

**Supporting Statement
Rotorcraft External-Load Operator
Certificate Application - FAR-133
OMB 2120-0044**

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating and authorizing the collection of information.

Part A of Subtitle VII of the Revised United States Code authorizes the issuance of regulations governing the use of navigable airspace. 14 CFR Part 133, Rotorcraft External-Load Operations, was adopted to establish certification and operating rules governing nonpassenger-carrying rotorcraft external-load operations conducted for compensation or hire. As such, the Federal Aviation Administration (FAA) requires information reporting by affected Rotorcraft External-Load Operators in order to maintain its regulatory responsibilities. The collection of this information directly supports the Department of Transportation's strategic goal on safety

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The information required by Part 133 is used by the FAA to process the operating certificate as a record of aircraft authorized for use, and to monitor Rotorcraft External-Load Operations. FAA Form 8710-4, Rotorcraft External-Load Operator Certificate Application, provides a record of surveillance activities when completed by an inspector. If the information was not collected, FAA would not be able to meet its regulatory responsibilities under Part 133.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses and the basis for the decision for adopting this means of collection.

The collection of this information does not lend itself to sophisticated collection techniques or other forms of collection. There presently is no other method contemplated to replace the information collected by FAA Form 8710-4, Rotorcraft External-Load Operator Certificate Application. Applicants may electronically request applications to conduct operations or an activity. Therefore, it is felt that the spirit of the Government Paperwork Elimination Act (GPEA) is accomplished. However, most of the activity associated with this information collection must be physically verified (airmen certificates, aircraft inspections, etc.) by aviation safety inspectors prior to its approval. The United States cannot risk having unknown people

operating within its critical infrastructure. Electronic signature and collection will be considered as that technology becomes available.

4. Describe efforts to identify duplication. Show specifically why any similar information already available can be used for the purpose described in Item 2 above.

We have reviewed our other public reports to insure that no duplication exists. To our knowledge, no other agency is responsible for collecting information on Rotorcraft External-Load Operators.

All information gathered is compiled for a specific reason, from a specific source and relates to a unique and specific requirement and situation.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Individuals or small entities may receive, upon request, specific assistance from FAA Aviation Safety Inspectors located in district offices around the country. This collection of information is reviewed periodically to ensure the requirements involved are kept to the minimum necessary to bring about effective compliance with Part 133. To keep the burden to a minimum on small businesses, the inspectors deal directly with the certificate holders' management personnel

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The respondents determine frequency of collection. The respondents cannot legally conduct external-load operations without the proper certification.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with 1320.5(d)(2)(i)-(viii).

The guidelines specified in 5 CFR 1320.5(d)(2)(i)-(viii) are being complied with in the collection of information required by this FAR Part.

8. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any) and on data elements to be recorded, disclosed, or reported.

The notification of the triennial review of this report was published in the Federal Register on September 3, 2014, vol. 79, no. 170, page 52406, and we have not received any comments from the public.

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

No payments or gifts are made to respondents.

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

There is no confidentiality requested or provided.

11. Provide additional justification for any questions of a sensitive nature.

There are no questions of a sensitive nature.

12. Provide estimates of hour burden of the collection information. This information should provide number of respondents, frequency of response, annual burden, and an explanation of how the burden was estimated.

A section by section breakdown of the applicable sections of Part 133 is listed below, showing frequency of response, number of respondents, annual burden, and how the burden has been estimated.

Section 133.15, Application for Certificate Issuance or Renewal. Requires that a would-be operator make application on a form and manner prescribed by the Administrator. FAA Form 8710-4, Rotorcraft External- Load Operator Certificate Application is the form prescribed by the Administrator and approved by OMB. It contains only information necessary for a Part 133 Operating Certificate.

Estimated number of annual recertifications and new applications	200
<u>Estimated average hours per submission</u>	<u>.3</u>
Estimated annual reporting burden	60 hours

Section 133.21, Personnel.

Requires applicant to designate one pilot as chief pilot for rotorcraft external-load operators. Paragraph (c) requires certificate holders to report any change in chief pilot designation.

Estimated number of annual chief pilot designations	40
<u>Estimated average hours per submission</u>	<u>.3</u>
Estimated annual reporting burden	12 hours
Estimated annual reported changes in designations	40

Estimated average hours per submission	.3
<u>Estimated annual reporting burden</u>	12 hours

Total 133.21 Estimated annual reporting burden 24 hours

Section 133.25, Amendment of Certificate.

This section indicates a certificate holder may submit a list of new or deleted aircraft to be used.

Estimated annual requests for amendment	45
<u>Estimated average hours per request</u>	.3
Estimated annual reporting burden	14 hours

Section 133.27, Availability, transfer, and surrender of certificate.

Requires each certificate holder to keep the certificate and a list of authorized rotorcraft at the home base of operations.

Total number of operators maintaining records	400
<u>Estimated time required to maintain records</u>	.5
Estimated annual recordkeeping burden	200 hours

Section 133.31, Emergency Operators.

Operators, upon request, are required to provide a report of a deviation from the rules.

Estimated number of operators required to report	25
<u>Estimated time required to complete a report</u>	2
Estimated annual reporting burden	50 hours

Section 133.33, Operating Rules.

This section requires an operator to develop a plan for congested area operations and obtain approval to implement that plan.

Estimated number of operators required to develop the congested area plans	300
Estimated number of plans per operator, per year	<u>x 3</u>
	900
<u>Estimated time required per plan</u>	<u>x 2</u>
Total annual reporting burden	1800 hours

Section 133.37, Crewmember training, currency, and testing requirements.

Each pilot must demonstrate his skill and knowledge before he can serve.

Estimated number of operators maintaining records	400
<u>Estimated time required to maintain records</u>	.3
Total recordkeeping burden	120 hours

Section 133.47, Rotorcraft-Load Combination Flight Manual. Requires the applicant to prepare a flight manual and submit it for approval by the Administrator.

Estimated manual submissions (new applicants only)	25
Estimated average hours per submission	40
Estimated total reporting burden	1,000 hours

Total recordkeeping burden hours	320
Total reporting burden hours	2,948
Total information collection burden	3,268 hours

The annualized cost to the public to process the information required was determined by the following method:

<u>Hours by Regulation</u>	<u>Hours</u>
133.15 200 applications @ .3 hours	60
133.21 80 designations @ .3 hours	24
133.25 45 amendments @ .3 hours	14
133.27 400 changes @ .5 hours	200
133.31 25 reports @ 2 hours	50
133.33 900 reports @ 2 hours	1,800
133.37 400 demonstrations @ .3 hours	120
133.47 25 manual developments @ 40 hours	<u>1,000</u>
	3,268

Approximately 80 percent of the total cost is labor done by technical specialists at \$24 per hour, and 20 percent is by clerical labor at \$11 per hour. Other expenses such as general and administrative costs, overhead costs, and other indirect costs are eliminated to amount to approximately 15 percent of the direct labor costs. Based on the above, the annualized cost to the public is as follows:

Estimated total annual labor burden	3,268 hours
Technical Labor (3,268 x .8 x \$25)	\$65,360
Clerical Labor (3,268 x .2 x \$12)	\$7,843
	\$73,203
Other Expenses (\$73,203 x .15)	\$10,980
TOTAL	\$84,183

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

We estimate that there will be no additional start-up costs for this renewal.

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

The annualized cost to the Federal Government to collect, analyze, and process the information received was determined by the following method:

<u>Hours by Regulation</u>		<u>Hours</u>	
133.15	200 applications @ 2 hours	400	
133.21	80 designations @ 1 hour	80	
133.25	45 amendments @ 1 hour	45	
133.27	400 changes @ 1 hour		400
133.31	25 reports @ 4 hours	100	
133.33	900 reports @ 2 hours	1800	
133.37	400 demonstrations @ 2 hours	800	
133.47	25 manual reviews @ 4 hours	<u>100</u>	
			3725

Approximately 80 percent of the total cost is government labor done by technical specialists at \$50 per hour, and 20 percent is by clerical labor at \$40 per hour. Other expenses such as general and administrative costs, overhead costs, and other indirect costs are estimated to amount to approximately 15 percent of the direct labor cost. Based on the above, the annualized cost to the Federal Government is as follows:

Estimated total annual labor burden	3,725 hours
Technical Labor (3,725 x .8 x \$53)	\$157,940
Clerical Labor (3,725 x .2 x \$42)	<u>\$31,290</u>
	\$189,230
Other Expenses (\$178,800 x .15)	<u>\$28,385</u>
TOTAL	\$217,615

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

The total hourly burden has not changed. The cost burden figures have increased to account to inflation.

16. For collections of information whose results will be published, outline plans for tabulation, and publication. Address any complex analytical techniques that will be used.

There is no requirement for any of the information collected pursuant to 14 CFR Part 133 to be published for statistical use.

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.

We are not seeking approval to exclude the expiration date.

18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-1.

There appear to be no exceptions.