

SUPPORTING STATEMENT

OMB -2120-XXXX Safety Management Systems for Part 121 Certificate Holders

Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The *Aviation Safety and Federal Aviation Administration Extension Act of 2010* (the Act), Public Law 111-216, § 215 (enacted on August 1, 2010). The Act requires the FAA to initiate rulemaking requiring all part 121 air carriers to implement a Safety Management System (SMS). The Act requires a notice of proposed rulemaking (NPRM) within 90 days of the enactment and a final rule within twenty-four months of enactment.

Collection and analysis of safety data is an essential part of an SMS. In addition, a primary component of an SMS is the publication of the safety policy, which establishes the foundation for the SMS. Two other essential components of SMS are safety risk management (SRM) and safety assurance. The certificate holder is required to maintain records of the outputs of these processes. Safety promotion is the other component of SMS. Within it, the certificate holder is required to maintain training records and records of communications used to promote safety. However, it is important to note that some part 121 certificate holders already have and maintain some of these documents and records as a result of other voluntary or required programs. In addition, the data, records, and documentation will not be submitted to the FAA. They will be used by the certificate holder in operation of its SMS.

Finally, because of the complexity involved in the development and implementation of an SMS, a phased-approach to implementation within the certificate holder will be used. Part of the initial phase is the development of an implementation plan, which will guide the certificate holder's implementation, as well as provide the basis for the FAA's oversight during the development and implementation phases. The implementation plan is the only new document or data the certificate holder will submit to the FAA due to the new rule.

2. Indicate how, by whom, and for what purpose the information is to be used.

The certificate holder will use the data it collects to identify hazards and instances of non-compliance with requirements and standards. The data will not be submitted to the FAA. The safety policy, outputs of safety risk management and safety assurance processes, and training and communication records will be kept by the certificate holder and used in its SMS. The certificate holder will also use the data, records and documentation to show compliance with Title 14 CFR part 5. However, none of these data, records or documentation will be submitted to the FAA.

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.

The only information that must be submitted to the FAA is the certificate holder's SMS implementation plan. The FAA does not specify how or in what media documents and records must be maintained relative to the requirements in this rule. Therefore, the certificate holder is free to use whatever systems and media it deems appropriate, including existing systems. However, in accordance with the Government Paperwork Elimination Act (GPEA), the FAA will not only allow and accept, but encourages the use of automation and electronic media for the gathering, storage, presentation, review, and transmission of all requests, records, reports, tests, or statements required by this rule. Any such transmission must be with the provision that such automation or electronic media has adequate provision for security (i.e., that in the case of submissions of implementation plans, they may not be altered after review and acceptance by the FAA), and that the systems or applications are compatible with the systems or applications used by the FAA.

Further, certificate holders will have free access to the FAA's Web-Based Application Tool (WBAT), which will assist in the data collection and management aspects of the rule. WBAT is a federally developed and funded software system that could assist the air carriers data management and information technology needs to support compliance with a significant portion of requirements specified under 14 CFR Part 5. While the FAA is not requiring certificate holders to use WBAT, it is one option that is available and it reduces the costs of developing and implementing a separate platform.

One hundred percent of the rule is available electronically and includes hyper-linking of table-of-content entries directly to the appropriate section of the rule and to associated preamble language for further explanation. The FAA is working to insure that the process maintains this 100% availability to respondents throughout the world.

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

The only information that must be submitted to the FAA is the certificate holder's SMS implementation plan. The FAA has reviewed other public-use reports and finds no duplication. No other agency collects this information and similar information is not available from any other sources. The SMS implementation plan, as well as information required to be collected and maintained by the certificate holder (this is not submitted to the FAA) is particular to each certificate holder operating under the provisions of 14 CFR, part 121. The information necessary is available from that certificate holder only, is not available from any other source, and is to be used by the certificate holder in its SMS.

The FAA does not specify how, or in what media, documents, and records must be maintained relative to the requirements in this rule. However, it encourages certificate holders to use existing mechanisms and systems to minimize the burden. For instance, the FAA encourages certificate holders to maintain training records required by this rule using the same mechanisms and systems it uses for other required training records.

5. If the collection of information has a significant impact on a substantial number of small businesses or other small entities (item 5 of OMB Form 83-I), describe the methods used to minimize burden.

Using the Small Business Administration (SBA) definition of small entity (North American Industrial Classification Code # 481111, Scheduled Passenger Air Transportation, 1,500 employees), approximately 64 part 121 certificate holders that will be affected by the final rule are classified as small entities. FAA Flight Standards Service inspectors work with certificate holders on a case-by-case basis to ensure compliance with required standards and information collection are not unduly burdensome. Also, procedures are in place for a certification holder to request an exemption from a reporting or recordkeeping requirement that is financially burdensome or operationally difficult.

In addition, the only submission that is required to the FAA is an SMS implementation plan. It is important to note that the scale and complexity of the implementation plan would be consistent with the scale and complexity of the operation. Therefore, the impact on small business would be minimized. The required safety policy, outputs of safety risk management and safety assurance processes, and training and communication records will be kept by the certificate holder and used in its SMS. The FAA does not specify how, or in what media, documents and records must be maintained relative to the requirements in this rule. However, it encourages certificates holders to use existing mechanisms and systems to minimize the burden.

To further ease the burden, certificate holders will have free access to the FAA's Web-Based Application Tool (WBAT) in assisting in the data collection and management aspects of the rule. WBAT is a federally developed and funded software system that could assist the air carriers data management and information technology needs to support compliance with a significant portion of requirements specified under 14 CFR Part 5. WBAT started as an ASAP and incident reporting tool and now contains functions that more broadly support SMS. Specifically, WBAT currently has modules that support the data management needs of SRM and safety assurance functions (e.g., employee reporting, audits, investigations, and evaluations). WBAT also contains an SMS Implementation Plan Manager module, which supports the certificate holder's implementation of SMS by providing a tool to guide certificate holders through a gap analysis and implementation planning process. The results of the gap analysis and implementation planning are documented and stored in WBAT. While WBAT data are treated as proprietary to the carrier, permission can be given to FAA Certificate Management Team (CMT) members to access it and review draft plans online and provide feedback, greatly expediting the review and approval process. While the FAA is not requiring certificate holders to use WBAT, it is one option that is available and it reduces the costs of developing and implementing a separate platform.

Finally, the material published in conjunction with this rule is informative and explanatory with regards to the requirements, and potential ways to comply with them.

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.

Collection and analysis of safety data is an essential part of an SMS. In addition, a primary component of an SMS is the publication of safety policy, which establishes the foundation for the SMS. Two other essential components of SMS are safety risk management and safety assurance. The certificate holder is required to maintain records of the outputs of these processes. Safety promotion is the other component of SMS. Within it, the certificate holder is required to maintain training records and records of communications used to promote safety. However, it is important to note that the data, records and documentation will not be submitted to the FAA. They will be used by the certificate holder in operation of its SMS. Without these essential components, the certificate holder's SMS will be incomplete, and likely not as effective.

Because of the complexity involved in the development and implementation of an SMS, a phased-approach to implementation with the certificate holder will be used. Part of the initial phase is the development of an implementation plan, which will guide the certificate holder's implementation, as well as provide the basis for the FAA's oversight during the development and implementation phases. The implementation plan is the only new document or data the certificate holder will submit to the FAA. Without the implementation plan, the FAA will not be able to monitor the certificate holder's implementation.

7. Explain any special circumstances that would cause an information collection not be conducted in a manner -

- **requiring respondents to report information to the agency more often than quarterly;**

There are no special circumstances 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;**

There are no special circumstances requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.

- **requiring respondents to submit more than an original and two copies of any document;**

There are no special circumstances requiring collection of information to be submitted in 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 3 years;**

Outputs of safety risk management processes must be retained for as long as the resultant safety risk control remains relevant to the operation. This is necessary because safety risk controls are used to control or mitigate safety risk. Without the record, the analysis of a safety issue and the reason for a risk control could be lost or forgotten. Thus, the risk control itself could be eliminated without knowledge of the consequences.

Records of SMS-required training that is administered to the accountable executive and members of the certificate holder's management must be retained for as long as the individual who received the training is employed by the certificate holder. This is to ensure that the SMS-required training is provided to all individuals who must receive that training.

Outputs of safety assurance processes must be retained for a minimum of 5 years. This is necessary because these outputs provide baseline history, which allows the certificate holder to assess the impact of changes in the operation on its safety performance.

- **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;**

There are no special circumstances that would cause an information collection to be conducted in connection with a statistical survey.

- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

There are no special circumstances that would cause an information collection to be conducted in a manner requiring the use of a statistical data classification not 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;**

There are no special circumstances that would cause an information collection to be conducted in a manner that includes a pledge of confidentiality that is not supported by authority established in statute or regulation.

- **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.**

The only submission to the FAA would be an SMS implementation plan, which is required 6 months after publication of the final rule. All other required data, records, and documentation is held and used by the certificate holder. The submission of an SMS implementation plan does not require respondents to submit proprietary trade secrets or other confidential information.

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 record keeping, disclosure, or reporting format (if any) and on the data elements to be recorded, disclosed, or reported.

On July 23, 2009, the FAA issued an advanced notice of proposed rulemaking (ANPRM), soliciting comment on the appropriate applicability and scope of a potential SMS rule. The ANPRM requested information from air carriers, operators conducting charters, maintenance repair stations, and design and manufacturers on their experiences with SMS, the costs associated with implementing SMS in their organization, and recommendations for documentation, recordkeeping, data collection and sharing, and training requirements necessary for implementation of an SMS. The FAA received 90 comments in response to the ANPRM from a variety of commenters, including air carriers, aircraft designers and manufacturers, service facilities, trade associations and private citizens. Seven part 121 operators and six trade associations representing the 121 operators or their employees submitted comments in response to the ANPRM.

On February 12, 2009, the FAA formed the Safety Management System Aviation Rulemaking Committee (ARC), to seek recommendations from industry experts on the scope of the rulemaking. On March 31, 2010, the ARC, which is comprised of representatives from air carrier operations, maintenance organizations, and design and manufacturing companies and associations, submitted a report to the FAA providing recommendations regarding the public comments to the ANPRM and the proposed SMS rule.

A notice of proposed rulemaking was published on November 5, 2010, vol. 75, no. 214, pages 68224-68245, allowing for public comments. The Modification and Replacement Parts Association (MARPA) was the only commenter to the NPRM that specifically addressed the Paperwork Reduction Act in its comments. MARPA provided a table of proposed information collection requirements with estimates for annual burden (in hours) to meet the requirements both for the initial year and out years. The FAA used these estimates as one of the data sources for its cost analyses.

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

There are no monetary considerations for this 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 only submission to the FAA is an SMS implementation plan, which is required 6 months after publication of the final rule. All other required data, records, and documentation is held and used by the certificate holder. However, the respondents have been given no assurance of confidentiality.

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

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden for the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

The information provided below are general estimates based on data provided by carriers participating in the voluntary pilot project, the ARC, and comments submitted on the Initial Regulatory Evaluation. The FAA estimates that there are approximately 90 operators will be in compliance the requirements described below.

§ 5.1 - Applicability

A. Safety Management System

A certificate holder under part 119 of this chapter authorized to conduct operations in accordance with the requirements of part 121 of this chapter must have a Safety Management System that meets the requirements of this part and is acceptable to the Administrator within 3 years after the effective date of final rule. Most carriers have existing programs in place that the FAA strongly encourages carriers to use to establishing a safety management system. Programs such as the Aviation Safety Action Program (ASAP) and the Internal Evaluation Program (IEP) have strong relationships to SMS. Plus the FAA also offers an existing Web-Based Application Tool (WBAT) which is a federally developed and funded software system that meets most or nearly all of the minimum requirements under SMS. Moreover, the FAA expects that 59 carriers with existing ASAP programs will expand this program to cover those employees currently not covered under this program leaving 31 remaining carriers using the WBAT at a minimal cost.

B. Implementation Plan

Certificate holders are required to develop and submit an implementation plan. The implementation plan will guide the certificate holder's implementation of SMS, as well as provide the basis for the FAA's oversight during the development and implementation phases. The SMS implementation plan is the only new document or data the certificate holder will submit to the FAA. It is a one-time submission due six-months after the publication of the final rule.

§ 5.95 SMS Documentation

Costs for SMS documentation come from both the necessary man hours to research and document the safety policy, processes, and procedures, as well as the actual documentation.

A. Safety Policy

The certificate holder must have a safety policy that includes at least the following: safety objectives, a clear statement about the provision of the necessary resources for the implementation of the SMS, a safety reporting policy that defines requirements for employee reporting of safety hazards or issues, a policy that defines unacceptable behavior and conditions for disciplinary action, an emergency response plan.

B. SMS processes and procedures

Carriers will also need to establish policies and procedures. For example, under safety risk management, certificate holders must develop processes to analyze systems and use the resulting system analyses to identify hazards that may impact the certificate holder's aviation operations.

The initial documentation, including the implementation plan and SMS documentation will occur over a three-year period. There are also recurring costs for document updates as a company's SMS evolves. The FAA assumes that the majority of document updates are a minor cost; an estimate is provided below.

Estimated Cost for Expansion of Existing Programs

90 Operators

59 Part 121 Carriers with an ASAP for one or more employee groups

1 Full Time Employee (FTE) = 2000 hours per year

2 FTEs per additional ASAP @ 0.2 FTE each¹ = 800 hours per ASAP

3 Pilot ASAPs,

14 Mechanic and Engineering ASAPs,

18 Dispatcher ASAPs

+ 32 Flight Attendant ASAPs

67 Total ASAPs

67 Total ASAPs

x \$2,000 hardware/software, administration, and meeting logistics per employee group

\$134,000 Material cost per year

Airline pilots, copilots, and flight engineers salary² = \$151,248 per year = \$75.6239 per hour

Maintenance staff salary = \$73,606 per year = \$36.8031 per hour

Dispatchers salary = \$70,250 per year = \$35.1249 per hour

¹ (See in ATA comments the footnote in Table 3)

² http://www.bls.gov/oes/current/naics3_481000.htm,

<http://www.bls.gov/news.release/pdf/ecec.pdf>, BLS reports in Table A. Relative importance of employer costs for employee compensation, June 2011 that additional employer compensation per employee is roughly 31 % of an employee's salary

Flight attendants salary = \$54,290 per year = \$27.1452 per hour

3 Pilot ASAPs x 800 hours = 2,400 hours
14 Mechanics and Engineers ASAPs x 800 hours = 11,200 hours
18 Dispatcher ASAPs x 800 hours = 14,400
+ 32 Flight Attendant ASAPs x 800 hours = 25,600

53,600 total labor hours per year

3 Pilot ASAPs; 2,400 hours x \$75.6239 = \$181,497
14 Mechanics and Engineers ASAPs; 11,200 hours x \$36.8031 = \$412,195
18 Dispatcher ASAPs; 14,400 hours x \$35.1249 = \$505,798
+ 32 Flight Attendant ASAPs; 25,600 x \$27.1452 = \$694,917

\$1,794,408 labor cost per year
+ \$134,000 material cost per year

\$1,928,408 total cost per year

Implementation of Expansion of Existing Programs

The FAA assumes that carriers will phase in a portion of the expansion of these programs over 3 years. A third of the expansion will be completed in the first year, two-thirds of the program will be completed by the second year, and the program will be fully operational by the third year.

Year 1 = 53,600 total labor x 33.3% = 17,848.8 total labor hour for year 1
Year 2 = 53,600 total labor x 66.6% = 35,697.6 total labor hours for year 2
+ Year 3 = 53,600 total labor x 100% = 53,600.0 total labor hours for year 3

107,146 total labor hours for 3 years

Year 1 = \$1,928,408 total cost x 33.3% = \$642,160 total cost for year 1
Year 2 = \$1,928,408 total cost x 66.6% = \$1,284,320 total cost for year 2
+ Year 3 = \$1,928,408 total cost x 100% = \$1,928,408 total cost for year 3

\$3,854,888 total cost over 3 years

Estimated Cost for Implementation Plan, SMS Documentation, and Implementation:

90 Operators

1 Full Time Employee (FTE) = 2000 hours per year

Research Analyst Salary³ = \$92,958 per year = \$46.479 per hour

Material Costs of Documentation over 3 years per Carrier;

Small = \$24,000; Medium = \$95,000; Large = \$337,500

30 Large Carriers x 4,256 hours of labor per carrier = 127,680 hours per year
31 Medium Carriers x 2,732 hours of labor per carrier = 84,692 hours per year
+ 29 Small Carriers x 3,045 hours of labor per carrier = 88,305 hours per year

300,677 total labor hours per year for 90 carriers
x 3 years

902,031 total labor hours for 3 years for 90 carriers

³ Bureau of Labor Statistics, <http://www.bls.gov/oes/current/oes152031.htm>

300,677 hours of labor per year
x \$46.479 hourly wage (research analyst)
\$13,975,166 labor cost per year

\$13,975,166 Cost of labor per year
x 3 years

\$41,925,498 Total Initial Labor Costs for 90 Carriers over 3 years

30 Large Carriers * \$337,500 = \$10,125,000 Material Cost (3 years)
31 Medium Carriers * \$95,000 = \$2,945,000 Material Cost (3 years)
+ 29 Small Carriers * \$24,000 = \$696,000 Material Cost (3 years)

\$13,766,000 total material cost (3 years)

\$41,925,498 Total Initial Labor Costs for 90 Carriers over 3 years
+ \$13,766,000 Total Material Costs of Documentation for 3 years
\$55,691,498 Total Estimated Initial Cost Burden for 3 years

Estimated Recurring Cost for SMS Documentation:

30 Large Carriers x \$30,000 per carrier = \$900,000 hours per year
31 Medium Carriers x \$15,000 per carrier = \$465,000 hours per year
+ 29 Small Carriers x \$10,000 per carrier = \$290,000 labor hours per year

\$1,655,000 Total Cost for Document Updates per year for 90 Carriers

§ 5.97 SMS records

This rule will require carriers to record output from their safety risk management (SRM) process, safety assurance (SA) process, safety communications and SMS training. Under safety risk management carriers will identify hazards and assess the control of associated risks. For safety assurance carriers will acquire data with respect to its operations, products, and services to monitor the safety performance of the organization. Carriers must develop and maintain means for communicating safety information and provide training to the necessary personal. All of these records depend on a carrier’s operations.

The FAA does not specify how, or in what media, documents and records must be maintained relative to the requirements in this rule. However, it encourages certificates holders to use existing tools to minimize the burden which includes both staffing and safety programs. For example, CASS/QA/MRRB program manager or the Director of Safety are existing employees and voluntary programs and software such as an ASAP or WBAT have the ability to be integrated into a carrier’s SMS to help carriers reduce the cost of compliance. Based on this information the FAA maintains that only one additional employee will be required for carriers with several existing safety programs, 2 full time employees for large and medium carriers with few pre-existing programs, and a part-time employee for small carriers. The FAA also maintains that there will be minimal additional material costs and costs training records since all part 121 certificate holders already maintain training records. Operating costs will begin after the development, documentation, and implementation of an SMS.

Estimated Annual Operating Costs:

90 Operators

1 Full Time Employee (FTE) = 2000 hours per year

Research Analyst Salary⁴ = \$92,958 per year = \$46.479 per hour

59 Large/Medium/Small Carriers x 1 FTE = 118,000 hours per year
 9 Large/Medium Carriers x 2 FTE = 36,000 hours per year
 + 22 Small Carriers x .5 FTE = 22,000 hours per year

176,000 total hours per year for 90 carriers

176,000 hours
 x \$46.479 hourly wage (research analyst)

\$8,180,304 for all 90 carriers per year

\$833 Promotional material per year
 x 90 Carriers

\$74,970 material cost per year

\$8,180,304 total labor cost per year
 + \$74,970 material cost per year

\$8,255,274 total cost per year

Summary Chart of Labor Hours Calculated Above

Part 5	Description	Initial Burden Hours (Years 1-3)	Annual Burden Hours (Years 4-10)
5.1 5.95	<ul style="list-style-type: none"> Develop and implement a Safety Management System Develop and submit an implementation plan Develop and maintain SMS documentation describing safety policy and SMS processes and procedures 	107,146 total labor for 3 years + 902,031 total labor for 3 years <hr/> 1,009,177 total labor for 3 years	
5.97	<ul style="list-style-type: none"> SMS Records: output of SRM, output of SA, communication records, training records 		176,000 hours per year + 53,600 hours per year 229,600 annual burden
Total Burden		1,009,177 hours over 3 years, or an average of 336,392 hours/year	229,600 hours annually

⁴ Bureau of Labor Statistics, <http://www.bls.gov/oes/current/oes152031.htm>

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

- (a) Total capital and start-up components takes place in the first three years of this rule. Costs include establishing an implementation plan, SMS documentation, and implementing the programs necessary for a functioning Safety Management System.

\$55,691,498 total cost for implementation plan, SMS documentation, and implementation
+\$3,854,888 total cost of expansion of ASAPs over 3 years
\$59,546,386 total cost of implementation (\$4.2 million annualized over 10 years)

- (b) Total operating costs includes additional staffing, the maintenance of ASAP programs, updates to SMS documentation, and material to continuously promote safety. These costs occur in years 4-10 of the rule.

\$8,255,274 total cost per year for staffing plus promotional material;
\$1,928,408 total cost per year for ASAPs
+\$1,655,000 total cost per year of SMS manual updates
\$11,838,682 total cost per year

\$11,838,682 total cost per year x 7 years = \$82,870,774

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

The FAA offers carriers a federally developed and funded software system, the WBAT, which costs roughly \$2.6 million per year. However, the WBAT serves a variety of functions in addition to aiding carriers with their ASAPs and SMS. Therefore the current \$2.6 million cost is a high estimate of the FAA's cost to maintain WBAT yearly.

The total annual cost to the government is \$2.6 million.

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

SMS is a new requirement, so this is a program change. It is important to note that, with the exception of the SMS implementation plan, the data, records, and documentation will not be submitted to the FAA. They will be used by the certificate holder in operation of its SMS.

16. For collections of information whose results are planned to be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

There is no plan for tabulation or publication.

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.

No such approval is being sought.

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

There are no exceptions.