

Department of Transportation

SUPPORTING STATEMENT
2120-XXXX

INTRODUCTION

This information collection is submitted to the Office of Management and Budget (OMB) to request a three-year approval clearance for the information collection entitled Disclosure of Seat Dimensions to Facilitate the Use of Child Safety Seats on Airplanes During Passenger-Carrying Operations.

Part A. Justification

1. Circumstances that make collection of information necessary.

Section 412 of the FAA Modernization and Reform Act of 2012 (Public Law 112-95) specifically required the Federal Aviation Administration (FAA) to conduct rulemaking “[T]o require each air carrier operating under part 121 of title 14, Code of Federal Regulations, to post on the Internet Web site of the air carrier the maximum dimensions of a child safety seat that can be used on each aircraft operated by the air carrier to enable passengers to determine which child safety seats can be used on those aircraft.” The FAA proposes to require air carriers to make available on their Web sites the width of the widest passenger seat in each class of service for each make, model and series of airplane used in passenger-carrying operations. If finalized as proposed, this rule amends 14 CFR 121.311.

2. How, by whom, and for what purpose is the information used.

This rule is intended to facilitate the use of child restraint systems onboard airplanes. If finalized as proposed, this rule would provide greater information to caregivers to help them determine whether a particular child restraint system will fit in an airplane seat.

3. Extent of automated information collection.

Section 412 of Public Law 112-95 requires that all air carriers provide this required information on their Internet Web sites. Therefore, this information collection will be fully electronic.

4. Efforts to identify duplication.

The FAA is the only Federal agency that requires this information to be provided to the public. Therefore, there is no duplication of any other requirements.

5. Efforts to minimize the burden on small businesses.

The Small Business Administration small entity size standard for air carriers is 1,500

employees or less. Of the 58 part 121 air carriers analyzed for this rule, 25 are classified as large entities and 20 as small entities. Employment statistics for the 13 remaining air carriers are not available; however for purposes of the regulatory flexibility analysis, it is assumed that these 13 air carriers are small entities (for a total of 33 small entities). Since a majority of the air carriers analyzed for this rule are classified as small entities, the rule is expected to impact a substantial number of small entities.

Calendar year (CY) 2012 operating revenues were compared to the estimated costs during year 1 of the rule. Of the 33 air carriers considered to be small entities, operating revenue data were only available for 23 of them. For the 23 air carriers reporting financial data to the Bureau of Transportation Statistics, the estimated cost of this rule was no greater than .03 percent of any carrier's CY 2012 operating revenues. The FAA believes a compliance cost of .03 percent relative to annual revenue is not a significant economic impact.

Therefore, as provided in section 605(b) of the Regulatory Flexibility Act, the head of the FAA certifies that this rulemaking will not result in a significant economic impact on a substantial number of small entities.

6. Impact of less frequent collection of information.

The vast majority of this burden occurs on a one-time basis as air carriers initially provide information on their Web sites in order to comply with the regulation. After initial implementation, the only time air carriers would need to update their Web sites after initial implementation would be when a new airplane make, model, or series is introduced to an air carrier's fleet, or when an air carrier replaces the widest seats installed on an existing airplane make, model, or series with wider or narrower seats.

7. Special circumstances.

There are no special circumstances associated with this information collection. The only time air carriers would need to update their Web sites after initial implementation would be when a new airplane make, model, or series is introduced to an air carrier's fleet, or when an air carrier replaces the widest seats installed on an existing airplane make, model, or series with wider or narrower seats. Therefore, an air carrier may be required to provide information to its Web site more often than quarterly if that carrier were to introduce new aircraft to its fleet more often than quarterly. This information collection is collected on an as-needed basis and is contingent on business practices.

8. Compliance with 5 CFR 1320.8:

A notice of proposed rulemaking was published in the Federal Register on April 1, 2014, vol. 79, no. 62, pages 18212-18223. Comments received regarding the public burden will be addressed during the final rule stage.

9. Payments or gifts to respondents.

No payments or gifts were provided to respondents.

10. Assurance of confidentiality:

Air carriers disclose information to third parties, including the public, on their Web sites. The FAA does not collect any information. No assurances of confidentiality are provided in this information collection.

11. Justification for collection of sensitive information:

Questions of a sensitive nature are not included in this information collection.

12. Estimate of burden hours for information requested:

This rule requires Part 121 passenger air carriers to post seat dimension information to their Web sites. The labor required to comply with this rule is for the collection of information. Thus the labor hours estimated for the regulatory evaluation is the paperwork hour burden. To estimate labor hours, the FAA used assumptions for job skills and labor hours from the regulatory analysis¹ of the Department of Transportation's (DOT's) recent "Enhancing Airline Passenger Protections"² rule. One provision of the DOT's rule required an air carrier to post on its Web site a tarmac delay plan and a customer commitment plan, and the FAA believes that the skills and labor hours estimated for this task are similar to those required to post information about seat dimensions. In the DOT rule, it was estimated that it would take a computer programmer and a supervisor/manager a combined total of eight hours to post the customer commitment plan and tarmac delay plan to an air carrier's Web site. The FAA is using the DOT estimate of eight hours as the foundation for the time required to perform the work required to comply with the seat dimension disclosure rule.

To provide a range of costs, the FAA prepared a low- and high-case estimate for labor hours.³ To account for these costs, labor hours are separated into two categories: staff hours and management hours. A description of each category follows:

Staff Hours: Staff hours consist of two components. Component one is base hours. It is a change in the assumption for base hours that distinguishes the low-case estimate from that of the high case. The second component is variable hours. Variable hours are based on a carrier's fleet attributes and do not fluctuate between the low and high case.

Staff Base Hours: Base hours are dependent upon whether an air carrier does or does not have a link to fleet information at the time the rule is implemented. In the low case, for those air carriers that already have a link to fleet information at the time the rule goes into effect, it is assumed that 8.0 base hours are required to bring a Web site into compliance. For air carriers that

¹ Final Regulatory Analysis, Consumer Rulemaking: Enhancing Airline Passenger Protections II at p. 43. This document can be found in Docket No. DOT-OST-2010-0140 or at <http://www.regulations.gov/#!documentDetail;D=DOT-OST-2010-0140-2046>.

² 76 FR 23110, April 25, 2011.

³ To estimate costs for this rule, labor hours required by staff and management were determined. Staff hours are assumed to be performed by BLS Job Series 15-1140 - Database and Systems Administrators and Network Architects. Management hours are performed by BLS Job Series 15-3021 - Computer and Information Systems Managers. Fully-burdened wage rates for each of these job series were calculated

do not have a link to fleet information at the time the rule is implemented, base hours are assumed to total 16.0.

In the high case, staff base hours are assumed to be twice that of the low case. Thus, for air carriers that already have a link to fleet information, base hours are assumed to be 16.0. For those air carriers without a link to fleet information at the time of the rule’s implementation, base hours are assumed to total 32.0.

Staff Variable Hours: Variable hours fluctuate according to the number of different make, model, and series of aircraft an air carrier has in its fleet. (For an A319-100, the make is Airbus; the model is 319; the series is 100.) The rationale for the variable hour component is that it builds in additional time (and thus costs) for air carriers that have multiple aircraft types compared to those that operate only one make, model, and series of aircraft. The variable hour component assumes an additional 0.5 hours of staff time beyond the base hour component is required for gathering and analyzing seat dimension information for each make, model, and series of aircraft in an air carrier’s fleet. Unlike base hours, which have separate assumptions for the low and high case, variable hours are fixed and are the same on an individual carrier basis in both the low and high case.

Management Hours: Management oversight is required by each air carrier to verify that the Web site has been updated to reflect accurate information. In terms of hours, it is assumed that each of the 59 Web sites will require two hours of management review to verify accuracy of data. The assumption for management hours is the same for both the low and high case.

DERIVATION OF PAPERWORK HOUR BURDEN ESTIMATE

Tables 1, 2, and 3 are provided to show derivation of labor hours on an individual carrier basis. A brief description of each table follows:

Table 1: This table shows the assumptions for staff and management hours that are used to calculate total labor hours required for an individual air carrier to comply with the seat dimension disclosure rule. (Again, the labor hours required to bring an air carrier’s Web site into compliance is equal to the paperwork hour burden). Assumptions for estimating labor hours are provided for both the low and high case.

Table 1

Assumptions for Paperwork Hours Required Per Website for an Air Carrier to Comply with Seat Dimension Disclosure Rule						
Does Carrier Have Web Link to Fleet Info?	Low Case			High Case		
	Staff Hours		Mgmt Hours	Staff Hours		Mgmt Hours
	Base	Variable*		Base	Variable	
Yes	8.0	0.5	2	16.0	same as low case	
No	16.0	0.5	2	32.0		

*Variable Staff Hours: The count of make, model, and series in an air carrier’s fleet is multiplied by 0.5 variable hours. The estimate is the same for both cases.

Table 2: Table 2 shows the low case estimate for paperwork burden hours based on the each carrier’s count of make, model, and series of aircraft in its fleet. The estimate is derived

using an individual carrier’s attributes as described in Table 1. Table 2 provides the paperwork hour burden for a carrier with a count of up to 17 make, model, and series of aircraft (the most of any carrier at the time of this rulemaking).

Table 2
Year 1 - Low Case
Estimate of Paperwork Hours Required for an Individual Carrier to Comply with the
Seat Dimension Disclosure Rule *

Count of Aircraft Make, Model and Series	Does Carrier Already Have a Web Link to Fleet Information?							
	Yes				No			
	Staff Hours		Mgmt. Hours	Total Hours	Staff Hours		Mgmt. Hours	Total Hours
	Base	Variable			Base	Variable		
1	8	0.5	2	10.5	16	0.5	2	18.5
2	8	1.0	2	11.0	16	1.0	2	19.0
3	8	1.5	2	11.5	16	1.5	2	19.5
4	8	2.0	2	12.0	16	2.0	2	20.0
5	8	2.5	2	12.5	16	2.5	2	20.5
6	8	3.0	2	13.0	16	3.0	2	21.0
7	8	3.5	2	13.5	16	3.5	2	21.5
8	8	4.0	2	14.0	16	4.0	2	22.0
9	8	4.5	2	14.5	16	4.5	2	22.5
10	8	5.0	2	15.0	16	5.0	2	23.0
11	8	5.5	2	15.5	16	5.5	2	23.5
12	8	6.0	2	16.0	16	6.0	2	24.0
13	8	6.5	2	16.5	16	6.5	2	24.5
14	8	7.0	2	17.0	16	7.0	2	25.0
15	8	7.5	2	17.5	16	7.5	2	25.5
16	8	8.0	2	18.0	16	8.0	2	26.0
17	8	8.5	2	18.5	16	8.5	2	26.5

* Note that staff variable hours and management hours are the same in both the low and high case.

Table 3: Table 3 is similar to Table 2 except that total hours reflects the labor hour assumptions for the high case.

Table 3
Year 1 - High Case
Estimate of Paperwork Hours Required for an Individual Carrier to Comply with the
Seat Dimension Disclosure Rule *

Count of Aircraft Make, Model and Series	Does Carrier Already Have a Web Link to Fleet Information?							
	Yes				No			
	Staff Hours		Mgmt. Hours	Total Hours	Staff Hours		Mgmt. Hours	Total Hours
	Base	Variable			Base	Variable		
1	16	0.5	2	18.5	32	0.5	2	34.5
2	16	1.0	2	19.0	32	1.0	2	35.0
3	16	1.5	2	19.5	32	1.5	2	35.5
4	16	2.0	2	20.0	32	2.0	2	36.0
5	16	2.5	2	20.5	32	2.5	2	36.5
6	16	3.0	2	21.0	32	3.0	2	37.0
7	16	3.5	2	21.5	32	3.5	2	37.5
8	16	4.0	2	22.0	32	4.0	2	38.0
9	16	4.5	2	22.5	32	4.5	2	38.5
10	16	5.0	2	23.0	32	5.0	2	39.0
11	16	5.5	2	23.5	32	5.5	2	39.5
12	16	6.0	2	24.0	32	6.0	2	40.0
13	16	6.5	2	24.5	32	6.5	2	40.5
14	16	7.0	2	25.0	32	7.0	2	41.0
15	16	7.5	2	25.5	32	7.5	2	41.5
16	16	8.0	2	26.0	32	8.0	2	42.0
17	16	8.5	2	26.5	32	8.5	2	42.5

* Note that staff variable hours and management hours are the same in both the low and high case.

Example: Paperwork Hour Burden Computation for an Individual Air Carrier:

For illustrative purposes, the computation of the paperwork hour burden for a single carrier is provided using the following assumptions from the low case: 1) the carrier had a Web link to fleet information at the time of the rule’s implementation, and 2) the carrier has a fleet of seven different make, model, and series of aircraft (Table 3, column 1). Looking at Table 2, a carrier with these attributes requires 13.5 hours to comply with the rule in Year 1. The equation used to calculate the 13.5 labor hours is below:

$$[8 \text{ staff base hrs} + (7 \text{ make/model/series} * 0.5 \text{ staff variable hrs}) + 2 \text{ mgmt hrs}] = 13.5 \text{ hrs}$$

Paperwork Burden Hours -- Summed Across All Carriers:

Tables 4, 5, and 6 are provided to show the sum of total hours required for all air carriers to comply with the seat dimension disclosure rule. A description of each of these tables follows:

Table 4: Table 4 is a matrix showing the classification of the 59 affected Web sites by the following criteria:

- 1) Whether the carrier's Web site provides a link to information about the fleet?
- 2) The count of make, model, and series of aircraft in an individual carrier's fleet.
- 3) Whether the air carrier performs scheduled or nonscheduled operations? (Note: This attribute is required only for the purpose of calculating costs and does not have a bearing on the computation of labor hours).

Table 4
Websites Categorized by Count of Aircraft Make, Model and Series of Aircraft
in an Individual Air Carrier's Fleet*

# of Aircraft Make, Model, and Series in a Carrier's Fleet	Does Carrier Have a Link to Fleet Information?						Total Websites
	Yes			No			
	Sked	Nonsked	Total	Sked	Nonsked	Total	
1	6	5	11		1	1	12
2	15	6	21	1		1	22
3	4	1	5	1	1	2	7
4	4	3	7		1	1	8
5	4		4				4
6	1		1				1
7				1		1	1
8							
9	2		2				2
10							
11							
12							
13							
14							
15	1		1				1
16							
17	1		1				1
Total Websites	38	15	53	3	3	6	59

*Shaded cells indicate that no carriers with the attributes described existed at the time of the rulemaking.

Note: How to read this table: The last cell of each row identifies the number of websites operated by a carrier with a fleet consisting of a specific number of make, model, and series of aircraft the is designated by the number in the first column. For example, 22 air carriers operate a fleet consisting of 2 different make, model, and series of aircraft. Of the 22 carriers , 21 have a link to fleet information at the time of the rulemaking and one does not.

Table 5: Table 5 is derived by multiplying the labor hours from Table 2 by the corresponding cell values of Table 4 on a row-by-row basis. It is necessary to calculate hours for scheduled carriers independently of nonscheduled carriers since labor costs vary between the two.

Table 5
Estimate of Total Paperwork Hours Summed for All Carriers
by Count of Aircraft Make, Model and Series in an Individual Carrier's Fleet
Year 1 - Low Case

# of Aircraft Make, Model, and Series in a Carrier's Fleet	Staff Hours				Management Hours*		Total Hours		
	Does Carrier Have a Link to Fleet Information?								
	Yes		No		Sked	NonSked	Staff	Mgmt	Total
	Sked	Nonsked	Sked	Nonsked					
1	51.0	42.5	-	16.5	12.0	12.0	110.0	24.0	134.0
2	135.0	54.0	17.0	-	32.0	12.0	206.0	44.0	250.0
3	38.0	9.5	17.5	17.5	10.0	4.0	82.5	14.0	96.5
4	40.0	30.0	-	18.0	8.0	8.0	88.0	16.0	104.0
5	42.0	-	-	-	8.0	-	42.0	8.0	50.0
6	11.0	-	-	-	2.0	-	11.0	2.0	13.0
7	-	-	19.5	-	2.0	-	19.5	2.0	21.5
8	-	-	-	-	-	-	-	-	-
9	25.0	-	-	-	4.0	-	25.0	4.0	29.0
10	-	-	-	-	-	-	-	-	-
11	-	-	-	-	-	-	-	-	-
12	-	-	-	-	-	-	-	-	-
13	-	-	-	-	-	-	-	-	-
14	-	-	-	-	-	-	-	-	-
15	15.5	-	-	-	2.0	-	15.5	2.0	17.5
16	-	-	-	-	-	-	-	-	-
17	16.5	-	-	-	2.0	-	16.5	2.0	18.5
	374.0	136.0	54.0	52.0	82.0	36.0	616.0	118.0	734.0

*Management hours are estimated to be 2 hours per website in both the low case and high case.

Table 6: Table 6 is similar to Table 5 except that it reflects the labor hour assumptions for the high case.

Table 6
Estimate of Total Paperwork Hours Summed for All Carriers
by Count of Aircraft Make, Model and Series in an Individual Carrier's Fleet
Year 1 - High Case

# of Aircraft Make, Model, and Series in a Carrier's Fleet	Staff Hours				Management Hours*		Total Hours		
	Does Carrier Have a Link to Fleet Information?								
	Yes		No		Sked	NonSked	Staff	Mgmt	Total
	Sked	Nonsked	Sked	Nonsked					
1	99.0	82.5	-	32.5	12.0	12.0	214.0	24.0	238.0
2	255.0	102.0	33.0	-	32.0	12.0	390.0	44.0	434.0
3	70.0	17.5	33.5	33.5	10.0	4.0	154.5	14.0	168.5
4	72.0	54.0	-	34.0	8.0	8.0	160.0	16.0	176.0
5	74.0	-	-	-	8.0	-	74.0	8.0	82.0
6	19.0	-	-	-	2.0	-	19.0	2.0	21.0
7	-	-	35.5	-	2.0	-	35.5	2.0	37.5
8	-	-	-	-	-	-	-	-	-
9	41.0	-	-	-	4.0	-	41.0	4.0	45.0
10	-	-	-	-	-	-	-	-	-
11	-	-	-	-	-	-	-	-	-
12	-	-	-	-	-	-	-	-	-
13	-	-	-	-	-	-	-	-	-
14	-	-	-	-	-	-	-	-	-
15	23.5	-	-	-	2.0	-	23.5	2.0	25.5
16	-	-	-	-	-	-	-	-	-
17	24.5	-	-	-	2.0	-	24.5	2.0	26.5
	678.0	256.0	102.0	100.0	82.0	36.0	1,136.0	118.0	1,254.0

*Management hours are estimated to be 2 hours per website in both the low case and high case.

Example: Computation of Total Hourly Burden for Collection of Information - All Carriers (Based on count of Make, Model and Series of Aircraft in a Carrier's Fleet):

For illustrative purposes the derivation of total labor hours reported in row 3 of Table 5 (96.5 hours) is provided. This row contains the total paperwork burden hours computed for the seven carriers (See Table 4, Line 3) that operate a fleet of three different make, model, and series of aircraft. Of the seven Web sites five already have a link to fleet information and two do not. The following is the calculation of staff and management hours.

1) Staff Base Hours:

(5 carriers with Web link to fleet information * 8 base staff hours) + (2 carriers w/o Web link to fleet information * 16 base staff hours)

= 72.0 staff base hours

2) Staff Variable Hours:

(7 carriers * 0.5 variable staff hours * 3 make, model, and series)

= 10.5 staff variable hours

3) Total Staff Hours:

72.0 base staff hours + 10.5 variable staff hours
= 82.5 staff hours

4) Total Management Hours:

7 carriers * 2 management hours
= 14.0 management hours

5) Total Labor Hours:

82.5 staff hours + 14.0 management hours
= 96.5 labor hours

Labor Hours for Years 2 and 3:

For years 2 and 3 of the rule’s implementation it is assumed that through the ordinary course of business less time is required, relative to year 1, to maintain accuracy of seat dimension information posted to a carrier’s Web site. During this period, it is established that air carriers with Web sites have already posted seat dimension information, and thus air carriers may only need to revise the data periodically. Table 7 shows the total hours estimated for the paperwork burden in the low and high case during year two and year three.

In the low case, it is assumed that 5 hours per Web site are required on an annual basis to comply with the paperwork burden. The 5 hours consists of 4 staff hours and 1 management hour. In the high case, an annual total of nine hours (8 staff hours plus 1 management hour) per carrier is required for the paperwork burden. Summed across all carriers, a total of 295 hours in the low case and 531 hours in the high case will be required to comply with paperwork burden.

Table 7
Hours Required on an Annual Basis to Comply with Paperwork Requirement
By Operator Type (Scheduled vs. Nonscheduled)
Year 2 and Year 3

Case	Websites Affected	Annual Hours Per Carrier			Total Annual Hours		
		Staff	Mgmt	Total	Staff	Mgmt	Total
Low							
Sked	41	4	1	5	164	41	205
NonSked	18	4	1	5	72	18	90
Total	59				236	59	295
High							
Sked	41	8	1	9	328	41	369
NonSked	18	8	1	9	144	18	162
Total	59				472	59	531

Respondents:

There are a total of 58 respondents that operate 59 Web sites. The one additional Web site beyond the total number of respondents stems from the merger of Southwest Airlines and AirTran Airways. Even though these two air carriers are under a single operating certificate, they continue to sell tickets through separate Web sites.

Costs – Paperwork Burden Collection of Information:

Labor is the only cost associated with the collection of information for the rule. Tables 8 through 13 provide detail to show how the costs for the paperwork burden are calculated.

Table 8: Table 8 contains the Bureau of Labor Statistics (BLS) fully-burdened staff and management wage rates for the work performed toward the collection of information.

**Table 8
Hourly Wage and Benefits Compensation***

NAICS**	Job Series	Job Category	Job Title	Hourly Wage	Benefits** *	Total Hourly Compensation
481100 Scheduled Air Transportation	15-1140	Staff	Database and Systems Administrators and Network Architects	\$42.14	\$17.80	\$59.94
	11-3021	Mgmt.	Computer and Information System Managers	\$61.81	\$26.11	\$87.92
481200 Nonscheduled Air Transportation	15-1140	Staff	Database and Systems Administrators and Network Architects	\$33.94	\$14.34	\$48.28
	11-3021	Mgmt.	Computer and Information System Managers	\$48.65	\$20.55	\$69.20

*Source: U.S. Department of Labor, Bureau of Labor Statistics April 2012 Occupational Employment Statistics Survey (released in May 2013) (<http://stat.bls.gov/oes/home.htm>)

**North American Industry Classification System – US Census Bureau

***Source: U.S. Department of Labor, Bureau of Labor Statistics News Release dated June 12, 2013 “Employer Costs for Employee Compensation – March 2013” Page 3- Table A. Hourly wage rates are 70.3 percent of total hourly compensation. (http://www.bls.gov/news.release/archives/ecec_06122013.pdf)

Tables 9 and 10: Table 9 shows the low case cost estimate (on an individual carrier basis) for labor hours associated with the paperwork burden. These estimates are calculated by multiplying the paperwork burden hours identified in the low case (Table 2) by the fully-burdened wage rates (Table 8). Table 10 is similar to Table 9 except that it contains the high case estimate for paperwork burden costs. The estimate is calculated by multiplying paperwork burden hours identified in Table 3 by the wage rates identified in Table 8.

Table 9
Year 1 - Low Case
Estimate of Paperwork Costs For an Individual Carrier*
In 2012\$

# of Aircraft Make, Model, and Series in a Carrier's Fleet	Carriers w/ Web Link to Fleet Information						Carriers w/o a Web Link to Fleet Information					
	Scheduled Carriers			Nonscheduled Carriers			Scheduled Carriers			Nonscheduled Carriers		
	Staff	Mgt	Total	Staff	Mgt	Total	Staff	Mgt	Total	Staff	Mgt	Total
1	\$ 509	\$ 176	\$ 685	\$ 410	\$ 138	\$ 549	\$ 989	\$ 176	\$ 1,165	\$ 797	\$ 138	\$ 935
2	539	176	715	435	138	573	1,019	176	1,195	821	138	959
3	569	176	745	459	138	597	1,049	176	1,225	845	138	983
4	599	176	775	483	138	621	1,079	176	1,255	869	138	1,007
5	629	176	805	507	138	645	1,109	176	1,285	893	138	1,032
6	659	176	835	531	138	669	1,139	176	1,315	917	138	1,056
7	689	176	865	555	138	694	1,169	176	1,345	941	138	1,080
8	719	176	895	579	138	718	1,199	176	1,375	966	138	1,104
9	749	176	925	604	138	742	1,229	176	1,405	990	138	1,128
10	779	176	955	628	138	766	1,259	176	1,435	1,014	138	1,152
11	809	176	985	652	138	790	1,289	176	1,465	1,038	138	1,176
12	839	176	1,015	676	138	814	1,319	176	1,495	1,062	138	1,201
13	869	176	1,045	700	138	838	1,349	176	1,524	1,086	138	1,225
14	899	176	1,075	724	138	863	1,379	176	1,554	1,110	138	1,249
15	929	176	1,105	748	138	887	1,409	176	1,584	1,135	138	1,273
16	959	176	1,135	772	138	911	1,439	176	1,614	1,159	138	1,297
17	989	176	1,165	797	138	935	1,469	176	1,644	1,183	138	1,321

Table 10
Year 1 - High Case
Estimate of Paperwork Costs For an Individual Carrier
In 2012\$

# of Aircraft Make, Model, and Series in a Carrier's Fleet	Carriers With a Web Link to Fleet Information						Carriers Without a Web Link to Fleet Information					
	Scheduled Carriers			Nonscheduled Carriers			Scheduled Carriers			Nonscheduled Carriers		
	Staff	Mgt	Total	Staff	Mgt	Total	Staff	Mgt	Total	Staff	Mgt	Total
1	\$ 989	\$ 176	\$ 1,165	\$ 797	\$ 138	\$ 935	\$ 1,948	\$ 176	\$ 2,124	\$ 1,569	\$ 138	\$ 1,708
2	1,019	176	1,195	821	138	959	1,978	176	2,154	1,593	138	1,732
3	1,049	176	1,225	845	138	983	2,008	176	2,184	1,617	138	1,756
4	1,079	176	1,255	869	138	1,007	2,038	176	2,214	1,642	138	1,780
5	1,109	176	1,285	893	138	1,032	2,068	176	2,244	1,666	138	1,804
6	1,139	176	1,315	917	138	1,056	2,098	176	2,274	1,690	138	1,828
7	1,169	176	1,345	941	138	1,080	2,128	176	2,304	1,714	138	1,852
8	1,199	176	1,375	966	138	1,104	2,158	176	2,334	1,738	138	1,876
9	1,229	176	1,405	990	138	1,128	2,188	176	2,364	1,762	138	1,901
10	1,259	176	1,435	1,014	138	1,152	2,218	176	2,394	1,786	138	1,925
11	1,289	176	1,465	1,038	138	1,176	2,248	176	2,424	1,811	138	1,949
12	1,319	176	1,495	1,062	138	1,201	2,278	176	2,454	1,835	138	1,973
13	1,349	176	1,524	1,086	138	1,225	2,308	176	2,484	1,859	138	1,997
14	1,379	176	1,554	1,110	138	1,249	2,338	176	2,514	1,883	138	2,021
15	1,409	176	1,584	1,135	138	1,273	2,368	176	2,543	1,907	138	2,045
16	1,439	176	1,614	1,159	138	1,297	2,398	176	2,573	1,931	138	2,070
17	1,469	176	1,644	1,183	138	1,321	2,428	176	2,603	1,955	138	2,094

Tables 11 and 12: The total paperwork burden costs associated with bringing all 59 Web sites of Part 121 passenger carriers affected by this rule into compliance are calculated by multiplying the fully-burdened wage rates shown in Table 8 by the paperwork burden hours in Table 5 (for the low case) and Table 6 (for the high case). The results of this calculation are shown in Tables 11 and 12. The bottom-right cell in each of these tables is the combined total paperwork burden cost for all carriers.

Table 11
Total Paperwork Costs
Year 1 - Low Case (In 2012 Dollars)

# of Aircraft Make, Model, and Series in a Carrier's Fleet	Staff Hours				Management Hours		Total Hours		
	Does Carrier Have a Link to Fleet Information?								
	Yes		No		Sked	NonSked	Staff	Mgmt	Total
	Sked	Nonsked	Sked	Nonsked					
1	3,057	2,052	-	797	1,055	830	5,905	1,885	7,791
2	8,092	2,607	1,019	-	2,813	830	11,718	3,644	15,362
3	2,278	459	1,049	845	879	277	4,630	1,156	5,786
4	2,398	1,448	-	869	703	554	4,715	1,257	5,972
5	2,517	-	-	-	703	-	2,517	703	3,221
6	659	-	-	-	176	-	659	176	835
7	-	-	1,169	-	176	-	1,169	176	1,345
8	-	-	-	-	-	-	-	-	-
9	1,499	-	-	-	352	-	1,499	352	1,850
10	-	-	-	-	-	-	-	-	-
11	-	-	-	-	-	-	-	-	-
12	-	-	-	-	-	-	-	-	-
13	-	-	-	-	-	-	-	-	-
14	-	-	-	-	-	-	-	-	-
15	929	-	-	-	176	-	929	176	1,105
16	-	-	-	-	-	-	-	-	-
17	989	-	-	-	176	-	989	176	1,165
	22,418	6,566	3,237	2,511	7,209	2,491	34,731	9,701	44,432

Table 12
Total Paperwork Costs
Year 1 - High Case (In 2012 Dollars)

# of Aircraft Make, Model, and Series in a Carrier's Fleet	Staff Hours				Management Hours		Total Hours		
	Does Carrier Have a Link to Fleet Information?				Sked	NonSked	Staff	Mgmt	Total
	Yes		No						
	Sked	Nonsked	Sked	Nonsked					
1	5,934	3,983	-	1,569	1,055	830	11,486	1,885	13,372
2	15,285	4,925	1,978	-	2,813	830	22,187	3,644	25,831
3	4,196	845	2,008	1,617	879	277	8,666	1,156	9,822
4	4,316	2,607	-	1,642	703	554	8,564	1,257	9,821
5	4,436	-	-	-	703	-	4,436	703	5,139
6	1,139	-	-	-	176	-	1,139	176	1,315
7	-	-	2,128	-	176	-	2,128	176	2,304
8	-	-	-	-	-	-	-	-	-
9	2,458	-	-	-	352	-	2,458	352	2,809
10	-	-	-	-	-	-	-	-	-
11	-	-	-	-	-	-	-	-	-
12	-	-	-	-	-	-	-	-	-
13	-	-	-	-	-	-	-	-	-
14	-	-	-	-	-	-	-	-	-
15	1,409	-	-	-	176	-	1,409	176	1,584
16	-	-	-	-	-	-	-	-	-
17	1,469	-	-	-	176	-	1,469	176	1,644
	40,639	12,360	6,114	4,828	7,209	2,491	63,941	9,701	73,642

Paperwork Burden Costs for Years 2 and 3:

For years 2 and 3 of the rule's implementation it is assumed that, through the ordinary course of business, less time is required than in year 1 to maintain accuracy of seat dimension information posted to a carrier's Web site. The paperwork burden costs for years 2 and 3 are calculated by multiplying the paperwork burden hours shown in Table 7 by the fully-burdened wages rates shown in Table 8. The paperwork burden costs for the low and high case are shown in Table 13

Table 13
Annual Paperwork Cost to Comply with Requirements of Seat Dimension Disclosure Rule
Years 2 and 3 (In 2012 Dollars)

Case	# of Websites	Fully Burdened Hourly Wage		Hours Per Website			Paperwork Cost							
		Staff	Mgmt	Staff	Mgmt	Total	Per Website			All Websites				
							Staff	Mgmt	Total	Staff	Mgmt	Total		
Low														
Sked	41	\$59.94	\$87.92	4	1	5	\$240	\$88	\$328	\$9,830	\$3,605	\$13,435		
NonSked	18	\$48.28	\$69.20	4	1	5	\$193	\$69	\$262	\$3,476	\$1,246	\$4,722		
Total	59									\$13,306	\$4,850	\$18,157		
High														
Sked	41	\$59.94	\$87.92	8	1	9	\$480	\$88	\$567	\$19,660	\$3,605	\$23,265		
NonSked	18	\$48.28	\$69.20	8	1	9	\$386	\$69	\$455	\$6,952	\$1,246	\$8,198		
Total	59									\$26,613	\$4,850	\$31,463		

Summary of Hours and Costs for Years 1-3

Table 14 summarizes paperwork burden hours and costs for the low and high cases during the first three years of the rule’s implementation.

Table 14
Summary of Total Paperwork Hours and Costs for Years 1, 2 and 3
by Carrier Type (Scheduled vs. Nonscheduled)

HOURS										
Hours	Scheduled Carriers			NonScheduled Carriers			Total Hours			
	Staff	Mgmt	Total	Staff	Mgmt	Total	Staff	Mgmt	Total	
Low Case										
Year 1	428	82	510	188	36	224	616	118	734	
Year 2-3	164	41	205	72	18	90	236	59	295	
High Case										
Year 1	780	82	862	356	36	392	1,136	118	1,254	
Year 2-3	328	41	369	144	18	162	472	59	531	
COSTS (In 2012 Dollars)										
Costs	Scheduled Carriers			NonScheduled Carriers			Total Costs			Present Value (7 %)
	Staff	Mgmt	Total	Staff	Mgmt	Total	Staff	Mgmt	Total	
Low Case										
Year 1	\$25,654	\$7,209	\$32,863	\$9,077	\$2,491	\$11,568	\$34,731	\$9,700	\$44,431	\$41,526
Year 2	9,830	3,605	13,435	3,476	1,246	4,722	13,306	4,850	18,157	\$15,859
Year 3	9,830	3,605	13,435	3,476	1,246	4,722	13,306	4,850	18,157	\$14,822
High Case										
Year 1	\$46,753	\$7,209	\$53,962	\$17,188	\$2,491	\$19,679	\$63,941	\$9,700	\$73,641	\$68,826
Year 2	19,660	3,605	23,265	6,952	1,246	8,198	26,613	4,850	31,463	\$27,482
Year 3	19,660	3,605	23,265	6,952	1,246	8,198	26,613	4,850	31,463	\$25,684

13. Estimate of total annual costs to respondents.

The annualized cost for the paperwork hour burden during the first three years of the rule’s implementation is the average of the annualized cost for the low case and high case during the same three-year period. For the low case, the annualized cost for the paperwork burden during the first three years is \$27,515, and for the high case the annualized cost is \$46,485. The average of these two values is \$37,000; thus the annualized paperwork burden cost for the first three years is \$37,000.

14. Estimate of cost to the Federal government.

There are no costs to the Federal Government associated with this information collection.

15. Explanation of program changes or adjustments.

This is a new information collection, therefore it is a program change. Section 412 of Public Law 112-95 requires this information collection.

16. Publication of results of data collection.

The FAA does not collect nor publish data as part of this information collection. This information collection is a third-party disclosure by air carriers on their Web sites.

17. Approval for not displaying the expiration date of OMB approval.

There is no form associated with this information collection.

18. Exceptions to certification statement.

There are no exceptions to the supporting statement.