

## SUPPORTING STATEMENT

OMB 2120-0682

Final Rule: Certification of Repair Stations

### **Justification:**

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

Part 145 of Title 14, Code of Federal Regulations (14 CFR) prescribes the requirements for the issuance of repair station certificates and associated ratings to maintenance and alteration organizations. A regulatory project was initiated to revise 14 CFR part 145 to reflect the changes that have occurred in maintenance technology and methodology employed in the conduct of maintenance at repair stations.

In addition to the statutory and regulatory basis, the submittal and collection of this information is necessary to ensure that each repair station meets minimum acceptable standards.

This project is in support of Department of Transportation Strategic Goal of Systems approach to safety oversight.

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

The information requested is required from applicants who wish repair station certification. Applicants must submit the required data to the appropriate FAA district office for review and acceptance/approval. If the information is satisfactory, an onsite inspection is conducted. When all the FAR Part 145 requirements have been met an air agency certificate and repair station operations specifications with appropriate ratings and limitations are issued.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection.**

In accordance with the Government Paperwork Elimination Act, this rule allows repair station certificate holders and applicants to submit information or transact with the FAA 100% electronically. The rule also allows repair stations to maintain records electronically and use electronic signatures. For example, after a repair station has requested that the FAA change the capabilities listed on its operations specifications, the FAA will sign the amended operations

specifications using an electronic signature and transmit the operations specifications to the repair station. The repair station reviews the operations specifications, signs them with an electronic signature and electronically transmits them back to the FAA. Additionally, a repair station certificate holder is required to maintain FAA a repair station manual. The manual must be in a format acceptable to the FAA, which may include maintaining the manual on a local network or on CD-ROM.

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

We have reviewed the other public use reports and information and find no duplication. Also, we know of no other agency requiring this information from repair stations and repair station applicants for the purpose of certification or rating. The information collected is only available from the applicants applying for a repair station certificate and is not available from any other source.

**5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.**

The information submittal/collection burden is related to the size and the number of ratings for which a repair station is certificated. These requirements are the absolute minimum necessary to ensure effective compliance with Part 145. Small organizations would have a proportionally smaller burden under the rule.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

The consequences to the FAA's program activities if this information was not submitted would be the inability to determine whether or not an applicant met the criteria for certification, and there would be no basis for repair station standardization.

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

The collection of information is conducted in accordance in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2)(i)-(viii), with the exception that some records are maintained longer than three years. Application for Repair Station is maintained as long as the repair station remains certificated.

**8. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure,**

**or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

A notice for public comment was published in the Federal Register on November 22, 2011, document #2011-30089, page 72240.

One comment was received. The commenter requested that for clarity and to reduce confusion the block 2 “Reason for Submission” selection as currently states “Change in Ownership” be changed to “Sale or Transfer of Assets”. We evaluated the suggestion and do not concur for the following reason: As stated in 14 CFR 145.57(b) “If the holder of a repair station certificate sells or transfers its assets, the new owner must apply for an amended certificate in accordance with § 145.51.” The requirement for application is directed at the new (future) owner based on obtaining asset by sale or transfer from the current (previous) owner. The current owner may sell or transfer asset without obligation to make application for certification as the regulation does not require such. A person who obtains ownership (new owner) and chooses to be certificated must make application as required by § 145.51. The regulatory requirement is clear that a *new owner must apply*, as differentiated from the previous owner, thus it is a ‘change in ownership’ as stated on the form.

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

No payments or gifts are made to respondents.

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

Respondents have not been given an assurance of confidentiality

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

There are no questions of a sensitive nature.

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

Section 145.163 Training Requirements.

Each repair station certificate holder must submit for approval a training program for all personnel involved in maintenance of articles at the repair station. This was a one-time submittal for each repair station, that has now been completed. Other submittals occur if the applicant/operator proposes changes to the training program. The training program for individual repair stations differ since the size, complexity of operations, and number of employees vary from station to station. The FAA assumes that 4,625 repair stations currently have training programs.

The FAA assumes a supervisor will need to spend 2 hours for submitting changes to the program and that clerical personnel will spend approximately 6 hours annually filing training records (also known as records retention), totaling 8 hours.

Number of repair stations	4,625
Number of hours	<u>8</u>
Total burden	37,000

Estimated Cost for Training Requirements

Annually:

	Maint. Mgr.	Clerk	Hours	Total Cost
Submitting changes	2		2	\$67.32
Records retention		6	6	\$72.84
Totals per repair station			8	\$140.16
Total Cost			37,000	\$648,240.00

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

There are no additional start-up costs associated with this collection.

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

This cost is determined based on FAA primary maintenance inspector’s time to review and process applicants, renewals, and amendments to existing certificates. It also includes estimated time spent reviewing previously listed items in item 12. The typical inspector is a FG-13, having a fully loaded hourly wage of \$45.47.

Training	4,625	10	2	92,500	\$4,209,580
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**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.**

Since a significant portion of this information collection burden was a one-time preparation of manuals, the burden has decreased since the last submission. Manuals are only created once, and after that, only if changes are needed.

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

There are no plans to publish this information for statistical 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.**

We shall seek approval to not display the expiration date. FAA Form 8310-3 is a recurring form that is printed and stocked for continuous use. When the supply gets low, the form is automatically reprinted and stocked so that there will be no interruptions in services. The FAA therefore requests an exemption from placing the expiration date on the form.

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

There appears to be no exceptions.