

**Pilot Certification and Qualification Requirements for Air Carrier Operations
2120-0755**

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.

Title 49 U.S.C., Section 44702 empowers and requires the Secretary of Transportation to issue operating certificates and to establish minimum safety standards for the operation of pilots and those to whom such certificates are issued. Also, Title 49 U.S.C., Section 44701 empowers and requires the Administrator of the Federal Aviation Administration (FAA) to prescribe standards applicable to the accomplishment of the mission of the FAA.

This project is in direct support of the Department of Transportation's Strategic Plan – Strategic Goal – SAFETY; i.e., to promote the public health and safety by working toward the elimination of transportation-related deaths and injuries.

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.

FAA aviation safety inspectors review the Airline Transport Pilot (ATP) Certification Training Program (CTP) submittals to determine that the program complies with the applicable requirements of 14 CFR 61.156. The programs that comply with the minimum requirements receive approval to begin offering the course to applicants for an ATP certificate with a multiengine class rating or an ATP certificate obtained concurrently with an airplane type rating.

FAA aviation inspectors review an institution of higher education's application for the authority to certify its graduates meet the minimum requirements of 14 CFR 61.160. The institutions of higher education that receive a letter of authorization for their degree program(s) are authorized to place a certifying statement on a graduates' transcript indicating he or she is eligible for a restricted privileges ATP certificate.

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.

In accordance with the Government Paperwork Elimination Act (GPEA), the FAA allows, accepts, and encourages the use of automation and electronic media for the gathering, storage, presentation, review, and transmission of all ATP CTP requests as well as applications for authority to certify graduates by institutions of higher education required by this collection activity. The FAA will ensure that such automation or electronic media has adequate provision for security (i.e., that such submissions 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. One hundred (100) % of the rule is available electronically. 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 can be used for the purpose described in Item 2 above.

We have reviewed other FAA public-use reports and find no duplication. Also, the FAA knows of no other agency collecting the same information. The information sought is particular to the proposed ATP Certification Training Program training offered by providers certified under part 121, 135, 141 or 142. The information necessary is available from the certificate holders only, and is not available from any other source. The information sought from institutions of higher education seeking the authority to certify their graduates is particular to their degree program(s) and associated aviation coursework required by this rule and can only be provided by them and is not available from any other source.

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

The FAA believes this will not impact a substantial number of small businesses or other small entities; however, the guidance material is informative and explanatory with regards to the requirements. Certificate holders seeking to obtain approval to offer or provide the ATP CTP are guided through the administrative requirements by the local principal operations inspector/training course program manager using published guidance material. The local FAA representative forwards an ATP CTP for approval through the FAA Regional Office to a representative of the Washington headquarters staff. Institutions of higher education seeking the authority to certify graduates of its degree program can contact the General Aviation and Commercial Division at the Washington headquarters office for assistance with the application and any other questions concerning the process.

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 reason for information collection is for original certification and review and approval of the ATP CTP. It is also for the initial review and approval of an institution of higher education's application for the authority to certify its graduates through issuance of a letter of authorization. Additional submittals by the certificate holder for the ATP CTP would only be required if there

is a desired program change. Additional application submittals by an institution of higher education will only be required if there is a change in what was originally approved or if the institution of higher education wants to add a degree program.

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).

This collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2)(i)-(viii).

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.

A 60-day notice for public comments was published in the Federal Register on April 9, 2015, vol. 80 no. 68, page 19107. No comments were received.

9. Explain any decision to provide any payment or 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 respondents have been given no assurance of confidentiality.

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

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden to respondents or record keeper from the collection of information from respondents or record keepers.

ATP CTP

The rule levies requirements that must be met by part 121, 135, 141, or 142 certificate holders who choose to offer or provide the ATP CTP. The estimates for hours and costs are broken down by initial development and approval of an ATP CTP, followed by pilot training record keeping.

While requiring the gathering and maintaining of information and, in certain cases, the reporting of some of that information to the FAA, these sections require no additional burden on the

certificate holders beyond what is currently required by rule or currently borne by certificate holders in regular practice. Exceptions to this are the following:

- a. One time development and submission of an ATP CTP to the FAA for approval. It requires one instructor 120 hours for each certificate holder who initially would offer the course.
- b. Requires one instructor 0.1 hours for course completion record keeping for each applicant for an ATP certificate with an airplane category multiengine class rating.

Assumptions for Cost Burden to Respondents

120 hours	Instructor time for course development and submission
\$32.55	Instructor hourly rate
\$3,906	Cost to develop an ATP CTP
7	Initial number of certificate holders offering the ATP CTP (2014)
14	Initial number of certificate holders offering the ATP CTP (2015)
1	Annual increase in no. of certificate holders offering the ATP CTP
0.1	One-time per pilot record keeping instructor hours for records on course completion

Note: Instructor salary adjusted for 1.302 benefits factor (Employee Benefit Research Institute, www.ebri.org (Benefit FAQs))

Table 1. Burden to Respondents

Year	Course Development Hours	Course Development Costs	Estimated No. of ATP Applicants	Record Keeping Hours	Record Keeping Costs	Total Hours	Total Costs
2014	840	\$ 27,342	3731	373	\$ 12,145	1213	\$ 39,487
2015	1680	\$ 54,684	3754	375	\$ 12,218	2055	\$ 66,902
2016	120	\$ 3,906	3776	378	\$ 12,291	498	\$ 16,197
2017	120	\$ 3,906	3799	380	\$ 12,365	500	\$ 16,271
2018	120	\$ 3,906	3821	382	\$ 12,439	502	\$ 16,345
2019	120	\$ 3,906	3844	384	\$ 12,514	504	\$ 16,420
2020	120	\$ 3,906	3867	387	\$ 12,589	507	\$ 16,495
2021	120	\$ 3,906	3891	389	\$ 12,664	509	\$ 16,570
2022	120	\$ 3,906	3914	391	\$ 12,740	511	\$ 16,646
2023	120	\$ 3,906	3938	394	\$ 12,817	514	\$ 16,723
2024	120	\$ 3,906	3961	396	\$ 12,893	516	\$ 16,799
2025	120	\$ 3,906	3985	398	\$ 12,971	518	\$ 16,877
2026	120	\$ 3,906	4009	401	\$ 13,049	521	\$ 16,955
2027	120	\$ 3,906	4033	403	\$ 13,127	523	\$ 17,033
2028	120	\$ 3,906	4057	406	\$ 13,206	526	\$ 17,112
2029	120	\$ 3,906	4081	408	\$ 13,285	528	\$ 17,191
2030	120	\$ 3,906	4106	411	\$ 13,365	531	\$ 17,271
2031	120	\$ 3,906	4131	413	\$ 13,445	533	\$ 17,351
2032	120	\$ 3,906	4155	416	\$ 13,526	536	\$ 17,432
Total	4,560	\$ 148,428	74,853	7,485	\$243,646	12,045	\$392,074
Average Annual Burden	228	\$ 7,421	3743	374	\$ 12,182	602	\$ 19,604

As the table shows, the hourly burden for the first year was **1,213 hours** and the first year cost was **\$39,487**. The average annual hour burden to respondents is still 602 and the average annual cost burden is \$19,604.

The total burden for 2015-2018 will be 3,555 hours and \$115,715. **This is an average of 888.75 hours and \$28,928.75 annually.**

Application for Authority to Certify Graduates for a Restricted Privileges ATP Certificate

The rule provides a method for an institution of higher education to seek the authority to certify its graduates of a degree program with an aviation major for a restricted privileges ATP certificate. The rule will require the institution to hold a part 141 pilot school certificate from the FAA to provide pilot training within the degree program. The estimates for hours and costs are broken down by the assumed number of institutions applying for this authority and the initial aviation coursework mapping that needs to be documented by the institution of higher education as this information is not typically collected from them.

While requiring the gathering and maintaining of pilot training information and, in certain cases, the reporting of some of that information to the FAA, these sections generally require no additional burden on the part 141 certificate holders beyond what is currently required by rule or what is currently borne by certificate holders in regular practice. Exceptions to this are the following:

- a. One-time application to the FAA by an institution of higher education that seeks this authority. Requires one individual from the institution of higher education 8 hours to review the instructions in Advisory Circular 61-139, obtain part 141 pilot school information as well as degree and coursework details, and complete the application.
- b. Requires an academic advisor 0.5 hours to review the transcript of each graduate to determine eligibility for a restricted privileges ATP certificate.
- c. During the part 141 certificate holders' renewal every 24 calendar months, the chief instructor will review the letter of authorization with an FAA inspector. The associated costs are minimal additional recurring because the review is included as part of existing duties for approved pilot training and record keeping.

Assumptions for Cost Burden to Respondents

8 hours	Initial application: College professor from the institution of higher education
0.5	Academic advisor (college professor) one-time per graduate for record keeping to review their transcript for eligibility for a restricted privileges ATP certificate
\$53.33	College professor / Academic advisor hourly rate
28	Number of institutions of higher education that applied (2013)
44	Number of institutions of higher education that applied (2014)
32	Number of institutions of higher education that will apply (2015)
10	Annual increase in no. of institutions of higher education applying (next 5 years)
1	Annual increase in no. of institutions of higher education applying (beyond 2020)

Table 2. Burden to Respondents

Year	School Application for FAA Approval--Hours	School Application for FAA Approval--Costs	Estimated No. of Graduates	Review of Transcripts --Hours	Review of Transcripts --Costs	Total Hours	Total Costs
2013	224	\$ 11,946	648	324	\$ 17,277	548	\$ 29,223
2014	352	\$ 18,772	652	326	\$ 17,381	678	\$ 36,153
2015	256	\$ 13,652	656	328	\$ 17,485	584	\$ 31,137
2016	80	\$ 4,266	660	330	\$ 17,590	410	\$ 21,856
2017	80	\$ 4,266	664	332	\$ 17,696	412	\$ 21,962
2018	80	\$ 4,266	668	334	\$ 17,802	414	\$ 22,068
2019	80	\$ 4,266	672	336	\$ 17,909	416	\$ 22,175
2020	80	\$ 4,266	676	338	\$ 18,016	418	\$ 22,282
2021	8	\$ 427	680	340	\$ 18,124	348	\$ 18,551
2022	8	\$ 427	684	342	\$ 18,233	350	\$ 18,660
2023	8	\$ 427	688	344	\$ 18,343	352	\$ 18,769
2024	8	\$ 427	692	346	\$ 18,453	354	\$ 18,879
2025	8	\$ 427	696	348	\$ 18,563	356	\$ 18,990
2026	8	\$ 427	700	350	\$ 18,675	358	\$ 19,101
2027	8	\$ 427	705	352	\$ 18,787	360	\$ 19,213
2028	8	\$ 427	709	354	\$ 18,899	362	\$ 19,326
2029	8	\$ 427	713	356	\$ 19,013	364	\$ 19,440
2030	8	\$ 427	717	359	\$ 19,127	367	\$ 19,554
2031	8	\$ 427	722	361	\$ 19,242	369	\$ 19,668
2032	8	\$ 427	726	363	\$ 19,357	371	\$ 19,784
Total	1,328	\$ 70,824	13,724	6,862	\$ 365,973	8,191	\$436,791
Average Annual Burden	66	\$ 3,541	686	343	\$ 18,299	410	\$ 21,840

As the table shows, the hourly burden for the first two years was **1,226 hours** with a cost of **\$65,376**. The average annual hour burden to respondents is 410 and the average annual cost burden is \$21,840.

The total annual burden for 2015-2018 will be 1,820 hours and \$97,023. **This is an average of 455 hours and \$24,255.75 annually.**

Revision Application for Authority to Certify Graduates for a Restricted Privileges ATP Certificate

For those institutions of higher education that have received the Letter of Authorization (LOA) from the FAA to certify graduates for a restricted privileges ATP certificate that would like to add degree programs or additional coursework to the authorization, they must submit an application for revision. FAA will review the revised application, and amend the LOA accordingly.

a. An application for revision to the FAA by an institution of higher education that seeks to amend its authority. Requires one individual from the institution of higher education 2 hours to review the instructions in Advisory Circular 61-139, obtain part 141 pilot school information as well as any new degree and coursework details as needed for the revision, and complete the applicable sections of the application. A revision uses the same application form (FAA form 8700-1) as the initial application.

Assumptions for Cost Burden to Respondents

2 hours	Initial application: College professor from the institution of higher education
\$53.33	College professor / Academic advisor hourly rate
1	Number of institutions of higher education that sent a revised application (2013)
23	Number of institutions of higher education that sent a revised application (2014)
36	Number of institutions of higher education that will send a revised app (2015)
40	Annual increase in no. of institutions of higher education revising (2016)
30	Annual increase in no. of institutions of higher education applying (beyond 2016)

Table 3. Burden to Respondents

Year	School Revision Application for FAA Approval-- Hours	Total Costs
2013	2	\$ 107
2014	46	\$ 2,453
2015	72	\$ 3,840
2016	80	\$ 4,266
2017	60	\$ 3,200
2018	60	\$ 3,200
2019	60	\$ 3,200
2020	60	\$ 3,200
2021	60	\$ 3,200
2022	60	\$ 3,200
2023	60	\$ 3,200
2024	60	\$ 3,200
2025	60	\$ 3,200
2026	60	\$ 3,200
2027	60	\$ 3,200
2028	60	\$ 3,200
2029	60	\$ 3,200
2030	60	\$ 3,200
2031	60	\$ 3,200
2032	60	\$ 3,200
Total	1,160	\$ 61,866
Average Annual Burden	58	\$ 3,093

As the table shows, the hourly burden for the first two years was **48 hours** with a cost of **\$2,560**. The average annual hour burden to respondents is 58 and the average annual cost burden is \$3,093.

The total annual burden for 2015-2018 will be 272 hours and \$14,506. **This is an average of 68 hours and \$3,626.50 annually.**

Combining the average annual burden for the ATP CTP, Application for Authority to Certify Graduates for a Restricted Privileges ATP Certificate, and Revision Application for Authority to Certify Graduates for a Restricted Privileges ATP Certificate produces a total annual hourly burden of **1,412 hours** and **\$56,181**.

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

There are no additional costs not already included in Item 12.

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

ATP CTP

The estimates for hours and costs are for the FAA to issue initial approval and then ultimately final approval of an ATP Certification Training Program. After final approval, there are minimal additional recurring costs for the Federal Government because an ATP Certification Training Program would be included as part of current FAA certificate management duties for approved pilot training and record keeping.

Assumptions for Cost to the Federal Government

\$61.50	FAA Aviation Safety Inspector, GS14--Hourly rate (average)
\$24.67	FAA Clerk/Secretary, GS07--Hourly rate
156 hours	Inspector time to review an ATP CTP submitted for approval (includes 6 hours of travel)
0.5	Clerk/Secretary time (hours) to type approval letter

Note: FAA hourly rates adjusted for 1.3245 benefits factor.

- a. Requires one FAA inspector (Field Inspector) 30 hours, one FAA inspector (Regional Inspector) 30 hours, and two FAA inspectors (Headquarters Inspector) 25 hours each to review each ATP Certification Training Program submitted for initial approval. This initial approval permits the certificate holder to deliver the ATP Certification Training Program for one year.
- b. Requires two FAA inspectors 20 hours of review and 6 hours of travel for one FAA inspector (Headquarters Inspector) for final approval. Final approval will be granted after review of the certificate holder's training program performance measures, site visit and FAA inspector (Headquarters Inspector) observation of the program.

Table 4. Cost Burden to Federal Government

Year	Review of ATP Cert. Training Pgm Course-- Hours	Review of ATP Cert. Training Pgm Course—Costs	Approval Letter Hours	Approval Letter Costs	Total Hours	Total Costs
2014	1092	\$ 67,158	3.5	\$ 86	1095.5	\$ 67,244
2015	2184	\$ 134,316	7.0	\$ 173	2191.0	\$134,489
2016	156	\$ 9,594	0.5	\$ 12	156.5	\$ 9,606
2017	156	\$ 9,594	0.5	\$ 12	156.5	\$ 9,606
2018	156	\$ 9,594	0.5	\$ 12	156.5	\$ 9,606
2019	156	\$ 9,594	0.5	\$ 12	156.5	\$ 9,606
2020	156	\$ 9,594	0.5	\$ 12	156.5	\$ 9,606
2021	156	\$ 9,594	0.5	\$ 12	156.5	\$ 9,606
2022	156	\$ 9,594	0.5	\$ 12	156.5	\$ 9,606
2023	156	\$ 9,594	0.5	\$ 12	156.5	\$ 9,606
2024	156	\$ 9,594	0.5	\$ 12	156.5	\$ 9,606
2025	156	\$ 9,594	0.5	\$ 12	156.5	\$ 9,606
2026	156	\$ 9,594	0.5	\$ 12	156.5	\$ 9,606
2027	156	\$ 9,594	0.5	\$ 12	156.5	\$ 9,606
2028	156	\$ 9,594	0.5	\$ 12	156.5	\$ 9,606
2029	156	\$ 9,594	0.5	\$ 12	156.5	\$ 9,606
2030	156	\$ 9,594	0.5	\$ 12	156.5	\$ 9,606
2031	156	\$ 9,594	0.5	\$ 12	156.5	\$ 9,606
2032	156	\$ 9,594	0.5	\$ 12	156.5	\$ 9,606
Total	5928	\$ 364,572	19.5	\$ 475	5947	\$365,035
Average Annual Burden	296.4	\$ 18,228	0.95	\$ 24	297.4	\$ 18,251

Application for Authority to Certify Graduates for a Restricted Privileges ATP Certificate

The estimates for hours and costs are for initial application processing and issuance of a letter of authorization to an institution of higher education. After initial approval, there will be 2 hours of time added to an already scheduled event for a part 141 certificate holder with an Aviation Safety Inspector (Operations). The additional recurring costs for the Federal Government are minimal because a part 141 pilot school is included as part of current FAA certificate overall management duties for approved pilot training and record keeping.

2029	90	\$ 5,535
2030	90	\$ 5,535
2031	90	\$ 5,535
2032	90	\$ 5,535
Total	1740	\$ 107,011
Average Annual Burden	87	\$ 5,351

Total Federal costs 2015-2018: \$199,481. **This is an annual cost of 49,870.25**

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

ATP CTP

The number of ATP Certification Training Program submissions initially provided on the collection form were projected for a new collection. FAA did not receive the number of anticipated programs for approval in 2014; therefore the number of initial programs received that year was revised. However, FAA still anticipates a total of 21 programs by the end of 2015 as originally projected, therefore the overall hours and cost had little change.

The process for review of ATP Certification Training Programs now includes the FAA Regional Office, which requires an additional inspector review. In addition, the program is reviewed by two FAA inspectors at Headquarters instead of one. As a result more inspector time is accounted for in the table. FAA also underestimated the amount of time it would take to review program submissions. The material submitted by the certificate holder to ultimately determine the learning objectives will be met is greater than expected and more detailed reviews of several key components of the course are required. As a result there is a significant increase in inspector review time overall. Inspector time also increased slightly to account for more on-site review time based upon the first visits recently conducted.

Application for Authority to Certify Graduates for a Restricted Privileges ATP Certificate

The number of applications to certify graduates for a restricted privileges ATP certificate provided on the collection form was projected for a new collection and assumed every aviation degree program in the U.S. would apply immediately. FAA did not receive the number of anticipated programs for approval in 2013; therefore the number of initial programs received was revised for 2013 and 2014. Based upon what has been received in 2015 to date, FAA has projected new numbers for the next several years. Instead of every school applying the first year, the initial applications appear to be spreading out over a 5-year period with several programs still working on meeting the eligibility requirements.

For those authorized institutions of higher education that would like to add degree programs or additional coursework to the authorization, they must submit an application for revision. FAA did not originally anticipate the number of revisions that these schools would submit. New tables were added to account for the time and cost of these additional application reviews.

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.

FAA publishes a list of approved ATP CTP providers and a list of authorized institutions of higher education on its Web site: <http://www.faa.gov/pilots/training/atp/>

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.