review, the pilot's pesticide applicator's license, and the aircraft logbook. APHIS transfers information from these documents to PPA Form 816, which is then signed by the APHIS official collection the information and the contractor or contract pilot, indicating acceptance of the pilot and aircraft for the job.

APHIS is requesting OMB to approve, for three years, its use of this information collection, associated with its efforts to assure that pilots and aircraft meet contract specifications.

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.

Contract Pilot and Aircraft Acceptance Form (PPQ Form 816) – This form is used by PPQ personnel who are involved with contracts for aerial application services for

emergency pest outbreaks. PPQ Form 816 is used to document that the pilot and aircraft meet contract specifications.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, 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.

PPQ Form 816 is posted as a PDF file at:
www.aphis.usda.gov/library/forms/pdf/ppq816.pdf

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in item 2 above.

The information APHIS collects is exclusive to its mission of preventing the interstate spread of plant pests, diseases, and noxious weeds and is not available from any other source.

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

This information collection does not affect small entities.

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.

If APHIS did not collect this information or collected it less frequently, APHIS would not be able to verify if APHIS contracts for aerial application services met specifications.

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.

No special circumstances exist that require this collection to be conducted in a manner inconsistent with the general information collection guidelines in CFR 1320.5.

8. Describe efforts to consult with persons outside the Agency to obtain their views on the availability of, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting from, 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 Federal Register of the agency's notice, soliciting comments on the information collection prior to submission to OMB.

In 2008-2009, APHIS held productive consultations with the following individuals concerning the information collection activities associated with this certification:

Mr. Kent Taylor
Taylor Ag Services, Inc.
P.O. Box 1229
Watford City, ND 58854
(701) 444-3772

Mr. Rod Thomas
Thomas Helicopters
1553 South 1800 East
Gooding, ID 83330
(208) 934-8298

Mr. Chuck Kemper and Mr. Chip Kemper
Queen Bee Air Specialties
136 North Yellowstone
Rigby, ID 83442
(208) 745-7654

On Tuesday, December 9, 2008, page 74687, APHIS published in the Federal register a 60-day notice seeking public comments on its plans to request a 3-year renewal of this collection of information. During that time, one general comment was submitted from an American citizen which had nothing to do with paperwork burden.

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

This information collection activity involves no payments (other than appropriate, program-related payments) or gifts to respondents.

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

No additional assurance of confidentiality is provided with this information collection. However, the confidentiality of information is protected under 5 U.S.C. 552a.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and others that are considered private. This justification should include the reasons why the agency considers the questions necessary.

This information collection activity asks no questions of a personal or sensitive nature.

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

Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-1.

See APHIS Form 71 for hour burden estimates (attached). These estimates were developed using historical data, calculations of the average number of documents requested, and discussions with pilots and contractors.

Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

Respondents are contract pilots. APHIS estimates the total annualized cost to these respondents to be \$109.36. APHIS arrived at this figure by multiplying the total hours of estimated burden (4) by the estimated average hourly wage of the above respondents (\$27.34).

13. Provide estimates of the total annual cost burden to respondents or recordkeepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimated should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.

There is zero annual cost burden associated with capital and start-up costs, maintenance costs, and purchase of services in connection with this program.

14. Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

The estimated annualized cost to the Federal Government is \$125.64 (see attached APHIS Form 79 for description of estimated cost).

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

There is no change in burden for this three year renewal.

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

APHIS has no plans to tabulate or publish the information collected.

17. If seeking approval to not display the expiration date of OMB approval of the information collection, explain the reasons that display would be inappropriate.

APHIS has no plans to seek approval for not displaying the OMB expiration date on this form.

18. Explain each exception to the certification statement identified in the “Certification for Paperwork Reduction Act.”

APHIS is able to certify compliance with all the provisions in the Act.

B. Collections of Information Employing Statistical Methods.

Statistical methods are not used in this information collection.

