INFORMATION COLLECTION SUPPORTING STATEMENT

Maryland Three Airports: Enhanced Security Procedures for Operations at Certain Airports in the Washington, DC, Metropolitan Area Flight Restricted Zone
OMB No. 1652-0029
OMB Expiration Date: 8/31/2015

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. (Annotate the CFR parts/sections affected).*

   49 U.S.C. Section 114 and 49 CFR part 1562 require security measures to protect important national assets in the Washington, DC area and apply to flight operations at the Maryland Three (MD-3) airports (College Park Airport (CGS), Potomac Airfield (VKX), and Washington Executive/Hyde Field (W32)). TSA requires all individuals who operate an aircraft to or from these airports or who serve as an airport security coordinator to submit personal information and fingerprints to TSA for a security threat assessment. The Maryland Three regulations were promulgated to permit flight operations that had been prohibited at these airports immediately after the terrorist attacks on September 11, 2001, and to enhance security of critical infrastructure and Federal government assets in the Washington, DC metropolitan area.

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.*

   TSA requires aircraft operators to complete TSA Form No. 418 MD-3 PIN Application to operate to or from the Maryland Three airports or to serve as an airport security coordinator at one of these three airports. TSA collects the following information:

   - Personal information from applicants: full name; social security number; address; telephone number; date of birth; current and valid airman or student pilot certificate number and medical certificate; and fingerprints. Applicants must also submit a list of the aircraft make, model, and FAA registration number of each aircraft the applicant intends to operate to or from Maryland Three airports.
   - The applicant must submit this information either to the Maryland Three airport from which the applicant wishes to fly, or directly to TSA via fax to 703-603-4056. The Personal Identification Number Issuance Form is available at on the TSA website. http://www.tsa.gov/interweb/assetlibrary/pin_issuance_form.pdf. Alternately, applicants can visit www.tsa.gov, click on "Travelers and Consumers," then "Air Travel," then "General Aviation," then "Maryland Three Airports," and finally click "PIN Issuance Form."
   - For collection of fingerprints, applicants may go to Metropolitan Washington Airports Authority at Ronald Reagan Washington National Airport, any participating local law enforcement agency, or a participating local airport badging office. Applicants may go to one of two FAA Flight Standards District Offices (FSDO), Glen Burnie, Maryland, or

Washington Dulles International Airport, so that FAA can verify the applicant's airman certificates and determine if there is any FAA record of violation of certain FAA regulations.

- After the applicant is satisfactorily vetted, TSA will issue a Personal Identification Number (PIN) that enables the applicant to fly to or from the Maryland Three airports or to serve as an airport security coordinator.

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.   [Effective 03/22/01, your response must SPECIFICALLY reference the Government Paperwork Elimination Act (GPEA), which addresses electronic filing and recordkeeping, and what you are doing to adhere to it. You must explain how you will provide a fully electronic reporting option by October 2003, or an explanation of why this is not practicable.]*

Because the collection involves fingerprints, the information and fingerprints are collected manually at various locations in the Washington metropolitan area. After fingerprints are taken at Ronald Reagan Washington National Airport, a participating local law enforcement agency, or participating local airport badging office, the fingerprints are entered into an electronic database, which facilitates transmission of the information to TSA.

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 Item 2 above.*

TSA is unaware of other sources for this information.

5. *If the collection of information has a significant impact on a substantial number of small businesses or other small entities (Item 5 of the Paperwork Reduction Act submission form), describe the methods used to minimize burden.*

The general aviation airports covered by these regulations could be considered small businesses. This information collection affects the Maryland Three airports but the information collected is tailored to the information needed to conduct security threat assessments and protect the airspace of the Washington, DC, Metropolitan Area Flight Restricted Zone (FRZ). Thus, TSA believes this collection does not have a significant impact on a substantial number of small businesses. These regulations allow continued operation at the Maryland Three airports located within the Washington DC FRZ.

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.*

    Collecting this information is an integral part of ensuring that aircraft operators who fly to or from the Maryland Three airports or airport employees who serve as airport security coordinators are properly vetted, and to ensure protection of vital assets in the National Capital Region.

7. *Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5(d)(2).*

    The report of information to the agency may be collected in a manner different than the general information collection guidelines in 5 CFR § 1320.5(d)(2)(ii)). There is a continuing obligation on MD-3 pilots and security coordinator to notify TSA within 24 hours of a conviction or finding of not guilty by reason of insanity of certain crimes specified in TSA regulations specified in 49 CFR parts 1542 and 1572 or certain violations of FAA regulations specified in 49 CFR § 1562(e)(5).

8. *Describe efforts to consult 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 the data elements to be recorded, disclosed, or reported. If applicable, provide a copy and identify the date and page number of publication in the <u>Federal Register</u> 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 response to these comments. Specifically address comments received on cost and hour burden.*

    As required by 5 CFR § 1320.8(d), TSA published a 60-day notice soliciting comments in the <u>Federal Register</u> on April 7, 2015 (80 FR 18643), and a 30-day notice on July 14, 2015 (80 FR 41051). No comments were submitted to TSA in response to the notices.

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

    TSA does not provide any gifts or payments to respondents.

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

    TSA does not provide any assurances of confidentiality. However, all information will be collected in accordance with the Privacy Act of 1974. The applicable system of records notice (SORN) for this collection is DHS/TSA-002, Transportation Security Threat Assessment System, last published in the <u>Federal Register</u> on August 11, 2014. *See* 79 FR

46862. Also, a Privacy Impact Assessment was published on February 20, 2009 on
www.dhs.gov.

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

TSA does not ask questions of a sensitive nature.

12. *Provide estimates of hours burden of the collection of information.*

TSA estimates a total of 312 annual applicants who will incur a total annual hour burden of 4,290 [1]hours.

Estimated Public Burden

Public (Per Individual PIN Application)	Time (Hours)
Read program directions become/familiar with process	0.5
Travel time to/from the Maryland Three airport to initiate process	4.0
Travel time to/from a Flight Standards District Office for airman and medical certificate examination	4.0
Fill out required forms	0.25
Travel time for fingerprinting (Fingerprinting can be done at Reagan National Airport or participating local law enforcement agency or participating local airport badging office.)	4.0
Fingerprinting process	0.5
View security video at Maryland Three airport	0.5

**Total
13.75**

Note: All PIN applicants must go to one of two Fight Standards District Offices (Glen Burnie, Maryland, or Washington Dulles International Airport) for their FAA credential check, and all fingerprinting is done at Ronald Reagan Washington National Airport, a participating local law enforcement agency, or a participating local airport badging office.

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[1] The estimated annual burden hours are different from what was reported in the 60-day notice (28,080 annual hours). TSA examined the processes of the program and, using more accurate parameters, arrived at more refined conclusion regarding the hourly burden estimates.

The estimated public burden is **4,290** hours annually, (312 annual applicants x 13.75 hours). The time for each step of the process is described in detail in the table below.

Estimated Costs of the Collection of Information

The annual cost burden for 312 applicants is **$248,181.31**. The time burden and the fully loaded wage rate for a commercial pilot are used to estimate the total annual cost burden to respondents resulting from the collection of information. The fully loaded wage rate for a commercial pilot is estimated from the May 2012 Bureau of Labor Statistics mean annual wage of $80,140 for commercial pilots on nonscheduled air carrier routes or helicopters[2] and assuming a 1.5 load factor to account for benefits. The mean annual wage of $80,140 is divided by total annual hours of labor of 2,080, and divided by the load factor resulting in a fully loaded wage rate of **$57.85**. This is multiplied by the time burden to estimate the total annual burden per applicant and for all applicants. The details of the total annual cost burden to respondents are shown in the table below.

Description of Process	Fully Loaded Wage Rate A	Time Burden (hours) B	Annual Cost Burden Resulting from Collection of Information C = (A*B)
Read program directions/familiarize self with the process	$57.85	0.5	$28.93
Travel time to/from the Maryland-3 airport to initiate process	$57.85	4.0	$231.40
Travel time to/from a Flight Standards District Office for the purpose of airman and medical certificate examination	$57.85	4.0	$231.40
Fill out required forms	$57.85	0.25	$14.46
Travel to time for fingerprinting (Fingerprinting can be done at Reagan National Airport or participating local law enforcement agency or participating local airport badging office.)	$57.85	4.0	$231.40
Fingerprinting process	$57.85	0.5	$28.93
View security video at Maryland-3 airport	$57.85	0.5	$28.93
Total cost burden per individual		**13.75 hours**	**$795.45**
Total annual cost burden for 312 applicants			**$248,181.31**

[2] Bureau of Labor Statistics, Occupational Employment Statistics, May 2012: http://www.bls.gov/oes/2012/may/oes532012.htm

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

There are no annualized capital or start-up costs for respondents due to this collection.

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, and other expenses that would not have been incurred without this collection of information.

The annual cost estimate to Federal Government agencies is **$28,576**.

The estimated government time burden is 678 hours annually, as described in the table below.

Government Time Burden	Time Estimate Per Applicant	Total Hours
TSA Inspector - for 12 inspections per year	13 hours	156
TSA Program Manager	.97 hours	304
Technician conducting background checks	0.2 hours	62.4
Metropolitan Washington Airports Authority: Fingerprinting technician at Reagan National Airport	0.25 hours	78
Flight Standards District Office official who conducts FAA records checks on applicants	0.25 hours	78
Total Annual Time Burden to the Government for all 312 applicants		**678**

The annual cost estimate to the Federal Government is **$28,576**. It is determined by multiplying the time estimate by the average hourly wage rate of the applicable government employees as noted in the table below**.**

Government Burden	Time Estimate	Total Hours (Annually, for all 312 applicants)	Average Hourly Wage Rate	Total Annual Burden
TSA Inspector - for 12 inspections per year	13 hours per inspection	156	$56.75	$8,853
TSA Inspector - mileage expense for travel to inspections ($.405/mi. x 80	NA	NA	NA	$389

miles x 12 inspections/yr.				
TSA Program Manager	.97 hours per applicant	304	$48.00	$14,592
Technician conducting background checks	0.2 hours per applicant	62.4	$16.00	$998
Flight Standards District Office official who conducts FAA records checks on applicants	0.25 hours per applicant	78	$32.00	$2,496
Metropolitan Washington Airports Authority: Fingerprinting technician at Reagan National Airport	0.25 hrs per applicant	78	$16.00	$1,248
Total Annual Burden for Government		**678**		**$28,576**

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

There have been no program changes or adjustments. Rather, TSA examined the processes of the program and using more accurate parameters arrived at more refined and accurate conclusion regarding the hourly burden estimates to the public.

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. 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.*

The results of the information will be not be published by TSA.

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.*

TSA is not seeking such approval.

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

No exceptions are requested.