

SUPPORTING STATEMENT
OMB-2120-0552
Suspected Unapproved Parts Report--FAA Form 8120-11

JUSTIFICATION

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

49 USC, Section 44701 empowers the Administrator of the Federal Aviation Administration (FAA) to provide reasonable rules and regulations for minimum standards governing the design, materials, construction, and performance of aircraft, engines, and propellers as may be required to ensure safety in air transportation. Submission of the Suspected Unapproved Parts Report, FAA Form 8120-11, is necessary to ensure that only FAA approved parts are installed on type certificated aircraft, and that continued airworthiness is maintained. Attached are copies of **Section 44701 and FAA AC-21-29, Detecting and Reporting Suspected Unapproved Parts.**

This information collection supports the Department of Transportation's Strategic Goal on Safety 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; and indicate the actual use the agency has made of the information received from the current collection.

The information collected on the FAA Form 8120-11 will be reported voluntarily by manufacturers, repair stations, aircraft owner/operators, air carriers, and the general public who wish to report suspected unapproved parts to the FAA for review. The report information is collected and correlated by the FAA, Aviation Safety Hotline Program Office (AAI-3), and used to determine if an unapproved part investigation is warranted. When unapproved parts are confirmed that are likely to exist on other products or aircraft of the same or similar design or are being used in other facilities, the information is used as a basis for an aviation industry alert or notification. Alerts are used to inform industry of situations essential to the prevention of accidents, if the information had not been collected. The consequence to the aviation community would be the inability to determine whether or not unapproved parts are being offered for sale or use for installation on type-certificated products.

Procedures and processes relating to the SUP program and associated reports are found in FAA Order 8120.16, Processing Reports of Suspected Unapproved Parts, and AC 21-29, Detecting and Reporting Suspected Unapproved Parts. When unapproved parts are identified, the FAA notifies the public by published Field Notifications (FN), disseminated using Unapproved Parts Notifications (UPN), Aviation Maintenance Alerts, Airworthiness Directives (AD), entry into an issue of the Service Difficulty Reporting Summary, a Special Airworthiness Information Bulletin, a display on an Internet site, or direct mailing

3. Describe whether 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, collection and consideration of the use of improved information technology to reduce burden, and any technical or legal obstacles to reducing burden.

The Form 8120-11 may be returned to FAA 100% electronically, meeting the requirements of the Government Paperwork Elimination Act. The form is available electronically online through FAA Web Site: http://forms.faa.gov/info_new.asp?form_number=8120-11&open_doc=N , and a hard copy of the form can also be faxed, mailed, or sent electronically to initiator by the FAA. Forms may be reproduced locally. The form is available to the public, and may be found on the internet .

4. Describe efforts to identify duplication.

The information requested on FAA Form 8120-11 is not available from any other source. There is no duplication of reported information.

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

Reporting of information is strictly voluntary. The information is requested from any individual or facility suspecting an unapproved part. Any burden is minimized by requesting only necessary information to warrant an investigation.

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 collection of this information is conducted under the authority of the Administrator found in Section 44701, and is necessary in pursuance of aviation safety. Reports are submitted only when a suspected unapproved part is identified by an individual; therefore, notification frequency is not controllable.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner: (Reference 5 CFR 1320.5(d)(2)(i)-(viii))

There are no special circumstances that would cause this information collection to be conducted in a manner inconsistent with 5 CFR 1320.5(d)(2)(i)-(viii).

8. If applicable, provide 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 action taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. and estimates of annualized cost to respondents for the hour burdens

A notice to allow comments was published in the Federal Register on December 23, 2008, volume 73, number 247, page 78866. A copy of the notice is attached for your convenience. No comments were received.

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 record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Discussions have been held with private industry as well as other government agencies such as the Department of Defense, Federal Bureau of Investigation, and U.S. Customs on these issues, and all comments and suggestions have been incorporated.

The FAA routinely meets with industry representatives on aviation safety issues.

9. Explain any decision to provide any payment or give to respondents, other than re-enumeration of contractors or grantees.

No payment or gratuities are involved in this program.

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

Release of the initiator's identity, if confidentiality was requested, or any document which could reveal an initiator's identity is covered under the Freedom of Information Act's Sixth Exemption (5 USC 552(b) (6)).

11. Provide additional justification for any questions of a sensitive nature, such as secular behavior and attitudes, religious beliefs, and other manners that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

These issues do not apply to the collection of any suspected unapproved part data.

12. Provide estimates of the hour burden and estimates of the annualized cost to respondents for the hour burdens for collections of information.

INFORMATION COLLECTION BURDEN

Estimated Collection of Forms Per Year 150 forms

Hours Burden	.50 hours
Total Hours	75 hours
Estimated \$ per Hour	\$25.00 per hour
Estimated Cost	\$1,875 Total collection cost

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

There are no additional startup costs. Equipment already in place.

14. Provide estimates of annualized cost to the Federal Government. Also provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may aggregate cost estimates from Item 12, 13, and 14 in a single table.

COST TO FEDERAL GOVERNMENT

Forms Collected Per Year	150 forms
Hours per form for processing	0.5 hours
Total Hours	75 total hours
Estimated \$ per Hour	\$ per hour
Estimated Cost	21,000 analysis \$3,150 costs

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

There is an adjustment to the burden because the number of forms received each year is down from an estimated 300 to an estimated 150. This results in an decreased adjustment of the total estimated annual burden from 150 hours to 75 hours.

16. For collection 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.

Information is to be used for initiating suspected unapproved parts investigations. Results and reports are for FAA use and not for national publication. Regular and usual statistical methods are to be used to analyze the data. The program has progressed from 1989 to the present.

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.

This is a recurring program and the requirements and forms used have been standardized, thus no further changes are sought.

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

There is no exception to the certification statement, Item 19, OMB Form 83-1.

Attachment List:

1. Supporting Statement
2. 60 Day Notice
3. 30 Day Notice
4. 49 USC 44701
5. FAA Form 8120-11