

10/2010

**Supporting Statement
Aviation Maintenance Technician Schools - Far Part 147
OMB 2120-0040**

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.

Section 44707 (49 USC) empowers the Administrator of the Federal Aviation Administration (FAA) to examine and rate air agencies.

FAR Part 147 implements the provisions of the sections of the Public Law above by prescribing the requirements for issuing aviation maintenance technician school certificates and associated ratings and the general operating rule for the holders of those certificates and ratings.

The collection of information (application or a certificate and rating) is necessary to ensure that Aviation Maintenance Technician Schools meet the minimum requirements for procedures and curriculum set forth by the FAA in FAR Part 147. Also, it was necessary for the FAA to develop minimum standards for properly qualified persons who would enter the aviation industry. FAR Part 147 provides necessary standardization.

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

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.

Applicants submit FAA Form 8310-6, Aviation Maintenance Technician School certificate and Ratings Application, to the appropriate FAA district office for review. If the application (including supporting documentation) is satisfactory, an on-site inspection is conducted. When all FAR Part 147 requirements have been met, an aviation maintenance technician school certificate with appropriate ratings is issued. If this information were not

collected, there would be no means of maintaining a standardized level of proficiency in MTS.

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.

We are currently using the automatic Program Tracking and Reporting Subsystem (PTRS) to collect, store, and organize safety data. Data inputs into this system are made by FAA inspectors as the need arises using activity codes for the certification of maintenance technician schools. Additionally, the codes are used to record revisions in a school's curriculum, instructor qualifications, and to evaluate a school's facilities, equipment, materials, tools, and records. Data can be readily retrieved by any FAA office connected to PTRS, thereby reducing the time needed to obtain current information.

In response to the Government Paperwork Elimination Act (GPEA), the FAA Form 8310-6 is available in electronic format and can be downloaded from the Internet or e-forms service. We are not currently working to utilize electronic signatures in this collection activity due to the fact that the collection requires face-to-face contact between the FAA inspectors and representatives of the technician schools. Electronic collection is not practicable at this time due in part to the limited number of 147 schools and continued face to face contact.

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 the other FAA public use reports and find no duplication. We know of no other agency collecting information about Aviation Maintenance Technician Schools, and the reporting and recordkeeping information required by FAR Part 147 can only be supplied by applicants for Aviation Maintenance Technician School certificates or ratings. The information 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 reporting/information collection burden is related to a school's curriculum, facilities, instructors, student enrollment, and training records. The requirements are the absolute minimum necessary to ensure effective compliance with FAR Part 147. Small organizations with a small enrollment would have a proportionally smaller reporting requirement under the rule.

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.

This information collection is not conducted on a specific time schedule. The applicant fills out the application when certification or additional ratings are desired. There is no way to collect less frequently. Certification and surveillance would be hindered

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 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 data elements to be recorded, disclosed, or reported.

A notice was published in the Federal Register on September 22, 2010, vol. 75, no. 183, page 57827-57828 soliciting public comment on this information collection activity. No comments were received.

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

No payments or gifts are provided in connection with the information collection burden.

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

Respondents are given no assurance of confidentiality. As an existing system with no changes that affect privacy, Aviation Maintenance Technical Schools does not require a Privacy Impact Assessment.

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 estimated cost burden is \$1,653,350, and the estimated hour burden is 66,134 hours as indicated:

Reporting:

Total reporting hours:	1,134 hours
Cost per hour:	\$25
Total reporting cost:	\$28,350

Recordkeeping:_____

Total recordkeeping hours:	65,000
Hourly cost per certificate holder:	\$25
Total recordkeeping cost:	\$1,625,000

TOTAL COST BURDEN

\$28,350
<u>+\$1,625,000</u>
\$1,653,350

The specific reporting and recordkeeping requirements of FAR Part 147 are prescribed by the following sections.

Section 147.5, Application and Issue. The Applicants for an aviation maintenance technician certificate and rating, or for an additional rating, are required to submit FAA Form 8310-6, Aviation Maintenance Technician School Certificate and Ratings Application, and the required supporting documentation, to the FAA. The supporting documentation will contain:

- A description of the proposed curriculum
- A list of facilities and materials to be used
- A list of its instructors, including the kind of certificate and ratings held, the certificate number, and the subjects taught by each, and
- A statement of the maximum number of students it expects to teach at any one time.

FAA Form 8310-6 is divided into three parts. The top portion of the front side is used by the applicant, the lower portion of the front side is used by the FAA to record certification action of the applicant, and the reverse side is used by the FAA to record findings during certification inspection and/or for surveillance inspections.

Estimated annual applications for original certificates:	10
Estimated hours per application:	80 hrs
Estimated annual reporting burden:	800 hrs
Estimated annual applications for additional ratings:	4
Estimated hours per application:	40 hrs
Estimated annual reporting burden:	160 hrs

Section 147.33, Records. Each certificated aviation maintenance technician school is required to maintain records about the training activities of each student graduated annually by certificate holders. According to the schools, an average of 5.2 hours per student per year is needed to maintain student records. This includes a weekly/monthly class record of testing students and transferring those test results to each student's record for the student's entire term in school. This also includes recording the student's grades onto a graduation document. In addition, the school provides a transcript of a student's records

to persons who need to verify a student's record for continuing education and/or employment purposes.

Average number of student records:	12,500
Average annual hours per student:	5.2 hrs
Estimated annual recordkeeping burden:	65,000 hrs

Section 147.37, Maintenance of Facilities, Equipment, and Material. A school may not make a substantial change in facilities, equipment, or material that have been approved for a particular curriculum unless that change is approved in advance. Also, a school may not change its approved curriculum unless that change is approved in advance. Those changes are accomplished by letter with the changes attached. See the burden listed under Part 147.38.

Section 147.38, Maintenance of Curriculum Requirements. A school may not change its approved curriculum unless the change is approved in advance. These changes are accomplished by letter with the changes attached.

Estimated annual applications for changes:	174
Estimated annual hours per application:	1 hr
Estimated annual reporting burden:	174 hrs

Summary of annual hourly burden:

FAR Section 147.5 (Part I)	800 hrs
FAR Section 147.5 (Part II)	160 hrs
FAR Section 147.33	65,000 hrs
FAR Section 147.38	174 hrs

Total hourly burden: **66,134 hrs.**

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

There are no additional startup costs associated with this collection not already included in question 12.

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

Estimated annualized cost to the Federal Government: \$54,723

Number of annual responses:	174
Estimated time to process each request:	8.5 hrs
Total hours:	1,479 hrs
Estimated cost per hour:	\$37
Total cost:	\$54,723

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

The burden has not changed from the previous submission; the ROCIS entry has been broken down into individual Information Collections (ICs) for the different types of collections conducted. By splitting the requirements for the different sections of Part 147 into different ICs within the ROCIS system, the system reads the total number of responses individually for each section.

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 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 reasons that display would be inappropriate.

FAA Form 8310-6 is a recurring non-changing form that is printed and stocked for continuous use. When the supply gets low, the forms are automatically reprinted and stocked so there will be no interruption in service. It would not be cost effective to destroy unused, dated forms.

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.