

# **INFORMATION COLLECTION SUPPORTING STATEMENT**

## **Security Programs for Foreign Air Carriers (OMB No. 1652-0005) Exp. 10/31/2015**

- 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).***

Section 44906 of title 49 U.S.C. includes a mandate for TSA to require foreign air carriers flying into and out of the United States to adopt and use a security program approved by TSA. This statutory authority is implemented by regulation in 49 CFR part 1546. TSA will accept a security program from a foreign air carrier (FAC) only when it determines that the security program provides passengers of the FAC a level of security similar to the level of security passengers would receive from domestic carriers using the same U.S. airport.

Further, the security program requires the FAC to maintain certain records and to provide certain information to TSA or make it available for inspection as outlined in the Model Security Program (MSP), which is Sensitive Security Information (SSI) under 49 CFR part 1520. Collection information and reporting requirements are described in the MSP, and include requirements such as verifying compliance, training and related records, incident and suspicious activity reporting, and submission of Secure Flight data for vetting of passengers and watchlist vetting of employees against government lists.

*Compliance (recordkeeping requirement).* Upon request of TSA, each FAC must provide evidence of compliance with 49 CFR part 1546 and its security program, including copies of records. Hard copies or relevant records must be maintained at corporate offices and electronic copies maintained at stations. FACs must also make their security programs available for annual review.

*Training (recordkeeping requirement).* FACs are required to include training in their security programs. They are specifically required to provide their crewmembers and other individuals performing security-related functions with initial training and recurrent training covering a number of subjects. Depending on the subject matter, the training is delivered via several methods such as web-based training, classroom training, hands on training, and home study. The FACs must retain the records for varying specified periods of time.

*Incident and Suspicious Activity Reporting.* TSA's regulations require FACs to immediately report to the Transportation Security Operations Center (TSOC) all incidents, suspicious activities, and threats that could affect the security of U.S. civil aviation. Incidents, suspicious activities, and threat information may include, but are not limited to, interference with the flight crew, possible surveillance of an aircraft or airport facility, bomb threats, and air piracy. In light of the urgency of this type of reporting, FACs give this report orally, in writing, or over the telephone.

Watch Lists. FACs must submit Secure Flight Passenger Data (SFPD) to TSA Secure Flight for the watchlist vetting of every passenger traveling to and from the United States. This data is required 72 hours in advance of the flight when available that early. The FAC also submits subsequent SFPD received up until flight departure. The vetting of the information is done internally within TSA Secure Flight operations and takes place almost instantaneously. The majority of these submissions are covered under the TSA's Secure Flight ICR (OMB Control Number 1652-0046).

However, there are times when certain passengers are on a watchlist and other processes must take place to clear the passenger for travel, prevent travel, or require additional processes before the passenger can travel. The following conservative estimates are based on the small number of passengers subject to additional screening processes. Specifically, they are based on a random selection of foreign air carriers with an average of 1,503 flights per month. The non-personally identifiable information is necessary to allow TSA to effectively prioritize watch list matching efforts and communicate with the covered aircraft operator.

In addition, TSA has assumed the responsibility for pre-flight screening of passengers and certain non-traveling individuals against the Federal Government watch list from the private sector as required by 49 U.S.C. 44903(j)(2)(C) and consolidation of the aviation passenger watch list matching function within one agency of the Federal Government. See Secure Flight ICR (OMB Control Number 1652-0046), which addresses the requirement for covered aircraft operators (including FACs) to transmit Secure Flight Passenger Data (SFPD) for each passenger which consists of the passenger's full name, date of birth, and gender and, to the extent available, Redress Number or known traveler number, information from the passenger's passport (full name, passport number, country of issuance, and expiration date), as well as certain non-personally identifiable information used to manage messages, including itinerary information. Secure Flight, however, does not eliminate the requirements for aircraft operators to conduct watch list matching. For example, aircraft operators are required to conduct a comparison of their employees against the TSA No Fly and Selectee Lists and report any matches to TSA. Additionally, on the rare occasions when there is a Secure Flight outage, aircraft operators are required to conduct further comparison of their passengers against the TSA No Fly and Selectee Lists and report any matches to TSA.

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 uses the information collected to ensure the FACs are performing required security measures. TSA inspects each FAC against its security program at its domestic and foreign locations to ensure that the FAC's security program is being carried out. Such inspections protect the security of the passengers, the general public, baggage, cargo, and aircraft.

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 record keeping, 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.]***

Due to the importance of receiving and determining acceptability of a security program, TSA requires a paper copy of the security program with original signatures from each FAC. A FAC is also required to submit a paper copy of any requests for amendments to its security program. TSA may need such specialized requests to address individual FAC security concerns.

Before receiving the official paper copy with original signatures, FACs may request amendments via email or fax. The email or fax request begins the process of review by TSA. In turn, TSA provides approval responses electronically, followed by official paper copies. This allows for immediate implementation of the agreed upon security measure.

FAC employees must have access to all applicable TSA security measures, which they carry out on behalf of the FAC. FACs may access these measures via electronic means; normally accomplished through the air carriers' internal computer files.

In limited instances, TSA needs the immediate personal contact with FACs to address issues pertaining to the vetting of passengers, crew members, and FAC personnel. The urgency pertains to whether or not an individual (passenger or FAC employee, including a crewmember) matches a government watch list and will be permitted to enter, overfly, or depart from the United States. In light of fiscal concerns, it is to the FAC's advantage to have that decision made before the carrier enters U.S. airspace.

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.***

No other Government entity has a Congressional mandate to require an FAC to adopt and carry out a security program. Prior to TSA's existence, this information collection was conducted by the Federal Aviation Administration. To TSA's knowledge, since the responsibility for this collection transferred to TSA, it has not been duplicated anywhere else.

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.***

TSA has determined the collection of information does not have a significant impact on a substantial number of small businesses.

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.***

TSA has the responsibility of ensuring the security of persons and property traveling to and from the United States. Part 1546 of title 49 CFR requires FACs seeking to provide air travel into or out of the United States to adopt and implement a FAC security program.

It is imperative that all FACs provide adequate security measures for all flights to and from the United States. Due to potential security threats and ever changing security risks and assessments, it is necessary to require FACs to perform certain security measures, which may involve maintaining records and providing information to TSA. TSA conveys the needed security measures to the FACs via mechanisms provided within the FAC security program.

FACs are provided an opportunity to indicate when they cannot meet such requirements due to their respective national laws. Further, FACs may provide to TSA an alternate means by which they can meet the intent of the required TSA security measures. TSA handles such requests on a case-by-case basis.

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).***

In the interest of transportation security, aircraft carriers may need to notify TSA more often than quarterly. FACs are required to report incidents and suspicious activities to the Transportation Security Operation Center (TSOC). In addition, although Secure Flight is fully operational, on the rare occasions when there is a Secure Flight outage, aircraft operators are required to conduct further comparison of their passengers against the TSA No Fly and Selectee Lists and report any matches to TSA. Otherwise, the collection of information is conducted in accordance with 5 CFR 1320(d)(2).

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

TSA published the 60-day notice on April 14, 2015 (80 FR 20003) and the 30-day notice was published on July 22, 2015 (80 FR 43456). TSA has not received any comments in response to the notices published.

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

TSA will not provide payment to respondents.

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

All created security programs and reporting information will be protected from disclosure to the extent required by existing laws and regulations. TSA does not provide any assurances of confidentiality to respondents. To the extent applicable, information provided by respondents will be protected in accordance with the Privacy Act and TSA privacy and information technology policy. The applicable system of records notice is DHS/TSA-019 Secure Flight Records, last published in the Federal Register on January 05, 2015. . TSA assures respondents that the portion of their responses that are deemed Sensitive Security Information will be handled as such, as described in 49 CFR parts 15 and 1520.

- 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 hour and cost burdens of the collection of information.**

The estimates presented in this section represent the annual hours and cost burdens to comply with the reporting and recordkeeping requirements of the Foreign Air Carriers (FACs) security programs. The hour and cost burden calculations depend on the number of FACs responding to the requirements in the Model Security Program (MSP), number of requirements in the MSP, amount of time it takes to complete the requirements, and the hourly average wage rate of the personnel completing the requirements. On average 175 FACs have regularly scheduled and charter flight (indicating their flights are on-demand)

operations to and from the United States annually. Table 1 presents the summary of the information collection burden. Based on the data provided by TSA Office of Global Strategies (OGS), TSA estimates that the average annual number of responses to the requirements of the MSP is 3,160,311. TSA also estimates that the total annual hour burden incurred by FACs to comply with the MSP requirements is 1,062,426 hours, which results in the total annual hour burden cost of \$89,530,735. The detailed information on these estimates are presented below:

#### Annual Hour and Cost Burden Estimates:<sup>1</sup>

##### (a) New FACs Implementing the MSP Requirements

TSA estimates that an annual average of 20 new FACs<sup>2</sup> will implement the security measures/procedures in the MSP. TSA estimates that it takes approximately 12 hours<sup>3</sup> to complete the MSP and a Corporate Security Director or Security Manager completes the task. TSA assumes that this position is equivalent to a General and Operations Manager in the Air Transport industry in the U.S. and takes the corresponding fully loaded hourly average wage rate of \$84.37 as a proxy.<sup>4</sup>

$$\begin{aligned}\text{Hour burden} &= 20 \text{ new FACs per year} \times 12 \text{ hours} = 240 \text{ hours per year} \\ \text{Hour burden cost} &= 240 \text{ hours per year} \times \$84.37 = \$20,249 \text{ per year}\end{aligned}$$

Note: OGS revised the above burden figures to convey more recent estimates as they pertain to new carriers and hours needed to implement and distribute requirements in the MSP. To more accurately reflect hour burdens, TSA accounts for the additional 20 FACs by using 175 FACs as the annual average number of respondents over the next three years.

##### (b) TSA Issued Security Program Amendments

TSA may issue an amendment, if safety and the public interest require it, to the TSA-accepted security program. Based on information obtained from OGS, TSA estimates on average 16 new amendments to be issued per year. Each of the 175 FACs would be required

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<sup>1</sup>TSA assumes that the requirements of the MSP in this document are completed by a Corporate Security Director or Security Manager, or Station Manager, or other station personnel in the training department of an FAC. Since the hourly average wage rates for these foreign personnel are not readily available, TSA takes the fully loaded hourly average wage rates of personnel holding equivalent positions in the U.S. Air Transportation industry as proxies.

<sup>2</sup> Information obtained from OGS.

<sup>3</sup> Information obtained from OGS.

<sup>4</sup> Fully loaded hourly average wage rate \$84.37 = hourly average wage \$54.84 x compensation factor 1.538. Source-hourly average wage: BLS, May 2014 National Industry-Specific Occupational Employment and Wage Estimates, NAICS 481100 - Scheduled Air Transportation, 11-1021 General and Operations Managers. [http://www.bls.gov/oes/current/naics4\\_481100.htm](http://www.bls.gov/oes/current/naics4_481100.htm) Accessed on September 15, 2015  
Source-compensation factor: BLS Economic News Release March 2015 Employer Costs for Employee Compensation Summary Table 11 for All Full Time Workers Transportation and material moving. 1.538 = \$30.96 in total compensation ÷ \$20.15 in wages and salaries. <http://www.bls.gov/news.release/pdf/ecec.pdf>. Accessed on September 15, 2015

to respond to each new amendment, resulting in a total of 2,800 responses (175 FACs × 16 amendments).

TSA estimates that each new amendment takes approximately one hour to complete and a Corporate Security Director or Security Manager completes the task. TSA assumes that this position is equivalent to a General and Operations Manager in the Air Transport industry in the U.S. and takes the corresponding fully loaded hourly average wage rate of \$84.37 as a proxy.

$$\begin{aligned}\text{Hour burden} &= 175 \text{ FACs} \times 16 \text{ amendments per year} \times 1 \text{ hour} = 2,800 \text{ hours} \\ \text{Hour burden cost} &= 2,800 \text{ hours per year} \times \$84.37 = \$236,236 \text{ per year}\end{aligned}$$

Note: TSA adjusted the average number of amendments using data from OGS. The burden of 0.5 hours was increased to 1 hour to account for the level of interaction some FACs required when requesting clarification or support when implementing the amended procedures.

#### (c) Carrier Requested Security Program Amendments

A FAC may submit a request to TSA through its assigned TSA International Industry Representative (IIR) to amend its TSA-accepted security program or adopt alternative procedures of complying with the TSA-issued amendments. Based on past requests, TSA estimates that it receives on average 256 requests annually from 150 FACs. TSA estimates that each FAC takes approximately one hour to prepare a document for each request and a Corporate Security Director or Security Manager completes the task. TSA assumes that this position is equivalent to a General and Operations Manager in the Air Transport industry in the U.S. and takes the corresponding fully loaded hourly average wage rate of \$84.37 as a proxy.

$$\begin{aligned}\text{Hour burden} &= 256 \text{ requests per year} \times 1 \text{ hour} = 256 \text{ hours per year} \\ \text{Hour burden cost} &= 256 \text{ hours per year} \times \$84.37 = \$21,599 \text{ per year}\end{aligned}$$

Note: TSA adjusted the burden associated with FAC-requested amendments to reflect the average number of such requests received in the past. Some of the amendment requests are based on the operational impacts TSA-issued amendments have had on the FACs.

#### (d) Compliance Recordkeeping Requirement

TSA estimates that an average of four hours is required for each FAC to maintain copies (i.e., hard copies at corporate offices and electronic copies at stations) and to make its security program available for annual review. TSA assumes this task is done by a position equivalent to an Administrative Service Manager in the Air Transportation industry in the U.S. and takes the corresponding fully loaded hourly average wage rate of \$63.68 as a proxy.<sup>5</sup> Based

<sup>5</sup> Fully loaded hourly average wage rate \$63.68 = hourly average wage \$41.39 x compensation factor 1.538. Source-hourly average wage: BLS, May 2014 National Industry-Specific Occupational Employment and Wage Estimates, NAICS 481100 - Scheduled Air Transportation, 11-3011 Administrative Service Managers. [http://www.bls.gov/oes/current/naics4\\_481100.htm](http://www.bls.gov/oes/current/naics4_481100.htm) Accessed on September 15, 2015.

on information obtained from OGS, TSA estimates that each FAC has an average of four yearly inspections for compliance with the MSP.

$$\begin{aligned}\text{Hour burden} &= 175 \text{ FACs} \times 4 \text{ inspections per year} \times 4 \text{ hours} = 2,800 \text{ hours per year} \\ \text{Hour burden cost} &= 2,800 \text{ hours per year} \times \$63.68 = \$178,295 \text{ per year}^6\end{aligned}$$

Note: TSA updated the number of hours for each inspection to account for the present-day number of measures subject to inspections. TSA periodically updates security requirements for FACs to address the ongoing threat against aviation.

#### (e) Training Recordkeeping Requirement

Based on information obtained from OGS, TSA estimates that the average annual hour burden per FAC associated with training and related records is 24 hours. TSA assumes that this task could be completed by a Training and Development Manager in the Air Transportation industry in the U.S. and takes the corresponding fully loaded hourly average wage rate is \$72.89 as a proxy.<sup>7</sup>

$$\begin{aligned}\text{Hour burden} &= 175 \text{ FACs} \times 24 \text{ hours per year} = 4,200 \text{ hours per year} \\ \text{Hour burden cost} &= 4,200 \text{ hours per year} \times \$72.89 = \$306,148 \text{ per year}^8\end{aligned}$$

#### (f) Incident and Suspicious Activity Reporting

Based on the 2012 incident reporting data from TSOC, TSA estimates that all FACs combined report approximately 60 incidents annually. TSA also estimates that it takes 0.5 hours (30 minutes) to report an incident. TSA assumes that a Corporate Security Director or Security Manager completes this task. TSA also assumes that this position is equivalent to a General and Operations Manager in the Air Transport industry in the U.S. and takes the corresponding fully loaded hourly average wage rate of \$84.37 as a proxy.

$$\begin{aligned}\text{Hour burden} &= 0.5 \text{ hours per report} \times 60 \text{ incidents per year} = 30 \text{ hours per year} \\ \text{Hour burden cost} &= 30 \text{ hours per year} \times \$84.37 = \$2,531 \text{ per year}\end{aligned}$$

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Source-compensation factor: BLS Economic News Release March 2015 Employer Costs for Employee Compensation Summary Table 11 for all full time workers in private industry for Transportation and material moving. 1.538 = \$30.96 in total compensation ÷ \$20.15 in wages and salaries.

<http://www.bls.gov/news.release/pdf/eccec.pdf>. Accessed on September 15, 2015

<sup>6</sup> Total may vary slightly to rounding.

<sup>7</sup> Fully loaded hourly average wage rate \$72.89= hourly average wage \$47.38 x compensation factor 1.538. Source-hourly average wage: BLS, May 2014 National Industry-Specific Occupational Employment and Wage Estimates, NAICS 481100 - Scheduled Air Transportation, 11-3131 Training and Development Managers. [http://www.bls.gov/oes/current/naics4\\_481100.htm](http://www.bls.gov/oes/current/naics4_481100.htm) Accessed on September 15, 2015.

Source-compensation factor: BLS Economic News Release March 2015 Employer Costs for Employee Compensation Summary Table 11 for full time private industry Transportation and material moving. 1.538 = \$30.96 in total compensation ÷ \$20.15 in wages and salaries. <http://www.bls.gov/news.release/pdf/eccec.pdf>. Accessed on September 15, 2015

<sup>8</sup> Total may vary slightly due to rounding.



## (g) Watch List

The majority of information collection related to watch lists is covered under the TSA's Secure Flight ICR (OMB Control Number 1652-0046).

The following estimates are based on the small number of passengers subject to additional screening processes and on a random selection of FACs. TSA estimates that there will be an average of 1,503 flights per month<sup>9</sup> that will be required to submit Secure Flight Passenger Data (SFPD) of passengers subject to additional screening to TSA Secure Flight for the watch list vetting. As a result, there will be a total of 18,036 SFPD submissions per year (1,503 per month × 12 months = 18,036 per year). TSA estimates that it takes 0.33 hours (20 minutes) for FACs to submit SFPD to TSA Secure Flight. TSA assumes that a Corporate Security Director or Security Manager completes this task. TSA also assumes that this position is equivalent to a General and Operations Manager in the Air Transport industry in the U.S. and takes the corresponding fully loaded hourly average wage rate of \$84.37 as a proxy.

Hour burden = 175 carriers × 18,036 submissions/year × 0.33 hours = 1,052,100 hours/year

Hour burden cost = 1,052,100 hours per year × \$84.37 = \$88,765,677 per year

Note: TSA updated the above estimate to account for the changes in procedures since the deployment of Secure Flight and the corresponding changes to the watchlist vetting process. TSA also reviewed more recent data pertaining to the average number of FAC flights on a monthly basis.

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<sup>9</sup> Information obtained from Aviation Program Office.

Table 1: Summary of Information Collection Annual Cost and Hour Burdens

<b>MSP Requirements</b>	<b>Average Number of Respondents</b>	<b>Number of Occurrences</b>	<b>Average Number of Responses</b>	<b>Hour Burden per Response</b>	<b>Total Hour Burden</b>	<b>Total Cost Burden <sup>10</sup></b>
	<b>(a)</b>	<b>(b)</b>	<b>(c = a x b)</b>	<b>(d)</b>	<b>(e = c x d)</b>	<b>(f = e x wage rate)</b>
a) New FACs	20		20	12	240	\$20,249
b) TSA Amendments	175	16	2,800	1	2,800	\$236,236
c) Carrier Amendments	150	1.7	256	1	256	\$21,599
d) Compliance	175	4	700	4	2,800	\$178,295
e) Training	175		175	24	4,200	\$306,148
f) Incident and Suspicious Activity Reporting	60		60	0.5	30	\$2,531
g) Watch list	175	18,036	3,156,300	0.33	1,052,100	\$88,765,677
<b>Total</b>			<b>3,160,311</b>		<b>1,062,426</b>	<b>\$89,530,735</b>

Note: Totals may not add due to rounding

**13. Provide an estimate of the annualized capital and start-up costs resulting from the collection of information.**

There are no capital or start-up costs associated with the collection of information.

<sup>10</sup> The requirements in (a) – (g) are completed either by a Corporate Security Director or Security Manager, or Station Manager, or other station personnel in the training department of FAC. The hourly wage rates for these foreign personnel are approximated by the fully loaded hourly average wage rates of personnel holding equivalent positions in the U.S. Air Transportation industry. Accordingly, the hour burden costs are calculated using the fully loaded hourly average wage rate of \$84.37 for requirements in (a) – (c) and (f) – (g), \$63.68 and \$72.89, respectively, for requirements in (d) and (e).

**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 estimates presented in this section represent the annual cost burden to the Federal Government. The cost burden calculations depend on the number of FACs responding to the requirements in the Model Security Program (MSP), number of security program amendments issued by TSA or amendment requests by FACs, amount of time TSA takes to complete the tasks, and the hourly average wage rate of TSA personnel completing the tasks. Based on data provided by TSA Office of Global Strategies (OGS), TSA estimates that the total annual cost incurred by the Federal Government is \$829,312. The detailed information on these estimates is presented below:

Annual Cost Burden Estimates:

(a) New FACs Implementing the MSP Requirements

TSA estimates that approximately 20 new FACs will seek to adopt and implement the Model Security Program yearly in order to initiate operations to or from the United States. The acceptance and explanation of the program and presentation of the MSP to the FAC requires approximately 40 hours<sup>11</sup> of an IIR's time at an hourly average wage rate of \$148.81.<sup>12</sup>

$$\text{Government cost} = 20 \text{ FACs} \times 40 \text{ hours} \times \$148.81 = \$119,050 \text{ per year}^{13}$$

(b) TSA Issued Security Program Amendments

TSA projects that it will issue 16 amendments per year based on information obtained from OGS. Since this is a global issuance, TSA estimates that it takes approximately 30 minutes (0.5 hours) for IIRs to issue to each of the 175 FACs a TSA-initiated amendment. TSA uses an hourly average wage rate of \$148.81 for an IIR.

$$\text{Government cost} = 175 \text{ FACs} \times 16 \text{ amendments} \times 0.5 \text{ hours} \times \$148.81 = \$208,338 \text{ per year}^{14}$$

(c) Carrier Requested Security Program Amendments

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<sup>11</sup> Information provided by OGS.

<sup>12</sup> Fully loaded hourly average wage rate for an international J band inspector, including overseas allowances and travel. Source: TSA Office of Global Strategies, Budget and Finance Branch.

<sup>13</sup> Total may vary slightly due to rounding.

<sup>14</sup> Total may vary slightly due to rounding.

Based on past requests, TSA estimates that 150 FACs initiate requests for a change to their security programs. TSA estimates that these 150 FACs receive 256 amendments and alternative procedures per year. Based on information obtained from OGS, TSA estimates that an average of 4 hours is necessary for an IIR to review a request from FACs, conduct any related research, and draft appropriate related paperwork. TSA uses hourly average wage rate of \$148.81 for an IIR.

Government cost (IIR review) = 256 responses per year × 4 hours × \$148.81 = \$152,384 per year<sup>15</sup>

Various TSA headquarter personnel review the paperwork drafted by IIRs and the FACs' requesting changes to their security programs. Based on information obtained from OGS, TSA estimates that it takes an average of 8 hours for TSA headquarter personnel to review the information. TSA uses hourly average wage rate of \$80.09 for the various personnel involved in reviewing the document<sup>16</sup>.

Government cost (TSA headquarter review) = 256 responses per year × 8 hours × \$80.09 = \$164,023 per year<sup>17</sup>

Total government cost (IIR and TSA headquarter review) = \$152,384 + \$164,023 = \$316,407 per year

Note: TSA updated the number of hours and number of FAC requests for amendments to their security programs to reflect present-day data associated with such requests.

#### (d) Compliance Recordkeeping and Review Requirement

TSA estimates that each FAC is inspected for compliance with record keeping requirements 4 times a year based on information obtained from OGS. TSA estimates that the time necessary to inspect and for record keeping is approximately one hour. TSA uses an hourly average wage rate of \$132.51 for an international inspector.<sup>18</sup>

Government cost (compliance) = 175 FACs × 4 inspections × 1 hour × \$132.51 = \$92,759 per year<sup>19</sup>

<sup>15</sup> Total may vary slightly due to rounding.

<sup>16</sup> Fully loaded hourly weighted average wage rate for H through SES band personnel reviewing the document, calculated using data from Economic Analysis Branch (EAB) database, FY2016 MODULAR COST STANDARDS, compiled from 2014 OPM Pay Tables for the Washington, D.C. area, and projected for FY 16.

<sup>17</sup> Total may vary slightly due to rounding.

<sup>18</sup> Fully loaded hourly average wage rate for an international I band inspector, including overseas allowances and travel. Source: TSA Office of Global Strategies, Budget and Finance Branch.

<sup>19</sup> Total may vary slightly due to rounding.

Based on information obtained from OGS, TSA estimates that the record review time for the above 4 annual inspections is also approximately one hour. TSA uses an hourly average wage rate of \$132.51 for an international inspector.

Government cost (record review) = 175 FACs × 4 inspections × 1 hour × \$132.51 = \$92,759 per year<sup>20</sup>

Total government cost (compliance and record review) = \$92,759 + \$92,759 = \$185,518 per year

The total annual Federal Government cost is obtained by summing the Government costs in (a) – (d):

Total Government cost = \$119,050 + \$208,338 + \$316,407+ \$185,518 = \$829,312 per year

Table 2: Summary of Information Collection Government Annual Cost Burden

<b>MSP Requirements</b>	<b>Average Number of Respondents (a)</b>	<b>Number of Occurrences (b)</b>	<b>Average Number of Responses (c = a x b)</b>	<b>Hour Burden per Response (d)</b>	<b>Total Hour Burden (e = c x d)</b>	<b>Total Cost Burden<sup>21</sup> (f = e x wage rate)</b>
a) New FACs	20	1	20	40	800	\$119,050
b) TSA Amendments	175	16	2,800	0.5	1,400	\$208,338
c) Carrier Amendments						
IIR Review	150	1.7	256	4	1,024	\$152,384
TSA Headquarter Review	150	1.7	256	8	2,048	\$164,023
d1) Compliance Inspection	175	4	700	1	700	\$92,759
d2) Record Review	175	4	700	1	700	\$92,759
<b>Total</b>			<b>4,476</b>		<b>6,672</b>	<b>\$829,312</b>

Note: Totals may not add due to rounding

**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. However, notably on June 19, 2014, TSA removed the previous security program regulatory requirement that foreign air carriers submit information regarding the amount of cargo screened because all foreign air carriers are required to screen 100% of cargo.

<sup>20</sup> Total may vary slightly due to rounding.

<sup>21</sup> The requirements in (a) – (c) are completed by an International Industry Representative (IIR). The fully loaded hourly average wage rate for an IIR, including overseas allowances and travel, is \$148.81. For TSA headquarter review, the fully loaded hourly weighted average wage rate for H through SES band personnel is \$80.09. The requirements in (d) are completed by I band international inspectors whose fully loaded hourly average wage rate, including overseas allowances and travel, is \$132.51.

**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.**

TSA will not publish or tabulate information on this collection.

**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 will not be seeking a request not to display expiration date.

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

TSA is not seeking any exceptions.