

Supporting Statement For
Civil Aircraft Landing Permit System
HQ USAF/A3O-A
DD Form 2400/2401/2402
OMB 0701-0050

A. JUSTIFICATION

1. Need for the Information Collection

Authority and Necessity. The Federal Aviation Act of 1958 (PL 85-726, Section 1107) authorized government agencies to regulate public use of government-owned airfields. Military airfields are established and funded to support the level of operations necessary to support the national defense mission; therefore, civil aircraft access to military airfields is not comparable to civil airports. The military departments have made military airfield available to civil aircraft operators, primarily to conduct official government business; however, use for other purpose is also occasionally accommodated (AFI 10-1001, AR 95-2, and SECNAVINST 3770-IC). Access must be managed to ensure that security and operational integrity at the airfields are maintained and that the government is not held liable for accidents if the civil aircraft becomes involved in an accident or incident while using military airfields, facilities, and services. The collection of information is necessary to identify the aircraft operator and the aircraft to be operated; establish that purpose for use of military airfields; and protect the US Government against litigation.

2. Use of Information

The information provided by civil aircraft operators in applying for landing rights serves as the basis for approval/disapproval by the military departments. The military departments also use the information to advise installation commanders of approved users, aircraft registration numbers, and purpose for use. Copies of the approved form are returned to the applicant for use in obtaining final landing clearance from the installation commander.

3. Use of Technology

An electronic version of the form is available on the internet. The military departments do not currently have the capability to validate electronic signatures; therefore, the forms cannot be filed electronically. The burden involved in this collection of information consists of the time required for respondents to complete the three forms. The current forms are used by all military department to simplify application procedures for civil aircraft operators. With no centralized source for the information and the diversity in applicants, there is no improved information technology that would reduce the burden on the respondents.

4. Collection Duplication

Each military department requires respondents to file the forms to apply for use of its airfields; however, due to differences in missions and the legal nature of the DD Forms 2400 and 2402, a single filing is not practical. The insurance certification that commercial operators provide to the Department of Transportation (DOT) does not include the legal provisions of the DD Form 2400 to protect the Department of Defense against litigation. Non-commercial operators are not required to provide proof of insurance to DOT or civil airports. Landing permits and hold harmless agreements are not required by DOT or civil airports. No existing combination of sources provides the full range of information required in making application for civil aircraft use of a military airfield.

5. Burden on Small Business

There is no significant impact on small businesses. The information collected is the minimum required to allow civil aircraft to use military airfields. User must: identify themselves; indicate where they want to operate; state their purpose for use; list their aircraft; sign the DD Form 2402 agreeing to hold the government harmless, and notify their insurance company to complete the DD Form 2400 showing evidence of third party liability insurance coverage. The forms are provided at no cost to the individual or company, and when use is for official government business, there is no charge for use of the airfield.

6. Less Frequent Collections

If the information is not collected, the security, operational, and liability risks would preclude approval for civil aircraft use of military airfields. The purposes of use vary greatly. In some cases, the civil aircraft operator would suffer the greater consequences if access was denied. For example, scheduled air carriers use designated military airfields as weather alternates. Denied access would increase the air carriers operating cost because the additional fuel required to reach a more distant civil airport alternate would reduce payload capacity. On the other hand, there are military department charter civil aircraft to move passengers and cargo - denied access for these aircraft would adversely impact the military department's capability to transport troops, dependents, and cargo. The collection cannot be conducted less frequently. It must be accomplished as respondents make application. Frequency of application is based on insurance expiration or purpose of use of the military airfield.

7. Paperwork Reduction Act Guidelines

There are no special circumstances. The collection of information will be conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

A notice of the proposed collection was published September 30, 2010 (75 FR 60434) requesting comments. No comments were received. There was limited consultation with outside agencies or respondents representatives concerning collection of the required information. The

information collected is the minimum required by the military departments to authorize civil aircraft operations at military airfields. The type of information provided (insurance, coverage, user identification, purpose of use, and aircraft data) is minimal and readily available to the respondents. Queries in excess of 3000 users would generate a paperwork burden on all parties. Randomly selected customers were questioned during routine contact concerning clarity and format of forms. There were no negative responses.

9. Gifts or Payments

No payments or gifts will be made to respondents.

10. Confidentiality

While assurance of confidentiality is not stressed, we comply with the Privacy act of 1974 with regard to release of information to agencies outside the Department of Defense. Information is protected to extent permitted by law and related to the respondents in the Privacy Act statement area of each of the forms. Information collected remains on file with the specific approval authority.

11. Sensitive Questions

No sensitive questions are asked in this collection of information.

12. Respondent Burden and its Costs

The number of respondents is estimated at 1800 for DD form 2400 (completed by insurance company representative) and 1800 for DD form 2401 and 2402 (completed by the applicant). The estimated completion time for each form is ten minutes. Estimate is based on the immediate availability of the information requested; it generally does not require research. Due to the diversity in respondents, a common standard for computing value of time required to complete the forms is impractical. Frequency of information collection depends on insurance expiration and purpose for using the military airfield.

Number of Respondents:	5,400 (1800 each form)
Frequency of Response:	1
Total Annual Responses:	5,400
Burden per Response:	30 minutes (10 minutes each form)
Total Burden Hours:	2,700

13. Cost of Respondent Burden

There are no capital or start-up costs associated with this information collected. The cost of mailing the form is negligible.

14. Cost to the Federal Government

The estimated annual cost to the Department of Defense is \$196,666.

COST ESTIMATES USED:

DIRECT COSTS

	<u>SALARY</u>	<u>FRINGE BENEFITS</u>
1 GS-6 part time	8,569	2,922 (34.1% of \$8,569)
1 GS-9 full time	41,412	13,749 (33.2% of \$41,412)
1 GS-11 full time	53,238	18,207 (34.2% of \$53,238)
1 GS-13 part time	20,085	6,869 (34.2% of \$20,085)
1 GS-14 part time	<u>23,735</u>	<u>7,880 (33.2% of \$23,735)</u>
SUBTOTAL	\$147,039	\$49,627
TOTAL	\$196,666	

15. Reasons for Change in Burden

Extension of a previously approved collection.

16. Collections of Information

The information collected is not published for public review.

17. Expiration Date

Request approval to not display the OMB expiration date on the DD forms 2400, 2401, and 2402. These forms are used by individuals and corporations all over the world that retain blank copies and repeatedly copy them. Many respondents do not have the capability to get forms off the internet. It would save time and cost of postage and telephone calls for respondents if the form did not become unusable simply because of an expired approval date.

18. Certification Statement

No exceptions to the certification statement are being requested.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.