

**Crew Resource Management Training for Crewmembers
In Part 135 Operations**

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 and authorizing the collection of information.

Title 49 U.S.C., Section 44702 empowers and requires the Secretary of Transportation to issue operating certificates and to establish minimum safety standards for the operation of air carriers and those to whom such certificates are issued. Also, Title 49 U.S.C., Section 44701 empowers and requires the Administrator of the Federal Aviation Administration (FAA) to prescribe standards applicable to the accomplishment of the mission of the FAA.

This project is in direct support of the Department of Transportation's Strategic Plan - Strategic Goal - SAFETY; i.e., to promote the public health and safety by working toward the elimination of transportation-related deaths and injuries.

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 request for clearance reflects requirements necessary under Title 14 CFR part 135 to ensure safety-of-flight by making certain that complete and adequate crew resource management training and evaluation is obtained and maintained by those who operate under this part of the regulation. The FAA will use the information it collects and reviews to ensure compliance and adherence to this regulation and, where necessary, to take enforcement action on violators of this regulation.

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.

In accordance with the Government Paperwork Elimination Act (GPEA), the FAA will not only allow and accept, but encourages the use of automation and electronic media for the gathering, storage, presentation, review, and transmission of all requests, records, reports, tests, or statements required by this proposed rule with the provision that such automation or electronic media has adequate provision for security (i.e., that such submissions may not be altered after review and acceptance by the FAA) and that the systems or applications are compatible with the systems or applications used by the FAA. One hundred (100) % of the rule is available electronically. The FAA is working to insure that the process maintains this 100% availability to respondents throughout the world.

4. Describe efforts to identify duplication. Show specifically why any similar information already available can be used for the purpose described in Item 2 above.

We have reviewed other FAA public-use reports and find no duplication. Also, the FAA knows of no other agency collecting the same information. The information sought is particular to the training and qualification requirements for certificate holders operating under the provisions of Title 14 CFR part 135. The information necessary is available from that certificate holder only, and is not available from any other source.

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

The FAA believes that this rule will not impact a substantial number of small businesses or other small entities; however, the guidance material that is already published regarding this rule is informative and explanatory with regards to the requirements, and an applicant for a certificate will be guided through the administrative requirements by the local principal operations inspector or training center program manager and, if necessary,

by a representatives of the Washington headquarters staff regarding crew resource management training and evaluation requirements for crewmembers.

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 reason for information collection is for original certification and review and approval of initial and continuing qualification of crewmember training and evaluation requirements in part 135 operations. If the certificate applicant does not apply initially, evaluation and approval of the applicable training programs and subsequent qualification will not occur. If the certificate holder does not continue to provide this information, the FAA will not be able to determine if the certificate holder continues to administer the program according to the approval and will not be able to determine if the training program continues to produce crewmembers who meet the required standards for serving in operations conducted under 14 CFR part 135.

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).

This collection of information is conducted in a manner consistent with the guidelines in 5 CFR 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) and on data elements to be recorded, disclosed, or reported.

This rule represents, in major part, a continuation of the requirements currently levied by the FAA and an inclusion of sound crew resource management training and evaluation practices developed over the preceding 12 years regarding the way and the frequency with which this training and evaluation should be conducted. The proposed rule was published in the Federal Register in its entirety on May 1, 2009, vol. 74, no. 83, pages

20263-20270, and the FAA encouraged public comment to be made. No comments on the collection of information were received.

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

There are no monetary considerations for this collection of information.

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

The respondents have been given no assurance of confidentiality.

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.

The rule sets out prerequisites and levies requirements that must be met by certificate holders operating in accordance with part 135 and by those individuals who serve as crewmembers for those certificate holders. The estimates for hours and costs are broken down by initial development and approval of an approved Crew Resource Management Training program, followed by hours and costs for crewmember training record keeping.

HOURLY COMPENSATION RATES FOR PART 135 INSTRUCTORS

| EMPLOYEE CATEGORY | HOURLY COMPENSATION |
|-------------------|---------------------|
| INSTRUCTOR | \$35 |

While requiring the gathering and maintaining of information and, in certain cases, the reporting of some of that information to the FAA, these sections require no additional burdens on the

certificate holders beyond what is currently required by rule or that which is currently borne by certificate holders in regular practice. Exceptions to this are the following:

a. One time development and submission of a Crew Resource Management Training Program to the FAA for approval.

Requires 1 Instructor 4 hours for 1,559 air carriers; then requires 1 instructor 4 hours for 60 future new air carriers that will enter the industry every year.

Calculations:

| | |
|-------------------------------------|---------|
| Air Carriers | 1,559 |
| Instructor | 1 |
| Time cost for instructor | \$35.00 |
| Time for development and submission | 4.0 |

First Year Cost

| | |
|---------|--------------|
| Dollars | \$218,260.00 |
| Hours | 6,236 |

Subsequent Years - per year costs

| | |
|------------------|------------|
| New Air Carriers | 60 |
| Dollars | \$8,400.00 |
| Hours | 240.0 |

Total over 10 years

| | |
|---------|--------------|
| Dollars | \$302,260.00 |
| Hours | 8,636.0 |

Average per year

| | |
|---------|-------------|
| Dollars | \$30,226.00 |
| Hours | 863.6 |

b. One time record keeping costs for crewmember training records regarding completion of Initial Crew Resource Management Training.

Requires 1 Instructor 0.1 hours for 11,815 crewmembers; then requires 1 instructor 0.1 hours for an average of 691 crewmembers who will enter the workforce every year.

Calculations:

| | |
|-------------|--------|
| Crewmembers | 11,815 |
| Instructor | 1 |

| | |
|--------------------------|---------|
| Time cost for instructor | \$35.00 |
| Time to record training | 0.1 |

First Year Cost

| | |
|---------|-------------|
| Dollars | \$41,352.50 |
| Hours | 1,181.50 |

Subsequent Years - per year costs

| | |
|-----------------|------------|
| New Crewmembers | 691 |
| Dollars | \$2,418.80 |
| Hours | 69.10 |

Total over 10 years

| | |
|---------|-------------|
| Dollars | \$65,540.50 |
| Hours | 1,872.50 |

Average per year

| | |
|---------|------------|
| Dollars | \$6,540.05 |
| Hours | 1,872.50 |

Total First-Year Hourly Burden

| | |
|---------------------|----------------|
| Reporting Hours | 6,236 |
| Recordkeeping Hours | 1,181.50 |
| TOTAL | 7,417.5 |

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

There are no additional costs not already included in question 12.

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

The estimates for hours and costs address initial approval of a certificate holders approved Crew Resource Management Training Program. There are minimal additional recurring costs for the Federal Government, after initial approval, because Crew Resource Management Training would be included as part of current FAA certificate overall management duties regarding approved crewmember training and record keeping. Computations involving salaries [including fringe benefits estimated at 32.45%] are based on the following positions distributed all over the United States:

- FAA Principal Operations Inspector (POI), GS14
\$61.50 per hour.
- FAA Clerk/Secretary, GS07
\$24.67 per hour.

a. Requires 1 POI 8 hours to review and approve a Crew Resource Management Training Program submitted for approval for 1,625 air carriers.

Calculations:

| | |
|------------------------------|---------|
| Air Carriers | 1625 |
| POI | 1 |
| Cost per hour for POI | \$61.50 |
| Time for review and approval | 4 |

First Year Cost

| | |
|---------|--------------|
| Dollars | \$399,750.00 |
| Hours | 6,500 |

Subsequent Years - per year costs

| | |
|---------|--------|
| Dollars | \$0.00 |
| Hours | 0.0 |

Total over 10 years

| | |
|---------|--------------|
| Dollars | \$399,750.00 |
| Hours | 6,500 |

Average per year

| | |
|---------|-------------|
| Dollars | \$39,975.00 |
| Hours | 650 |

(2) Cover, approval letter: Requires 1 Clerk/Secretary 0.5 hours per certificate holder for 1,625 air carriers.

Calculations:

| | |
|-----------------------------------|---------|
| Air Carriers | 1625 |
| Clerk/secretary | 1 |
| Cost per hour for clerk/secretary | \$24.67 |
| Time | .5 |

First Year Cost

| | |
|---------|-------------|
| Dollars | \$20,044.37 |
| Hours | 812.50 |

Subsequent Years - per year costs

| | |
|---------|--------|
| Dollars | \$0.00 |
| Hours | 0.0 |

Total over 10 years

| | |
|---------|-------------|
| Dollars | \$20,044.37 |
| Hours | 812.50 |

Average per year

| | |
|---------|-----------|
| Dollars | \$2004.40 |
| Hours | 81.25 |

Total first year cost: \$419,794.37

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

This is a new collection; therefore it constitutes a program change.

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.

There is no plan for tabulation or publication.

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 such approval is being sought.

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

There are no exceptions.