Supporting Statement for Paperwork Reduction Act Submission

Section A. Justification

1. **Necessity:** The worst airplane accident in history involved two commercial jets on a runway (occurring in 1977 in Tenerife, Canary Islands). Runway collisions continue to produce fatal consequences as most recently seen in Milan, Italy. The Department of Transportation (DOT) Office of Inspector General (OIG) lists "reducing the risk of aviation accidents due to runway incursions" as one of its top management challenges. Additionally, the National Transportation Safety Board (NTSB) has consistently included the issue of runway incursions on its "Most Wanted" list of transportation safety improvements since its inception in 1990. The events of September 11, 2001, shocked the confidence of the American public in the security of the nation's aviation infrastructure. A runway collision would only serve to further undermine the public's confidence in the National Airspace System (NAS).

FAA has been concentrating on this issue for a decade and progress has been elusive, in part, because of a lack of specific feedback on safety initiatives from the people for whom they were designed to support. The numbers of runway incursions are too low to measure the effect of any single factor or intervention strategy by analyzing the incursions. While this is fortunate from a public safety standpoint, it is a disadvantage when trying to measure the effectiveness of intervention strategies. However, several government/industry advisory groups (such as the Runway Incursion - Joint Safety Implementation Team) have recommended that educational materials aimed at reducing runway incursions be widely distributed (e.g., to all pilots). Since we cannot evaluate the effectiveness of educational or training materials by analyzing incidents, other means must be used to assess their usefulness.

Solicitation of critical and constructive feedback from the target audiences is the only means available to identify the aspects of these materials that are judged to be effective. Target audiences include, pilots, controllers, vehicle/tug operators, mechanics who taxi aircraft on airports, and airport operations personnel to include airport management. Such data collection supports the DOT strategic goal on safety. The FAA Office of Runway Safety, whose current procedures and responsibilities were established by FAA Order 7050.1 (signed by the FAA Administrator on July 25, 2002), will collect the data.

FAA is requesting this generic clearance to conduct surveys to assess pilots perceptions and the usability of Electronic Flight Bags or other technologies or procedures, as well as quizzes on their knowledge of safety topics, which will be administered at a variety of events noted in A.12. Prior to administering each survey or quiz under this clearance, FAA will seek OMB approval. FAA will submit information summarizing the need for the specific information to be collected, intended use of information, description of respondents, information collection procedures, expected response rate, estimated burden, as well as a copy

of the survey instrument and instructions. OMB will endeavor to respond with clearance or questions within 10 working days.

2. **Use of the Information:** Information to be collected will focus on pilot, controller, or vehicle driver practices and/or feedback on specific runway safety initiatives; e.g., training programs, Runway Safety Action Team meetings, changes to procedures, changes to infrastructure made to enhance runway safety (such as changes to paint, signs, lights, and markings), or aspects of airport design. Feedback gathered on the perceived effectiveness of specific strategies to prevent runway incursions will be used by the FAA to refine current intervention strategies and to develop new strategies to help reduce the severity and frequency of runway incursions. With the exception of sharing high level Electronic Flight Bag related survey results with participating industry partners, surveys approved under this generic clearance will only be used internally to obtain information for improving training materials and strategies and general service improvement, not for publication or for the purpose of informing significant policy or resource allocation decisions.

3. **Consideration of Technology to Reduce Burden** Surveys will be conducted in three different ways: 1) through the mail, 2) over the Internet, and 3) face-to-face interviews. Respondents in face-to-face interviews will be asked to respond verbally while personnel write down their responses or use audience response technology respond to a series of questions. While the Internet would be the written survey mechanism of choice, there is some concern as to whether distribution of the surveys via Internet alone would be effective.[1] For this reason, respondents (other than in personal interviews) will be given the option to respond via mail or via the Internet. The response rate via Internet and mail will be used to help design future surveys. (Programmatic intent is to collect information on a recurring basis over the next few years.) Except for the face-to-face interviews, the rest of the surveys (e.g., a mailing that will include a URL address as an alternative response mechanism, or a survey handed out at an air show that can either be mailed back or answered over the Internet) will be available 100% electronically. Expected time to complete one survey or interview is five to ten minutes.

4. **Avoiding Duplication:** Effort will be made to sample different audiences and vary the topic with each survey. We know of no other group collecting this same information.

5. **Small Business:** A sample of individuals and/or businesses may be included as potential respondents. The surveys will be voluntary, and information collected will not be attributed to specific individuals and/or organizations.

[1] There is insufficient information to predict the response rate to FAA surveys conducted over the Internet. However, respondents in a marketing research roundtable discussion cited recent return rates ranging from 1-20%. A reluctance of pilots to respond without anonymity may also result in a low response rate via the Internet.

6. **Consequences if not Collected:** The DOT OIG and NTSB have identified runway incursions as a sustained risk for the traveling public for over a decade. Better information is required to reduce this risk.

7. **Special Circumstances:** There are no special circumstances requiring the information collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.5(d)(2).

8. **Outside Comments:** A notice in the Federal Register was published on, announcing this request for continued clearance. No comments were received. A copy of this notice is attached for your convenience.

9. **Payments to Respondents:** No payment to respondents is anticipated. Distribution of aviation and safety-related information materials (e.g., books, pamphlets, instructional tools, CDs, videos, etc.) is part of this work; however, individuals can receive the materials whether or not they receive, or respond to, a survey.

10. **Assurance of Confidentiality:** In order to collect honest and unbiased information, it is important for the responses to be able to be submitted anonymously. Respondents will be assured confidentiality. 49 U.S.C. 40123, Protection of Voluntarily Submitted Information covers participants with active ASAP programs. No names of individuals or organizations will be cited. Respondents may, however, be given an opportunity to supply their names and addresses to receive additional aviation or safety-relation information, if desired.

11. **Sensitive Questions:** No sensitive questions will be asked.

12. **Estimate of Hour Burden:** Each survey is expected to take five to ten minutes to complete, either verbally or written. We estimate a 50% response rate for in-person interviews, and a 50% response rate for surveys with a mail-in or Internet response option. Therefore, the estimated cost of the burden hours is $31,375 based on $25/hour for 10 min/survey. (Out of a potential 17,800 respondents, an estimated 8900 respondents would total 2510 hours of burden and the estimated cost of the burden hours would be $25.00 per hour

Runway Safety Survey Estimates			
Venue	**Length in Minutes**	**Number of people**	
Sun'nFun	**5**	**1500**	
Oshkosh	**5**	**2000**	
Capstone 3	**10**	**300**	
DVD project	**5**	**2,000**	
Product Eval 1	**10**	**2000**	
Product Eval 2	**10**	**2000**	
Product Eval 3	**10**	**2000**	
Procedure Eval 1	**10**	**2000**	
Procedure Eval 2	**10**	**2000**	

Procedure Eval 3	**10**	**2000**	
Totals			
Estimate of Hour Burden	**2510 hrs X 50% response rate X $25 per hour =**	**$31,375.00**	

13. **Cost to Respondents or Record Keepers:** There are no additional costs to the respondents not already included in number 10.

14. **Cost to the Federal Government:** It is estimated that the total annual cost to the federal government will be $150,000. This estimate has already been budgeted in personnel and administrative costs. No additional funds will be requested resulting from this submission.

15. **Changes in Program Changes or Adjustments:** Not applicable; this is a new collection.

16. **Schedule and Publication:** Survey results May be published in the Runway Safety Annual Report, or as a separate internal document. In all cases, individual and corporate identities will not be published. A draft report on the Electronic Flight Bag project may be ready by the end of calendar year 2010.

17. **Display of OMB Expiration Date:** No exemption is requested.

18. **Exceptions to Certification Statement:** There are no exceptions to the Certification Statement identified in item 19. Respondents are informed about the information called for under 5 CFR 1320.8(b)(3) in the oral introduction to the questionnaire.