

SUPPORTING STATEMENT

OMB-2120-0648

Part 65- Certification: Airmen Other Than Flight Crewmembers
Subpart C - Aircraft Dispatchers and
Appendix A to Part 65 - Aircraft Dispatcher Courses

Justification

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

Under the authority of Title 49 USC, Section 44703, (formerly the Federal Aviation Act of 1958, Section 602) specifically empowers the Secretary of Transportation to issue airmen certificates to properly qualified persons. Over the past 36 years there has been very little change in the aircraft dispatcher requirements contained in Part 65 although there have been technological advances in practices and training methods of the aviation industry.

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

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

Each applicant for an aircraft dispatcher certificate or FAA approval of an aircraft dispatcher course must comply with Part 65, Subpart C and Appendix A. Any paperwork is provided to the local Flight Standards District Office of the FAA which oversees the certificates and FAA approvals.

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.

The burden is associated with information and recordkeeping. The FAA has traditionally encouraged and is receptive to the use of automation to reduce burden. An applicant must pass a computerized administered knowledge test (Section 65.55) and a verbal practical test (Section 65.59).

In response to the Government Paperwork Elimination Act (GPEA), the agency allows 100% of this information to be submitted electronically.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose(s) described in 2 above.

We find no duplication. We know of no other agency collecting this information. The information collected is not available from any other source, it is only available from the applicant.

5. If the collection of information has a significant impact on a substantial number of small businesses or other small entities (item 5 of OMB Form 83-I), describe the methods used to minimize burden.

Requirements apply to individual applicants for aircraft dispatcher certificates and those who choose to train them. Any small school would have burdens in proportion to the size of their operation. For example, Section 65.65 requires a description of equipment and facilities and Section 65.63 requires a list of the instructors and their qualifications. A school with little equipment, one facility, and one or two instructors would have little to list.

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 collection of information for individual applicants for aircraft dispatcher certificates is a one time event. The collection is necessary for the FAA to determine qualification and the ability of the applicant to safely dispatch aircraft.

The collection of information for those who choose to train aircraft dispatcher applicants is to protect the applicants by assuring that they are properly trained. The frequency of the burden largely depends on the stability of the school. Their burden is increased if they develop inadequate course outlines that need revision often and train students who do not satisfactorily complete the FAA tests.

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

This collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2)(i)-(viii). Previously training records for aircraft dispatchers were maintained indefinitely. Section 65.70, Records, has now been revised to three years after graduation.

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 soliciting public comment was published in the *Federal Register* on December 22, 2011, vol. 76, #246, page 79753-79754. No comments were received.

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

There are no payments or gifts.

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

There are no such assurances.

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. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of this nature.

12. Provide estimates of the hour burden for 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 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.

The hour burden and the cost burden for the respondent is **4,679 hours** and **\$68,836.51**. There are approximately 82 total responses per year, including new applications, renewals and cancelations, recording of course results and outline and curriculum updates.

The following information are givens:

- There are currently **36 schools** nationwide (attending a school is just one of the ways a person may qualify to be an aircraft dispatcher, the school is not mandatory).
- Each school conducts an average of 4 classes per year of 90 days each.
- Each class has an average of 12 students.
- 90% of the students complete the test (ten percent of course graduates never take the test).
- $90\% \times 12 = 10.8 \times 4 = 43.2 \times 36 = 1,555$ **students** take the test each year.
- The salary of a technical specialist is calculated at \$70,000 per year = **\$33.65 per technical hour**.
- The salary of a clerical specialist is calculated at \$30,000 per year = **\$14.42 per clerical hour**.
- The number of applicants with desire to train students has increased from 5 or less per year to 30 per year because of the rule change which moved the commuter airlines of 10-30 passenger seats from part 135 to part 121 (known as the Commuter Rule and as Part 119).

FAA estimates **5 new applicants** per year will be the average. An average of **2 schools** per year would **renew or cancel**.

Each new applicant must submit:

Letter - one page, 30 minutes technical, 20 minutes clerical per year
Course outline - 30 pages, 8 technical hours, 2 clerical hours plus make copies = 2.5 clerical hours per year (rule use to require 3 copies, changed to 2)

Description of equipment and facilities - one page, 1 technical hour, 20 minutes clerical per year.

List of instructors and their qualifications - one page, 1 technical hour, 20 minutes clerical hour per year.

Totals	Technical hours	-10.5 x \$33.65 = \$353.33
	Clerical hours	<u>.35 x \$14.42 = \$ 50.47</u>
	14 hours	\$403.80

Renewals and Cancellations: The applicant sends another letter.

Revisions - are accomplished in the same way as original applications.

There are no specific forms.

Renewal applicants (due each 24 months) or applicants who wish to cancel authority:

Letter - one page, 20 minutes technical, 10 minutes clerical per year.

Totals	Technical hours	- .33 x \$33.65 = \$ 11.10
	Clerical hours	<u>.16 x \$14.42 = \$ 2.31</u>
	.49 hours	\$ 13.41

Revisions: Not considered a burden since FAA does not mandate any revisions.

65.63 - Aircraft Dispatcher Certification Courses: Application, Duration, And Other General Requirements.

An applicant for approval of an aircraft dispatcher course (an FAA approval is good for 24 months.)

Burden:

New applicants and renewals/cancellations: Five new applicants per year at a rate of 70 hours per year (\$33.65 per hour)

5 new applicants x 14 hours = **70 hrs** x \$33.65 per hour = **\$2,355.50**

Renewals/cancellations: Two renewal/cancellations per year at a rate of .5 hours per year (\$33.65 per hour)

2 renewal/cancellations x .5 hrs = **1 hr** x \$33.65 per hour = **\$33.65**

Notification to the Administrator of changing the ownership, name, location of an approved course:

We do not anticipate any change in ownership, name, or location of courses.

Total hours/cost:	70 hours	\$2,355.60
	<u>1 hour</u>	<u>\$ 33.65</u>
	71 hours	\$2,389.15

65.67 – Personnel

This is a new requirement. The language is adopted from Part 141, Pilot Schools. The ratio of students per instructor may not exceed 25 students for one instructor (currently the average class has 12 students). Within the last 24 calendar months at least 80 percent of the students or graduates who applied for testing within 90 days after graduation from the school must have passed the practical test on the first attempt as per Part 65.63.

Burden: Combined with the burden of 65.70 below. This would be recorded in the same student file and a one-line statement would be in the request for renewal letter of 65.63 above.

65.70 - Records

The school must keep a record of each student including chronological log of all instructors, subjects covered, and course examinations and results, for a period of not less than 3 years (used to be indefinitely). The course operator must also prepare, retain, and transmit to the Administrator not later than January 31 of each year a report containing the following information for the previous year: The names of all students graduated, together with the results of their aircraft dispatcher certification course. The names of all the students failed or withdrawn, together with results or reasons for withdrawal. Each student who successfully completes the approved aircraft dispatcher certification course shall be given a written statement of graduation.

Burden: 36 schools in any given year x 48 students per year per school x 1 record for each student x 1 clerical hour per student

$$36 \times 48 = 1,728 \text{ students} \times 1 \text{ record} = 1,728 \text{ records} \times 1 \text{ hr} = \mathbf{1,728 \text{ hrs}} \times \$14.42 \text{ (cl. hr)} = \mathbf{\$24,917.76}$$

Update of course curriculum and training outline: Each of the 36 aircraft dispatcher certification course operators/schools is required to update the course curriculum and training outline which will be a one-time occurrence of approximately 80 hours per operator/school at a cost of \$14.42 per hour.

Burden: 36 operators/schools x 80 hrs = **2,800 hrs.** x \$14.42 = **\$41,529.60**

SUMMARY OF HOURS AND COST BURDEN BY SECTION:

<u>Section</u>	<u>Hours per Year</u>	<u>Cost per Year</u>
65.63	71	\$ 2,389.15
65.67	0	.00
65.70	1,728	\$24,917.76
Update of curriculum	<u>2,880</u>	<u>\$41,529.60</u>
Totals	4,679	\$68,836.51

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

There are no additional costs not already identified in 12.

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

Currently there are 30 Dispatch Aviation Safety Inspectors overseeing 37 FAA approved dispatcher certification courses and 34 designated Aircraft Dispatch Examiners. Generally, these inspectors are GS-13 for a wage of \$43 per hour.

The 37 approved dispatcher certification courses are approved for a period 24 months and must be reevaluated before the course is approved to continue.

The FAA approves an average of 2 new aircraft dispatcher certification courses per year and an average of 2 courses cease business each year.

The average number of hours for each activity is:

Review new course	40 hours
Review continuing course	20 hours
Training New Designated Aircraft Dispatcher Examiners	18 hours/examiner
Recurrent Training for Designated Aircraft Dispatcher Examiners	10 hours
Oversight of course over year	16 hours
Administrative paperwork	37 schools
	<u>34 examiners</u>
	71

Yearly cost for overall FAR 65, subpart C dispatcher courses:

New course	2 x 40hr x \$43 =	\$ 3,440.00
Review existing course	17.5 x 20hr x \$43 =	\$15,050.00
Training new DADE	6 x 18hr x \$43 =	\$ 4,644.00
DADE recurrent training	34 x 10hr x \$43 =	\$14,620.00
Course Oversight	37 x 16hr x \$43 =	\$25,456.00
Testing applicants that do not attend FAA approved courses	10 x 8hr x \$43 =	\$ 3,440.00

Administrative paperwork	71 x 10hr x \$43=	<u>\$30,530.00</u>
		\$97,180.00

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

There are no changes from the previous submission.

16. For collections of information whose results are planned to be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

There is no publication plan.

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.

No such approval is being sought.

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

There are no exceptions.