

SUPPORTING STATEMENT
Reduced Vertical Separation Minimum
OMB CONTROL NO. 2120-0679

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

The authority to collect data from aircraft operators seeking operational approval to conduct Reduced Vertical Separation Minimum (RVSM) operations is contained in Part 91, Section 91.180, as established by a final rule published in the Federal Register on October 27, 2003 (68 FR 61304). Aircraft operators seeking operational approval to conduct RVSM operations within the 48 contiguous States of the United States (U.S.), Alaska and that portion of the Gulf of Mexico where the FAA provides air traffic services must submit their application to the Certificate Holding District Office (CHDO). The CHDO registers RVSM approved airframes in the FAA RVSM Approvals Database to track the approval status for operator airframes. RVSM supports the Operational Evolution Plan (OEP) to reduce en route congestion, which supports the DOT strategic goals of Mobility, Economic Growth, and Human & Natural Environment.

2. Explain how, by whom, how frequent and for what purpose the information will be used.

Aircraft operators seeking operational approval to conduct RVSM operations initially submit application to their CHDO. The CHDO registers RVSM approved airframes in the FAA RVSM Approvals Database. When operators complete airworthiness, continued airworthiness and operations program requirements, the CHDO grants operational approval.

3. Describe whether and to what extent the collection of information involves the use of automated, electronic, or mechanical, or other technological techniques or other forms of information technology.

The Government Paperwork Elimination Act (GPEA) is an important tool to improve customer service and governmental efficiency through the use of information technology. This improvement involves transacting business electronically with Federal agencies and widespread use of the Internet and its World Wide Web. The FAA RVSM Web Page permits operators to obtain electronic copies of an example operator application, guidance material, and related documentation. The website provides a suitable mechanism for dissemination of information via downloading of materials relating to RVSM operational approval in accordance with the GPEA. Using the guidance provided on the RVSM Webpage, operators can develop and submit their application for RVSM authority to the FAA 100% electronically.

4. **Describe the efforts to identify duplication.**

Some elements of the application package such as a minimum equipment list are furnished to the FAA when the operator applies for other operating authorities. However, duplication in data collection is necessary because the data must be modified to reflect the specific requirements of RVSM. The duplicate data elements are easily provided by the respondents without additional search of existing data sources. The duplicate data collection therefore would not require a significant burden.

5. **If the collection of data involves small businesses or other small entities, describe the methods to minimize the burden.**

The information requested does not pose a significant burden on small entities.

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

If this collection is not approved, operators will be unable to initiate the process to receive operational approval by submitting their application to their respective CHDO.

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 collection is consistent with the guidelines.

8. **Provide a copy/citation of the FEDERAL REGISTER document soliciting comments on the conduct of the collection of information, a summary of all public comments responding to the notice, and a description of the agency's actions in response to the comments. Describe efforts to consult with persons outside the agency to obtain their views.**

A notice was published in the Federal Register soliciting public comment on November 6, 2014, vol. 79, no. 215, page 66028. No comments were received.

9. **Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.**

There are no payments or gifts to respondents.

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

We do not provide any assurance of confidentiality for this submission.

11. **Provide additional justification for any question of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.**

No questions of a sensitive nature are asked.

12. **Provide an estimate in hours of the burden of the collection of information, and provide estimates of annualized cost to respondents for the hour burdens for the information collection.**

The estimated preparation time for an operator to complete and submit an application for operational approval to their CHDO would be 16 hours. The 1560 operators estimated to seek operational approval would result in 24,960 hours in preparation time. These 16 hours are broken down into 8 hours for an engineer and 8 hours for an operations specialist; as their fully loaded (with fringe benefits) salaries average \$26.55, the total cost for all operators, for this work, sums to \$662,688.

All pilots would need to be trained to ensure familiarity with RVSM operations. Each organization would have a navigation specialist prepare a document; as the document costs \$502.20 to prepare and as the fully loaded salary equals \$35.80, the FAA anticipates that it would take this specialist approximately 14 hours to prepare the document. Given 1560 operators, the total time and cost sum to 21,840 hours and \$781,872.

The total paperwork burden, in terms of time and cost for this collection, is **46,800 hours** at a cost of \$1,444,560.

In the future, some operators may increase the number of aircraft in their fleet. Any addition of airframes for a currently operated type would not generate additional paperwork; all RVSM-related information would be covered in this package. The additional paperwork for RVSM-related work for an operator adding a new aircraft type to their fleet would be negligible; the operators would have existing paperwork burdens for the new aircraft type and the amount of time needed for RVSM-related information would be very small.

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

The majority of pilots would receive RVSM refresher training during recurrent training for their specific type ratings. Each pilot would receive a copy of the 2-page training document on an annual basis when completing their recurrent training. To be conservative with costs, the FAA is assuming that each pilot's document has been photostated; at a cost of \$0.10 per page, total costs for 142,511 pilots sum to \$28,502.20.

14. **Provide estimates of annualized costs to the Federal Government.**

The FAA assumes that it would take either an avionics inspector or an operations inspector 8 hours to process each applicant submission. Assuming each inspector at a GS-14 level, the time and cost to the Federal Government for processing 1560 application packages is 12,480 hours and \$672,796.80.

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

The previously reported 370 respondents for an estimated annual burden of 11,100 hours has been updated to reflect the current level of activity for aircraft operators of United States (U.S.) registry seeking operational approval to conduct RVSM operations. New operator authorizations continue to increase each year as newer aircraft are manufactured RVSM compliant. A recent analysis of operator RVSM approval data within the U.S. Minimum Aircraft System Performance Specification (MASPS) indicates that on average, **1,560** operators per year are seeking RVSM approval for aircraft types not currently within their operations specification or letter of operating authority.

16. **For collections whose results will be published, outline the plans for tabulation and publication.**

Results will not be published except for listings of airframes that have received operational approval, which are maintained by the North American Approvals Registry and Monitoring Organization (NAARMO) and are available at http://www.faa.gov/air_traffic/separation_standards/naarmo/rvsm_approvals/.

17. **If seeking approval to not display the expiration date for OMB approval of the information collected, explain the reasons why display would be inappropriate.**

Not applicable.

18. **Explain each exception to the certification statement identified in Item 19 of the OMB 83-I.**

There are no exceptions.