

**Supporting Statement
Request for Arbitration Panel for Airline System Boards of
Adjustment
National Mediation Board (NMB)**

A. JUSTIFICATION:

1. Section 183 of the Railway Labor Act, 45 U.S. C. provides that the parties to the labor-management disputes in the airline industry must have a procedure for the resolution of disputes involving the interpretation or application of provisions of the collective bargaining agreement. The Railway Labor Act mentions system board of adjustment or arbitration boards as the mechanism for resolution and is silent as to how the neutral arbitrator is to be selected if the parties are unable to agree on an individual. The NMB provides panels of arbitrators to help the parties in the selection of an arbitrator.
2. This collection is necessary to assist the parties in the selection of a neutral, when they are unable to agree on an individual. The parties invoke the process through the submission of the Request for Arbitration Panel for Airline System Boards of Adjustment form. The brief information is necessary for the NMB to perform this important function.
3. There is no improved technological method for obtaining this information. The burden on the parties is minimal in completing the Request for Arbitration Panel for Airline System Boards of Adjustment.
4. There is no duplication in obtaining this information.
5. The labor organizations and carriers which are the typical requesters, are national in scope and do not qualify as small business or other small entities.
6. The collection of this information is vital for the NMB to comply with the Railway Labor Act which requires that the parties have a procedure for the resolution of disputes involving interpretation or application of provisions of the collective bargaining agreement. This collection is required in order to comply with the law. The NMB has no ability to control the frequency, technical, or legal obstacles, which would reduce the burden.
7. The information requested by the NMB is consistent with the general information collection guidelines of C.F.R. 1320.8 (b) (3). The burden on the parties is minimal in completing the Request for Arbitration Panel for Airline System Boards of Adjustment. We do not require submission of more than one copy of any document, nor do we require submission of any confidential information.
8. A notice regarding the Request for Arbitration Panel for Airline Systems Boards of Adjustment was published in the Federal Register on April 28, 2006, page 25248 for public comment. The NMB did not receive any comments on this published notice. There have been no recent consultations regarding the form. (See attached copy of notice.)

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9. No payments or gifts have been provided by the NMB to any respondents of the form.

10. The information collected is not confidential as it can be requested under the Freedom of Information Act (FOIA). The parties are aware, therefore, that this information is not confidential.

11. There are no questions of a sensitive nature on the form.

12. The total **time burden on respondents** is 20 hours annually – this is the time required to collect information. After consulting with a small sample of people involved with the collection of this information, the time to complete this information collection is estimated to average 15 minutes per response, including gathering the data needed and completion and review of the information.

1. Number of respondents per year	80
2. Estimated time per respondent	15 minutes
3. Total Burden hours per year (80 x .25)	20

13. The total **collection and mail cost burden on respondents** is estimated at **\$331.20** annually (\$300.00 time cost burden + \$31.20 mail cost burden.)

- a. The respondents will not incur any capital costs or start up costs for this collection.
- b. Cost burden on respondents – detail:

(1) The total time burden annual cost is \$300.00

We are estimating that a mid-level clerical person, with an average salary of \$15.00 per hour will be completing the Request for Arbitration Panel for Airline System Boards of Adjustment form. The total burden is estimated at 20 hours, therefore the total time burden cost is estimated at \$300.00 per year.

Time Burden Basis: total hourly burden per year = 20
\$15.00 per hour – based on mid level clerical salary
\$15.00 x 20 hours per year = \$300.00

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(2) The total annual mailing cost to respondents is \$33.60

Number of requests mailed per year 80

Total estimated cost \$33.60

(80 x .42 stamp)

14. The total **annualized Federal cost is \$954.86** – this involves printing, mailing the forms upon request of the parties and processing the Request for Arbitration Panel for Airline Systems Boards of Adjustment, (see a., b., and c. below).

a. Printing cost \$.75 (estimated cost per copy is $.25 \times 3 = \$.75$)

b. Mailing costs \$ 10.11

Mailing costs basis: Forms are requested approximately 3 times per year, (most requestors obtain the form from the internet, few actually request that we provide the form to them) - it takes 5 minutes to print out the form and prepare it for mail.

Postage cost = \$1.26

3 (times per year) x .42 (cost of postage)

Staff cost = \$8.85

\$.59 per minute (GS 12 \$73,720 = \$35.32 per hr. ÷ 60)

\$.59 x 5 minutes per mailing = \$2.95

\$2.95 x 3 times per year = \$8.85

Total Mailing Costs = \$10.11

c. Processing Costs = \$944.00

Processing costs basis: Requests for Arbitration Panels for Airline System Boards of Adjustment are submitted approximately 80 times per year and it takes 20 minutes to process each application

Staff cost = \$944.00

\$.59 per minute (GS 12 \$73,720 = \$35.32 per hr. ÷ 60)

\$.59 x 20 minutes per request = \$11.80

\$11.80 x 80 times per year = \$944.00

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15. Item 13 Program Change & 14 Adjustments – this collection was not previously included in the Paperwork Reduction Act process.

16. The information collected by the request will not be published.

17. The NMB will display the OMB expiration date on the form.

18.

19 (c) – the form does not reduce the burden on small entities; however, the collection is not used by small entities. The burden is minimized and voluntary.

19 (f) – the form does not indicate the retention period for record keeping requirements.

19 (i) - the form is not part of a statistical survey.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable to this collection.