

Supporting Statement
Aircraft Re-Registration and 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.

On October 1, 2010, the FAA implemented new requirements for the 1) Re-registration of all aircraft on the Civil Aviation Register over a 39-month period, and after that, 2) Mandatory triennial renewal of aircraft registration. The primary reason for the effort was to acquire and then maintain more accurate data regarding aircraft and their owners. (Rulemaking: Re-registration and Renewal of Aircraft Registration, RIN: 2120-AI89). Aircraft that were issued continuous registration before the change have been assigned registration expiration dates and the owners are now required to apply for re-registration using the Aircraft Re-Registration Application, AC Form 8050-1A. After 39 months, all aircraft for which an owner has responded to the call for re-registration will have been re-registered and will have been issued a Certificate of Aircraft Registration (AC Form 8050-3) showing a registration expiration date. After the full cycle (for all civil aircraft) of re-registration is complete, the confirmation of registration information will continue as Aircraft Registration Renewal. The information collected will be the same, but the form used will be the Aircraft Registration Renewal Application, AC Form 8050-1B. There will be an eight-month overlap in the use of the two forms from May 2013 through December 2013.

The re-registration of aircraft and renewal of aircraft registration every third year will provide the FAA with more current information. The updated and validated information will be more reliable for the FAA and other agencies that operate programs for safety, security, law enforcement or commercial purposes.

The information requested on the Aircraft Re-Registration and Aircraft Registration Renewal Applications consists of: the description of the aircraft, the name(s) of the aircraft owner(s), the mailing and physical addresses of the aircraft owner, that the aircraft owner still meets citizenship requirements, and the aircraft is not entered on the registry of another country. The information above will have been provided to the FAA on the last received registration application for the aircraft. Requirements of 14 CFR Section 14.41 are that aircraft owners report any changes in the information. Prior to the re-registration program, aircraft owners were prompted to report changes by the Triennial Aircraft Registration Report, AC Form 8050-73. Unfortunately, many changes were unreported. With enforcement procedures being 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 (utilizing the Triennial Aircraft Registration Report, AC Form 8050-73) has 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 be 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) and Aircraft Registration Renewal Application (AC Form 8050-1B) will be used by the FAA to verify and update the aircraft registration information collected for an aircraft when it was first registered.

Aircraft registration information updates become part of the Aircraft Registration database that is used by the FAA to monitor and control U.S. airspace and to distribute safety notices and airworthiness directives to aircraft owners. The data is also used by law enforcement and national security agencies to support drug interdiction and to operate national security programs.

A Register of U.S. Civil Aircraft is provided to ICAO as required by international 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 the required information through the two above-mentioned forms uses internet filing and electronic automation to the maximum extent possible. Every option has been implemented to minimize the effort and resources expended by both the aviation public and the FAA Aircraft Registry.

Six months before a group of aircraft registrations is due to expire, the Registry's system will generate notices of the approaching deadline to mail to the aircraft owners. The notice

will contain instructions on the process, directions to the re-registration or renewal page on the FAA Aircraft Registration website, (<http://registry.faa.gov/aircraft.asp>) and a unique identification code the owner can use to re-register or renew online if all required information is current in the Registry database. 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, 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 certify the information to be accurate and pay the \$5.00 fee by credit card to complete re-registration or registration renewal for the aircraft. The Registry's document system will automatically place an image of the application form in the aircraft's record and generate a new Certificate of Aircraft Registration to be mailed to the owner.

If the registered owner views the registration information and realizes that a change of information (e.g. 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 is 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 is issued and mailed to the owner.

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

The Registry anticipates that approximately 70% of applicants will use the online process to re-register or renew the registration for their aircraft. While the FAA 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 online

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 is the only agency identified in statute and regulation that provides for the registration of U.S. Civil Aircraft. Use of the national airspace system is available to eligible U.S. citizens or residents who register and maintain their aircraft registration in accordance with statute and regulations. It is the responsibility of aircraft 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.

Compliance with requirements on aircraft owners to notify the FAA of any changes in registration information enables the Registry to provide a reliable and actionable database for use by FAA and others. Aircraft owners 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. Online re-registration for qualifying parties has proven popular. The FAA Aircraft Registry anticipates that level of popularity will continue for the registration renewal program. The triennial program that this replaces was an entirely manual process. The economic evaluation conducted in developing the new rule determined that small businesses and other small entities would not experience a significant negative impact by this collection of data.

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.

As a matter of record, the new rule is in place and aircraft owners are required by law to renew registration for their aircraft every three years. The consequence of non-compliance is the cancellation of the aircraft registration for the owner and additional work for Registry personnel.

Without a periodic mandatory update of aircraft registration information, that data in the U.S. Civil Aircraft Register would become unreliable. This would put the FAA and the United States in violation of its 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 resulting 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.

To a significant extent, this change was prompted by aircraft registration database users who have long requested greater data accuracy. In a meeting with a small group of government and industry organizations held in March 2004, the participants agreed that moving the Registry from an essentially voluntary

reporting system to a mandatory re-registration and renewal process 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 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. Online filing, initially proposed only for renewal was added for re-registration. To assist interested parties with tracking the progress of an aircraft through renewal 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 online. 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 60-day notice for public comments was published in the Federal Register on February 15, 2013, vol. 78, no. 32, page 11265. 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.

Due to the eight-month overlap of the Re-Registration and Registration Renewal programs for May through December of 2013, the collection burden will be greater than that for either of the programs before or after the overlap period.

The FAA estimated that approximately 72,996 aircraft (almost one third of active registered aircraft) will renew registration in an average year. Not all aircraft will need to be renewed every third year. Many aircraft will change their registration earlier through the normal course of business. For example, before its scheduled re-registration or renewal date, an aircraft may be sold to another owner and be registered utilizing AC Form 8050-1 (OMB 2120-0042).

The time needed to complete the single page of either form in this collection 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/renewed) during an average year equals \$1,357,726 per year. As previously stated, the overall burden in 2013 will increase due to overlap in the two programs. The table below reflects the anticipated rise and fall of the burden through 2015.

CY	1A	1B	Total	Hours	Rate	Cost
2012	72,996		72,996	0.5	\$37.20	\$1,357,726
2013	72,996	48,664	121,660	0.5	\$37.20	\$2,262,876
2014		72,996	72,996	0.5	\$37.20	\$1,357,726
2015		72,996	72,996	0.5	\$37.20	\$1,357,726

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

See response for #12 above.

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

The FAA estimates that registration renewal will be required for 72,996 aircraft each year. The cost to the FAA to send notices to aircraft owners and then to process the returned Aircraft Renewal Application forms is calculated by adding the estimated federal employee labor costs, contract labor costs, supplies, computer time, postage, and other overhead costs. This totals \$13.02 per paper re-registration or renewal application. At the current time, approximately 75% of re-registering owners are filing online. The Aircraft Registry anticipates the level to increase to 80% by CY 2014. Also allowing for an annual cost increase of 4%, the table below reflects projected government costs through CY 2015.

CY	1A	1B	Total	Paper	Rate	Cost
2012	72,996		72,996	25%	\$13.02	\$237,602
2013	72,996	48,664	121,660	25%	\$13.54	\$411,843
2014		72,996	72,996	20%	\$14.08	\$205,592
2015		72,996	72,996	20%	\$14.65	\$213,816

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

This submission adds the burden for the collection of aircraft registration renewal information via form 8050-1B. The information collected on both forms is identical. The total burden will reduce as the 8050-1A form is phased out in favor of the single 8050-1B form.

Three sets of numbers change regarding this collection.

1. The eight-month overlap in the usage of the two forms (8050-1A and 8050-1B) in CY 2013 produce a higher number of responses.
2. With a rising trend of owners completing the applications online, we project that filing of paper applications will decrease to 25% and then 20% by CY 2014. This adjustment affects only government cost.
3. For clarity, the government cost is shown for processing only paper form (not online submittals) and then utilizing the percentages above for the total.

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 and the Aircraft Registration Renewal 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.

At this time, the Registry has no objection to displaying the expiration date on the two data collection forms.

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.