

## SUPPORTING STATEMENT

OMB 2120-0022

### **Certification: Mechanic, Repairman, Parachute Rigger, And Inspection Authorization – Part 65**

**SUMMARY OF CHANGES:** The increase in the burden hour (form 31,838 to 44,841) is due to the increased numbers of airman certificates processed (FAA Forms 8610-1 and 8610-2).

#### **Justification:**

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection**

Title 49, United States Code, Sections 44702 and 44703, empower the Administrator of Federal Aviation Administration to issue airman certification and to specify the terms, conditions, and limitations, and to authorize the regulations that prescribe the reporting requirement discussed in this supporting statement. FAR Part 65 prescribes, among other things, rules governing the issuance of certificates and associated rating for mechanic, repairman, parachute riggers, and issuance of inspection authorizations.

The information collected on the forms submitted for approval is used for evaluation by FAA which is necessary for issuing a certificate and/or rating. Certification is necessary to ensure qualifications of the applicant.

The collection of this information supports the Department of Transportation's strategic goal on safety.

**2. Indicate how, by whom, how frequently, and for what purpose the information is to be used.**

Applicants for an inspection authorization, original or renewal, must complete and submit FAA Form 8610-1, Mechanic Application for Inspection Authorization, to the appropriate FAA district office for review and Inspection Authorization eligibility determination. If the applicant is eligible, an inspection authorization will be issued or renewed. The FAA Form 8610-1 is used as the authorization for taking the initial test. The use of the FAA Form 8610-1 for renewal is now only required to be submitted in the odd calendar years (beginning in 2007).

Applicant for mechanic, repairman, and parachute riggers certificates and/or ratings must complete and submit FAA Form 8610-2, Airman Certificate and/or Rating Application, to the appropriate FAA district office for review and certificate eligibility determination. If the applicant meets the certification requirements, the requested certificate is issued. FAA Form 8610-2 is used for original certification of mechanics, repairman, and

parachute riggers whenever they apply. It is also used for additional ratings. The FAA Form 8610-2 is used as the authorization to take the written, oral, and practical exams.

**3. Describe whether, and to what extent, the collection of information involves the use of automatic, electronic, mechanical, or other technological 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.**

At this time, the best method available to evaluate an applicant's qualifications is a review of the form completed and signed by the applicant. However, the FAA is developing a major automation initiative. The initiative is defined as Integrated Airman certification and Rating Application (IACRA). After beta testing, final development, and implementation of IACRA are accomplished (normally 3 to 5 year development), there will be oversight data and record keeping capability pertinent to the certification process that are not existent at this time.

In response to the Government Paperwork Elimination Act (GPEA), both the FAA Form 8610-1 and the 8610-2 are available in electronic format and can be downloaded off the Internet. However, the forms must be signed by the applicant and reviewed and processed by an Aviation Safety Inspector (ASI) at a Flight Standards District Office (FSDO). The agency is considering acceptance of electronic signatures (final determination is a TSA approval).

**4. Describe efforts to identify duplication.**

We have reviewed other FAA public use reports and find no duplication. We know of no other entity collecting similar information for certification of mechanics, repairman, or parachute riggers, or for issuing or renewing inspection authorizations. The information collected is only available from the applicants applying for certification or inspection authorization. No similar information is available without the applicants providing it.

**5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.**

This information collection does not involve small businesses. It involves only individuals who are required to complete an application form.

**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 collection of this information were not conducted, FAA inspectors would not be able to determine applicant eligibility and qualifications. Without this determination, the appropriate certification or inspection authorization could not be issued.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner in consistent with guidelines.**

This information collection 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 the data elements to be recorded, disclosed, or reported.**

A notice was published in the Federal Register on August 27, 2010, page 52802. No comments were received.

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

No payment or gifts are to be provided to the respondents.

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

The information provided by the applicant on FAA Forms 8610-1 and 8610-2 becomes part of the airman's record and is contained in the Privacy Act system of records DOT/FAA 847, Aviation Records on Individuals. The use of that information is subject to the provisions of the Privacy Act and the Privacy Act systems of records, DOT/FAA 847.

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

There are no questions of a sensitive nature.

**12. Provide estimates of the hour burden of the collection of information. The statement should: Indicate the number of respondents, frequency of response, annual hour burden and an explanation of how the burden was estimated. If this request is for approval covers more than one form, provide separate hour burden estimates for each form. Provide estimates of annualized cost to respondents for the hour burdens for collection of information, identifying and using appropriate wage rate categories.**

The estimated cost burden to respondents is \$197,370 and the hourly burden to the respondents is 44,841 hours. The breakdown is indicated below:

**Form 8610-1**—Approximately 23,786 mechanics apply for original inspection authorization and renewal spend an average of 20 minutes (.33 hours) at an hourly rate of \$18.

$$23,786 \text{ forms} \times .33 \text{ hours} = 7849 \text{ hours} \times \$18 = \$141,282$$

**Form 8610-2**—Approximately 42,367 airmen (mechanics, repairman, and parachute riggers) spend an average time of 20 minutes (.33 hours) completing the form at an hourly rate of \$16.

$$42,367 \times .33 \text{ hours} = 13,981 \text{ hours} \times \$16 = \$223,698$$

Total cost burdens \$197,370

The specific reporting and recordkeeping requirements contained in 14 CFR part 65 are prescribed by the following:

Section 65.11 – Application and Issue – Applicants for Airman Certificate and/or Rating are required to submit FAA Form 8610-2, Airman Certificate and/or Rating Application, to the nearest FSDO. We estimate a total of 42,367 airmen spend an average of 20 minutes (.33 hours) at an hourly rate of \$16.

$$42,367 \text{ airman} \times .33 \text{ hours} = 13,981 \text{ hours}$$

Section 65.91 – Inspection Authorization – Certificated mechanics applying for inspection authorization must submit a FAA Form 8610-1, Mechanic’s Application for Inspection Authorization, to the nearest FSDO. Each inspection authorization expires on March 31 of each odd numbered year. Holders of mechanic certificates must have held both ratings continuously for three (3) years prior to their applying for an inspection authorization.

$$1,710 \text{ application for original inspection} \times .33 \text{ hours} = 564 \text{ hours}$$

Section 65.93 – Inspection Authorization: Renewal – Since inspection authorization beginning in 2007 to expire every 2 years, those eligible for renewal must reapply.

$$22,076 \text{ inspection authorization renewal} / 2 \times .33 \text{ hours} = 3,643 \text{ hours}$$

Section 65.131 – Records – Each certificated parachute rigger is required to keep a record of parachutes he/she has packed, maintained, or altered. We estimate that approximately 6,000 parachute riggers pack, maintain, or alter 35 parachutes per year at 5 minutes (.0833) per record entry.

$$9,175 \text{ parachute riggers} \times 35 \text{ parachutes} = 321,125 \text{ per year} \times .083 \text{ minutes} = 26,653 \text{ hours}$$

**Total recording and recordkeeping burden:**

Section 65.11 – Application and Issue -	= 13,981 hours
Section 65.91 – Inspection Authorization -	= 564 hours
Section 65.93 – Inspection Authorization: Renewal -	= 3,643 hours
Section 65.131 – Records -	= 26,653 hours
Total hour burden	44,841 hours

**13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.**

There is no additional startup costs not already covered in question 12.

**14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method use to estimate cost, which should include quantification of hours, operational expenses and any other expense that would not have been incurred without this collection of information.**

The annual cost to the government to collect, analyze, and process the information received on FAA Forms 8610-1 and 8610-2 is \$793,775 as indicated below. We estimate that approximately 66,153 forms are processed at a rate of 20 minutes (.33 hours) per form at an average hourly cost of \$36.36 (I Band).

$$\text{Total forms } 66,153 \times .33 = 21,831 \text{ hours} \times \$36.36 = \$793,775$$

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

The increase in the burden hour (form 31,838 to 44,841) is due to the increased numbers of airman certificates processed (FAA Forms 8610-1 and 8610-2).

**16. For collections of information whose result will be published, outline plans for tabulation, and publication.**

There are no plans to publish this information for statistical or other purposes.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reason that display would be inappropriate.**

We shall seek approval to not display the expiration date. The subject FAA forms are recurring forms that are printed and stocked for continuous use. When the supply gets low, the forms are automatically reprinted and stocked so that there will be no interruptions in services. It would not be cost effective to destroy unused, dated stock. Also, the forms are on the Internet and we would like to maintain the current version without having to put a new one up every three years. FAA, therefore, request an exemption from placing the expiration date on the forms.

**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.