#### **SUPPORTING STATEMENT**

#### OMB #2120-0739

#### Qualification, Service, and Use of Crewmembers and Aircraft Dispatchers

#### **Justification**

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

This project provides direct support for the Safety Strategic Goal in the Department of Transportation for fiscal years 2012-2016 (i.e., to bring a department-wide focus on reducing transportation-related fatalities and injuries and to address the most serious safety risks in aviation).

This project also directly supports the FAA's strategic goal to provide to the next level of safety, by achieving the lowest possible accident rate and always improving safety, all users of our aviation system can arrive safely at their destinations.

This rulemaking is promulgated under the authority described in 49 U.S.C. 106(f), which vests final authority in the Administrator for carrying out all functions, powers, and duties of the administration relating to the promulgation of regulations and rules, and 44701(a)(5), which requires the Administrator to promulgate regulations and minimum standards for other practices, methods, and procedures necessary for safety in air commerce and national security. Also, the Airline Safety and Federal Aviation Administration Extension Act of 2010 (Public Law 111-216) specifically required the FAA to conduct rulemaking to ensure that all flightcrew members receive ground training and flight training in recognizing and avoiding stalls, recovering from stalls, and recognizing and avoiding upset of an aircraft, as well as the proper techniques to recover from upset. Public Law 111-216 also directed the FAA to require air carriers to develop remedial training programs for flightcrew members who have demonstrated performance deficiencies or experienced failures in the training environment.

The information collection is required for the full implementation of the regulations promulgated under this authority. As further described in response to question 12 herein, the agency expects respondents to modify training programs, training courseware, and operating manuals to comply with the final rule requirements.

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

This request for clearance reflects requirements necessary under 14 CFR part 121 to ensure safety-of-flight by making certain that adequate training is obtained and maintained by those who operate under this part of the regulation. The FAA will review the respondents' training programs, training courseware, and operating manuals through routine certification, inspection and surveillance of certificate holders operating under part 121 to ensure compliance and adherence to regulations and, where necessary, to take enforcement action.

# 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.

In accordance with the Government Paperwork Elimination Act (GPEA), the FAA encourages the use of automation and electronic media for the gathering, storage, presentation, review, and transmission of all requests, records, reports, tests, or statements required by this final rule with the provision that such automation or electronic media has adequate provision for security (i.e., that such submissions may not be altered after review and acceptance by the FAA) and that the systems or applications are compatible with the systems or applications used by the FAA.

The amendments to part 121 in the final rule do not affect the current methods of reporting, gathering, storing, presenting, reviewing, and transmitting all requests, records, reports, tests, or statements required by part 121. This recordkeeping includes different types of media such as electronic and paper records (e.g., courseware, training records, and manuals).

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 have reviewed other FAA public-use reports and find no duplication. Also, the FAA knows of no other agency collecting the same information. The information sought is particular to the training and qualification requirements for certificate holders operating under the provisions of 14 CFR part 121. The information necessary is available from that certificate holder only, and is not available from any other source.

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.

The FAA believes that the collection of information associated with this rule will not impact a substantial number of small businesses or other small entities; however, the material published in conjunction with this rule is informative and explanatory with regards to the requirements, and an applicant for a certificate will be guided through the administrative requirements by the local FAA principal operations inspector assigned to that air carrier and, if necessary, by representatives of the Washington headquarters staff.

As stated in the Regulatory Flexibility Act analysis published with the SNPRM, the FAA expects only minimal new training documentation, reporting, and record-keeping compliance requirements. These burdens affect all operators and are not unique to small entities.

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

As discussed above, the FAA will review the respondents' training programs, training courseware and operating manuals through routine certification, inspection and surveillance of certificate holders operating under part 121 to ensure compliance and adherence to regulations. If a new applicant seeking to conduct operations under part 121 is not able to produce the documents for approval to show compliance with the requirements of the rule, the FAA will not be able to issue the applicant an air carrier certificate. Similarly, if existing certificate holders do not continue to provide this information for review and make it available for inspection upon request of the FAA, the FAA will not be able to determine if the certificate holder continues to administer the program according to the approval.

Current regulations already provide that the information required by this final rule be maintained in training programs and crewmember manuals. These current regulations are:

- § 121.135 Manual contents
- § 121.403 Training Program Curriculum
- § 121.405 Training Program and Revision: Initial and Final Approval

### 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).

The information collection requirements related to the final rule provisions, including those responsive to the mandate in § 208 of Public Law 111-216, are consistent with 5 CFR 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 record keeping, disclosure, or reporting format (if any) and on the data elements to be recorded, disclosed, or reported.

The requirements in the final rule were proposed in a supplemental notice of proposed rulemaking, published in the <u>Federal Register</u> on January 12, 2009, vol. 74, no. 7, pages 1280-1453, and the public was encouraged to comment.

Commenters to the proposed rule noted that the provisions specifically addressing preparation, approval, and contents of crewmember and dispatcher manuals would generally result in significant time and cost to revise current manuals. Commenters also noted that proposed requirements regarding collection and retention of crewmember and dispatcher records were excessive and unnecessary. Commenters further noted that paperwork required by the proposed requirements for approval and amendment of crewmember and dispatcher training programs were burdensome for both air carriers and FAA personnel. Commenters also identified programming costs related to SNPRM provisions (e.g. new training intervals, new evaluation intervals and new designations for check personnel) and claimed that while these costs would be substantial, they were not included in the agency's cost analysis. The FAA has not adopted these proposed requirements in this final rule.

The final rule contains discrete additional training and evaluation requirements (e.g. prevention and recovery from stall, prevention and recovery of upset, recovery from bounced landing and training in manual handling skills). The FAA did not receive any comments regarding recording or recordkeeping requirements for the proposed provisions adopted in the final rule.

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

There are no monetary considerations for this collection of information.

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

The respondents have been given no assurance of confidentiality.

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 a sensitive nature.

#### 12. Provide estimates of the hour burden for the collection of information.

These amendments to part 121 set out prerequisites and levy requirements that must be met by certificate holders operating in accordance with part 121 and by those individuals who serve in given capacities for those certificate holders. The final rule adds paperwork in the curriculums for part 121 operator training programs, training courseware, and operating manuals.

Air carriers will incur costs for the following groups of provisions on the effective date of the final rule, which is 120 days after the publication of the rule:

- Personnel identified as flight attendants (§ 121.392),
- Communication records for domestic and flag operations (§ 121.711), and
- Approval of Advanced Qualification Program (§ 121.909).

Although compliance with the provisions on qualification and training for instructors and check airmen who serve in FSTDs (§§ 121.411, 121.412, 121.413, 121.414) is required 5 years after the effective date, the FAA believes that air carriers will start to accrue paperwork costs 4 years after the effective date.

Air carriers will incur paperwork costs for the following groups of provisions no later than five years and 120 days after the publication of the rule:

- Training equipment other than FSTDs approved under part 60 (§§ 121.403(b)(2), 121.408),
- Pilot monitoring (§§121.409,121.544, Appendix H),
- Remedial training (§§ 121.415(h) and § 121.415(i)), and
- Extended envelope flight training maneuvers and procedures (§§121.407(e),121.423, 121.424, 121.427(d)(1)(i), 121.433(e)), Extended envelope ground training subjects (§§ 121.419(a)(2), 121.427), Runway safety maneuvers and procedures (Appendices E and F) and Crosswind maneuvers including wind gusts (Appendices E and F).

We now provide a brief discussion of each provision that adds paperwork to part 121 operations. We also discuss the FAA's estimate for the additional hours an operator takes to create the paperwork for each provision, the category of the paperwork required for each provision, along with the number of pages each provision add.

We estimate the date that the FAA believes paperwork costs will start to accrue. In most cases, because the actual implementation of the provisions will vary by operator, we used the date on which compliance with the provision is required in order to estimate paperwork costs. Compliance is required either on the effective date (120 days after the final rule is published in the Federal Register) or 5 years after the effective date. Although we assume that a majority of the burdens will not accrue for five years, because the FAA is encouraging air carriers to comply with the provisions of the rule as soon as possible, the FAA is seeking approval of these collections now to help facilitate early compliance. The FAA will adjust these burdens in the next renewal for this collection to adequately account for those carriers who chose to comply

before the 5 year compliance period. Lastly, we summarize the information presented and provide a table with the costs by each group of provisions.

The FAA estimated the paperwork costs for these provisions by multiplying the hourly rate of the person responsible by the number of estimated hours to update the training program, training courseware, or operating manual. We then multiplied these training costs by the number of part 121 operators affected by the provision. The Flight Standards Service (AFS) of the FAA provided average hourly times and the number of additional pages of paperwork the final rule will add.<sup>1</sup>

#### Fraud and falsification (§ 121.9)

Although fraud is currently prohibited by criminal statute, the FAA has added language prohibiting fraud and falsification to part 121 to emphasize the importance of truthful statements. This provision prohibits fraudulent or intentionally false statements in, or a known omission from, any record or report that is kept, made, or used to show compliance with this part, or to exercise any privileges under this chapter. This provision enhances FAA enforcement options by allowing the agency to take certificate action or assess a civil penalty against a person for making a fraudulent or intentional false statement. Compliance with this provision is required 120 days after the date of publication of the final rule in the Federal Register. The FAA estimates that there are no costs for this provision.

#### Personnel identified as flight attendants (§ 121.392)

This provision prohibits operators from identifying any person as a flight attendant if that person has not completed all flight attendant training and qualification. Individuals who have not completed all flight attendant training and qualification requirements must be clearly identified (e.g. via an announcement, by wearing civilian clothes, or not wearing a uniform). This provision may reduce confusion of passengers during an emergency situation on a flight who might otherwise presume that these individuals are fully qualified flight attendants.

To satisfy this requirement, operators must revise flight attendant manuals to reflect the new procedures. Compliance with this provision is required on the effective date of the final rule, 120 days after the date of publication in the Federal Register. The FAA estimates that, for a certificate holder operating under part 121, one page of the content of the flight attendant operating manual will require revision for each affected operator. The FAA estimates that this provision will add a total of \$7,710 for all affected operators.

#### Proficiency checks for PICs (§ 121.441(a)(1)(ii))

Currently, in accordance with §§ 121.433(d) and 121.441(a)(1), a PIC who serves on more than one aircraft type must complete either recurrent flight training or a proficiency check on each aircraft type every 12 months. To ensure PICs operating multiple aircraft types maintain proficiency on each aircraft type, the final rule amends § 121.441(a)(1) by requiring PICs who

<sup>&</sup>lt;sup>1</sup> The FAA includes the number of pages in its calculation to estimate the hours required to update the training program, training courseware, or operating manuals.

fly more than one aircraft type to receive a proficiency check in each aircraft type flown at the existing 12-month recurrent training interval. The FAA expects that any recurrent training program updates needed to reflect this change are minimal and are subsumed in the paperwork costs for the collective amendments made to the recurrent training provisions in this final rule. Compliance with new paragraph (a)(1)(ii) of this provision is required 5 years and 120 days after the date of publication of the final rule in the Federal Register, consistent with the SNPRM. The FAA estimates that there are no costs for this provision.

Related aircraft differences training (§§ 121.400, 121.418, 121.434, 121.439, 121.441)

Section 121.400 discusses the applicability and terms used in the final rule and adds no costs.

The remaining cost relieving provisions allow pilots, who train in aircraft types that do not have a common type certificate, to take credit for common tasks that pilots are already trained in. An example of this would be the Airbus airplanes that have cockpit commonality, and through related aircraft difference training, these provisions could provide cost savings to operators.

Although air carriers are not required to request a related aircraft designation as permitted by § 121.418(b), if they seek the designation and receive it, it may provide relief from the training requirements in §§ 121.419, 121.424 and 121.425 as well as the operating experience, recent experience and proficiency check requirements in §§ 121.434, 121.439 and 121.441 respectively. <sup>2</sup> Lowering the cost for air carriers to adopt new aircraft types could speed up the entry of the newer aircraft types into the fleet. However, the magnitude of any cost savings would be based on operator's future actions and therefore we do not attempt to quantify the savings.

These provisions are effective 120 days after the date of publication of the final rule in the Federal Register. The FAA estimates that there are no costs for these provisions.

*Training equipment other than FSTDs approved under part 60 (§§ 121.408, 121.403(b)(2))* 

Current regulations do not provide specific requirements for training equipment other than FSTDs, but the regulations generally require training equipment to be adequate. Section 121.408 states that the FAA must approve training equipment (e.g. cockpit procedures trainers, door/exit trainers, water survival equipment, etc.) used to functionally replicate aircraft equipment required to be used as part of the approved training program. This provision also requires air carriers to develop a system for recording training equipment deficiencies for inclusion in the air carrier's manual system. Compliance with this provision is required 5 years and 120 days after date of publication of the final rule in the Federal Register. This provision will require an additional five pages in each air carrier's General Operating manual.

Section 121.403(b)(2) requires that operators provide the FAA with a list of all training devices or training aids that the certificate holder will use. Compliance with this provision is required 5 years and 120 days after date of publication of the final rule in the Federal Register. The FAA

<sup>&</sup>lt;sup>2</sup> In order to seek approval of related aircraft differences training for flightcrew members, a certificate holder must submit a request for related aircraft designation to the Administrator, and obtain approval of that request.

estimates that, for a certificate holder operating under part 121, one page of the content of the air carrier's approved training program will require revision for each affected operator.

The FAA estimates that these provisions will add a total of \$154,193 for all affected operators.

Approval of FSTDs (§ 121.407)

This provision conforms the requirements for evaluation, qualification, and maintenance of FSTDs used in part 121 to existing part 60 requirements, by providing a reference to part 60 in part 121 and adding a new paragraph consistent with the requirement in § 121.423 to use an FSTD for extended envelope training. This provision therefore provides clarification regarding part 60 requirements that currently apply to part 121 training. Compliance with new paragraph (e) of this provision is required 5 years and 120 days after date of publication of the final rule in the Federal Register, because the new extended envelope training required by § 121.423 is not required until such time. The FAA estimates that there are no compliance or paperwork costs for this provision.

*Pilot monitoring (§§ 121.544, 121.409, Appendix H)* 

Section 121.409 and Appendix H require training on pilot monitoring to be incorporated into an existing requirement for scenario based training. Section 121.544 also establishes an operational requirement for pilots to follow air carrier procedures regarding pilot monitoring. Existing regulations do not explicitly address development of pilot monitoring skills. However, pilot monitoring duties are currently included in the operating manual required by § 121.133. Air carriers will need to review this existing operating manual to ensure it reflects the pilot monitoring responsibilities set forth in 121.544. These provisions reinforce active monitoring skills to the pilot not flying by requiring the inclusion of active pilot monitoring skills during line oriented flight training (LOFT). Appendix H currently requires all part 121 pilots in training to complete a four hour LOFT in a simulator. The FAA believes that the active monitoring skills of this provision can be accomplished in the current four hour LOFT requirements.

Compliance with pilot monitoring is required 5 years and 120 days after date of publication of the final rule in the Federal Register. The new burden will be reviewing and updating the training courseware and the air carrier's approved training program to ensure that both reflect this new requirement. The FAA estimates that §§ 121.544 and 121.409 will add 20 pages to each air carrier's training courseware and one page to each air carrier's approved training program.

The FAA estimates that these provisions will add a total of \$773,860 (\$696,763 + \$77,097) for all affected operators.

Remedial training (§§ 121.415(h) and § 121.415(i))

These provisions require certificate holders to incorporate methods for remedial training and tracking for pilots who have experienced multiple failures or demonstrated performance deficiencies in the training or checking environment into approved training programs. Although

the FAA expects that industry already addresses deficiencies in pilot performance in accordance with existing agency guidance, these final rule provisions create a requirement for compliance. Examples of tracking include extra line checks, extra procedures, etc. to make sure the pilot trains to his or her deficiencies.

In August 2010, Congress directed the FAA to ensure air carriers develop remedial training programs for flight crew members who have demonstrated performance deficiencies or experienced failures in the training environment. The final rule remedial training requirements are intended to reflect the congressional direction and existing agency guidance. We assume air carriers training under subparts N and O are already implementing the recommendations in the agency's guidance material based on information received during FAA inspections in 2009 as part of the Call to Action to Enhance Airline Safety. Also, since subpart Y already requires an AQP to include such a system, we assume no additional cost to carriers training under AQP. Therefore, we only estimate the paperwork burden for incorporating the process, methods and requirements for the remedial training program into the approved training programs.

Compliance with these provisions is required 5 years and 120 days after the final rule is published. The FAA estimates that, for a certificate holder operating under part 121, 20 pages will be added to each air carrier's courseware and one page to each air carrier's training program.

The FAA estimates that these provisions will add a total of \$913,213 (\$836,116 + \$77,097) for all affected operators.

Communication records for domestic and flag operations (§ 121.711)

This provision clarifies the information that must be included in the record of communications between the pilot and aircraft dispatcher based on a legal interpretation of the current requirement in § 121.711. This provision also clarifies the recordkeeping requirement by defining "en route" for purposes of this section and applies the requirement to all flight crew/dispatch communications made using a two-way communication system required in accordance with § 121.99. It is current industry practice to record all en route communications as defined by the final rule, therefore the FAA does not estimate any additional costs to maintain the records. To ensure compliance with this provision, the FAA expects that operators will review their existing pilot and dispatcher operating manuals, and if not already addressed, amend these manuals to incorporate this procedure. We estimate that this is a one-time burden that will likely result in one page being added to both the pilot and dispatcher operating manuals. Compliance with this provision is required 120 days after date of publication of the final rule in the Federal Register.

The FAA estimates that, for a certificate holder operating under part 121, one page will be added to each air carrier's pilot operating manual and one page will be added to each air carrier's aircraft dispatcher operating manual.

The FAA estimates that this provision will add a total of \$7,710 for all affected operators.

Qualification and Training for instructors and check airman who serve in FSTDs (§§ 121.411, 121.412, 121.413, 121.414, Appendix H)

Sections 121.411 and 121.412 add simple technical changes, such as the deletion of obsolete dates, deletion of obsolete duty positions (such as flight navigator), and correction of terminology. These modifications do not affect costs or result in any additional paperwork burden.

Appendix H currently includes robust requirements for simulator training for check airman and instructors. These final rule provisions will add some additional check airman (simulator) and flight instructor (simulator) initial, transition and recurrent training curriculum items to current requirements in existing §§ 121.413 and 121.414 training to ensure comprehensive check airman and flight instructor understanding of new training tasks in the final rule and the limitations of simulation. When the FAA introduced the extended envelope requirements, we felt it was important to train simulator instructors on how to train pilots for these events. Although this requirement adds recurrent training subjects to instructor training, the FAA believes the additional time can be incorporated into the time currently required to train check pilots and instructors. The addition of these minimal curriculum requirements will not require additional program hour requirements and therefore have minimal to no costs.

Although compliance with this provision is required at 5 years and 120 days, the FAA believes that operators will start accruing paperwork costs 4 years after date of publication of the final rule in the Federal Register. The FAA estimates for a certificate holder operating under part 121, §§ 121.413 and 121.414, these provisions will each add 40 pages to each air carrier's training courseware and two pages to each air carrier's approved training program.

The FAA estimates that these provisions will add a total of \$1,199,338 (\$1,045,145 + \$154,193) for all affected operators.

Extended envelope flight training maneuvers and procedures (§§ 121.423, 121.407(e), 121.424, 121.427(d)(1)(i), 121.433(e)), Extended envelope ground training subjects (§§ 121.419(a)(2), 121.427), Runway safety maneuvers and procedures (Appendices E and F) and Crosswind maneuvers including wind gusts (Appendices E and F).

Amendments to §121.407 provide a reference in part 121 to part 60 and the new extended envelope training requirement in § 121.423, but does not add requirements; therefore there is no paperwork cost.

Sections 121.419 and 121.427 will require operators to revise current initial, transition, upgrade or recurrent ground training to include training for extended envelope flight training maneuvers and procedures, as well as additional training regarding runway safety and crosswind takeoffs and landings with gusts. The FAA estimates that, for a certificate holder operating under part 121, §§ 121.419 and 121.427 will add 20 pages to each air carrier's training courseware and one page, for each provision (two pages total) to each air carrier's approved training program.

Section 121.423 details new extended envelope flight training and provides the interval for recurrent training. The FAA estimates that, for a certificate holder operating under part 121, there is a one-time burden of 20 pages will be added to each air carrier's training courseware,

one page to each air carrier's approved training program, and 20 pages to each air carrier's flightcrew operating manual.

Section 121.424 revises revise current initial, transition and upgrade flight training curriculum/courseware to include flight training and evaluation, as appropriate. The FAA estimates that, for a certificate holder operating under part 121, there is a one-time burden of 20 pages will be added to each air carrier's training courseware, one page to each air carrier's approved training program, and 20 pages to each air carrier's pilots operating manual.

Section 121.433 revises the requirements to ensure that a proficiency check may not be substituted for the extended envelope training required by §121.423 and has paperwork which was included in the § 121.423 cost estimate.

Compliance with the extended envelope training maneuvers and procedures as well as the crosswind maneuvers with gusts and runway safety procedures, is required 5 years and 120 days after date of publication of the final rule in the Federal Register.

The FAA estimates that these provisions will add a total of \$5,105,740 (\$4,180,579 + \$925,161) for all affected operators.

Approval of Qualification Standards Document for Operators with AQP (§ 121.909)

Although the final rule does not make any changes to § 121.909, when the new N and O training requirements are published, operators that use AQP will have to review their training programs to make sure they address the new N and O requirements (recovery from stall, upset recovery, etc.) and possibly revise their Qualifications Standards Document required by § 121.909 during this process.

This is a cost that only applies to operators that use AQP for pilot training because they are the only ones who must meet the § 121.909 requirements. This provision does not apply to operators who train their pilots under a traditional N and O training program.

The FAA estimates that, for a certificate holder using AQP to conduct training, this provision will add 5 pages to each air carrier's Qualification Standards Document. For each of the 22 operators with an approved AQP, it will take an instructor 9.6 hours and a tech writer 40.0 hours to complete the five pages required to comply with this provision.

The FAA estimates that these provisions will add a total of \$85,195 (\$44,324 + \$40,871) for operators who train their pilots under AQP.

Summary of Estimated Paperwork Costs by Objective Grouping

The FAA estimates the total paperwork costs for the final rule will be about \$8.2 million in 2012 dollars. The table shows the details of the number of pages required for each objective grouping of final rule provisions, the estimated date that the FAA believes paperwork costs will start to accrue, the number hours required for each provision, the person conducting the paperwork

review, their salary, and the total costs for each provision. For some of these provisions, technical writers and instructors will both be needed to complete the paperwork requirements. We have reflected the labor costs of the technical writers and instructors for these provisions in separate rows for the objective groupings in the table below.

The FAA encourages early paperwork compliance and will work with all operators to ensure compliance and approval is achieved as soon as practicable, but no later than 5 years after the effective date of the final rule.

	Date When	Paperwork Requirements								
	FAA Assumed	Number of Pages				Paper	Number		Total	Total
	Costs Start	Training	Training	Operating	Number	Work	Of	Wage	Number	Cost
Final Rule Requirement	To Accrue	Program	Courseware	Manual	Of Hours	Person	Operators	(2012 \$)	Of Pages	(2012 \$)
Fraud and falsification (§ 121.9)	120 days	0	0	0	0.0	n/a	83	\$0.00	0	\$0
Personnel identified as flight attendants (§ 121.392)	120 days	0	0	1	2.0	Tech Writer	83	\$46.44	83	\$7,710
Proficiency checks for PICs (§ 121.441(a)(1)(ii))	5 years and 120 days	0	0	0	0.0	n/a	83	\$0.00	0	\$0
Related aircraft differences training (§§ 121.400, 121.418, 121.434, 121.439, 121.441)	120 Days	0	0	0	0.0	n/a	83	\$0.00	0	\$0
Training equipment other than FSTDs approved under part 60 (§§ 121.403(b)(2), 121.408)	5 years and 120 days	1	0	5	40.0	Tech Writer	83	\$46.44	498	\$154,193
Approval of FSTDs (§ 121.407)	5 years and 120 days	0	0	0	0.0	n/a	83	\$0.00	0	\$0
		0	20	0	40.0	Instructor	83	\$209.87	1,660	\$696,763
Pilot monitoring (§§121.409,121.544, Appendix H)	5 years and 120 days	1	0	0	20.0	Tech Writer	83	\$46.44	83	\$77,097
		0	20	0	48.0	Instructor	83	\$209.87	1,660	\$836,116
Remedial training (§§ 121.415(h) and § 121.415(i))	5 years and 120 days	1	0	0	20.0	Tech Writer	83	\$46.44	83	\$77,097
Communication records for domestic and flag operations (§ 121.711)	120 days	0	0	2	2.0	Tech Writer	83	\$46.44	166	\$7,710
Qualifications and Training for instructors and check airmen who serve in FSTDs		0	40	0	60.0	Instructor	83	\$209.87	3320	\$1,045,145
(§§ 121.411, 121.412, 121.413, 121.414)	4 years	2	0	0	40.0	Tech Writer	83	\$46.44	166	\$154,193
Extended envelope flight training maneuvers and procedures (§§121.407(e),121.423,		0	60	0	240.0	Instructor	83	\$209.87	4980	\$4,180,579
121.424, 121.427(d)(1)(i), 121.433(e)), Extended envelope ground training subjects (§§ 121.419(a)(2), 121.427), Runway safety maneuvers and procedures (Appendices E and										
F) and Crosswind maneuvers including wind gusts (Appendices E and F).	5 years and 120 days	4	0	40	240.0	Tech Writer	83	\$46.44	3652	\$925,161
	,	0	0	0	9.6	Instructor	22	\$209.87	0	\$44,324
Approval of Advanced Qualification Program (§ 121.909)	120 Days	5	0	0	40.0	Tech Writer	22	\$46.44	110	\$40,871
Total					801.6				16,461	\$8,246,958

The summary of burden reflects 935 total responses. FAA estimated the number of responses by counting the total number of respondents (83 operators), and multiplying that number by the number of provisions that require action/response by the operator to the FAA. Specifically 83 operators will respond 11 times (7 new requirements that will include a total of 11 responses from each operator in recordkeeping burden). In addition, under section 121.909 22 operators will be required to respond, for an additional 1 response each. Thus, the total number of responses is:

(83 respondents X 11 responses each = 913 responses) + (22 respondents X 1 response = 22 responses) = 935 total responses.

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

The FAA believes there are no annual costs to respondents or record keepers resulting from the collection of information. There is only a one time initial paperwork cost to respondents for labor time (which is accounted for in the 802 hour burden estimate). The monetary cost of this time burden is detailed by provision in the response to question 12. The paperwork updates require no additional material costs.

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

The recordkeeping requirements for the public respondents imposed by this rule will not add costs to the Federal Government. The final rule reporting requirements do not require the Federal Government to:

- Create any special data entry or information collection systems,
- Update any current data entry or information collection systems, or
- Hire additional staff to review or inspect the additional paperwork the final rule adds.

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

This is a new collection therefore, it is a program change.

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 plan for tabulation or publication.

### 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 because this information collection does not involve the use of a standard form to submit information to the agency. This information collection requires air carriers to update training programs, courseware and operating manuals. Air carriers will be required to maintain these documents for display and inspection upon request of the FAA.

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

The agency certifies compliance with all provisions of the Paperwork Reduction Act. There are no exceptions.