

SUPPORTING STATEMENT

MARYLAND THREE AIRPORTS: ENHANCED SECURITY PROCEDURES AT CERTAIN AIRPORTS IN WASHINGTON, DC AREA

1652-0029

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information. (Annotate the CFR parts/sections affected).**

49 CFR part 1562 sets forth security measures that protect important national assets in the Washington, DC area and permit flight operations at the Maryland-Three airports (College Park Airport (CGS), Potomac Airfield (VKX), and Washington Executive/Hyde Field (W32)). TSA requires all individuals who operate an aircraft to or from these airports to submit personal information and fingerprints to TSA for a security threat assessment. The Maryland-Three regulations were adopted to permit flight operations that were prohibited at these airports after the terrorist attacks on September 11, 2001, and to enhance security of critical infrastructure and Federal government assets in the Washington, DC metropolitan area.

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

TSA requires aircraft operators to complete TSA Form No. 418 MD-3 PIN Application to obtain permission to fly out of the Maryland-Three airports. TSA collects the following information for the following uses:

- Personal information from applicants: full name; social security number; address; telephone number; date of birth; current and valid airman certificate number and medical certificate; and fingerprints. Applicants must also submit a list containing the aircraft make, model, and FAA registration number of each aircraft the applicant intends to operate to or from Maryland-Three airports.
- The applicant must submit this information either to the Maryland-Three airport from which the applicant wishes to fly, or directly to TSA via the TSA web site. The Personal Identification Number Issuance Form is available at on the TSA website. http://www.tsa.gov/interweb/assetlibrary/pin_issuance_form.pdf. Alternately, applicants can visit www.tsa.gov, click on "Travelers and Consumers," then "Air Travel," then "General Aviation," then "Maryland Three Airports," and finally click "PIN Issuance Form."
- Applicants must go to Metropolitan Washington Airports Authority at Ronald Reagan Washington National Airport for fingerprints to be taken. Applicants must go to one of two specified FAA Flight Standards District Offices (FSDO) so that FAA can verify the

applicant's airman certificates and determine if there is any FAA record of violation of certain FAA regulations.

- When the applicant is satisfactorily vetted, TSA will issue a Personal Identification Number (PIN) that permits the pilot to fly to or from, the Maryland-Three airports.

- 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. Also describe any consideration of using information technology to reduce burden. [Effective 03/22/01, your response must SPECIFICALLY reference the Government Paperwork Elimination Act (GPEA), which addresses electronic filing and recordkeeping, and what you are doing to adhere to it. You must explain how you will provide a fully electronic reporting option by October 2003, or an explanation of why this is not practicable.]**

The information currently is collected manually at various locations in the Washington metropolitan area. After fingerprints are taken at Ronald Reagan Washington National Airport, applicants' fingerprints are entered into an electronic database, which facilitates transmission of the information to TSA.

- 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 Item 2 above.**

TSA is unaware of other sources for this information.

- 5. If the collection of information has a significant impact on a substantial number of small businesses or other small entities (Item 5 of the Paperwork Reduction Act submission form), describe the methods used to minimize burden.**

This information collection will affect small businesses; however TSA does not believe this collection will have a significant impact on a substantial number of small businesses. General aviation airports themselves are small businesses, and typically employ or host other small businesses such as restaurants, maintenance shops, flight schools, and charter operations. Overall, this program allowing aircraft to fly to and from the Maryland-Three airports benefits these general aviation airports by providing business opportunities that otherwise would be unavailable.

- 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.**

Collecting this information is an integral part of the process that allows properly vetted pilots to fly to or from the Maryland-Three airports, while still protecting vital assets in the

National Capital Region. Without these measures, it is likely that the Maryland-Three airports would be closed.

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

The duration of the program is unknown. The Maryland-Three airport operators are required to maintain records relating to this program for more than three years (5 CFR 1320.5 (d)(2) (iv)). This is because once an applicant is vetted and has received a PIN, they have permission to fly to-from-between the subject airports indefinitely or until the permission is revoked. Therefore, in order to maintain current records of all the persons concerned, the Maryland-Three airports will have to maintain records of their vetted pilots indefinitely. This is in support of their own day-to-day operational requirements, as well as required for the periodic inspections of each airport by TSA headquarters personnel.

8. Describe efforts to consult 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. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d) soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

As required by 5 CFR 1320.8(d), TSA published in the Federal Register a 60-day notice soliciting comments on January 5, 2012 (77 FR 573), and a 30-day notice on March 21, 2012 (77 FR 16552). TSA did not receive comments in response to the notices.

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

TSA does not provide any gifts or payments to respondents.

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

TSA published a Systems of Records Notice on February 9, 2009 70 FR 33383 and a Privacy Impact Assessment on Notice on May 19, 2010 75 FR 28046-28051 to assure confidentiality.

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

TSA does not ask questions of a sensitive nature.

12. Provide estimates of hours burden of the collection of information.

The entering assumption is that TSA will issue 312 PINs annually.

Airports Hours/Year

<u>Hyde</u>	<u>Potomac</u>	<u>College Pk</u>
Review applicant paperwork (Base value x 1.0)		
112 (Note)	125	75
Answer miscellaneous requests for information regarding the program (Telephone, email, walk-ins, etc.) (Base value x 0.5)		
56	62.5	34.5
Processing applications, corresponding with TSA regarding applications		
104	52	130
Preparing for and undergoing monthly inspections		
13	15.6	20.8
Showing applicants the security brief		
52	10.4	260
Totals: 337	265.5	522.3
	Grand Total:	1,122.8

Note: Potomac Airfield has a highly automated website/information system that greatly reduces the day-to-day human action required to administer this program. The system cost Potomac Field over \$100,000 to put in place, a number that is not reflected in the above figures.

<u>Public (Per Individual PIN Application)</u>	Time (Hours)
Read program directions/familiarize self with the process	0.5
Travel time to/from the Maryland-3 airport to initiate process	4.0
Travel time to/from a Flight Standards District Office for the purpose of airman and medical certificate examination	4.0
Fill out required forms	0.3

Travel to time to/from Reagan National Airport for fingerprinting	4.0
Fingerprinting process	0.4
View security video at Maryland-3 airport	<u>0.7</u>

Total

13.9

Note: All PIN applicants must go to one of two Flight Standards District Offices (Glen Burnie, Maryland, or Washington Dulles International Airport) for their FAA credential check, and all fingerprinting is done at Ronald Reagan Washington National Airport. While most applicants are from the greater Washington, DC, area, applications are received from across the country.

Thus the estimated public burden is 4,337 hours annually. (312 x 13.9 hours)

Total overall burden for this collection is 5,461 hours. (1,122.8 + 4,337)

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

Using the framework created for question 12 above, the cost for this collection is as follows:

Airports

Cost to:

Potomac Airfield:	[337 hrs x \$30.00/hr]	\$10,110.00
College Park Airport:	[265.5 hrs x \$10.60/hr]	\$2,814.30
Washington Executive/Hyde Field:	[522.3 hrs x \$25.00/hr]	<u>\$13,057.50</u>

Total

\$25,981.80

Public (Cost to each individual applicant)

Travel to/from a Maryland-Three airport to initiate the process	\$24.00
Travel to/from specified FSDO for airman certificate check	\$24.00

Travel to/from Reagan National Airport for fingerprinting	\$24.00
Fingerprinting	<u>\$31.00</u>
Total per individual	\$103.00
Total for 312 applicants	\$32,136.00

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, and other expenses that would not have been incurred without this collection of information.

Annual Cost to Federal Government Agencies:

Transportation Security Administration:

Supervisor [156 hrs x \$56.75/hr]	\$8,853.00
Supervisor travel to inspections [\$.405/mi. x 80 miles x 12 insp/yr]	\$389.00
Program Manager [304 hrs x \$48/hr]	\$14,592.00
Program Mgr. Assistant/Record keeper [.2 hrs/app. x \$22/hr x 312 apps.]	\$1,372.80
Technician conducting background checks [.2 hrs/app x \$16.00/hr x 312 apps.]	\$998.00

Metropolitan Washington Airports Authority:

Fingerprinting technician at Reagan National Airport [.25 hrs/app. x \$16/hr x 312 applicants/year]	\$1,248.00
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Federal Aviation Administration Flight Standards District Office official who conducts FAA records checks on applicants [.25 hrs/app. x \$32/hr x 312 applicants/yr]	\$2,496.00
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Federal Bureau of Investigation:

Technician who conducts the criminal history background check on applicants' fingerprints [\$16/hr x .25 hr/app. x 312 applicants/yr]	<u>\$1,248.00</u>
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Total

\$31,196.00

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

TSA examined the processes of the program and using more accurate parameters arrived at more refined and accurate conclusions regarding hour and cost burden estimates to the public.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. 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.

TSA does not anticipate this information will be published.

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.

TSA is not seeking such approval.

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

No exceptions are requested.