

**Supporting Statement
Aircraft Registration Renewal
OMB 2120-0729**

A. Justification

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.

The FAA has changed the aircraft registration system from one in which registration did not expire to one in which aircraft registration will expire, and may be renewed, every three years, (Rulemaking: Re-registration and Renewal of Aircraft Registration, RIN: 2120-AI89, October 10, 2010). Aircraft that were issued continuous registration before the change have been assigned expiration dates by which they must apply for re-registration using the Aircraft Re-Registration Application, AC Form 8050-1A, (OMB Control No: 2120-0729). After three years and three months all registered aircraft will have been re-registered and will have been issued a Certificate of Aircraft Registration, AC Form 8050-3, with an expiration date. This confirmation of registration information will then continue every third year as Aircraft Registration Renewal because it would better fit the character of the process at that time. The information collection itself would remain unchanged. However, the form would be renamed at the Aircraft Registration Renewal Application, AC Form 8050-1B.

The re-registration of aircraft and renewal of aircraft registration every third year will provide the FAA, Aircraft Registration Branch with reasonably current information for registered aircraft. The updated and validated information will then be more reliable for the FAA and other agencies or system users who operate programs for safety, security, law enforcement or commercial purposes.

The information requested on the Aircraft Re-Registration Application consists of: the description of the aircraft, the name(s) of the aircraft owner(s), the mailing and physical addresses of the aircraft owner, and certification that the

aircraft owner still meets citizenship requirements, and the aircraft is not entered on the registry of another country.

This information is initially provided to the FAA when the aircraft is first registered on the Aircraft Registration Application, AC Form 8050-1, (assigned OMB Form Approval Number 2120-0042). Reporting changes to this information has been required by regulation (14 C.F.R. Section 14.41). The reporting of changes, or that no changes have occurred, had been prompted by sending aircraft owners a Triennial Aircraft Registration Report, AC Form 8050-73, to complete and return to the FAA Aircraft Registry. This was sent when three years had passed without any registration related activity. Unfortunately too many changes were left unreported. With enforcement procedures that were slow, expensive and often inconclusive, the decreasing accuracy and reliability of aircraft registration information became an issue for users of the aircraft registration system. The Triennial Aircraft Registration Report program and the Triennial Aircraft Registration Report, AC Form 8050-73, have been replaced by the Aircraft Re-Registration and Renewal program.

ANNEX 7 - Aircraft Nationality and Registration Marks, of the Convention on International Civil Aviation, as published by the International Civil Aviation Organization (ICAO), requires in Section 6 - Register of Nationality, Common and Registration Marks, that signatory countries maintain a current register showing for each aircraft registered by a country the information recorded in the certificate of registration. Section 7 - Certificate of Registration, provides a sample format that requires a description of the aircraft, the owner's name and address, and the registration date.

Title 49, U.S.C. Section 44101(a) provides that a person may operate an aircraft only when it is registered under section 44103 of that title. Section 44102(a) establishes as eligible an aircraft not registered under the laws of another country and owned by a person meeting certain U.S. citizenship requirements. Section 44103(a)(1) indicates that an eligible aircraft owner must make application for the aircraft to become registered.

14 C.F.R. Sections 47.5 and 31 prescribe that a person wishing to register an aircraft must submit an Application for Aircraft Registration, AC Form 8050-1. Section 47.7 prescribes that an applicant for aircraft registration must establish their

compliance with the applicable citizenship requirement. Section 47.11 requires each applicant to submit their recordable evidence of ownership. Section 47.41(b) requires aircraft owners to timely report events that terminate aircraft registration. Section 47.45 requires address changes to be reported within 30 days.

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.

The information collected on an Aircraft Re-Registration Application, AC Form 8050-1A will be used by the FAA to verify and update the aircraft registration information collected for an aircraft when it was first registered using the Aircraft Registration Application, AC Form 8050-1, (OMB No.2120-0042).

The updated registration database will then be used by the FAA to monitor and control U.S. airspace and to distribute safety notices and airworthiness directives to aircraft owners. Law enforcement and national security agencies will use the database to support drug interdiction and activities related to national security.

A Register of U.S. Civil Aircraft will be provided as required by ICAO agreement.

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.

The collection of this information through the Aircraft Re-Registration Application uses internet filing and electronic automation to the maximum extent possible. Every option to minimize the effort and resources expended by both our customers and our office has been implemented.

Six months before a group of aircraft registrations is due to expire; our computer will generate letters to notify the aircraft

owners of the approaching deadline. The notice will contain instructions on the process, directions to the re-registration page at the FAA Aircraft Registration web site, <http://registry.faa.gov/aircraft.asp> and a unique identification code for the owner can use to re-register on-line if all required information is current. The letter mailed to the registration address on file in the aircraft registration records is itself a test of the validity and current status of the address provided by the applicant.

Upon entering the aircraft's registration number and the unique code provided in the notice letter the web page will show aircraft owners the registration information in the system for their aircraft. If their registration information on file is still correct and current, they will be able to select a button to certify this to be true and pay the \$5.00 fee by credit card to complete re-registration of the aircraft. The computer will automatically place an image of the application form in the aircraft's record and generate a new Certificate of Aircraft Registration, AC Form 8050-3 to be mailed to the owner.

If the registered owner views the registration information and realizes that an update, like a new address, needs to be reported, then the owner may enter the updated information on the form, print it, sign it and mail it with the fee to the FAA, Aircraft Registry. The new address checked against a USPS address standardization program by a Registry examiner. If all is in order, the aircraft record is updated and a new Certificate of Aircraft Registration mailed to the owner.

Aircraft owners, without computer access, may contact the Aircraft Registry and request that a Re-Registration Application be mailed to them.

Approximately 70% of applicants are using the on-line process to re-register their aircraft. While the Aircraft Registry agrees that a secure way to enable electronic reporting and modification to aircraft records could be advantageous, the high value of many aircraft and the large revenue streams they support contrasted with the potential for nefarious actions that could prevent them from being flown causing their owners significant economic losses argue for prudence in moving forward with changes in this area. For the moment, being able to re-register on-line is encouraging aircraft owners to update address and make other changes that have been long overdue.

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.

The FAA, Aircraft Registry is the only agency identified in Statute and regulation to provide for the registration of all U.S. Civil Aircraft. Aircraft registration and use of national airspace systems is available to eligible U.S. Citizens or residents who register and maintain their registration in accord with statute and regulations. It is the responsibility of the owners to provide this information upon initial application and to report changes when they occur. Updating a mailing address also serves to confirm that registration is still desired. As such, any change requires contact with the owner.

One resource does present itself to help the registry remind aircraft owners of their obligations. Twice yearly, the Aircraft Registry compares its address list with the USPS address change reports. Letters are sent to the new addresses seeking to confirm that the change actually affected the aircraft owner, and if other registration related changes also occurred. The Registry responds to the notification from the owner, not just to the change in information. No other source can be substituted for communication with the aircraft owner.

This enables the Registry to provide a database for use by FAA and others that is reliable and actionable. They are the only source for current data on themselves and their aircraft.

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

Care was taken to minimize the burden of this change for all holders of aircraft registration. On-line re-registration for qualifying parties has proven popular. The triennial program that this replaces was an all manual process. The economic evaluation for the rule determined that small businesses or other small entities would not be significantly impacted.

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.

If the validation of information is not conducted at least every third year, the currency of aircraft registration information in the U.S. Civil Aircraft Register would deteriorate and become unreliable. This would put the FAA and the United States of America in violation of its international agreement with the International Civil Aviation Organization to maintain a current register of U.S. civil aircraft. Users of the system would lose a reliable information resource that would slow or complicate their aircraft related tasks.

Longer intervals have been considered. However, the error rates calculated for longer intervals were too high to allow characterization of the data as current and accurate. Shorter intervals provide minimal improvement in data quality. Three years was determined to be the best fit for user requirements versus costs and burdens.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with 1320.5(d)(2)(i)-(viii).

There are no circumstances that would cause information collection to be inconsistent with 1320.5(d)(2)(i)-(viii).

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) on data elements to be recorded, disclosed, or reported.

This change was prompted, to some extent, by users of the aircraft registration database, who have long been requesting greater data accuracy and currency. A meeting with a small group of government and industry organizations was held in March 2004, to discuss this issue. The meeting participants agreed that moving the Registry away from an essentially voluntary reporting system to a required re-registration and renewal was the only

reasonable method available to ensure a more accurate aircraft registry for all users.

A Notice of Proposed Rulemaking was published in the Federal Register on February 28, 2008, page 10701. The comment period ran through May 28, 2008, and comments were accepted for consideration through June 30, 2008.

Comments from the public and their dispositions are more fully addressed in the published rule. Many commenters lauded the FAA for trying to improve the accuracy and currency of the aircraft registration database. However, almost all expressed a preference that we find another way to achieve our goal. The commenters generally did not want to take on the additional cost and responsibility of re-registering their aircraft every three years.

To address commenter concerns the FAA made the following changes. The proposed process was streamlined and further automated to make compliance easier. To lower the possibility of owners missing the filing date, the compliance time was lengthened, and the number of notices sent to owners was increased. On-line filing, initially proposed only for renewal was added for re-registration. To assist interested parties with tracking the progress of an aircraft through re-registration the FAA posts lists on our web site indicating where aircraft are in the process of re-registration and if they are approaching expiration of their registration or cancellation of their N-number assignment. Additional time was added in the application processing and certificate delivery step to assure the Registry would be able to send new certificates in advance of expiration and assure timely arrival for timely applicants.

All sectors of the aviation community encouraged the FAA to implement computer and internet technology or automation to the maximum extent possible. They felt that the time they spent completing the requirement could be greatly reduced if they could apply on-line. Commenters also felt that this would save time and resources for the FAA as well. The FAA agreed and has implemented what electronic processing they could with the information and resources available.

A notice for public comments for this submission was published in the Federal Register on September 23, 2011, vol. 76, no. 185, page 59185. No comments were received.

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

There has not been any payment or gift to respondents.

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

No assurance of confidentiality is made to the public.

Respondents to the information collection are informed in accord with the Privacy Act of 1974 (PL 93-579). Aircraft records maintained by the FAA aircraft registry are public records open to inspection in accord with identified routine uses. One of the routine uses reads, "To prepare an Aircraft register in electronic media as required by ICAO agreement containing information on aircraft owners by name, address, N Number, and type aircraft, used for internal FAA safety program purposes and also available to the public (individuals, aviation organizations, direct mail advertisers, state and local governments, etc)." The privacy act and routine uses will be included with each Aircraft Re-registration Application.

11. Provide additional justification for any questions of a sensitive nature.

There are no questions of a sensitive nature.

12. Provide estimates of hour burden of the collection information. This information should: Provide number of respondents, frequency of response, annual burden, and an explanation of how the burden was estimated.

Re-registration and serial renewal applications are scheduled to occur once every third year.

The FAA estimated that approximately 72,996 aircraft (almost one third of active registered aircraft) will re-register or renew registration in an average year. Not all aircraft will need to be re-registered, or need to be renewed every third year. Many

aircraft will change their registration through the normal course of business. For example, before their scheduled re-registration or renewal date, an aircraft may be sold to another owner and receive a registration certificate outside of the re-registration/renewal process.

The time needed to complete the single page Aircraft Re-Registration Application, AC Form 8050-1A is estimated at 30 minutes. This was determined by comparison with the Aircraft Registration Application, AC Form 8050-1, (OMB 2120-0042) which has been determined to take 30 minutes to complete. The information collected on both forms is the same. Therefore, the FAA concludes that the re-registration/renewal application will take the same amount of time to complete. This amounts to an annual hourly burden of 36,498 hours (72,996 x 30 minutes each).

The value of 30 minutes of an aircraft owner's time is estimated to be \$18.60. Multiplying \$18.60 times 72,996, the number of aircraft to be re-registered during an average year, equals \$1,357,726 per year.

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

The re-registration of all registered U.S. civil aircraft is scheduled to take three years and will be followed by registration renewal at recurrent three year intervals. The net cost for this change over twenty years equals \$36,369,600 (or \$19,588,700 present value). During that time 1,308,900 aircraft re-registration and renewal actions are expected to take place. In an average year, 72,996 aircraft will be re-registered or renewed. For re-registration the average cost would be \$27.70 per aircraft for an annual cost of \$2,021,989(2007 dollars). For renewal the average cost would be \$24.42 per aircraft for an annual cost of \$1,782,562(2007 dollars).

However, there is a segment of aircraft ownership that lease their aircraft to operators. The FAA accepts some start-up and operating costs for these owners as provided by comments to the NPRM from these owners. The FAA believes that these owners will have access to an online tracking and registration system. This system will be provided and maintained by the registry thereby eliminating the need for these owners to acquire a separate

system. Therefore all aircraft ownership paperwork costs are captured in the average cost per airplane.

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

The FAA estimates that 72,996 aircraft will need to re-register or renew registration on a yearly basis. The cost to the FAA to send notices to aircraft owners and then to process the returned Aircraft Re-registration (or Renewal) Application forms is calculated by adding the estimated federal employee labor costs, contract labor costs, supplies, computer time, and postage. This totals \$9.10 for re-registration and \$5.82 for renewal. These numbers have been calculated to take into account an estimated 60% of forms that will be filed on-line, and 40% on paper. The average cost multiplied by the 72,996 responses totals \$664,264 per year for re-registration. This will be the annual cost to the Federal government during the first three years when this version of the form is in use for reregistration. In future years, under renewal, the cost will be \$424,837 per year.

The Aircraft Re-registration, with the follow-on Aircraft Registration Renewal every three years, replaces the Triennial Report Program (14 C.F.R. Part 47.51). The Triennial is a report form that has been sent to aircraft owners to complete and return whenever three years have past and there has been no registration related activity for the aircraft. Eliminating the annual cost to the FAA for sending triennial report forms and processing the resulting returns lowers the net annual increase in FAA processing costs due to re-registration and renewal. 70,000 triennial report forms were sent in an average year at a cost of \$1.63 each, for a total of \$114,100. 5,000 triennial forms are returned each year with address or other registration updates that must be processed at a cost of \$12.11 each, for a total of \$60,550. The annual triennial costs are \$114,100 plus \$60,550 equaling \$174,650. The overall processing cost for the Triennial is less than the proposed re-registration because the number of responses received under the Triennial is significantly lower than those required to respond under re-registration. Under the Triennial the Registry processed 5,000 per year compared to an estimated 73,000 under re-registration and renewal.

The estimated net annual increase in FAA processing costs due to Re-registration and Renewal to validate or update registration information is \$420,900 (\$595,540 less \$174,650) for re-registration and \$206,234 (\$380,884 less \$174,650) for renewals.

15. Explain reasons for program changes or adjustments reported in Items 13 or 14 of OMB Form 83-1.

Re-Registration of aircraft and registration renewal replaces the Triennial Aircraft Registration Report program. However, the differences are significant enough that re-registration/renewal has been presented as a new program. The accuracy and currency of the aircraft registration system had seriously deteriorated. The triennial program prompted aircraft owners to update their registration information. However, enforcement was by revocation of certificate procedures, which are slow, expensive for the government, and low priority. Too many people failed to take notice of their responsibilities over too long a time for the existing system to become workable.

Re-registration and renewal assigned an expiry date to all registered aircraft. Those wanting to continue operating their aircraft would have to come forward and confirm or update their registration information. Aircraft that are not re-registered will be canceled. This should eliminate approximately 100,000 out of service aircraft from the records and update many others. Repeating this every three years as registration renewal will maintain the registry at what is believed to be an acceptable level of accuracy and currency. The need, delay, and expense of registration enforcement actions have been greatly reduced. Being able to process re-registration on-line shows indications of being a factor that motivates aircraft owners to more readily report their registration changes as they occur. Just having an expiration date for registration is expected to help many owners remember to report changes more promptly than in the past.

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

The information collected on the Aircraft Re-Registration Application will not be published as an individual project or study. The information will be used to validate or update the information associated with individual aircraft as contained in the U.S. Civil Aircraft Register. The updates will be entered

into the register as they are received. The Register is available to the public as both a searchable database and as a downloadable comma delineated (CSV) data file on the FAA web site.

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 Registry has no objection with regard to displaying the expiration date.

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

There are no exceptions.

END