

The Supporting Statement for OMB 0596-0015

Airplane Pilot Qualifications and Approval Record, Helicopter Pilot Qualifications and Approval Record, Airplane Data Record, and Helicopter Data Record
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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 or authorizing the collection of information.**

Laws, Statutes, and Regulations

- Public Law 106-181 (April 5, 2000) – Wendell H. Ford Aviation Investment and Reform Act for the 21st Century
- Forest Service Manual (FSM) 5700 – Aviation Management
- Forest Service Handbook (FSH) 5709.16 – Flight Operations Handbook
- Title 14 CFR – Federal Aviation Administration Regulations

The Forest Service (FS) is the largest operator of aircraft in the Federal government outside of the Department of Defense.

The process by which the Forest Service operates, maintains, and provides aircraft is through the use of Federal Government contractual agreements with private industry. Two types of aviation contracts are utilized: Exclusive Use contracts and Call-When-Needed (CWN) contracts. Currently, in excess of 700 private companies contract with the Forest Service. Additionally, the Forest Service owns and operates 27 agency aircraft.

Exclusive use contracts are agreements between the Forest Service and private industry during which private industry guarantees aircraft, pilot, and maintenance staffing for a specified period of time for use by the Forest Service.

CWN contracts are agreements between the Forest Service and private industry that, at the option of the contracted company, guarantee aircraft, pilot, and maintenance staffing for government optional use by the Forest Service.

Contractor aircraft and pilots place water and chemical retardants on fires, provide aerial delivery of firefighters to fires (such as smokejumpers with parachutes and rappel operations from helicopters), search for lost personnel, perform reconnaissance, resource surveys, and fire detection. They transport firefighting personnel in all weather conditions over long distances to small airports/helicopter landing sites in small to airline-size aircraft.

Contracts for such services include rigorous qualification requirements for pilots and specific conditions/equipment/performance requirements for aircraft. Forest Service Aviation policy is the basis for contract requirements. Agency policy is set forth in FSM 5700 and FSH 5709.16, which cite specific Federal Aviation Administration Regulations in Title 14 (Aeronautics and Space) of the Code of

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Federal Regulations. Title 14 CFR is specific to aeronautics and identifies the Federal Aviation Administration (FAA) as the regulatory agency for all aviation activities. These requirements are necessary to maintain an acceptable level of safety, mission preparedness, and cost effectiveness in aviation operations. Of particular importance are the standards relating to fire suppression missions, as such missions are conducted under extremely adverse conditions of weather, terrain, turbulence, smoke reduced visibility, minimally improved landing areas, and congested airspace around wildfires.

It is critical that Agency contracting officers executing these contracts have assurance that the pilots and aircraft offered meet these special Forest Service qualifications and other requirements. The only practical way to accomplish this is to require prospective contract pilots to provide the certified information. The Forest Service uses forms FS-5700-20 and FS-5700-20a to obtain such certified information from prospective contract pilots.

Forest Service aviation maintenance inspectors use forms FS-5700-21 and FS-5700-21a as worksheets and approval documentation when checking aircraft for contract compliance. The maintenance inspectors provide a copy of a portion of the completed form to the contractor as proof of compliance.

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.

a. What information will be collected - reported or recorded? (If there are pieces of information that are especially burdensome in the collection, a specific explanation should be provided.)

Pilot information collected is used to assess pilot qualifications as defined within the language of the contract. The purpose of the collection is to determine whether or not the pilot meets contractual requirements and serves no other purpose. Pilot data is not disseminated beyond the Forest Service Pilot Inspector, the government agent who reviews the pilot application. There is no hardcopy or electronic database that pilot information is accessed by either the Federal Government or private industry. Data collected is not reported to any other agency, private or government.

Data collected includes pilot and career experience, Forest Service course curriculum accreditation, FAA certification, and FAA medical certification. Forms FS-5700-20 (Airplane Pilot Qualifications and Approval Record) and FS-5700-20a (Helicopter Pilot Qualifications and Approval Record) collect the following information from pilots:

- (1) Name, date of birth, and contact information;
- (2) Current and previous employment history;
- (3) Medical Certification;
- (4) Previous Agency approval information;
- (5) Airman Certificate;

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- (6) Date last Agency evaluation flight and inspector;
- (7) Pilot-In-Command Flight Time and Type of Flying;
- (8) Aircraft Accidents/FAA Violations; and
- (9) Pilot Certification.

Airplane and helicopter information collected provides the Forest Service with aircraft maintenance and inspection history. Such information informs Agency officials as to how well the aircraft is equipped to meet specific contract requirements. Forms FS-5700-21, Parts 1 and 2 (Airplane Data Record) and FS-5700-21a (Helicopter Data Record) collect the following information from contractors for aircraft considered for Forest Service use:

- (1) Operator's address and contact information;
- (2) Aircraft make, model, FFA Registration Number, Manufacturer's Serial Number;
- (3) Gross Weight, Number of Passenger Seats, and other aircraft specifications;
- (4) Authorized Uses;
- (5) Airframe Information;
- (6) Engine Information;
- (7) Equipment; and
- (8) Avionics.

b. From whom will the information be collected? If there are different respondent categories (e.g., loan applicant versus a bank versus an appraiser), each should be described along with the type of collection activity that applies.

Information is collected from private industry soliciting for Forest Service government contracts, as well as from pilots employed by private industry who are currently under contract with the Federal Government.

c. What will this information be used for - provide ALL uses?

Pilot information will be used to assess pilot qualifications as specified within the language of the contract. The purpose of the collection is to determine whether or not the pilot meets contractual requirements and serves no other purpose. Pilot data is not disseminated beyond the Forest Service Pilot Inspector, the government agent who reviews the pilot application. There is no hardcopy or electronic database that pilot information is accessed by either the Federal Government or private industry. Data collected is not reported to any other agency, private or government.

Once the Forest Service Pilot Inspector assess a pilot's qualifications as meeting contractual requirements, a pilot qualification and approval card is issued to the pilot by the Forest Service Pilot Inspector. The pilot application documents are kept by the Forest Service Pilot Examiner and are not

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disseminated to government or private industry.

The pilot qualification and approval card that is issued to the pilot provides the “license’ and “proof” that the pilot has met all contractual requirements and is able to safely and effectively perform Forest Service flight missions. Forest Service personnel using these pilots are required to verify possession of properly approved cards.

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The pilot qualification and approval card contains the following information:

- (1) Name;
- (2) Pilot certificate number;
- (3) Company;
- (4) Type of aircraft approved for;
- (5) Expiration date;
- (6) Approval authority (Forest Service Pilot Inspector); and
- (7) Approved mission types.

No other information is annotated on the card.

Aircraft qualification cards are issued specific to the aircraft certified by Aircraft Maintenance Inspectors as proof that the aircraft has met the requirements of the contract. Forest Service personnel using these aircraft verify possession of properly approved aircraft cards.

Without the information supplied on the application forms, Forest Service contracting officers, aircraft inspectors, and pilot inspectors cannot document and determine if pilots and aircraft meet the detailed qualifications, equipment, and condition requirements essential to safe and efficient accomplishment of Forest Service specified special use missions for which the aircraft and pilots are under contract.

d. How will the information be collected (e.g., forms, non-forms, electronically, face-to-face, over the phone, over the Internet)? Does the respondent have multiple options for providing the information? If so, what are they?

The information is collected via the following forms:

- FS-5700-20 - Airplane Pilot Qualifications and Approval Record
- FS-5700-20a - Helicopter Pilot Qualifications and Approval Record
- FS-5700-21 - Airplane Data Record
- FS-5700-21a - Helicopter Data Record

The respondent has multiple options for providing information. Blank forms may be downloaded via the internet and filled out. Forms accessible via Forest Service Websites do not electronically save nor archive data typed onto the form, unless a blank form has been downloaded. Additionally, hard-copy forms are available.

Contract pilots usually provide completed forms to pilot inspectors via face-to-face meetings, teleconference, and/or internet communication.

Aircraft information is collected onsite at the aircraft's location.

The completed forms are maintained by Forest Service approved Agency Pilot and Aircraft Inspectors.

e. How frequently will the information be collected?

Collection occurs annually as contractors offer aircraft or pilot(s) for use on a Forest Service contracts.

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f. Will the information be shared with any other organizations inside or outside USDA or the government?

Pilot application form information is not shared with any government or private industry entity beyond that of the applicant and the pilot inspector. The only information shared is the information contained on the pilot qualification and approval card issued to the pilot, himself, as discussed previously.

Aircraft application form information is shared between the United States Department of Interior, Aviation Management Directorate, and the Forest Service. The Forest Service and the Department of Interior maintain an Interagency Agreement that allows aircraft contracted by either agency to be used by either agency. Aircraft information consists of the contract number, aircraft type and specifications, and point of contact information with the contracted private company.

g. If this is an ongoing collection, how have the collection requirements changed over time?

The requirements remain the same as for the previous version. The form provides an all-inclusive request for information thereby negating an appended request for information. However, no additional information is requested beyond contractual requirements.

To clarify, Federal Government contracts between the Forest Service and private enterprise identify Federal Aviation Administration and Forest Service endorsement and certification requirements. These endorsements and certificates provide supporting documentation as proof that applicants meet contractual requirements.

The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

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. Also, describe any consideration of using information technology to reduce burden.

Non-Forest Service respondents do not have access to the Forest Service intranet. The collection of information does not involve use of automated, electronic, mechanical, other technological collection techniques, or other methods of information technology. Electronic submission of responses is not permitted, nor possible.

Use of information technology has been considered in an effort to reduce burden through a means to provide electronic access to a blank form that can be downloaded and then filled in via computer or hand written. The form is merely a copy of the form sourced from the Forest Service intranet. The necessity to supply supporting documentation along with the form is not conducive to any further automation techniques at this time.

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4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The Department of Interior and Forest Service contract from private industry for use of aviation assets. An interagency agreement between the Department of Interior and the Forest Service allows the use of Federal Government contracted aviation assets to be used by either agency in the conduct of Wild Land Firefighting operations.

However, specific contract differences in the conduct and certification of other than wild land firefighting activities requires different and/or increased data collection that are non-concurrent between Forest and Department of Interior aviation contracts. Therefore, a single form cannot be used by both the Department of Interior and Forest Service.

However, in an effort to further reduce duplication, the Forest Service and Department of Interior are exploring use of a standard form. However, this task is in its infancy and requires significant investigation and vetting due to the myriad of differing agency missions that are contracted. The myriad scope of aviation contracts and specialized operations does not render a “one-size fits all”. The different agency forms are not identical at this time and request different information.

The differing agency application forms are not carried by the pilot. However, the qualification cards issued to the pilot and the aircraft from either agency are. These qualification cards are identical in that they provide a summary of the pilot, approved aircrafts, and approved missions that the pilot can perform.

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

The collection of information, and resulting burden, for approval and issuance of pilot and aircraft qualification cards is identical for each pilot and aircraft evaluated within a company, regardless of the size of the company. Therefore, small business burden would be reduced only by a decrease in the number of pilots employed and aircraft on contract.

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.

If the Agency were not able to collect this information or frequency of collection is reduced, Forest Service contracting officers and pilot/aircraft inspectors could not determine if pilots and aircraft meet the detailed qualification, equipment, and condition requirements essential for safe, efficient accomplishment of Forest Service aviation missions, which are included in contract specifications. Without a reasonable basis and oversight through annual evaluations to determine pilot qualifications and aircraft capability, Forest Service employees, other Federal and State agency employees, and the public would be exposed to unnecessary hazards and compromise the integrity of the program as a whole.

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Additionally, aircraft and pilot evaluations provide oversight of the contract to assure the Federal government is getting full value, while maintaining the safety and mission preparedness as required in the contract. Less frequent collection of this information, or no information collection, would work against the purpose of the contract and the interest of the Federal government.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **Requiring respondents to report information to the agency more often than quarterly;**
- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

Forms are a requirement for private industry that want to conduct business through contracts with the Forest Service Aviation by providing their services as pilots or providing aircraft for Forest Service contracts. The forms show the Forest Service that the individual or aircraft meets the required qualifications in order for the Forest Service representative to certify they meet the requirements.

- **Requiring respondents to submit more than an original and two copies of any document;**
- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in

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response to these comments. Specifically address comments received on cost and hour burden.

Notice of the 60-day comment period was published in the Federal Register in Volume 80 No. 36 on February 24, 2015, on page 9690. The Agency received no comments about the use of the form.

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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.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

Contact was made with the following individuals, who were asked to provide comment on the renewal of this information collection:

PJ Aviation. Ron Chaplin, Training Director - 530-570-1981

Rogers Helicopters - Steve Wiedekamp, Chief Pilot - 559-392-4767

Cal-Fire Steve Wiedekamp, Program Manager - 559-392-4767

All individuals were positive about the use of the form and felt it was a good, easy to fill out form and the estimated time burden is accurate.

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

The only payment is for services rendered under the contract. No payment rendered for 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 information provided is only for internal Federal government use. However, apart from protection of pilot information records required by Public Law 93-579 and 5 USC 552A; no assurance of confidentiality is given. Forest Service Privacy Act System of Records USDA/FS-44 (Pilot Qualification Records) covers collection, storage, maintenance, use of pilot information collected, and public requests for information collected processed according to Freedom Information Act and Privacy Act regulations.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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.

No such questions are included in the forms.

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

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form.**

a) Description of the collection activity

Collection activity is comprised of the private industry applicant filling out the applicable application form for each aircraft and pilot applicant. Applicants are further required to provide supporting documentation to verify data submitted via the form. This application package is submitted to the appropriate government agent for review, evaluation, and processing. The applicant may fill out the form via electronic or hand written methods. The package, itself, may be submitted via mail, email, or in person to the appropriate agent responsible for review and evaluation of the submitted package.

b) Corresponding form number (if applicable) See Table 1.

c) Number of respondents. See Table 1.

d) Number of responses annually per respondent. See table 1.

e) Total annual responses (columns c x d). See table 1

f) Estimated hours per response. See table 1.

g) Total annual burden hours (columns e x f). See table 1.

Table 1: Estimates of Burden Collection ^{note 1}

(a) Description of the Collection Activity	(b) Form Number	(c) ^{note 2} Number of Responden ts	(d) ^{note 5} Number of responses annually per Responde nt	(e) Total annual response s (c x d)	(f) ^{note 6} Estimate of Burden Hours per response	(g) Total Annual Burden Hours (e * f/60)
Airplane Pilot Record	FS-5700-20	944 ^{note 3}	1	944	1.5	1,416
Helicopter Pilot Record	FS-5700-20a	1300 ^{note 3}	1	1,300	1.5	1,950
Airplane Approval Record	FS-5700-21	236 ^{note 4}	1	236	4.0	944
Helicopter Approval Record	FS-5700-21a	325 ^{note 4}	1	325	4.0	1,300
Totals	---	2,805	---	2,805	---	5,610

Notes:

1. Best professional judgment was used to determine estimates of burden collection data. Assessment estimates were based on the following mechanisms. An assessment from Federal agency evaluators involved in the processing of

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applications and who have experienced working with private industry applicants during the last 5 years. Additionally, phone interviews were conducted in support of this supporting statement with 3 businesses in which information was requested to provide the data to support estimates of burden collection. The Federal Government does not manage any database that compiles or tracks estimate of burden collection nor tracks number of respondents or forms submitted.

2. A respondent is defined as a single pilot applicant or single aircraft applicant. Values listed comprise initial and recurrent applicants.
3. Method of calculation: Each aircraft has been calculated for an average of two pilots as well as two relief pilots (2 x 2 = 4) totaling 4 pilots for each aircraft. 236 airplanes x 4 pilots = 944 pilots. 325 helicopters x 4 pilots = 1300 pilots.
4. Sourced from Forest Service Fire and Aviation Management for Fiscal Year (FY) 2015, accurate as of May 9, 2015; includes call-when-needed and exclusive use contracts. Each aircraft utilized in these contracts must submit their aircraft records for approval of use in the contract = 236 airplanes + 325 helicopters = 561 respondents.
5. Pilots will have to submit an initial or recurrent application package annually. Aircraft are reviewed annually as well.
6. Time includes data collection, support document collection, administrative processing, and form submission.
 - **Record keeping burden should be addressed separately and should include columns for:**
 - a) **Description of record keeping activity:** Hardcopies of records are kept at the localized agent level and are not distributed; nor are records distributed within the Federal Agency, it's Federal and State partners, or private industry.
 - b) **Number of record keepers:** None
 - c) **Annual hours per record keeper:** None
 - d) **Total annual record keeping hours (columns b x c):** Zero
 - **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

Table 2: Estimates of Annualized Cost to Respondents

(a) Description of the Collection Activity	(b) Estimated Total Annual Burden on Respondents (Hours)	(c) ^{note 1} Estimated Average Income per Hour	(d) Estimated Cost to Respondents
Airplane Pilot Record, FS-5700-20	708	31.35	22,195
Helicopter Pilot Record, FS-5700-	975	31.35	30,566

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Table 2: Estimates of Annualized Cost to Respondents

(a) Description of the Collection Activity	(b) Estimated Total Annual Burden on Respondents (Hours)	(c) ^{note 1} Estimated Average Income per Hour	(d) Estimated Cost to Respondents
20a			
Airplane Approval Record, FS-5700-21	944	31.35	29,613
Helicopter Approval Record, FS-5700-21a	1300	31.35	40,755
Totals	3930	---	123,129

Notes:

- The FS-5700-20 and FS-5700-20a forms go to pilots for completion of pilot data prior to agency inspector verification and approval. Completion of forms FS-5700-21 and FS-5700-21a are nearly the sole responsibility of agency inspectors, with vendors (pilots, aircraft owner, maintenance personnel, etc.) providing aircraft logbooks during inspections. Wages based on Department of Labor Occupation code 31010 Pilot, \$27.86/hour wage + \$3.49/hour health and welfare wage.

- 13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.**

There are no capital operation and maintenance costs.

- 14. Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.**

The response to this question covers the actual costs the agency will incur as a result of implementing the information collection. The estimate should cover the entire life cycle of the collection and include costs, if applicable, for:

- **Employee labor and materials for developing, printing, storing forms**
Not applicable
- **Employee labor and materials for developing computer systems, screens, or reports to support the collection**
Not applicable
- **Employee travel costs**
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- **Cost of contractor services or other reimbursements to individuals or organizations assisting in the collection of information**

Not applicable

- **Employee labor and materials for collecting the information**

Reference Table 3

- **Employee labor and materials for analyzing, evaluating, summarizing, and/or reporting on the collected information**

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Table 3: Estimates of Annualized Cost to Government

GOVERNMENT EMPLOYEE ACTIVITY	NUMBER OF RESPONSES	TIME TO REVIEW/CERTIFY AIRCRAFT AND/OR PILOT	EMPLOYEE WAGE RATE <small>NOTE 3</small>	EMPLOYEE ANNUAL TRAVEL COSTS <small>NOTE 4</small>	ANNUAL COST TO THE GOVERNMENT PER IC <small>NOTE 5</small>
Review/Finalization of FS-5700-20	472	.42 hrs <small>Note 1</small>	\$39.70	\$25,200	\$32,870
Review/Finalization of FS-5700-20a	650	.42 hrs <small>Note 1</small>	\$39.70	\$25,200	\$30,419
Review/Finalization of FS-5700-21	236	.58 hrs <small>Note 2</small>	\$39.70	\$25,200	\$30,434
Review/Finalization of FS-5700-21a	325	.58 hrs <small>Note 2</small>	\$39.70	\$25,200	\$32,483
Total Cost to the Government		---	---		\$126,206

Notes:

1. Historically typical time to review and certify a pilot application package.
2. Historically typical time to review and certify an aircraft application package.
3. Federal employee wage rate GS-13, step 5 was used to calculate the wage rate (Reference http://www.opm.gov/oca/12tables/pdf/rus_h.pdf). Cost of living allowance was not included. Pilot and aircraft inspectors are paid at this level.
4. Travel expenses are required due to non-located government agent location and private industry aircraft location. Government agents are required to travel to the aircraft location to conduct pilot and aircraft evaluations. Travel expenses include airfare, lodging, per diem, and rental car expenses. It does not include wages while in travel status. An average travel expense of \$2,100 per month has been generally incurred as indicated by historical FY 2015 travel data and has been deemed appropriate for this cost assessment. Annual travel expenses are calculated to be \$25,200.
5. Annual cost = number of responses x hours x wage rate + travel cost.

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

This submission is based on current and projected aircraft and pilot contractual oversight for FY 2012 through FY 2015 and beyond. It further reflects changes necessary to facilitate accurate and efficient Forest Service Aviation Management as described in section 2g.

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16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.

Collection results are not published.

A summary of aircraft type/model/series, contract number, and business point of contact information is published for use by those agencies included under the Interagency Agreement.

Pilot information is not published.

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.

The Forest Service is not requesting approval to omit the OMB expiration date.

18. Explain each exception to the certification statement identified in item 19, "Certification Requirement for Paperwork Reduction Act."

The Forest Service does not request any exceptions.

B. Collections of Information Employing Statistical Methods

This information collection does not employ statistical methods.