

Request for Approval under the “Generic Clearance for the Collection of Routine Customer Feedback” (OMB Control Number: 2120-0746)

TITLE OF INFORMATION COLLECTION: Regulatory Consistency Communication Board (RCCB) Submission Form

PURPOSE: On February 14, 2012, the President signed the FAA Modernization and Reform Act of 2012 (the Act), Public Law 112-95. Pursuant to section 313 of the Act, the FAA chartered the Consistency of Regulatory Interpretation Aviation Rulemaking Committee (ARC). The ARC created a forum for the U.S. aviation community to assess, determine the root causes of, and provide recommendations to reduce inconsistent interpretation and application of FAA regulations.

One of the ARC’s recommendations was that the FAA should establish a Regulatory Consistency Communication Board (RCCB) comprised of representatives from Flight Standards Service (AFS), Aircraft Certification Service (AIR), and the Office of the Chief Counsel (AGC). The RCCB, essentially functioning as an avenue of complaint, will review issues submitted by internal and external stakeholders that involve an inconsistency in the application of regulations.

To facilitate the submission of issues for review by the RCCB, the FAA has developed an electronic submission form. The web-based electronic form, housed on www.FAA.gov, will be used by internal and external stakeholders to submit issues to the RCCB.

The submission of concerns is voluntary. Information collected on the form will only be used to learn about and possibly address inconsistencies in regulatory application. This may include contacting the submitter for additional information via email or phone.

Submissions of concerns to the RCCB are not anticipated to result in substantial policy changes. However, they may result in clarifying changes to guidance documents controlled by AFS or AIR or changes to training provided to employees responsible for oversight activities.

Results of this information collection will not be tabulated and published. However, we do intent to publish responses to individual issues raised through the RCCB, if we feel there is value in clarifying the FAA’s response to the issue publically.

DESCRIPTION OF RESPONDENTS: Use of the RCCB is voluntary and individuals will self-select participation. The RCCB is open to internal and external stakeholders. Because the RCCB only handles issues related to regulatory application, respondents would be entities regulated by the FAA or internal stakeholders responsible for oversight activities.

TYPE OF COLLECTION: (Check one)

Customer Comment Card/Complaint Form
 Usability Testing (e.g., Website or Software)
 Focus Group

Customer Satisfaction Survey
 Small Discussion Group
 Other: _____

CERTIFICATION:

I certify the following to be true:

1. The collection is voluntary.
2. The collection is low-burden for respondents and low-cost for the Federal Government.
3. The collection is non-controversial and does not raise issues of concern to other federal agencies.
4. The results are not intended to be disseminated to the public.
5. Information gathered will not be used for the purpose of substantially informing influential policy decisions.
6. The collection is targeted to the solicitation of opinions from respondents who have experience with the program or may have experience with the program in the future.

Name: Leisha Bell

To assist review, please provide answers to the following question:

Personally Identifiable Information:

1. Is personally identifiable information (PII) collected? [X] Yes [] No
2. If Yes, will any information that is collected be included in records that are subject to the Privacy Act of 1974? [] Yes [X] No
3. If Yes, has an up-to-date System of Records Notice (SORN) been published? [] Yes [X] No

Gifts or Payments:

Is an incentive (e.g., money or reimbursement of expenses, token of appreciation) provided to participants? [] Yes [X] No

BURDEN HOURS

Category of Respondent	No. of Respondents	Participation Time	Burden
(2) Private Sector	30	30 minutes	15 hours
(4) Federal Government	10	30 minutes	5 hours
Totals	40	30 minutes	20 hours

Note: Members of the Consistency of Regulatory Interpretation ARC have been able to submit issues to the RCCB via an FAA employee for the past 14 months. During that time we have received 11 issues. We estimate that a publically available form will result in approximately a quadrupling of submissions.

FEDERAL COST: The estimated annual cost to the Federal government is \$21, 615.

Federal cost to respond is:

The FAA estimates the total cost of this information collection to the Federal Government to be \$21,615. This estimate is based on the fully burdened (per OMB A-76) direct costs of required FAA personnel time, as detailed below.

Components of the above estimate are as follow:

(A) One-time cost to set up a system to provide and maintain RCCB Submission Forms, with associated guidance. As an average salary, we have used \$72.05:

One hundred hours in total, at \$72.05 per hour = \$7,205.00

(B) FAA employee time spent reviewing and processing RCCB Submission Forms submitted to the FAA as identified in this document. As an average salary, we have used \$72.05:

200 hours in total, at \$72.05 per hour = \$14,410.00

If you are conducting a focus group, survey, or plan to employ statistical methods, please provide answers to the following questions:

The selection of your targeted respondents

1. Do you have a customer list or something similar that defines the universe of potential respondents and do you have a sampling plan for selecting from this universe?
[] Yes [X] No

If the answer is yes, please provide a description of both below (or attach the sampling plan)? If the answer is no, please provide a description of how you plan to identify your potential group of respondents and how you will select them?

Submissions to the RCCB are voluntary and individuals self-select to participate via an online form available at www.FAA.gov.

Stakeholders will be aware of the RCCB through the FAA order, currently in internal review at the FAA, which will officially establish the RCCB. The order will include a program description and location of the RCCB form. The main audience for orders is internal FAA stakeholders that have oversight and enforcement responsibilities. The FAA is also planning on publishing an Information for Operators (InFO) that will describe the RCCB and give the location of the RCCB submission form. The main audience for InFOs is regulated entities. These documents will be publically available. These documents are also automatically emailed to internal and external stakeholders signed up for “Orders & Notices Update Notifications” via the gov delivery system available at https://public.govdelivery.com/accounts/USAFAA/subscriber/new?topic_id=USAFAA_50

Administration of the Instrument

1. How will you collect the information? (Check all that apply)
[X] Web-based or other forms of Social Media
[] Telephone
[] In-person
[] Mail
[] Other, Explain
2. Will interviewers or facilitators be used? [] Yes [X] No