

# **INFORMATION COLLECTION SUPPORTING STATEMENT**

## **Safe Disposition of Life-Limited Aircraft Parts**

OMB #2120-0665

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information. (Annotate the CFR parts/sections affected).***

14 CFR Parts 43 and 45.

The FAA has found life-limited parts that exceeded their operating limitations installed on aircraft through accident investigations, Suspected Unapproved Parts reports and routine surveillance activities. This new regulation ensures positive control and safe disposition of all life-limited parts until they are mutilated or destroyed after they have reached their mandatory operating life limits by preventing them from being accidentally installed. This regulation requires that records be maintained showing the current status of the part regardless of time remaining if any. This collection of information supports the Department of Transportation's strategic goal on safety.

This data collection applies to maintenance providers authorized to perform maintenance, preventive maintenance, rebuilding, and alterations in accordance with 14 CFR section 43.3. This section includes certificate mechanics, certificated repairman; pilots certificated under 14 CFR part 61, repair stations, air carriers certificated under 14 CFR parts 121 and 135 with approved maintenance programs and manufacturers performing inspection or alterations for operators conducting operations in accordance with 14 CFR parts 91 and 125.

49 U.S.C. Section 40113(a) empowers the Administrator of the Federal Aviation Administration to issue such regulations as he/she shall deem necessary to carry out the provisions of the Act.

- 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.***

This new rule now requires a record keeping system to be maintained that will aid aircraft operators in determining the status of the life-limited parts from inadvertently being installed that have reached their life limit.

- 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. Also describe any consideration of using information technology to reduce burden.***

This rule permits the use of electronic record keeping for tracking of documents. In compliance with the Government Paperwork Elimination Act (GPEA), 100% electronic record keeping is available and is presently being utilized by most aircraft operators and repair facilities.

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

This information collection is not a duplication of other reporting. No other Federal Agency requires this record keeping procedure.

- 5. If the collection of information has a significant impact on a substantial number of small businesses or other small entities (Item 5 of the Paperwork Reduction Act submission form), describe the methods used to minimize burden.**

This has had a minimal impact on small entities. This minimal impact is due to the fact that most operators had an acceptable record keeping system in place that met the requirements of the new rule for keeping records of time remaining on life-limited parts. The additional part marking requirement when used has had only a minimal impact of small businesses.

- 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 regulation requires that the current status of life-limited parts be maintained to prevent installation after reaching or exceeding their authorized life limit. The additional requirement for proper disposition of parts when their life limit is reached has not imposed an additional burden on small businesses or other entities.

- 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(d)(2).**

There are no special circumstances to require this data to be collected in manner inconsistent with 5 CFR 1320.5 (d) (2).

- 8. Describe efforts to consult 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. If applicable, provide a 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 actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

A notice was requesting public comment was published in the Federal Register on October 16, 2009, vol. 74, no. 199, page 53317-53318. No comments were received. A copy is attached for your convenience.

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

We do not provide any payments or gifts.

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

No assurance of confidentiality is necessary.

- 11. Provide additional justification for any questions of sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.**

There are no sensitive questions in this collection of information.

- 12. Provide estimates of hour burden of the collection of information.**

The cost estimate assumes that about 8,000 maintenance providers would perform almost all of the activities subject to this data collection. Of these maintenance providers about 1500 would perform about 300 subject removals requiring marking and tagging annually, while the remaining 6,500 would perform about 50. Each removal was assumed to require an additional 5 minutes at \$50 per hour.

These amendments impose the following burdens:

Estimated annual burden for marking and tagging:

- |   |  |
|---|--|
| a. Number of respondents:   | 8,000 air carriers, repair stations, mechanics |
| b. Estimated annual items to be marked or tagged                          | 100,000  |
| Percentage of these respondents collected electronically (marking burden) | 70%  |
| c. Total annual hours requested   | 104,000  |

At a fully burdened industry overhead rate of	\$50.00
The annual cost to the respondents is	\$32,600,000

- 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 not already included in question 12. The additional cost increase is due to more operators and aircraft since the effective date of the rule.

- 14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, and other expenses that would not have been incurred without this collection of information.**

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There is no annual cost to the Federal Government to analyze and process the information. The parts marking burden requirement is for industry operators.

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

There have been no changes since the previous submission.

**16. For collections 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.**

No collections of information results are to be published.

**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.**

No request for seeking approval not to display expiration date for OMB.

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

No exceptions to Item 19.