

**Supporting Statement  
Aircraft Registration Renewal  
OMB 2120-0729**

**A. Justification**

**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.**

The FAA is changing the aircraft registration system from one in which registration does not expire to one in which aircraft registration will expire, and may be renewed, every three years. (Aircraft Re-registration and Renewal of Aircraft Registration, RIN: 2120-AI89). Aircraft that have been issued continuous registration before the change will be assigned expiration dates by which they should apply for re-registration using the Aircraft Re-Registration Application, AC Form 8050-1A, (reserved OMB Control No: 2120-0729). After three years and three months all registered aircraft will have been re-registered and will have been issued a Certificate of Aircraft Registration with an expiration date. At that time we plan to rename this form Aircraft Registration Renewal Application because it would better fit the routine and known character of the process at that time. The information collection itself would remain unchanged.

The re-registration of aircraft and renewal of aircraft registration every third year will provide the FAA, Aircraft Registration Branch with reasonably current information for registered aircraft. This updated and validated information will then be more reliable for the FAA and other agencies or system users who operate programs for safety, security, law enforcement or commercial purposes.

The information requested on the Aircraft Re-Registration Application consists of: verifying the description of the aircraft, the name(s) of the aircraft owner(s), verifying or updating the mailing and physical addresses of the aircraft owner, and certifications that the aircraft owner meets citizenship requirements and the aircraft is not entered on the registry of another country. This information is initially

provided to the FAA when the aircraft is first registered using the Aircraft Registration Application, AC Form 8050-1, (assigned OMB Form Approval Number 2120-0042). Changes to this information are required to be reported in a timely manner by regulation (14 C.F.R. Section 14.41). The reporting of changes has been encouraged by sending a Triennial Aircraft Registration Report, AC Form 8050-73, to aircraft owners for completion and returned to the FAA Aircraft Registry to report changes, or validate that none had occurred. The Triennial Aircraft Registration Report program and form will be replaced by Aircraft Re-Registration and Renewal.

ANNEX 7 - *Aircraft Nationality and Registration Marks*, of the Convention on International Civil Aviation, as published by the International Civil Aviation Organization (ICAO), requires in Section 6 - Register of Nationality, Common and Registration Marks, that signatory countries maintain a current register showing for each aircraft registered by a country the information recorded in the certificate of registration. Section 7 - Certificate of Registration, provides a sample format that requires a description of the aircraft, the owner's name and address.

Title 49, U.S.C. Section 44101(a) provides that a person may operate an aircraft only when it is registered under section 44013 of this title. Section 44102(a) establishes eligibility as an aircraft not registered under the laws of another country and owned by a person meeting certain U.S. citizenship requirements. Section 44103(a)(1) indicates that an eligible aircraft owner must make application for the aircraft to be registered.

14 C.F.R. Sections 47.5 and 31 prescribe that a person wishing to register an aircraft must submit an Application for Aircraft Registration, AC Form 8050-1. Section 47.7 prescribes that an applicant for aircraft registration must establish their compliance with the applicable citizenship requirement. Section 47.11 requires each applicant to submit their recordable evidence of ownership. Section 47.41(b) requires aircraft owners to timely report events that terminate aircraft registration. Section 47.45 requires address changes to be reported within 30 days.

**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.**

The information collected on an Aircraft Re-Registration Application, AC Form 8050-1A will be used by the FAA to verify and update aircraft registration information collected for an aircraft when it was first registered using the Aircraft Registration Application, AC Form 8050-1, (OMB No.2120-0042).

The updated registration database will then be used by the FAA to monitor and control U.S. airspace and to distribute safety notices and airworthiness directives to aircraft owners. Law enforcement and national security agencies will use the database to support drug interdiction and activities related to national security.

**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.**

The collection of this information through the Aircraft Re-Registration Application uses internet filing and electronic automation to the maximum extent possible. Every option to minimize the effort and resources expended by both our customers and our office has been implemented.

Six months before a group of aircraft registrations is due to expire; our computer will generate letters to notify the aircraft owners of the approaching deadline. The letter will contain instructions on the process, a unique identification code for the owner/aircraft combination, and directions to a re-registration page at the FAA Aircraft Registration web site, [registry.faa.gov](http://registry.faa.gov).

The web page will show aircraft owners the registration information in the system for their aircraft. If their registration information on file is still correct and current, they will be able to select a button to certify this to be true, enter the unique code provided in the notice letter, and pay the \$5.00 fee by credit card to complete re-registration of the aircraft. The computer will automatically place an image of the application form in the aircraft's record and generate a new

Certificate of Aircraft Registration, AC Form 8050-3 which will be mailed to the owner.

If the registered owner views the registration information and realizes that an update, like a new address, needs to be reported, then the owner may enter the updated information on the form, print it, sign it and send it with the fee to the FAA, Aircraft Registry. The form will be reviewed by an examiner, the aircraft record updated and a new Certificate of Aircraft Registration sent to the owner.

Aircraft owners, without computer access, may contact the Aircraft Registry and request that a Re-Registration Application be printed and mailed to them.

The Aircraft Registry expects that approximately 60% of applicants will complete the re-registration process on-line.

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

The FAA, Aircraft Registry is the only agency identified in Statute and regulation to provide for the registration of all U.S. Civil Aircraft. Not all of the States register aircraft. Both the States that do have registries and the manufacturers, who maintain mailing lists for aircraft that they built, often rely on the U.S. Civil Aircraft Register to find or verify address information for aircraft that they are interested in.

To provide a database that users find reliable and actionable, direct contact with aircraft owners is required. They are the only source for current data on themselves and their aircraft.

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

Care was taken to minimize the burden of this change for all holders of aircraft registration. In particular the use of the web site for verifying data and applying for re-registration. The economic evaluation for the rule determined that small

businesses or other small entities would not be significantly impacted.

**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.**

If the validation of information is not conducted at least every third year, the currency of aircraft registration information in the U.S. Civil Aircraft Register would deteriorate and become unreliable. This would put the FAA and the United States of America in violation of its international agreement with the International Civil Aviation Organization to maintain a current register of U.S. civil aircraft. Users of the system would lose a reliable information resource that would slow or complicate their aircraft related tasks.

Longer intervals were considered. However, the error rates estimated for these longer intervals were too high to allow characterization of the data as current and accurate. Shorter intervals would cause unnecessary effort for both the FAA and aircraft owners. Three years was determined to be the best fit for user requirements versus costs and burdens.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with 1320.5(d)(2)(i)-(viii).**

There are no circumstances that would cause information collection to be inconsistent with 1320.5(d)(2)(i)-(viii).

**8. 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 recordkeeping, disclosure, or reporting format (if any) on data elements to be recorded, disclosed, or reported.**

This change was prompted, to some extent, by users of the aircraft registration database, who have long been requesting greater data accuracy and currency. A meeting with a small group of government and industry organizations was held in March 2004, to discuss this issue. The meeting participants agreed that

moving the Registry away from a voluntary compliance system and introducing re-registration and renewal was the only reasonable method available to ensure a more accurate aircraft registry for all users.

A Notice of Proposed Rulemaking was published in the Federal Register on February 28, 2008, page 10701. The comment period ran through May 28, 2008, and comments were accepted for consideration through June 30, 2008.

Comments from the public and their dispositions are more fully addressed in the attached copy of the rule. Many commenters lauded the FAA for trying to improve the accuracy and currency of the aircraft registration database. However, almost all expressed a preference that we find another way to achieve our goal. The commenters generally did not want to take on the additional cost and responsibility of re-registering their aircraft every three years.

Commenters were generally against any collection of additional fees, especially on a recurring basis. Some asked that we at least keep any increases modest. Our response is that any increase in fees allowed by the reauthorization legislation would be only for the amount needed to cover the costs of the Aircraft Registry to perform the task of re-registration.

The commercial aircraft owner, operator and financing communities presented similar comments about possible difficulties that could arise through inadvertent noncompliance, (administrative error). This was coupled with the proposal that the recurrent nature of re-registration and renewal would present increased opportunity for inadvertent noncompliance to occur. For example, expiration could result in loss of insurance. This concerns the financiers because it could mean loss of protection for their investment. Also, if the trustee/owner failed to re-register or even file too late, then the lessee/operator would be harmed through loss of use of the aircraft. These interdependent situations led owners, operators, and financiers to anticipate creating tracking systems so they would know that they and others were completing their responsibilities in relation to the re-registration and renewal process. These commenters also thought that the Registry might have trouble handling the workload efficiently.

To address commenter concern the FAA made the following changes. The proposed process was streamlined and further automated to

make compliance easier. To lower the possibility of owners missing the filing date, the compliance time was lengthened, and the number of notices sent to owners was increased. On-line filing, initially proposed only for renewal was added for re-registration. To assist interested parties with tracking the progress of an aircraft through re-registration the FAA will post lists on our web site indicating where aircraft are in the process of re-registration and if they are approaching expiration or cancellation. The FAA also believes that the likelihood of accidental expiration is low, particularly in the commercial aviation industry. All aircraft owners are familiar with limited lifetime aircraft parts, and regularly scheduled maintenance. Registration certificates, that will now show an expiration date, are also required to be on display in each aircraft. Aircraft registration on a regularly scheduled basis should fit reasonably well into the professional culture of American aviation. The additional time was added in the application processing/certificate delivery step to assure the Registry would be able to send new certificates in advance of expiration and assure timely arrival for timely applicants.

The commercial sector also asserted that the NPRM had underestimated the increases in operational costs that re-registration and renewal would cause under their multi-partied ownership, trust, lease and financing arrangements. The assertion and examples were reviewed and some were found to have merit. The allowable additional costs were calculated and added to the total cost of the Rulemaking.

All sectors of the aviation community encouraged the FAA to implement computer and internet technology or automation to the maximum extent possible. They felt that the time they spent completing the requirement could be greatly reduced. Commenters also felt that this would save time and resources for the FAA as well. The FAA agreed. Initially, on-line re-registration was not going to be offered. The final rule allows on-line re-registration for those aircraft that can confirm there are no changes in their registration information to report. The FAA expects approximately 60% of aircraft will re-register online.

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

There has not been any payment or gift to respondents.

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

No commenter requested confidentiality or provided proprietary information as part of a suggestion or comment.

Respondents to the information collection are informed in accord with the Privacy Act of 1974 (PL 93-579). Aircraft records maintained by the FAA aircraft registry are public records and open to inspection. One of the routine uses reads, "To prepare an Aircraft register in electronic media as required by ICAO agreement containing information on aircraft owners by name, address, N Number, and type aircraft, used for internal FAA safety program purposes and also available to the public upon payment of applicable user charges reimbursing the Federal Government for its costs." The privacy act and routine uses will be included with each Aircraft Re-registration Application.

**11. Provide additional justification for any questions of a sensitive nature.**

There are no questions of a sensitive nature.

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

Re-registration and serial renewal applications are scheduled to occur once every third year.

The FAA estimated that approximately 72,996 aircraft will re-register or renew registration in an average year. Not all aircraft will need to be re-registered, or need to be renewed every third year. Many aircraft will change their registration through the normal course of business. For example, before their scheduled re-registration or renewal date, an aircraft may be sold to another owner and receive a registration certificate outside of the re-registration/renewal process.



The time needed to complete the single page Aircraft Re-Registration Application, AC Form 8050-1A is estimated at 30 minutes. This was determined by comparison with the Aircraft Registration Application, AC Form 8050-1, (OMB 2120-0042) which has been determined to take 30 minutes to complete. The information collected on both forms is the same. Therefore, the FAA concludes that the re-registration/renewal application will take the same amount of time to complete. This amounts to an annual hourly burden of 36,498 hours (72,996 x 30 minutes each).

The value of 30 minutes of an aircraft owner's time is estimated to be \$18.60. Multiplying \$18.60 times 72,996, the number of aircraft to be re-registered during an average year, equals \$1,357,726 per year.

**13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information.**

The re-registration of all registered U.S. civil aircraft is scheduled to take three years and will be followed by registration renewal at recurrent three year intervals. The net cost for this change over twenty years equals \$36,369,600 (or \$19,588,700 present value). During that time 1,308,900 aircraft re-registration and renewal actions are expected to take place. In an average year, 72,996 aircraft will be re-registered or renewed. For re-registration the average cost would be \$27.70 per aircraft for an annual cost of \$2,021,989(2007 dollars). For renewal the average cost would be \$24.42 per aircraft for an annual cost of \$1,782,562(2007 dollars).

However, there is a segment of aircraft ownership that lease their aircraft to operators. The FAA accepts some start-up and operating costs for these owners as provided by comments to the NPRM from these owners. The FAA believes that these owners will have access to an online tracking and registration system. This system will be provided and maintained by the registry thereby eliminating the need for these owners to acquire a separate system. Therefore all aircraft ownership paperwork costs are captured in the average cost per airplane.

**14. Provide estimates of annualized cost to the Federal government.**

The FAA estimates that 72,996 aircraft will need to re-register or renew registration on a yearly basis. The cost to the FAA to send notices to aircraft owners and then to process the returned Aircraft Re-registration (or Renewal) Application forms is calculated by adding the estimated federal employee labor costs, contract labor costs, supplies, computer time, and postage. This totals \$9.10 for re-registration and \$5.82 for renewal. These numbers have been calculated to take into account the estimated 60% of forms that will be filed on-line, and 40% on paper. The average cost multiplied by the 72,996 responses totals \$664,264 per year for re-registration. This will be the annual cost to the Federal government during the first three years when this version of the form is in use for re-registration. In future years, under renewal, the cost will be \$424,837 per year.

The Aircraft Re-registration, with the follow-on Aircraft Registration Renewal every three years, replaces the Triennial Report Program (14 C.F.R. Part 47.51). The Triennial is a report form that has been sent to aircraft owners to complete and return whenever three years have past and there has been no registration related activity for the aircraft. Eliminating the annual cost to the FAA for sending triennial report forms and processing the resulting returns lowers the net annual increase in FAA processing costs due to re-registration and renewal. 70,000 triennial report forms are sent in an average year at a cost of \$1.63 each, for a total of \$114,100. 5,000 triennial forms are returned each year with address or other registration updates that must be processed at a cost of \$12.11 each, for a total of \$60,550. The annual triennial costs are \$114,100 plus \$60,550 equaling \$174,650. The overall processing cost for the Triennial is less than the proposed re-registration because the number of responses received under the Triennial is significantly lower than those expected to respond under re-registration. Under the Triennial the Registry processed 5,000 per year compared to an estimated 73,000 under re-registration and renewal.

The estimated net annual increase in FAA processing costs due to Re-registration and Renewal to validate or update registration information is \$420,900 (\$595,540 less \$174,650) for re-registration and \$206,234 (\$380,884 less \$174,650) for renewals.

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

This is a new program; therefore the reason is a program change.

**16. Outline plans for tabulation and publication for collections of information whose results will be published. Address any complex analytical techniques that will be used.**

The information collected on the Aircraft Re-Registration Application will not be published as an individual project or study. The information will be used to validate or update the information associated with individual aircraft as contained in the U.S. Civil Aircraft Register. The updates will be entered into the register as they are received. The Register is available to the public as both a searchable database and as a downloadable comma delineated (CSV) data file on the FAA web site.

**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.**

The need for the Aircraft Re-registration Application AC Form 8050-1A, will run for three years and three months. The renewal of aircraft registrations will begin, due to expiring registration certificates, two months before the end of re-registration and is then expected to continue for many years into the future. For renewal we will want to rename the form Aircraft Registration Renewal Application, AC Form 8050-1B. The collection of information under both versions of the form is identical. Due to the continuing nature of the information collection and the usage overlap between the two versions of the form, we believe it would be less confusing to our customers if no expiration date were required to be shown on the form.

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

There are no exceptions.

END