

## SUPPORTING STATEMENT A

### National Transportation Safety Board Asiana Flight 214 Passenger Questionnaire NTSB Investigation No. DCA13MA120

#### A. JUSTIFICATION

##### 1. Circumstances that make the collection of information necessary.

The National Transportation Safety Board (NTSB) is required to investigate aviation accidents and incidents to determine their probable cause and make safety recommendations to prevent such events from occurring in the future. 49 United States Code (U.S.C.) §§ 1131, 1132; 49 Code of Federal Regulations (C.F.R). § 831.2. In addition, the NTSB makes any recommendations or takes steps to facilitate any safety improvements that may mitigate the effects of transportation accidents and incidents. For these purposes, the NTSB interviews witnesses who have first-hand information concerning such accidents, in order to conduct a complete review and ensure an accurate finding of probable cause. In addition, information the NTSB gathers from such collections may assist the NTSB in making safety recommendations or facilitating safety improvements in the aviation industry.

The NTSB needs to solicit information from passengers who survived the crash landing of Asiana flight 214 that occurred on July 6, 2013, in San Francisco, California. Specifically, the NTSB needs information from passengers onboard the aircraft concerning their understanding of the safety briefing prior to flight, the comprehensiveness of the briefing, the evacuation of the passengers from the aircraft, and other general questions concerning the circumstances of the accident. The NTSB seeks emergency approval for this information collection, because the agency's goal is to obtain the most accurate information possible. With a significant passage of time, witnesses' recollection of crash-related events may diminish or otherwise become less reliable than their current recollections. In addition, by using the questionnaire immediately, the NTSB will be able to obtain information to improve transportation safety.

##### 2. How, by whom, how frequently, and for what purpose the information will be used.

The NTSB's survival factors group assigned to NTSB Investigation No. DCA13MA120 will seek to collect information from all 291 passengers who survived the aircraft accident. The group will send a written questionnaire to all the passengers via postal mail or electronic mail. The questionnaire will also be available electronically, via a document in fillable portable document format (PDF). Respondents may transmit completed forms back to the NTSB by mail, facsimile, or electronic mail. The NTSB will only request feedback from each passenger one time on the form.

Information the NTSB gathers from completed questionnaires will assist the NTSB in achieving its objective of improving transportation safety by making safety recommendations and/or facilitating safety improvements. In this regard, in assessing passengers' understanding of the safety briefing prior to flight, the comprehensiveness of the briefing, the evacuation of the passengers from the aircraft, and other information concerning the circumstances of the accident, the NTSB may determine it can make safety recommendations to airline operators, the Federal

Aviation Administration (FAA), or other entities to increase the likelihood of survivability on the Boeing 777-200ER aircraft. Responses to the questionnaire are voluntary; however, they are important to the NTSB, as they will assist the NTSB in determining whether safety improvements could occur to increase the survivability rate, and decrease the rate of serious injury, in future accidents.

Respondents may submit completed questionnaires to the NTSB investigator listed on the questionnaire. The NTSB will consider all questionnaires the NTSB survival factors group receives prior to drafting its group factual report. Any questionnaires the NTSB receives after its draft report is finalized may be placed in the NTSB's public docket of information concerning NTSB Investigation No. DCA13MA120, but will not be considered for purposes of the accident report that will be issued by the NTSB Board. The NTSB does not plan to contact passengers to request completion of the questionnaires after the NTSB transmits the questionnaires. This information collection is a one-time collection, applicable only to NTSB Investigation No. DCA13MA120.

**3. Use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.**

To the greatest extent possible, the NTSB will transmit forms to passengers via electronic mail, and request completed forms be returned via electronic mail. Respondents may scan completed questionnaires and return them to the NTSB via electronic mail. In the alternative, respondents may receive questionnaires via electronic mail, but elect to transmit them to the NTSB via facsimile, postal mail, or hand delivery.

**4. Duplication.**

The NTSB is the only Federal agency charged with investigating aircraft accidents and incidents, and has priority over all other agencies in this role. 49 U.S.C. § 1131(a)(2)(A) and 49 C.F.R. § 831.5. Therefore, the NTSB will be the only agency distributing this passenger questionnaire to passengers. In accordance with 49 U.S.C. § 1132(c), the FAA is participating in NTSB Investigation No. DCA13MA120. However, in NTSB investigations, the NTSB does not permit the FAA to contact passengers to solicit information, unless such contact occurs under the direct supervision of the NTSB. The NTSB's priority over aircraft accident investigations ensures no duplicative collections of information from passengers will occur. As a result, the form the NTSB seeks to distribute to passengers is not duplicative of any other information collection.

**5. Small businesses or other small entities.**

The NTSB will only distribute the form to individuals. Therefore, solicitation of feedback via the form will not create a burden for any small business or entity.

**6. Consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

The NTSB's survival factors group for NTSB Investigation No. DCA13MA120 needs to obtain information from passengers in order to ascertain the circumstances of the accident, and

the events immediately following the accident. Such information will assist the NTSB in determining whether improvements could be made in the transportation industry to minimize the risk of passenger fatalities and injuries. The questionnaire is a means in which the NTSB can obtain such information.

**7. Special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.**

The NTSB requests expedited approval of the passenger form. The NTSB is unable to publish two notices in the Federal Register for solicitation of feedback from the public, pursuant to 5 C.F.R. part 1320, because such a delay would greatly hinder the NTSB's ability to obtain the information it needs from passengers. Passengers' memories will diminish with the passage of time. In addition, expedited collection of the information is important because the NTSB may discover information that indicates the necessity to pursue certain aspects of its investigation more completely than it may have originally planned.

**8. Federal Register publication.**

The NTSB requests emergency approval for this information collection; therefore, the NTSB has not published a Federal Register notice concerning this collection of information.

**9. Gifts or payments to respondents.**

The NTSB will not provide any gifts or payments to respondents for completion of the questionnaires.

**10. Assurance of confidentiality.**

The NTSB will not provide any assurance of confidentiality to respondents concerning the completed questionnaires. The NTSB plans to place completed questionnaires in the public docket for NTSB Investigation No. DCA13MA120.<sup>1</sup> The NTSB will not ask for respondents' names on the questionnaire. However, in the event a respondent lists his or her name or any contact information on the questionnaire, the NTSB will redact such information prior to placing the completed questionnaire in the public docket.

**11. Additional justification for questions of a sensitive nature.**

The questionnaire contains questions requesting each respondent's gender, age, height, weight, and whether the respondent wears corrective lenses. Such information is relevant to the NTSB's investigation of the survival factors the NTSB will consider, because a person's overall size, age, or gender may be relevant to the person's ability to assist with evacuation. Consistent with the NTSB's objective in gathering the information it requests on the questionnaire, the NTSB will use this information purely for informational purposes and determine whether the information can assist the NTSB in improving transportation safety. As clearly noted in the

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<sup>1</sup> An NTSB "public docket" for an accident investigation is "a collection of records from an accident investigation that the investigator who oversaw the investigation of that accident has deemed pertinent to determining the probable cause of the accident." 49 C.F.R. § 801.3.

questionnaire, all responses are voluntary, and if any respondent does not feel comfortable answering a question, he or she may opt to leave it blank. In addition, the questionnaire will not request the respondent provide his or her name.

**12. Estimate in hours of the burden of the collection of information.**

- The NTSB will request responses from the 291 passengers who survived the Asiana Airlines flight 214 aviation accident.
- The NTSB estimates only approximately 30 percent of questionnaires will be returned (i.e., approximately 88 responses). This estimate is based on prior, similar questionnaires, and the fact that the majority of potential respondents are overseas.
- The NTSB estimates completion of the questionnaire will take approximately 30 minutes. In reaching this estimate, the NTSB notes it has considered the fact that the NTSB will have the questionnaire translated into the respondent's native language. Respondents will not need to have the questionnaire translated from English, nor will they need to have their responses translated, because the NTSB has obtained the necessary resources to translate the responses.
- If the NTSB received completed questionnaires from 100 percent of respondents, the sum of annual reporting burden hours would be 146. For the 88 expected responses, the reporting burden hours is 44.

**13. Estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection.**

There are no record keeping, capital, start-up, or maintenance costs associated with this information collection.

**14. Estimates of annualized cost to the Federal government.**

The NTSB's cost for distributing the form will include the cost of postage or transmission of the questionnaire via an express mail courier service, if the NTSB opts to utilize this service, in situations in which the NTSB cannot transmit the form via electronic mail. The NTSB plans to make the questionnaire available in three languages: English, Chinese, and Korean. The cost of translation of the questionnaire into Chinese and Korean is approximately \$2,500.00. Costs for translating completed questionnaires from Chinese or Korean into English consist of \$0.24 per word. Many of the questions on the passenger questionnaire are questions in which the respondent will simply check a box to indicate their answer. Therefore, for translation of responses, the NTSB estimates it will spend approximately \$100 per questionnaire that requires translation. The total number of passengers of Korean or Chinese nationality amounts to approximately 214. Given the NTSB's estimate that approximately 30 percent of passengers receiving the questionnaire will respond, the NTSB expects to have approximately 64 passengers of Korean or Chinese nationality will respond; therefore, the NTSB anticipates the approximate cost of translating completed questionnaires into English for the NTSB's review will amount to \$6,400. The NTSB estimates the total cost of translating services, express mail transportation services, as well as staff time in reviewing the questionnaires for the survival factors group report will total \$15,000.

**15. Program changes or adjustments.**

No changes or adjustments will occur to any programs reported above, as this collection of information is new.

**16. Plans for tabulation and publication of responses.**

If the NTSB receives information in questionnaires that indicates a trend or similarity, the NTSB may state certain percentages in its reports concerning the accident. For example, the NTSB may total the number of forms it received, and of the total, mention what percentage of respondents heard and understood the safety briefing prior to take-off.

As described above, the NTSB plans to release completed passenger questionnaires in its public docket for NTSB Investigation No. DCA13MA120. The NTSB will not, however, request names or contact information on the questionnaires. If a respondent includes his or her name or contact information, the NTSB will redact such information prior to releasing the questionnaires on the public docket. In addition, the NTSB will not release the passenger manifest from the flight, pursuant to 49 U.S.C. § 1136. The NTSB does not believe it will be possible for anyone to identify specific passengers based on the NTSB's release of completed passenger questionnaires in the public docket for NTSB Investigation No. DCA13MA120. Nevertheless, the NTSB does not make any assurances of confidentiality concerning respondents' completed questionnaires. The instructions section of the questionnaire advises respondents of the NTSB's release, as follows: "[t]he NTSB may make completed questionnaires available to the public in its public docket for this investigation, in accordance with its obligation to release accident reports. However, the NTSB will redact all identifying information from each questionnaire prior to such release."

**17. Display of expiration date.**

The NTSB will display the expiration date of OMB approval. The NTSB does not request approval to refrain from displaying the expiration date of OMB approval for the questionnaire.

**18. Exception to certification statement in Form 83-I.**

The NTSB does not request any exception to the certification statement contained in Item 19 of OMB Form 83-I.