

**SUPPORTING STATEMENT**  
**for**  
**Certification of Airmen for the Operation of Light-Sport Aircraft**  
**2120-0690**

**Justification**

***1. Explain the circumstances that make the collection of information necessary.***

The purpose of Title 49 United States Code, Subtitle VII, Aviation Programs, is to encourage and foster the development of civil aeronautics, and to promote safety in air commerce.

Section 40113(a) empowers the Secretary of Transportation (or the Administrator of the Federal Aviation Administration with respect to aviation safety duties and powers designated to be carried out by the Administrator) to take action he/she considers necessary to carry out this part, including conducting investigations, prescribing regulations, standards and procedures, and issuing orders.

Section 44701 empowers the Administrator to promote safety by prescribing minimum safety standards and regulations necessary for safety in air commerce. It also empowers the Administrator to grant an exemption from a requirement of a regulation-if it is in the public interest.

Section 44702(a) specifies that applications shall be as the Administrator prescribes as to form, content, retention, and manner served.

Section 44702(d) empowers the Administrator to delegate to a qualified private person, or an employee under the supervision of that person, matters related to examination, testing and inspection necessary to issue a certificate; and issuing the certificate.

Section 44703 specifically empowers the Administrator to issue airman certificates to properly qualified persons.

**Part 21**

Federal Aviation Regulation (FAR) Part 21, Certification Procedures for Products and Parts, implements the provisions of 49 U.S.C., Subtitle VII, Sections 40113, 44701, 44702, and 44704, prescribing procedural requirements for the issue of airworthiness approvals; the certificates; the issue of support airworthiness approvals; the issue of Technical Standard Orders; the related approval of materials, parts, processes and appliances; and rules governing the holder of such certificates and approvals.

### **Part 43**

Federal Aviation Regulation (FAR) Part 43, Maintenance, Preventive Maintenance, Rebuilding, and Alterations, implements Section 44713(d) empowers the Administrator to make modifications in the system for processing forms for major repairs or alterations to fuel tanks and fuel systems of aircraft not used to provide air transportation. The purpose of these major repair and alteration forms is to ensure that a record is maintained that documents that the repair or alteration was performed using approved data that meets the aircraft's or product's type design standard.

### **Part 47**

Maintaining proper registration of aircraft is fundamental to ensure compliance with operations/airworthiness safety requirements. Proper registration of aircraft is necessary to advance the nations vital security interest in support of national strategies by ensuring that the national transportation system is secure.

The registration system provides identification of all civil aircraft in the United States. The registration record also provides evidence of ownership that may be used in court if there is a controversy over ownership. The form of the registration certificate and the basic rules concerning aircraft identification marks are prescribed by Annex 7 to the Convention on International Civil Aviation, which the United States has signed, and which has the force of law. Public Law 103-272 states that all aircraft must be registered before they may be flown. It sets forth registration eligibility requirements and provides for application for registration as well as suspension and/or revocation of registration.

As a result of this final rule, over the next ten years, the FAA has estimated the action will require the registration of an estimated 15,300 (14,000 + 1300) existing light-sport aircraft, and newly manufactured special light-sport, and experimental kit-built aircraft (13,100 new aircraft). The FAA estimates the annual response to be 2,840 (10% of (15,300 + 13,100)).

Federal Aviation Regulation (FAR) Part 47 prescribes procedures that implement Public Law 103-272.

### **Part 61**

Title 49, United States Code, Section 44703 specifically empowers the Secretary of Transportation to issue airman certificates to properly qualified persons. This final rule and clearance request covers the burden imposed on airmen directly responsible for the control of light-sport aircraft. Each certificate issued specifies the capacity in which the holder is authorized to serve as an airman in connection with the operation of a light-sport aircraft.

Federal Regulations Part 61, Certification: Pilots, Flight Instructors, and Ground Instructors, prescribes minimum standards and requirements for the issuance of airman certificates, and they establish procedures for applying for airman certificates.

As a result of this final rule the FAA has estimated the action will require the registration of an estimated 15,300 (14,000 + 1300) existing pilots and instructors, and 12,000 new pilots and 1,100 new instructors over ten years. The FAA estimates the annual response to be 2,840 (10%).

### **Part 65**

Title 49, United States Code, Sections 44702 and 44703 empowers the Secretary of Transportation 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 support statement. FAR Part 65 prescribes, among other things, rules governing the issuance of certificates for repairmen.

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

As a result of this final rule the FAA has estimated the action will require the registration of an estimated 23,160 repairman over the next ten years (19,200 repairman-inspection/3,960 repairman-maintenance). The FAA estimates the annual response to be 2,316 (10%).

### **Part 183**

Title 49, United States Code, Section 44702, states that the Secretary of Transportation may, subject to such regulations as he may prescribe, delegate to any properly qualified private person, the examination and testing necessary for issuance of certificates.

Part 183 of the federal regulations (14 CFR 183), Representatives of the Administrator, implements the provisions of Section 44702. Part 183 of the federal regulations describes the requirements for delegating to private individuals the authority to examine and test persons for the purpose of issuing airman certifications to those individuals.

In addition to the regulatory basis, the purpose of this information collection is to make designated examiners readily available to the public, especially in those areas where Federal Aviation Administration (FAA) inspector resources are limited.

This final rule will require the addition of designated pilot examiners to certificate sport pilots and flight instructors with a sport pilot rating who are qualified in these new light sport aircraft. Also, it will require additional designated airworthiness representatives to issue experimental airworthiness certificates for

the 15,300 existing light sport aircraft and the 13,100 special, light-sport and experimental, kit-built airworthiness certificates for the newly manufactured light-sport aircraft over the course of ten years. The annual response rate is to issue experimental airworthiness certificates for the 1,530 existing light sport aircraft and the 1,310 special, light-sport and experimental, kit-built airworthiness certificates for the newly manufactured light-sport aircraft

This information collection supports the Department of Transportation's strategic goals on safety and security. This collection is fundamental in order to promote the public health and safety by working toward the elimination of transportation-related deaths, injuries, and property damage.

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

**Part 21**

FAA designated inspectors confirm the appropriate manufacturer's self certification is presented with the aircraft, and inspects the aircraft to confirm that it is in a condition for safe operation. Those products that comply with the minimum requirement are issued the appropriate airworthiness certificate. The airworthiness certificate indicates to the purchaser of the aircraft that the product was designed and produced in compliance with the referenced industry developed consensus airworthiness standards. This will permit the purchaser of the aircraft to use the aircraft for purposes of flight instruction and rental for pilot proficiency training. This will lead to a higher skill level and resulting higher level of safety for the owners and operators of these aircraft.

It is expected that over the next ten years these aircraft will be certificated and hold these new airworthiness certificates:

Existing

15,300 (14,000 + 1300) Experimental light-sport aircraft (ELSA)  
(21.191(i)(1))

- 14,000 - No compensation or hire
- 1,300 - Training aircraft

The existing fleet will be replaced at an annual rate of 10%.

New (other than replacement aircraft)

In the first year 25% of new light-sport aircraft will be factory-built (i.e. special) and 75% will be kit-built (experimental); in the second and third years, half will be factory-built and half will be kit-built; and in all the subsequent years, 75% of new aircraft will be factory-built and 25% will be kit-built. Over the ten years examined by this analysis, of the 13,100 new aircraft (one for each

new pilot and flight instructor, about 70% will be factory-built and 30% will be kit-built.

Annual impact:

Existing

1,530 (1400 + 130) Experimental light-sport aircraft (ELSA)  
(21.191(i)(1))

- 1,400 - No compensation or hire
- 130 - Training aircraft

New

Of 1,310 new aircraft, on average, about 70% will be factory-built and 30% will be kit-built.

**Part 43**

Form 337 for major repairs and major alterations will only be used if the special light sport aircraft has a major repair or major alteration performed on a FAA approved product installed on that aircraft. The form is filled out by a person certificated under part 65. The purpose of the form is to ensure that the repair or alteration to a FAA approved product or appliance has been accomplished in accordance with approved data and the product or appliance meets its type design standard.

**Part 47**

The information collected is used by the FAA to register an aircraft or hold an aircraft in trust. The information requested is required to register and prove ownership.

The information is collected on the following forms:

AC Form 8050-1 (2120-0042)	Aircraft Registration Application
AC Form 8050-2 (2120-0042)	Aircraft Bill of Sale
AC Form 8050-4 (2120-0042)	Certificate of Repossession of Encumbered Aircraft
AC Form 8050-88A	Affidavit of Ownership for Light Sport Aircraft
AC Form 8050-98 (2120-0042)	Aircraft Security Agreement

**Part 61**

The Airman certificate and/or Rating Application Form and the required records/logbooks/statements required by the federal regulations are submitted to Federal Aviation Administration (FAA) district offices or its representatives to determine qualifications of the applicant for issuance of a pilot or instructor certificate, rating, privilege, or authorization.

There are approximately 28,400 pilots and flight instructors who will seek certification under this final rule. Approximately 2,840 of these pilots and flight instructors (2,600 pilots/240 flight instructors) are estimated to provide data on an annual basis. Flight instructor certificates must be renewed every 24 months to remain effective.

<b>Average No. of Sport Pilots (SP) and Flight Instructors (FI) Impacted Annually by Final Rule</b>				
<b>EXISTING SPs YEARLY TOTAL</b>	<b>EXISTING FIs</b>	<b>NEW SPs</b>	<b>NEW FIs</b>	<b>AVG.</b>
3407	560	2347	450	6764

Applicants for a new certificate for the student pilot, sport pilot, ground, and flight instructor with a sport pilot rating or new category or class privileges are required to submit FAA Form 8710-11, Sport Pilot Airman Certificate and/or Rating Application.

(The FAA used FAA Form 8710-1, Airman Certificate and/or Rating Application, in the regulatory evaluation. This form will not be used, a new form that is applicable only to the pilot certification activity conducted as a result of this rulemaking will be used. That form is FAA Form 8710-11, Sport Pilot Airman Certificate and/or Rating Application. However, because FAA Form 8710-11 had not yet been approved, the FAA used FAA Form 8710-1 in the regulatory evaluation.) If the information collection was not conducted, the FAA would be unable to issue the appropriate certificates and ratings.

**Part 65**

Applicants for repairman 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 repairman whenever they apply. It is also used for additional ratings.

As a result of this final rule the FAA has estimated the action will require the registration of an estimated 23,760 repairman over the next ten years (19,200 repairman-inspection 3,960 repairman-maintenance). The FAA estimates the annual response to be 2,316 (10%).

Average No. of Repairman Impacted Annually by Final Rule		
Repairman Inspection Rating 1,920	Repairman Maintenance Rating 396	Annual TOTAL 2,316

**Part 183**

This rule will require the addition of new designated examiners and will require modifications to the forms listed below. Collection of this information is for the purpose of obtaining essential information concerning the applicants' professional and personal qualifications. The FAA uses the information provided to screen and select the designees who act as representatives of the Administrator in performing various certification and examination functions.

The collection of information is accomplished by use of the following forms:

(a) Form 8110-14. Statement of Qualifications (DAR - ODAR - DMIR - DER). The designated representatives impacted by this rule:

- DAR - Designated Airworthiness Representative

(b) FAA Form 8110-28, Statement of Qualifications (DME-DPRE-DAR-ODAR). The designated representatives impacted by this rule:

- DAR - Designated Airworthiness Representative

(c) FAA Form 8710-12. Light-Sport Standardization Board-Designated Pilot Examiner Candidate Application. The designated examiners impacted by this rule:

- DPEs - Sport pilot Examiners and Sport Pilot Flight Instructor Examiners (SPE and SFIEs).

(The FAA stated, in the regulatory evaluation, that Form 8710-6 and FAA Form 8710-10 would be used to collect this data. They are both existing forms used to establish qualifications and make application to become a designated pilot examiner. The FAA is now using a new form, FAA Form 8710-11, that will only be used by Sport pilot Examiners and Sport Pilot Flight Instructor Examiners (SPE and SFIEs) to collect this information.

**3. Describe any consideration of the use of improved information technology to reduce burden and any technical or legal obstacles to reducing burden.**

**Part 21**

Efforts are ongoing to improve information technology through internal automation systems designed to collect, organize, store, and transmit diverse information. We are working with industry to develop systems for allowing on-line data entry of safety reporting data to reduce burden in industry. Currently, in compliance with the Government Paperwork Elimination Act (GPEA), 100% (with the exception of FAA Form 8050-1, which must be signed in ink) of the information collection is available electronically through pdf-fillable forms and online data bases.

#### **Part 43**

FAA estimates that the need to fill out the Form 337 for major repairs or major alteration for special light sport aircraft will average between 50 to 100 a year. FAA Form 337 is available in pdf-fillable format on the FAA website. (<http://www.faa.gov/>). Once on the home page, you would click on "Access FAA Forms. The burden for form 337 is approved under OMB control number 2120-0020.

#### **Part 47**

The FAA Aircraft Registry presently uses a microfiche system. This applies to maintenance of the records, and does not affect the collection of information, which must come from each individual aircraft owner.

#### **Part 61, Part 65, Part 183**

At the present time, there are two methods available to evaluate an applicant's qualifications. One is a review of the form completed and signed by the applicant and the other is a major automation initiative being developed by the FAA. The initiative is defined as Integrated Airman Certification and Rating Application (IACRA). As final development, and implementation of second phase, the internet version of IACRA are accomplished, there will be oversight data and record keeping capability pertinent to the certification process that are not existent across the board at this time.

Currently, the process continues to be field-tested in FAA FSDO's and by Designated Examiners as new paths are developed. The system is now complete and will be fully implemented by the end of FY08. The use electronic signatures has been authorized, and it should not be necessary to forward by mail the text equivalent of FAA Form 8710-1, 8710-2, or the FAA Form 8710-11. We anticipate full field implementation of the process by the end FY 2008 taking the airman certification process to a 98% paperless process. All airman that will be issued airman certificates under this rulemaking initiative will be utilizing IACRA. The IACRA initiative incorporates the capability of the applicant and the designee to digitally sign the airman application for a designee to meet the initiatives of the Government Paperwork Reduction Act (GPEA) P.L. 105-277, Title XVII.



**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.**

**Part 21**

We have checked our other public reports and are satisfied that no duplication exists. No other agency is responsible for collecting information on the certification of aircraft products and parts. The rule revision specifically excludes existing type certificated aircraft from its applicability, so there is no duplication and only new categories of aircraft are subject to its data collection requirements.

The information requested by the FAA established a record of essential data concerning the applicant and product(s) involved and is available only from the applicant. The information is not available elsewhere.

**Part 43**

We have checked our other public reports and are satisfied that no duplication exists. No other agency is responsible for collecting information on major repairs and alterations made to individual aircraft or related products. The information requested by the FAA established a record of essential what kind of a major repair or major alteration data was performed, who performed the work, and what kind of approved data was used to perform the work, concerning the product(s) involved. This information is made part of the aircraft's file in Aircraft registry in Oklahoma.

**Part 47**

There is only one registry; therefore, there is no duplication of records or of recordkeeping.

**Part 61, Part 65, Part 183**

We have reviewed other FAA public-use reports and find no duplication. Also, we know of no other agency collecting information from pilots and flight instructors prescribing the terms, conditions, and limitations of their operating certificates. This information is required under part 61 of the federal regulations.

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

**Part 21**

The manufacturer of the aircraft is permitted to use any means or methods for recordkeeping that will support the manufacturers issuance of the statement of compliance. The information is not submitted to the government, nor is it submitted to the purchaser of

the aircraft. It is retained by the manufacturer as process and product records.

**Part 43**

No information collected involves small business or other small entities Recording of major repairs or major alterations on form 337 is accomplished by a person certificated under part 65. The person may be a private individual or an employee of a small business. The single page, two sided form 337 has been used by the FAA and its predecessor agency CAA for over 60 years to document the major repair or major alteration performed on Type Certificated products. FAA estimates approximately 50 to 100 of these forms will be filled out annually to document major repairs or major alterations to special light aircraft.

**Part 47, Part 61, Part 65, Part 183**

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

***6. Describe the consequences to Federal program or policy activities if the collection were conducted less frequently.***

**Part 21**

The frequency of collection of this information is not a set time; it is established as needed by the respondent.

The frequency of collection of this information is not determined by a FAA mandated requirement. The recording of major repairs and major alterations is determined by the respondent as needed.

**Part 47**

Collection occurs only when an aircraft changes ownership. The renewal frequency has been changed to every ten years rather than the three year cycle.

**Part 61**

The frequency of information collection is determined by the applicants who submit certification applications to the FAA. A decrease in the frequency of collection is governed by the applicant, not the FAA, unless safety dictates otherwise (i.e. numerous violations of the federal regulations).

**Part 65**

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 certificate could not be issued.

**Part 183**

The information is collected only when the applicant wishes to apply for a designated examiner/representative position and such a designation is necessary to provide adequate certification service.

**7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.5(d)(2).**

**Part 21, Part 47, Part 61, Part 65, Part 183**

The collection of information is consistent with the guidelines in 5 CFR 1320.5(d)(2)(i)-(viii), except records concerning aircraft registration which are maintained for the life of each aircraft. Consensus standards call for the manufacturer to permanently retain design and performance analysis information for safety of the product, and liability and marketability of the manufacturer's design.

**Part 43**

The collection of information is consistent with the guidelines in 5 CFR 1320.5(d)(2)(i)-(viii), except records concerning major alterations to the aircraft's FAA approved product's type design. These form 337s which are maintained by FAA registry and the owner for the life of each aircraft product installed on a special light sport aircraft.

**8. Describe efforts to consult with person outside the Agency to obtain their views on the availability of data.**

A notice was published in the Federal Register on July 22, 2011, vol. 76, no. 141, page 44080-44081. No comments were received. The final rule went into affect on September 1, 2004.

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

Respondents are provided no payment or gift in connection with the information collection burden.

**10. Describe any assurance of confidentiality.**

**Part 21, Part 43, Part 47, Part 183**

No assurance of confidentiality is provided or needed.

**Part 61, Part 65**

The information collected will become Part of the Privacy Act system of records DOT/FAA 847, General Aviation Records on Individuals and afforded the protection offered under the Privacy Act and that particular system.

**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 sensitive questions in this collection of information.

**Part 61**

The Airman Certificate and/or Rating Application requires the applicant to respond to questions concerning a conviction under Federal or State statutes pertaining to narcotic drugs, marijuana, and or stimulant drugs or substance. This information is necessary to determine whether the applicant is in compliance with appropriate federal regulation 61 certification requirements.

**12. Provide estimates of the hour burden of the collection of information. Provide estimates of cost to respondents for the hour burdens for collections of information.**

**Pilot and Instructor Certification**

Over the ten years of the rule, the FAA assumes the following numbers:

- Existing pilots - 14,000
- Existing flight instructors - 1,300
- New pilots - 12,000
- New flight instructors - 1,100
- New ground instructors - 18,670

Hence, in an average year, 1,400 existing pilots, 130 existing flight instructors, 1,200 new pilots, 110 new flight instructors, and 1,867 ground instructors will be subject to this rule. Pilots and instructors who will be replacing their aircraft over the next ten years are used in this analysis when appropriate. In an average year, 1,400 pilots and 130 instructors will replace their existing aircraft.

**The FAA is using the following hourly wages, which include all fringe benefits:**

DAR wage:	\$65.00
Management wage for manufacturer:	\$55.00
Pilot wage:	\$31.50
Instructor wage:	\$34.65
DPE wage:	\$100.00
Clerical wage for manufacturer:	\$17.93

The FAA is also using the following assumptions:

Percent of pilots with associations	75%
Percent of pilots not with associations	25%
Percent of Pilots and instructors that fail knowledge test	10%
Percent of Pilots and instructors that fail practical test	10%
Percent of instructors who buy training course from Associations, as the FAA assumes that it would be cheaper for them to buy the training courses from Associations rather than developing courses themselves	100%
Cost of the training	\$100

## **Part 21**

This analysis of the cost to the public of the light-sport aircraft airworthiness certification program uses the following assumptions and data from the Regulatory Evaluation for this rulemaking project: Approximately 14,000 existing light-sport aircraft operators and 1,300 existing light-sport aircraft flight instructors will obtain the "experimental - operating light-sport aircraft" certificate issued under §21.191(i)(1) over the course of three years (2 years to register the aircraft and 1 year after to certificate it).

Based on information from the program office, five eighths of the manufacturers produce "simple" class products (powered parachute or weight-shift-control aircraft), while the rest produce "complex" class products (more typical (rigid fixed wing) airplanes). Given 45 manufacturers, the FAA assumes that 28 produce "simple" class products (2 new models per year per manufacturer), while the rest produce more complex class aircraft (1 new model per year per manufacturer).

This analysis assumes that the cost of the inspection required prior to issuance of an "experimental-operating light sport aircraft" certificate for an aircraft is either \$350, if the inspection was performed at a workshop or the factory, or \$650, if the inspection is not performed at a workshop or factory. If the inspection was performed at the workshop or factory, the inspector would be able to do several at once, and possibly charge a lower amount, hence, the FAA's use of \$350. In such a situation, the DAR will be available at a workshop especially designated for pilots wishing to bring in their existing light-sport aircraft to be issued an experimental certificate. The aircraft inspection and any other necessary paper work should be accomplished already or can be done on the spot. This means that the DAR should be able to inspect one aircraft after another without any delay or travel time costs. On the other hand, if he had to travel, he would have to charge for the travel time, hence, the FAA's use of \$650.

§21.190(b)(3) states that to be eligible for a special airworthiness certificate in the light-sport category, the aircraft must be inspected and found to be in a condition for safe operation. This cost is paid by the customer to obtain the inspection needed to obtain the special light-sport category airworthiness certificate. §21.191(i)(1) requires the applicant for an experimental airworthiness certificate for an existing aircraft that meets the light-sport aircraft definition must obtain that certificate within 3 years of the final rule.

§21.191(i)(2) applies to obtaining experimental certificates for eligible aircraft that have been assembled from a kit. The DAR will process the applications. As mentioned above, the total charge for the DAR is \$350 if the inspection is performed at the factory or at a workshop, and \$650 if the inspection is not performed at the factory or at a workshop. The FAA is assuming an average of about 5.4 hours per inspection for the former situation and 10 hours per inspection for the latter, given the DAR's hourly rate of \$65. The relevant table is Table 1 on page 40 of the Regulatory Evaluation. The burden for these sections is covered under OMB #2120-0018.

§21.190(c)(2) states that the manufacturer must determine that the aircraft complies with the industry-developed consensus airworthiness standard. For the customer, there is no new cost. For each manufacturer, this is a recordkeeping requirement that applies for each new aircraft model produced for sale to customers.

Based on information from industry, the amount of time for determining that all applicable airworthiness requirements have been met for the project ranged from 12 hours for a simple project to 150 hours for a fairly complex project. Costs are calculated using this range of hours assuming that  $\frac{3}{4}$  of the time will be supplied by management and  $\frac{1}{4}$  by a clerical assistant. The relevant table is Table E.1 on page 172 of the Regulatory Evaluation.

Annualized cost burden:

- "simple" class products - 28 manufacturers X 2 new models X 12 hours per model X ( $\$55$  per hour x  $\frac{3}{4}$  +  $\$17.93$  per hour x  $\frac{1}{4}$ ) =  $\$30,732$
- more complex class aircraft - 17 manufacturers X 1 new model X 150 hours per model X ( $\$55$  per hour x  $\frac{3}{4}$  +  $\$17.93$  per hour x  $\frac{1}{4}$ ) =  $\$116,618$
- Total cost =  $\$147,350$

Annualized hour burden:

- "simple" class products - 28 manufacturers X 2 new models X 12 hours per model = 672 hours
- more complex class aircraft - 17 manufacturers X 1 new model X 150 hours per model = 2,550 hours
- Total hours = 3,222 hours

§21.190(c)(3) states that the manufacturer must determine that the aircraft conforms to the manufacturer's design data using an acceptable quality assurance system. This cost applies only to the manufacturer of new aircraft seeking to obtain the special light sport aircraft airworthiness certificate. For the "simple" class aircraft, this is assumed to require two hours for recordkeeping, while for the more complex aircraft, this is multiplied a ratio of 12 equivalent to that used in the preceding cost item ("Complex" is 12 times the burden of "simple"). For the 1,980 aircraft per year, the average recordkeeping burden will be 10.3 hours per aircraft, which is derived by taking the average of 2 hours for the 28 manufacturers of "simple" aircraft and 24 hours for 17 manufacturers of "complex" aircraft. Costs are calculated using this range of hours assuming that  $\frac{3}{4}$  of the time will be supplied

by management and  $\frac{1}{4}$  by a clerical assistant. The relevant table is Table E.2 on page 173 of the Regulatory Evaluation.

# respondents: 1,980

Annualized cost burden = 1,980 aircraft X 10.3 hours X ( $\$55$  per hour x  $\frac{3}{4}$  +  $\$17.93$  per hour x  $\frac{1}{4}$ ) =  $\$932,669$

Total time = 1,980 aircraft X 10.3 hours = 20,394 hours

§21.190(c)(5) requires manufacturers to monitor and correct safety-of-flight issues, using a continued airworthiness system that meets the identified consensus standard. The relevant table is Table E.6 on page 176 of the Regulatory Evaluation.

Annualized cost burden:

- "simple" class products - 28 manufacturers X 2 hours per model X ( $\$55$  per hour x  $\frac{1}{2}$  +  $\$17.93$  per hour x  $\frac{1}{2}$ ) =  $\$2,042$

- more complex class aircraft - 17 manufacturers X 24 hours per model X ( $\$55$  per hour x  $\frac{1}{2}$  +  $\$17.93$  per hour x  $\frac{1}{2}$ ) =  $\$14,878$

- Total cost =  $\$16,917$

Annualized hour burden:

- "simple" class products - 28 manufacturers X 2 hours per model = 56 hours

- more complex class aircraft - 17 manufacturers X 24 hours per model = 408 hours

- Total time = 464 hours

**Total cost =  $\$16,917$**

**Total hour burden = 464 hours**

§21.190(c)(7) states that the manufacturer must have a final acceptance test procedure for evaluation of completed aircraft, and that records for each aircraft produced must show successful completion of the test procedure. This cost applies only to the manufacturer of new aircraft seeking to obtain the special light sport aircraft airworthiness certificate. For this analysis, inspection, test, and documentation for "simple" class aircraft is assumed to require one hour, while the same task for more complex aircraft is assumed to require three hours. Average required recordkeeping time is 1.75 hours, which is derived by taking the average of 1 hours for the 28 "simple" aircraft and 3 hours for 17 "complex" aircraft. Costs are calculated using this range of hours assuming that  $\frac{3}{4}$  of the time will be supplied by management and  $\frac{1}{4}$  by a clerical assistant. The relevant table is Table E.2 on page 173 of the Regulatory Evaluation.

# respondents - 1,980 aircraft annually

**Total cost = 1,980 aircraft X 1.75 hours per aircraft X ( $\$55$  per hour x  $\frac{3}{4}$  +  $\$17.93$  per hour x  $\frac{1}{4}$ ) =  $\$158,463$**

**Total time = 1,980 aircraft X 1.75 hours per aircraft = 3,465 hours**

Summary of the part 21 burden:

Section	Cost	Hours	Class Aircraft
21.190(c)(2)	\$30,732	672	simple
	\$116,618	2,550	complex
21.190(c)(3)	\$932,669	20,394	
21.190(c)(5)	\$16,917	464	
21.190(c)(7)	\$158,463	3,465	
<b>Total</b>	<b>\$1,255,399</b>	<b>27,545</b>	

**Part 47**

§ 47.15(a) provides that, for aircraft not previously registered anywhere, including a foreign country, the applicant must submit a request in writing for a U.S. identification number. The FAA assumes that only those who are registering their aircraft as experimental will apply for an ID number under this section. Experimental aircraft will include existing vehicles and new kit-built aircraft.

As shown in Table 4, page 45 of the Regulatory Evaluation, the FAA estimates that there will be 1,980 annual requests submitted from pilots and 104 annual requests by flight instructors. The FAA assumes all respondents, will need 0.75 hours annually to complete each request. Pilots will spend 1,485 hours per year complying with this requirement at an hourly cost of \$31.50; assuming \$5 for postage, the annual cost sums to \$54,203. Instructors will spend 78 hours per year submitting requests for identification numbers at an hourly cost of \$34.65; assuming \$5 for postage, the annual cost sums to \$3,093. **In an average year, this will cost \$57,295 and take 1,563 hours.**

§ 47.15(c) provides for issuance to a manufacturer or dealer, upon written request, Dealers Aircraft Registration, enough United States identification numbers to supply his estimated production for 18 months. As shown in Table 3, page 43 of the Regulatory Evaluation, the FAA assumes that, on average, 45 respondents will need 0.75 hours annually to complete this requirement. Costs are calculated using this range of hours assuming that ¼ of the time will be supplied by management and ¾ by a clerical assistant, at hourly rates of \$55 and \$17.93, respectively.

**Costs = 45 x 0.75 x (.25 x \$55 + .75 x \$17.93) = \$918**

**Time = 45 x 0.75 = 33.75 hours**

§§ 47.11, 47.31, 47.33, 47.35, and 47.37 describes documents, which are acceptable for recording as evidence of ownership and sets forth procedures for submission of AC Form 8050-1, Aircraft Registration Application. Evidence of ownership can be verified with a bill of sale, affidavit of ownership, or a variety of other forms. They must be drafted in accordance with local statutory requirements. The following forms are furnished to the public as a convenience for their use, if desired, in fulfilling the requirements of Part 47.11:



AC Form 8050-2, Aircraft Bill of Sale AC Form 8050-4, Certificate of Repossession of Encumbered Aircraft, Form 8050-98, Aircraft Security Agreement, each of which is covered under OMB control number 2120-0042. AC Form 8050-88A, Affidavit of Ownership for Light-sport Aircraft, is also accepted. The FAA assumes pilots will register, on average, 3,720 aircraft and flight instructors will register on average 240 aircraft, and that these provisions will require 0.75 hours per aircraft for submission of this form at a cost of \$31.50 and \$34.65 per hour, respectively. Hence, **in an average year, this will cost \$94,122 and take 2,970 hours.**

§§ 47.41 and 47.43 provide for return of AC Form 8050-3, Certificate of Aircraft Registration, to the FAA Aircraft Registry when the registration becomes invalid. As shown in Table 6 on page 47 of the Regulatory Evaluation, the FAA assumes that, on average, 1,417 pilots and 146 flight instructors will need 1 hour annually to complete both forms at a cost of \$31.50 and \$34.65 per hour, respectively. Hence, **in an average year, this will cost \$49,694 and take 1,563 hours.**

§ 47.49 provides for issuance of a duplicate Certificate of Registration upon request and payment of fees, when the certificate has been lost or stolen. This requires no information other than that necessary to describe the requested service and identify the person or persons making the request as the registered owner(s) of the aircraft. As shown in Table 7 on page 48 of the Regulatory Evaluation, the FAA assumes that, on average, 5 pilots and 5 flight instructors will need 0.5 hours annually to complete these forms at a cost of \$31.50 and \$34.65, respectively, per hour. Hence, **in an average year, this will cost \$165 and take 5 hours.**

The following is an estimate of the number of responses received for each of the reporting and recordkeeping requirements set forth in FAR Section 47. We estimate the annual total cost to the respondents to be \$202,194, taking 6,134.75 hours.

A summary of the part 47 burden:

Section(s)	Number of respondents	Time per respondent	Cost	Hours
47.15(a)(1)	2,084	0.75	\$57,295	1,563
47.15(c)	45	0.75	\$918	33.75
47.11, 31, 33, 35, 37	3,960	0.75	\$94,122	2,970
47.41, 43	1,563	1.0	\$49,694	1,563
47.49	10	0.5	\$165	5
<b>Total</b>			<b>\$202,194</b>	<b>6,134.75</b>

### **Part 61**

A breakdown of the applicable sections of Federal Regulation Part 61 is listed below, showing the number of respondents impacted by this rule, frequency of response, annual hour burden, and how the burden has been estimated for the completion of FAA Form 8710-11 (the

regulatory evaluation referenced FAA Form 8710-1) or required logbook endorsement.

Average No. of Sport Pilots (SP) and Flight Instructors (FI) Impacted Annually by the Final Rule				
EXISTING SPs	EXISTING FIs	NEW SPs	NEW FIs	AVG. YEARLY TOTAL
1,400	130	1,200	110	2,840
# of existing pilots with organizations (annual) - 1,050				
# of existing instructors with organizations (annual) - 130				

A. Costs of Training, Testing, and Registering Sport Pilots

§ 61.309 require a candidate for sport pilot certification to receive and log ground training on specified knowledge and proficiency areas. While the time spent in training is not a paperwork burden, the cost of the home study course is. The relevant tables are Tables 9A and 9B on page 55 of the Regulatory Evaluation.

# of existing pilots not with associations (annually) - 350

# of new pilots not with associations (annually) - 300

# of new pilots with associations (annually) - 900

Cost of home study course - \$55

Paperwork burden =  $(350 + 300 + 900) \times \$55 = \$85,250$

§ 61.307 stipulates that one must take and pass a knowledge test in order to receive sport pilot certification. Before taking the knowledge test, the applicant must receive a logbook endorsement from an authorized instructor:

- a) Each pilot must receive a logbook endorsement from an authorized instructor and all pilots must purchase a knowledge test (\$90), and
- b) For purposes of this evaluation, we estimate that 10% of the pilots will fail the knowledge test and be required to retake the test. Under § 61.49, an applicant who fails a knowledge or practical test may reapply for the test only after receiving training from an authorized instructor and a logbook endorsement from an authorized instructor. This includes repurchasing a knowledge test.

For a), as shown in Table 10 on page 58 of the Regulatory Evaluation:

# of existing pilots (annually) - 1,400

# of new pilots not with associations (annually) - 300

# of existing instructors (annually) - 130

Amount of time for logbook endorsement - 5 minutes

Cost of logbook endorsement to pilots and instructors =  $(1,400 + 300) \times 5/60 \times \$31.50/\text{hour} + 130 \times 5/60 \times \$34.65/\text{hour} = \$4,838$

Cost of logbook endorsement from instructors =  $(1,400 + 300 + 130) \times 5/60 \times \$34.65 = \$5,284$

Cost of purchasing knowledge test =  $(1,400 + 300 + 130) \times \$90 = \$164,700$

Amount of time for logbook endorsement for pilots and instructors =  $(1,400 + 300 + 130) \times 5/60 = 152.5$  hours

Amount of time for logbook endorsement from instructors =  $(1,400 + 300 + 130) \times 5/60 = 152.5$  hours

**Total Cost = \$4,838 + \$5,284 + \$164,700 = \$174,822**

**Total Time = 152.5 + 152.5 = 305 hours**

For b), as shown in Table 11 on page 58 of the Regulatory Evaluation, the FAA assumes that 10% of the pilots will need to get logbook endorsements again as well as repurchasing the test.

# of existing pilots (annually) - 140

# of new pilots not with associations (annually) - 30

# of existing instructors (annually) - 13

Cost of logbook endorsement to pilots and instructors =  $(140 + 30) \times 5/60 \times \$31.50/\text{hour} + 13 \times 5/60 \times \$34.65 = \$484$

Cost of logbook endorsement from instructors =  $(140 + 30 + 13) \times 5/60 \times \$34.65/\text{hour} = \$528$

Cost of purchasing knowledge test =  $(140 + 30 + 13) \times \$90 = \$16,470$

Amount of time for logbook endorsement for pilots and instructors =  $(140 + 30 + 13) \times 5/60 = 15.25$  hours

Amount of time for logbook endorsement from instructors =  $(140 + 30 + 13) \times 5/60 = 15.25$  hours

**Total Cost = \$484 + \$528 + \$16,470 = \$17,482**

**Total Time = 15.25 + 15.25 = 30.5 hours**

§ 61.329(a)(3) will allow ultralight pilots with FAA-recognized ultralight organizations to take the practical and knowledge tests without any additional flight training. They will have to provide the FAA with a certified copy of their ultralight pilot records from the organization. The relevant table is Table 12 on page 60 of the Regulatory Evaluation.

# of existing pilots with organizations (annual) - 1,050

# of existing instructors with organizations (annual) - 130

Average pilot/instructor time spent writing letter - 5 min.

Average pilot/instructor time to send certified copy to the DPE - 5 min.

Average clerical time needed to process letter - 10 min.

Postage - \$0.37

Cost for pilots -  $1,050 \times (\$31.50 \times (10/60) + \$0.37) = \$5,901$

Cost for instructors -  $130 \times (\$34.65 \times (10/60) + \$0.37) = \$799$

Cost for clerk =  $1,180 \times (\$17.93 \times (10/60) + \$0.37) = \$3,963$

Time for pilots =  $1,050 \times (10/60) = 175$  hours

Time for instructors =  $130 \times (10/60) = 21.67$  hours

Time for clerk =  $1,180 \times (10/60) = 196.67$  hours

**Total cost = \$5,901 + \$799 + \$3,963 = \$10,663**

**Total time = 175 + 21.67 + 196.67 = 393.33 hours**

§ 61.311 requires that an applicant for a sport pilot certificate receive and log ground and flight training from an authorized instructor on certain areas of operation. The relevant tables are Tables 13A and 13B on page 64 of the Regulatory Evaluation.

# of existing and new pilots not with associations (annual) = 650

Average hours spent in training = 20

Average logbook endorsement = 5 minutes

Cost of logbook endorsements for pilots =  $650 \times 20 \times (5/60) \times 31.50 = \$34,125$

Cost of logbook endorsements for instructors =  $650 \times 20 \times (5/60) \times \$34.65 = \$37,538$

Time for logbook endorsements (pilots and instructors) =  $2 \times 650 \times 20 \times (5/60) = 2,166.67$

# of existing and new pilots with associations (annual) = 900

Average hours spent in training = 10

Average logbook endorsement = 5 minutes

Cost of logbook endorsements for pilots =  $900 \times 10 \times (5/60) \times 31.50 = \$23,625$

Cost of logbook endorsements for instructors =  $900 \times 10 \times (5/60) \times 34.65 = \$25,988$

Time for logbook endorsements (pilots and instructors) =  $2 \times 900 \times 10 \times (5/60) = 1,500$

**Total cost =  $\$34,125 + \$37,538 + \$23,625 + \$25,988 = \$121,276$**

**Total time =  $2,166.67 + 1500 = 3,666.67$**

§ 61.13 requires the applicant for a pilot certificate and/or flight instructor certificate to submit FAA Form 8710-11 (the regulatory evaluation referenced FAA Form 8710-1) to the FAA district office or its representatives to determine qualifications of the applicant for issuance of a pilot or flight instructor certificate, rating, or authorization. Both pilots and instructors will need to work with an existing instructor in filling out the form. The relevant table is Table 14 on page 66 of the Regulatory Evaluation.

# of new and existing pilots (annual) - 2,600

# of existing instructors (annual) - 130

Time to fill out form for both pilot and instructor - 15 min.

Time for DPE to verify form - 10 min.

Cost to fill out application for pilots =  $(2,600 \times 0.25 \times \$31.50) + (2,600 \times 0.25 \times \$34.65) = \$42,998$

Cost to fill out applications for instructors =  $2 \times (130 \times 0.25 \times \$34.65) = \$2,252$

Cost of DPE verifying information =  $(2,600 + 130) \times (10/60) \times \$100 + (2,600 \times (10/60) \times \$31.50) + (130 \times (10/60) \times \$34.65) = \$59,901$

Time to fill out applications =  $2 \times (2,600 + 130) \times 0.25 = 1,365$  hours

Time for DPE to verify information =  $2 \times (2,600 + 130) \times (10/60) = 910$  hours

**Total cost =  $\$42,998 + \$2,252 + \$59,901 = \$105,151$**

**Total time =  $1,365 + 910 = 2,275$  hours**

§ 61.39 - Except for 75 percent of new pilots and 100 percent of new instructors that will have taken the practical test through their associations, the rest of sport pilot candidates are required to take this test. The relevant tables are Tables 15 and 16 on page 68 of the Regulatory Evaluation.

a) As a prerequisite to taking the practical test,

§ 61.39 states that the applicant must have a logbook endorsement

signed by an authorized instructor, and each pilot must purchase the practical test, which costs \$200.

b) An estimated 10% who take the practical test may fail it. These pilots and instructors will need to reapply to take the test using FAA Form 8710-11 (the regulatory evaluation referenced FAA Form 8710-1) after failure, resulting in the logbook endorsement time and costs, as well as purchasing another practical test.

a) # of existing pilots (annual) - 1,400  
# of new pilots (annual) - 1,200  
# of existing instructors (annual) - 130  
Time for logbook endorsement - 5 minutes  
Cost of practical test = \$200  
Cost for pilots -  $(1,400 + 1,200) \times \$31.50 \times (5/60) + ((1,400 + 1,200) \times \$200) = \$526,825$   
Cost for instructors -  $(1,400 + 1,200 + 130) \times \$34.65 \times (5/60) + (130 \times \$200) = \$33,883$   
Time for pilots -  $(1,400 + 1,200) \times (5/60) = 216.67$   
Time for instructors -  $(1,400 + 1,200 + 130) \times (5/60) = 227.5$   
**Total cost = \$526,825 + \$33,883 = \$560,708**  
**Total time = 216.67 + 227.5 = 444.17 hours**

b) # of existing pilots (annually) - 140  
# of new pilots not with associations (annually) - 120  
# of existing instructors (annually) - 13  
Amount of time to fill out form - ¼ hour  
Cost of practical test = \$200  
Cost to pilots to fill out form =  $(140 + 120) \times \frac{1}{4} \times \$31.50/\text{hour} = \$2,048$   
Cost to instructors to fill out form =  $13 \times \frac{1}{4} \times \$34.65 = \$113$   
Amount of time for pilots to fill out form =  $(140 + 120) \times \frac{1}{4} = 65$  hours  
Amount of time for instructors to fill out form =  $13 \times \frac{1}{4} = 3.25$  hours  
**Total Cost = \$2,048 + \$113 = \$2,161**  
**Total Time = 65 + 3.25 = 68.25 hours**

Cost of logbook endorsement to pilots and purchase test =  $(140 + 120) \times 5/60 \times \$31.50 + ((140 + 120) \times \$200) = \$52,683$   
Cost of logbook endorsement to instructors and purchase test =  $(140 + 120 + 13) \times 5/60 \times \$34.65 + (13 \times \$200) = \$3,388$   
Amount of time for logbook endorsement for pilots =  $(140 + 120) \times 5/60 = 21.67$  hours  
Amount of time for logbook endorsement for instructors =  $(140 + 120 + 13) \times 5/60 = 22.75$  hours  
**Total Cost = \$52,683 + \$3,388 = \$56,071**  
**Total Time = 21.67 + 22.75 = 44.42 hours**

Totals for § 61.39:

**Total Cost = \$560,708 + \$2,161 + \$56,071 = \$618,940**

**Total Time = 444.17 + 68.25 + 44.42 = 556.84 hours**

The current rule (in § 61.56) requires pilots to take a flight review (BFR) every two years. This flight review includes a logbook endorsement, which generates a paperwork burden. The first BFR

occurred in 2006 so the paperwork burden only occurs in 8 of the 10 years of this analysis. The relevant tables are Tables 17 and 18 on page 70 of the Regulatory Evaluation.

# of existing pilots (annual) = 5,600 (80% (8 of 10 years) of 7,000 to take into account that there will be no BFR in the first two years of this rule)

# of existing instructors (annual) = 520 (80% of 650 to take into account that there will be no BFR in the first two years of this rule)

# of new pilots (annual) = 1,600 (80% of 2,000 to take into account that there will be no BFR in the first two years of this rule)

Cost of logbook endorsement for pilots =  $(5,600 + 1,600) \times \$31.50 \times (5/60) = \$18,900$

Cost of logbook endorsement for instructors =  $520 \times \$34.65 \times (5/60) = \$1,502$

Time for logbook endorsement for pilots =  $(5,600 + 1,600) \times 5/60 = 600$  hours

Time for logbook endorsement for instructors =  $520 \times 5/60 = 43.33$  hours

**Total cost = \$18,900 + \$1,502 = \$20,402**

**Total time = 600 + 43.33 = 643.33 hours**

§ 61.57 states that no person may act as a pilot in command of an aircraft carrying passengers or of an aircraft certificated for more than one pilot flight crewmember unless that person has made at least three takeoffs and three landings within the preceding 90 days. The number of pilots and instructors affected is cumulative. The relevant table is Table 19 on page 71 of the Regulatory Evaluation.

# of pilots affected - 2,600

# of instructors affected - 130

Time for logbook endorsement - 5 minutes

Number of logbooks endorsements per year - 12

Cost of logbook endorsements for pilots =  $2,600 \times 12 \times (5/60) \times \$31.50 = \$81,900$

Cost of logbook endorsements for instructors =  $130 \times 12 \times (5/60) \times \$34.65 = \$4,505$

Time for logbook endorsements for pilots =  $2,600 \times 12 \times (5/60) = 2,600$  hours

Time for logbook endorsement for instructors =  $130 \times 12 \times (5/60) = 130$  hours

**Total cost = \$81,900 + \$4,505 = \$86,405**

**Total time = 2,600 + 130 = 2,730 hours**

The FAA revised the final rule to require FAA Form 8710-11, Sport Pilot Airman Certificate and/or Rating Application, (the regulatory evaluation referenced FAA Form 8710-1), be completed by the airman receiving this additional category or class privilege, and signed by the recommending instructor, and the authorized instructor conducting the proficiency check. The authorized instructor conducting the proficiency check will be required to submit the completed FAA Form 8710-11, Sport Pilot Airman Certificate and/or Rating Application, (the regulatory evaluation referenced FAA Form 8710-1) to the FAA upon satisfactory completion of the proficiency check. While this

requirement will result in additional paperwork, the FAA has no record as to the number of sport pilots who would seek additional category and class ratings. Accordingly, the FAA is unable to estimate the cost and hour burden.

§ 61.309 - Training Courses:

a) Cost of Organizations to develop and maintain training courses for Pilots - This reflects the costs of an FAA-recognized ultralight organization to develop and maintain their training courses. The relevant table is Table E.9 on page 180 of the Regulatory Evaluation.

# of organizations = 4

Instructor time to develop the course (annual) = 7 hours

Clerical time to develop the course (annual) = 3 hours

Instructor time to maintain the course (annual) = 6.3 hours

Clerical time to maintain the course (annual) = 2.7 hours

Cost of instructor to develop & maintain the course = 4 x (7 + 6.3) x \$34.65 = \$1,843

Cost of clerical time to develop and maintain the course = 4 x (3 + 2.7) x \$17.93 = \$409

Time for instructor to develop and maintain the course = 4 x (7 + 6.3) = 53.2 hours

Time for of clerk to develop the course = 4 x (3 + 2.7) = 22.8 hours

**Total cost = \$1,843 + \$409 = \$2,252**

**Total time = 53.2 + 22.8 = 76 hours**

b) Buying the training courses from the associations - The FAA assumes that every instructor will purchase a training course from an FAA-recognized ultralight organization. There is no hour burden.

# of instructors purchasing training courses (annual) = 11

Average cost for a training course = \$100

Cost of buying the training courses = 11 x \$100 = \$1,100

**Summary of the Costs of Training, Testing, and Registering Sport Pilots:**

Part Number	Number of Respondents	Hours	Costs	Comment
61.311, 319	1,550	N/A	\$85,250	
61.307	1,830	305.00	\$174,822	Initial
61.307	183	30.50	\$17,482	Retake the test
61.329 (a)(3)	1,180	393.33	\$10,663	
61.311	650	2,166.67	\$37,538	Not with Associations
61.311	900	1,500.00	\$25,988	With Associations
61.13	2,730	2,275.00	\$105,151	
61.39	1,830	444.17	\$560,708	Initial
61.39	183	112.67	\$58,232	Retake the test
61.56	7,720	643.33	\$20,402	Flight Review (BFR)
61.57	2,730	2,730.00	\$86,405	
61.309	4	76.00	\$2,252	Develop and maintain
61.309	11	N/A	\$1,100	Buy course
<b>TOTAL</b>		<b>10,676.67</b>	<b>\$1,185,993</b>	

B. Cost to become certified as a flight instructor with a sport pilot rating

Cost of the knowledge test - A person applying for a flight instructor certificate with a sport pilot rating must pass knowledge tests on the fundamentals of instructing, as listed in § 61.407(a) and the aeronautical knowledge areas listed in § 61.407(c). While there is no hour burden with this, there is a paperwork cost; the relevant table is Table 20 on page 74 of the Regulatory Evaluation:  
# of existing and new instructors (annually) - 130  
Cost of the knowledge test - \$90  
Total cost of purchasing training courses = 130 x \$90 = \$11,700

An estimated 10% who take the knowledge test may fail it. These pilots and instructors will need to reapply to take the test completing FAA Form 8710-11, Sport Pilot Airman Certificate and/or Rating Application, (the regulatory evaluation referenced FAA Form 8710-1) after failure, as well as repurchase the knowledge test; the relevant table is Table 21 on page 75 of the Regulatory Evaluation.  
# of existing instructors (annually) - 13  
Amount of time to fill out 8710-11 form - ¼ hour  
Cost of the knowledge test - \$90  
Cost to fill out form and purchase knowledge test = (13 x ¼ x \$34.65) + (13 x \$90) = \$1,283  
Amount of time to fill out 8710-11 form = 13 x ¼ = 3.25 hours

§ 61.433 will not require ultralight instructors with FAA-recognized ultralight organizations to meet the aeronautical knowledge requirements, the flight proficiency requirements, and the aeronautical experience requirements; however, they have to meet the minimum total flight time requirements. They will have to submit a copy of their ultralight pilot records from the organization; the relevant table is Table 22 on page 77 of the Regulatory Evaluation.  
# of existing instructors with organizations (annual) - 130  
Average instructor time spent writing letter - 5 min.  
Average instructor time to send certified copy to the DPE - 5 min.  
Average clerical time needed to process letter - 10 min.  
Postage - \$1.11

Cost for instructors - 130 x (\$34.65 x (10/60) + \$1.11) = \$895  
Cost for clerk = 130 x \$17.93 x (10/60) = \$388  
Time for instructors = 130 x (10/60) = 21.67 hours  
Time for clerk = 130 x (10/60) = 21.67 hours  
**Total cost = \$895 + \$388 = \$1,283**  
**Total time = 21.67 + 21.67 = 43.33 hours**

Flight training costs - The FAA estimates, on average, an applicant will need an additional 10 hours of flight training with an instructor before being ready for the practical test. Each of these tests requires a logbook endorsement; the relevant table is Table 23 on page 79 of the Regulatory Evaluation.  
# of new instructors (annual) - 110  
Hours of flight training experience - 10  
Cost for new instructors - 110 x 10 x (5/60) x \$31.50 = \$2,888



Cost for instructors teaching the new instructors -  $110 \times 10 \times (5/60)$   
 $\times \$34.65 = \$3,176$   
Time for instructors =  $2 \times 110 \times 10 \times (5/60) = 183.33$  hours  
Total Cost =  $\$2,888 + \$3,176 = \$6,064$

Cost of purchasing training courses - The FAA assumes all instructors will purchase the training curriculum that has been developed by the ultralight associations and other organizations; the relevant table is Table 24 on page 80 of the Regulatory Evaluation.

# of new and existing instructors (annual) = 240  
Cost for training course = \$100  
Total cost = \$24,000

Applying to become an instructor - The FAA estimates, on average, that an instructor and a DPE will each need  $\frac{1}{4}$  hour for the paperwork for existing and new instructors to become an instructor; the relevant table is Table 25 on page 81 of the Regulatory Evaluation.

# of new instructors (annual) - 110  
# of existing instructors (annual) - 130  
Cost of applying =  $(110 \times \$31.50 \times \frac{1}{4}) + (130 \times \$34.65 \times \frac{1}{4}) + (240 \times \$100 \times \frac{1}{4}) = \$7,992$   
Time to apply =  $(240 \times \frac{1}{4}) + (240 \times \frac{1}{4}) = 120$  hours

Practical tests for instructor candidates - Except for new instructors that will have taken the practical tests through their associations, the rest of candidates are required to take this test; the relevant tables are Table 26 and 27 on page 83 of the Regulatory Evaluation.

a) As a prerequisite to taking the practical test, the applicant must have a logbook endorsement signed by a DPE.

b) An estimated 10% who take the practical test may fail it. These instructors will need to reapply to take the test completing FAA Form 8710-11, Sport Pilot Airman Certificate and/or Rating Application, (the regulatory evaluation referenced FAA Form 8710-1) after failure.

a) # of existing instructors (annual) - 130  
Time for logbook endorsement - 5 minutes  
Cost for instructors -  $130 \times \$34.65 \times (5/60) = \$375$   
Cost for DPE's -  $130 \times \$100 \times (5/60) = \$1,083$   
Time for instructors -  $130 \times (5/60) = 10.83$   
Time for DPE -  $130 \times (5/60) = 10.83$   
Total cost =  $\$375 + \$1,083 = \$1,458$   
Total time =  $10.83 + 10.83 = 21.67$  hours

b) # of existing instructors (annually) - 13  
Amount of time to fill out form -  $\frac{1}{4}$  hour  
Cost to instructors to fill out form =  $13 \times \frac{1}{4} \times \$34.65 = \$113$   
Time for instructors to fill out form =  $13 \times \frac{1}{4} = 3.25$  hours  
Cost of logbook endorsement to instructors =  $13 \times 5/60 \times \$34.65/\text{hour} = \$38$   
Cost of logbook endorsement to DPE =  $13 \times 5/60 \times \$100/\text{hour} = \$108$   
Time for logbook endorsement for instructors =  $13 \times 5/60 = 1.08$  hours  
Time for logbook endorsement for DPE =  $13 \times 5/60 = 1.08$  hours  
**Total cost = \$113 + \$38 + \$108 = \$259**

Total time = 3.25 + 1.08 + 1.08 = 5.41 hours

For practical test:

Total cost = \$1,458 + \$259 = \$1,717

Total time = 21.67 + 5.41 = 27.08 hours

§ 61.309 - Developing ground-training courses for instructors - The paperwork costs are included in the costs of training, testing, and registering sport pilots

**Summary of costs to become certified as a flight instructor with a sport pilot rating:**

Part	Number of respondents	Time	Cost	Comment
61.407(a)	130		\$11,700	Cost of knowledge test
	13	3.25	\$1,283	Reapply & retake test
61.433	130	43.33	\$1,283	
	110	183.33	\$6,064	Flight training costs
	240		\$24,000	Purchase training course
	240	120.00	\$7,992	Apply to become instructor
	143	27.08	\$1,717	Practical test for instructors
<b>TOTAL</b>		<b>376.99</b>	<b>\$54,039</b>	

**Maintenance**

Training to be a repairman with an inspection rating - In 2004 and 2005, all existing and new pilots minus the sport pilots who purchased factory-built aircraft will take the repairmen course. Thereafter, all sport pilots who purchased kit-built aircraft will take the course. The FAA assumes that on an annual basis, 1,980 pilots will take this course. While there are no paperwork costs involved with taking the course per se, the cost of the course (\$500) is a paperwork-related burden. Hence, total costs sum to \$990,000 (calculation: 1,980 x \$500).

Training to be repairmen with a maintenance rating - The FAA assumes that 20% of pilots who own factory built aircraft and all instructors who own factory built aircraft take a maintenance course at a cost of \$2,816. On an annual basis, 396 pilots and instructors will take the course. As above, the cost of the course is a paperwork-related burden. Costs sum to \$1,115,136 (calculation: 396 x \$2,816).

Form 8610-2 - Repairmen will have to complete Form 8610-2 in order to apply for the repairman certificate (light-sport aircraft) with an inspection rating or a maintenance rating. The relevant table is Table 32 on page 93 of the Regulatory Evaluation. The burden for this section is covered under OMB #2120-0022.

§ 43.11 prescribes maintenance record entries after any inspection performed in accordance with Part 91 (and other parts). § 91.319 will require that experimental light-sport aircraft being used for instruction have a 100 hour inspection, while § 91.327 will require that special light-sport aircraft have a 12-month condition

inspection. Therefore, § 43.11 requires logbook endorsements of these aircraft because the inspection is performed in accordance with Part 91. Logbook endorsements are also required by the operating limitations after a condition inspection on an experimental aircraft. The relevant table is Table 33 on page 95 of the Regulatory Evaluation.

# of sport pilots with kit built aircraft (annual) = 9,723  
 # of sport pilots with manufactured aircraft (annual) = 513  
 # of instructors with manufactured aircraft (annual) = 922  
 Time for logbook endorsement = 5 minutes  
 Cost for pilots = (9,723 + 513) x \$31.50 x 5/60 = \$26,870  
 Cost for instructors = 922 x \$34.65 x 5/60 = \$2,662  
 Time for pilots = (9,723 + 513) x 5/60 = 853 hours  
 Time for instructors = 922 x 5/60 = 76.83 hours  
**Total cost = \$26,870 + \$2,662 = \$29,532**  
**Total time = 853 + 76.83 = 929.83 hours**

**Summary of maintenance-related costs:**

Part	Number of respondents	Time	Cost	Comment
	1,980		\$990,000	Inspection Rating
	396		\$1,115,136	Maintenance Rating
43.11	10,236	853.00	\$26,870	Pilots
43.11	922	76.83	\$2,662	Instructors
<b>Total</b>		<b>929.83</b>	<b>\$2,134,668</b>	

**Part 183 - Designated Airworthiness Representatives (DAR's) and Designated Pilot Examiners (DPE's)**

The FAA estimated that the cost of completing applications and writing renewal letters for Designated Airworthiness Representatives (DAR's) and Designated Pilot Examiners (DPE's) relate to the forms 8110-14, 8110-28, and 8710-11:

FAA Form 8710-12. Light-Sport Standardization Board-Designated Pilot Examiner Candidate Application. This is the form that will be used by new DPEs (SPE and SFIEs). (The FAA referenced in the regulatory evaluation that FAA Form 8710-6 and FAA Form 8710-10 would be used to collect this data).

- a) Form 8110-14 deals with DAR applications and renewals, which are processed through the Manufacturer Inspection District Office (MIDO), as part of Office of Aircraft Certification (AIR). This burden is approved under OMB control number 2120-0033.
- b) Form 8110-28 deals with the cost of applications and renewal letters, which are applied through the Flight Service District Offices (FSDO's), as part of the Office of Flight Standards (AFS). This burden is approved under OMB control number 2120-0033.
- c) Form 8710-12 (The FAA referenced in the regulatory evaluation FAA Form 8710-6 and FAA Form 8710-10) deals with the time that DPE's need to process these forms. The FAA estimates that 5 DPE's will need 30 minutes to process these forms. At \$100 per hour, this sums to an annual cost of \$250, taking 2.5 hours. The relevant table is Table E.5 on page 176 of the Regulatory Evaluation.

§ 183.23 - Training of DPE's - All sport pilot DPE's will require special training. Because before sport pilots and flight instructors with a sport pilot rating can be certified there must be sport pilot designated pilot examiners (DPE's). The relevant table is Table E.12 on page 183 of the Regulatory Evaluation.

# of DPE's initially applying (annual) - 34.5

Time for DPE to fill out application FAA Form 8710-12 (The FAA referenced in the regulatory evaluation FAA Form 8710-6 and FAA Form 8710-10) = 1 hour

Cost of knowledge test = \$100

Postage per application = \$0.37

**Total cost = 34.5 x (\$100 + \$100 + \$0.37) = \$6,913**

**Total time = 34.5 x 1 = 34.5 hours**

§ 183.33 - Training of DAR's

The costs that designated airworthiness representatives will incur to become trained are included here in the aircraft certification discussion, because before light-sport aircraft can be certified there must be light-sport DAR's to inspect and certify the aircraft. The relevant table is Table E.8 on page 179 of the Regulatory Evaluation.

# of DAR's initially applying (annual) - 63

# of DAR's reapplying (annual) - 12

Time for DAR to fill out application = 1 hour

Postage per application = \$0.37

**Total cost = (63 + 12) x (1 x \$34.65 + \$0.37) = \$2,627**

**Total time = (63 + 12) x 1 = 75 hours**

**Summary of part 183 costs:**

Part	Number of respondents	Time	Cost	Comment
	5	2.50	\$250	8710-12
183.23	34.5	34.50	\$6,913	
183.33	74.9	75.00	\$2,627	
<b>Total</b>		<b>112</b>	<b>\$9,790</b>	

**Summary of all Burden Hours and Costs:**

Part	Time	Cost	Comment
21	27,545	\$1,255,399	
47	6,134.75	\$202,194	
61	10,676.67	\$1,185,993	Pilots
61	376.99	\$54,039	Instructors
	929.83	\$2,134,668	Maintenance
183	112	\$9,790	
<b>Total</b>	<b>45,775.24</b>	<b>\$4,842,083</b>	

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

**information. (Do not include the cost of any hour burden shown in items 12 and 14).**

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

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

Aircraft certification - This includes the cost of working with industry to develop consensus standards, the cost of training Designated Airworthiness Representatives (DAR's), the cost of appointing, supervising and renewing DAR's, and the cost of aircraft registration which will include the cost of registering aircraft and assigning N-numbers.

Cost of Working with Industry to Develop Consensus Standards - The relevant table is Table 34 on page 98 of the Regulatory Evaluation.  
# of employees - 2 full time the first year and 0.25 employees in subsequent years, averaging .425 employees per year  
Loaded salary = \$117,479  
Cost of helping to develop consensus standards =  $.425 \times \$117,479 = \$49,929$   
Time to help to develop consensus standards =  $.425 \times 2080 = 884$  hours

Appointing, supervising, and renewing a DAR - In order to certify aircraft a new type of light-sport aircraft Designated Airworthiness Representative (DAR) must be appointed, trained, supervised and renewed. The relevant table is Table 35 on page 100 of the Regulatory Evaluation.

Initial number of DAR's applying (annual) - 63  
Number of DAR's reapplying (annual) - 12  
    Designee Process Coordinator prepares application package - 1 hour  
    FG-13 appointment activities - 7.75 hours  
    FG-14 appointment activities - 3.625 hours  
    FG-15 appointment activities - 0.625 hours  
DAR's to be supervised (annual) - 125  
    FG-13 oversight activities - 27.4 hours  
DAR's renewals (annual) - 60  
    FG-13 renewal activities - 2 hours

Cost of DAR's applying and reapplying =  $(63 + 12) \times ((1 \times \$47.80) + (7.75 \times \$47.80) + (3.625 \times \$56.48) + (0.625 \times \$66.44)) = \$49,839$   
Time involved with DAR applying and reapplying =  $(63 + 12) \times (1 + 7.75 + 3.625 + 0.625) = 975$  hours

Cost of DAR's to be supervised =  $125 \times 27.4 \times \$47.80 = \$163,715$   
Time for DAR's to be supervised =  $125 \times 27.4 = 3,425$  hours

Cost of DAR's renewal =  $60 \times 2 \times \$47.80 = \$5,736$   
Time for DAR's renewal =  $60 \times 2 = 120$  hours

Total cost =  $\$49,839 + \$163,715 + \$5,736 = \$219,290$

Total time = 975 + 3,425 + 120 = 4,520 hours

Aircraft Registration existing pilots, new pilots, exiting instructors, and new instructors must register their aircraft - The relevant table is Table 36 on page 101 of the Regulatory Evaluation.

Cost to assign a registration number = \$12.00  
 Cost for a certificate of aircraft registration = \$19.17  
 # of aircraft (annual) = 4,064

Cost of aircraft registration - 4,064 x (\$12 + \$19.17) = \$126,675

Time for aircraft registration - Impossible to determine. The airman and aircraft registry contracts out part of costs of assigning a registration number and processing the aircraft registration certificate. Its bookkeeping is recorded as a certain cost per number assigned or certificate processed, and does not keep track of the amount of time that the contractor requires to do these tasks.

Assigning a special number - The relevant table is Table 37 on page 102 of the Regulatory Evaluation.

# of special numbers assigned (annual) - 15  
 Time to assign a special number - 1 hour by FG-10 personnel  
 Cost of assigning a special number = 15 x 1 x \$30.52 = \$458  
 Time for assigning a special number = 15 x 1 = 15 hours

Process the certification as to true copy of identification form - The relevant table is Table 38 on page 102 of the Regulatory Evaluation.

# of certification forms assigned (annual) - 10  
 Time to assign a certification form - 1 hour by FG-10 personnel  
 Cost of processing certification forms = 10 x 1 x \$30.52 = \$305  
 Time for assigning a special number = 10 x 1 = 10 hours

Summary of Aircraft Certification:

Activity	Time	Cost
Develop Consensus Standards	884.00	\$49,929
Appointing, supervising, and renewing a DAR	4,520	\$219,290
Aircraft Registration	N/A	\$126,675
Assigning a Special Number	15.00	\$458
True Copy of Identity	10.00	\$305
<b>Total</b>	<b>5,429</b>	<b>\$396,657</b>

### Pilot and Instructor Qualifications

Updating the General Aviation Inspector's Handbook:

This will all take place in 2004, hence, the average annual costs and hours will be one tenth of the 2004 costs. The relevant table is Table 39 on page 104 of the Regulatory Evaluation; the following activities must take place:

	Time	Grade step
Handbook drafting	120 hours	FG-14
Review by AFS-100	40 hours	FG-14
Oral Briefings	10 hours	FG-15

Review by AFS main office	10 hours	½ FG-14, ½ FG-15
Chief counsel office review	40 hours	FG-14

Total costs =  $(205 \times \$56.48 + 15 \times \$66.44)/10 = \$1,258$   
 Total time =  $(205 + 15)/10 = 22$  hours

Add Appendix on Sport Pilots to the Pilot Examiner's Handbook. This will also take place in 2004 and the costs and time are expected to be the same as updating the General Aviation Inspector's Handbook. The relevant table is Table 40 on page 104 of the Regulatory Evaluation.

Total costs =  $(205 \times \$56.48 + 15 \times \$66.44)/10 = \$1,258$   
 Total time =  $(205 + 15)/10 = 22$  hours

Development of Airmen Certification and Rating Application (ACRA) System for Sport Pilot - Modification of the airmen certification application FAA Form 8710-11 (the regulatory evaluation referenced FAA Form 8710-1) for use by sport pilot and sport pilot flight instructor certification and allow entry of information through ACRA. This will happen in 2004, hence, the average annual costs and hours will be one tenth of the 2004 costs. The relevant table is Table 41 on page 105 of the Regulatory Evaluation; the following activities must take place:

Design and develop ACRA program:

Total hours - M level - 1,090

Total hours - O level - 540

Revise FAA Form 8710-11 - total hours - M level - 10

Total costs =  $((1,090 + 10) \times \$47.36 + 540 \times \$33.84)/10 = \$7,037$

Total hours =  $(1,090 + 10 + 540)/10 = 164$  hours

Review and process original pilot applications (§ 61) - The relevant table is Table 42 on page 105 of the Regulatory Evaluation:

# of existing and new pilots (annual) - 2,970

Time to review and process the applications - 10 minutes

Total costs =  $2,970 \times (10/60) \times \$30.52 = \$15,107$

Total time =  $2,970 \times (10/60) = 495$  hours

§61.13 - Cost of reviewing and processing original flight instructor applications and renewals - The relevant table is Table 42 on page 105 of the Regulatory Evaluation.

# of existing instructors (annual) - 240

Time per instructor - 20 minutes

Cost to review and process =  $240 \times \$30.52 \times (1/3) = \$2,442$

Time to review and process =  $240 \times (1/3) = 80$  hours

Cost of airmen registration - The relevant table is Table 43 on page 106 of the Regulatory Evaluation:

# of airmen (existing pilots, new pilots, existing instructors, and new instructors) (annual) - 2,840

Cost to process each airmen certificate = \$4.84

Cost to process average annual number of airmen certificates =  $2,840 \times \$4.84 = \$134757$

Time to process certificates - Impossible to determine. The airman and aircraft registry contracts out part of costs of processing the airman registration certificate. Its bookkeeping is recorded as a certain cost per certificate processed, and does not keep track of the amount of time that the contractor requires to do these tasks.

Costs to Develop Practical Test Standards and Knowledge Test Standards to Test Airmen - The relevant table is Table E.16 on page 187 of the Regulatory Evaluation.

# of hours (annual) = 12

Cost to develop test standards = 12 x \$56.48 = \$678

Time to develop test standards = 12 hours

Summary of Pilot and Instructor Qualifications:

Activity	Time	Cost
Update G.A. Inspector's Handbook	22	\$1,258
Adding Appendix to Handbook	22	\$1,258
ACRA System for Sports Pilot	164	\$7,037
Review and Process - pilot	495	\$15,107
Review and Process - Instructor	80	\$2,442
Airmen Registration	N/A	\$13,757
Develop Practical Test Standards	12	\$678
<b>Total</b>	<b>795</b>	<b>\$41,537</b>

Maintenance Provisions

Develop supporting materials for repairmen certification and inspection requirements - The relevant table is Table 44 on page 107 of the Regulatory Evaluation.

# of hours required (annual) - 132

# of employees required = 1 FG-15 employee

Cost to develop supporting materials = 132 x \$66.44 = \$8,770

Time to develop supporting materials = 132 hours

Review and process form 8610-2 (part 65) - The relevant table is Table 45 on page 108 of the Regulatory Evaluation.

# of applications (annual) = 2,376

# of hours required = .25 hours (1 FG-14 employee)

Cost to review and process form = 2,376 x \$56.48 x .25 = \$33,549

Time to review and process form = 2,376 x .25 = 594 hours

The FAA will update the repairman paths in ACRA so that applicants for repairman light-sport aircraft can enter the 8610-2 information directly into ACRA. The relevant table is Table 46 on page 108 of the Regulatory Evaluation.

# of hours at M level for stand-alone program - 11

# of hours at O level for stand-alone program - 20

# of hours at M level to add functionality to the web based application - 30

# of hours at O level to add functionality to the web based application - 16

Total cost at M level = (11 + 30) x \$47.36 = \$1,942

Total cost at O level = (20 + 16) x \$33.84 = \$1,218



Total time at M level = 41 hours (annually)  
 Total time at O level = 36 hours (annually)

Summary of Maintenance Provisions:

Activity	Time	Cost
Supporting Materials	132	\$8,770
Review and process form 8610-2	594	\$33,549
Update ACRA	77	\$3,160
Total	803	\$45,479

**Miscellaneous**

Keep records to make sure that repairmen, DAR's, and DPE's have the proper training - The relevant table is Table 48 on page 112 of the Regulatory Evaluation.

# of respondents = 2,474

Time for each training record = 5 min. (FG-5 employees)

Cost of training records = 2,474 x (5/60) x \$18.29 = \$3,771

Time = 2474 x (5/60) = 206.2 hours

Accident Investigation Costs

This rule will register new two-seat ultralights and unregistered ultralight-like aircraft. Accidents of these vehicles will be investigated, leading to additional accident investigation costs. The relevant table is Table 49 on page 114 of the Regulatory Evaluation.

# of airplanes (annual) = 2,730

Cumulative # of airplanes (annual) = 19,540

Cumulative # of accidents (annual)= 32

Time per accident for investigation = 17.7 hours

Cost per accident for investigation = \$846

Annual Cost of accident investigation = 32 x \$846 = \$27,072

Annual Time for accident investigation = 32 x 17.7 = 566.4

New sport pilot DPE - Four FAA employees will need to review DPE applications. In the initial year of the rule, four FG-14's will need to meet four times the first year to review the applications, while in subsequent years, they will need to meet only once. Each meeting will last for three days. Three of these employees are based on Oklahoma City, so the costs need to accommodate transportation and per diem costs for one FAA employee.

All of this relates to paperwork as these four employees will be spending the time reviewing DPE applications. Total costs over 10 years sum to \$75,220, so, in an average year, costs sum to \$7,522. The time spent, in an average year, sums to 124.8 hours. The applicable table is Table E.13 on page 184 in the Regulatory Evaluation.

Placing DPE's - Several steps are involved, starting out with a FVG/FG-11 loading a list of DPE's into a database. When the light-sport program office has openings for DPE's, they will call an

employee for the top three people; the FAA assumes that all 300 DPE's will be placed in 2004, but only 30% will be placed thereafter.

All of these are paperwork costs. Total costs over 10 years sum to \$13,248, so, in an average year, costs sum to \$1,325. The time spent, in an average year, sums to 31 hours, and is calculated by multiplying the average number of DPE's applying (120) times 5 minutes (for entering the DPE applicant's test results into database) plus the average number of DPE's placed (57) times 20 minutes (to get information on top 3 DPE's for FSDO), and 120 minutes to do a quarterly purging of old DPE information. The applicable table is Table E.14 on page 185 of the Regulatory Evaluation.

Summary of Miscellaneous Costs

Activity	Time	Cost
Keep training records	206.19	\$3,771
Accident investigation costs	566.4	\$27,072
New sports pilot DPE	124.80	7,522
Placing DPE's	31.00	1,325
<b>Total</b>	<b>928.39</b>	<b>\$39,690</b>

Summary of all Burden Hours and Costs:

Category	Time	Cost
Aircraft Certification	5,429	\$397,027
Pilot and Instructor Qualifications	795	\$41,537
Maintenance	803	\$45,479
Miscellaneous	928.39	\$39,690
<b>TOTAL</b>	<b>7,955.39</b>	<b>\$523,733</b>

**15. Explain reasons for changes in burden, including the need for increase.**

This submission removes reported burden associated with this collection but previously approved by OMB under existing control numbers 2120-0018, 2120-0022, 2120-0033, and 2120-0042.

**16. For Collections of information whose results are planned to be published for statistical use, outline plans for tabulation, statistical analysis, etc.**

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.**

The FAA is seeking approval to not display the expiration date. Due to the new technologies used to automate the completion, processing, and retention of these forms we do not want to impose an unnecessary need for software modifications.

The subject FAA forms are also 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 interruption in services. It would not be cost effective to destroy unused, dated stock.

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

No exception to the certification statement of OMB Form 83-1 is requested.