

Supporting Statement for Paperwork Reduction Act Submission
Procedures for Non-Federal Navigational Facilities, FAR Part 171
OMB Control Number 2120-0014

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

The reporting and recordkeeping requirements of Federal Aviation Regulation (FAR) Part 171, Non-Federal Navigational Facilities, are authorized by Title 49, U.S.C., § 40102, 40103, 44502, 44505, 44702, 44708, 44709, and 46301.

FAR Part 171 establishes procedures and requirements for sponsors, both private and public other than FAA, to purchase, install, operate, and maintain electronic navaids for use by the flying public in the National Airspace System (NAS). FAR Part 171 describes procedures for receiving permission to install a facility and requirements to be fulfilled to keep it in service. These requirements include inspection and periodic maintenance. These tasks and any other repair work done to these facilities are recorded in on-site logs, copies of which are sent to the Service Center office.

These logs are required by FAA as proof that the facility is maintained within certain specified tolerances. This is necessary since FAA is responsible for all navigation facilities regardless of who owns them or who maintains them. In the event of an aircraft accident, the logs of the maintenance record of the facilities involved must be complete and available as possible evidence in court during litigation.

This information collection supports the Department of Transportation's strategic goal on safety which promotes the public health and safety by working toward the elimination of transportation-related deaths, injuries and property damage.

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

These logs are required by FAA as proof that the facility is maintained within certain specified tolerances. This is necessary since FAA issues instrument flight rule (IFR) procedures and is, therefore, ultimately responsible for navigation facilities. In the event of an aircraft accident, the logs of the maintenance record of the facilities involved must be complete and available as possible evidence in court during litigation to determine liability

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical or other forms of information technology.

This is strictly a recordkeeping burden, and we place no restrictions on how the sponsors compile the information. In compliance with the Government Paperwork Elimination Act, these logs may be kept 100% electronically. We leave it up to them and we even provide forms for their convenience or they can write it in any convenient format as long as it is accurate, useable, and legible.

Over the last several years FAA has been internally developing a data base with on-line fillable forms called the Non-Fed (Non-Federal) Tool. Phase 1 of this effort, which is currently completed, was to develop, test and work out software issues for FAA/ATO internal use. It was not a funded effort but worked out between FAA Technical Operations and ATO Finance. Phases 2 and 3 are intended to make the Tool mandatory for FAA Technical Operations Employees to input data on all non-Federal facilities and to allow on line access for airport sponsors/owners and non-Federal technicians employed by those airports to complete forms and other data required. These Phases are delayed due to funding issues with the continuing resolutions and budgetary limitations.

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.

To our knowledge only the FAA collects the information about non-Federal navaid facilities. This information is not available anywhere else. It is compiled solely for the purposes of FAA as stated earlier. There is no similar information that can be used or modified for use. FAA is the only entity that requires this information. No one else has any need for it.

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

This information collection only involves state, county, or local governments which own and operate airports, and the navaids facilities associated with the airports, or the navaid networks. Small businesses are not affected.

6. Describe the consequence to Federal program or policy activities if the collection were conducted less frequently.

In accordance with the regulations, we must collect it monthly when the information is reviewed. Collecting this information less frequently would result in not having up-to-date information about the reliability of the facility. The information collected is a history of the performance of the navaid and proof that it was or was not maintained and operating at an acceptable level. It is our intent that as equipment improves in performance and reliability, as we expect the newer equipment to do in the future, the interval between information collections will be lengthened.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with 5 CFR 1320.5 (d) (2) (i) - (viii).

The only inconsistency is that this information is collected monthly to ensure proper operation of the navigational facility - see question 6.

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. If applicable, provide a copy and identify the date and

page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection.

The agency's notice was published in the Federal Register on May 29, 2015, vol. 80, no. 103, page 30756-30757. No comments were received.

We are in constant communication with various airport officials concerning the collection of the required data, the manner and frequency of collection, and the purpose for it. This information collection is a continuing process, not just an occasional survey. As sponsors replace existing equipment with new and more reliable equipment, we fully expect to allow sponsors to reduce the frequency of inspection and information collection, once higher facility reliability has been established and documented. In addition, when performance requirements of new equipment are compiled they are published in the Federal Register for comment by the public. We then consider all remarks submitted and make changes to the requirements accordingly before a final ruling is published.

9. Explain any decision to provide payment or gift to respondents.

The FAA provides no payments or gifts to respondents.

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

No confidential type of information is collected, therefore no assurance is required.

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

This question is not applicable. The information collected is of a technical nature on the operation and maintenance of electronic equipment.

12. Provide estimates of the hour burden and annualized cost to respondents of the collection of information.

FAR Part 171 contains provisions for eight different types of facilities. These are: VOR, NDB, ILS, ISMLS, SDF, DME, GBAS, and VHF Markers. Each of the facilities is a separate Subpart and requires virtually the same information. Data is also collected on AWOS facilities under AC 150/5220-16C. There are a total of 2,300 facilities in the non-Federal system. A certain portion (about 10%) these usually are assumed annually for ownership and maintenance by the FAA and an approximately equal number of new non-Federal facilities are also established.

To be granted an IFR procedure, a sponsor must provide the following information:

Item A: Section 171.3(a)(1),171.23(a)(1),171.43(a)(1), 171.255(a)(1), 171.103(a)(10), 171.153(a)(1), 171.203(a)(1), Facility description- requires each sponsor requesting an IFR procedure to submit a description of the facility which includes: facility type (make and model), frequency assigned (if known), location of facility (latitude, longitude and distance to nearest town), elevation of property, antenna type and dimensions, whether antenna is on building or ground mounted, type of shelter used if any, utilities available, (road, power and telephone), and any object (such as a house), that may become an obstruction.

We estimate that 113 new requests are made annually to establish new facilities. These descriptions require an average of .25 hours to complete.
 $(113)(.25) = 28$ hours

Item B Sections 171.3(a), 171.23(a)(1), 171.43(a)(1), 171.255(a)(1), 171.103(a)(1), 171.153(a)(1), 171.203(a)(1), Facility performance requirements - require that sponsors present evidence that the equipment meets performance requirements such as ICAO standards, safe operating conditions, calibration, and stability, and adequacy as determined by flight check.

We estimate 113 new requests annually. Evidence of acceptable performance requires an average of .167 hours to complete.
 $(113)(.167) = 19$ hours

Item C Sections 171.3(a)(1), 171.23(a)(1), 171.43(a)(1), 171.25(a)(1), 171.103(a)(1), 171.153(a)(1), 171.203(a)(1), Installation standards - require sponsors to verify that equipment is installed in accordance with good engineering practices, electric safety codes, FCC licensing, has reliable power source, dual transmitting equipment and proper communications.

We estimate 113 new requests annually. Statements on proper installation require an average of .25 hours.
 $(113)(.25) = 28$ hours

Item D Sections 171.3(a)(2), 171.23(a)(2), 171.43(a)(2), 171.103(a)(2), 171.153(a)(2), 171.203(a)(2), Operating procedures - require sponsors to submit a proposed procedure for operating the facility.

We estimate 113 new requests annually. Operating procedures require an average of about 5 hours to write.
 $(113)(5) = 565$ hours.

Item E Sections 171.3(a)(3), 171.23(a)(3), 171.43(a)(3), 171.255(a)(3), 171.103(a)(3), 171.153(a)(3), 171.203(a)(3), Proposed maintenance organization/arrangement - require that sponsors submit a proposal maintenance organization or arrangement listing information on all qualified, and licensed maintenance personnel.

We estimate 113 maintenance organizations to be submitted annually for approval each taking an average of 10 hours.

(113)(10) = 1130 hours.

Item F Sections 171.3(a)(3), 171.123(a)(3), 171.43(a)(3), 171.255(a)(3), 171.103(a)(3), 171.203(a)(3), Proposed maintenance manual - requires that sponsors submit a proposed maintenance manual listing procedures and requirements for instructions on security, licensing, posting of appropriate signs, relations with other facilities, notices, communications, station logs, performance monitoring, inspections, hours of operations, call letters, etc.

We estimate 113 new maintenance manuals annually each requiring on the average 21 hours to compile.

(113)(21) = 2,373 hours.

Item G Sections 171.3(a)(4), 171.23(a)(4), 171.43(a)(4), 171.255(a)(4), 171.103(a)(4), 171.153(a)(4), 171.203(a)(4), Intent to meet requirements-requires that sponsors submit a statement that they will meet all the requirements stipulated in the subparts noted herein in when an IFR procedure is granted.

We estimate 113 such statements annually requiring .083 hours each.

(113)(.083) = 9 hours.

Item H Sections 171.3(a)(5), 171.23(a)(5), 171.255(a)(5), 171.103(a)(5), 171.153(a)(95), 171.203(a)(5), Acceptable level of reliability and performance - requires that sponsors show that the facility has an acceptable level of operational reliability and an acceptable standard of performance. Previous equivalent operational experience with a facility having identical design and operational characteristics will be considered in showing compliance with this requirement.

We estimate 113 reliability and performance statements annually requiring an average of .25 hours.

(113)(.25) = 28 hours.

Item I Sections 171.11(d), 171.31(c), 171.51(d), 171.273(e), 171.115(e), 171.161(d), 171.211(c), Requests to modify facilities - require that if the sponsor desires to modify the facility, he must submit the proposal to the FAA and may not allow any modifications to be made without specific approval. This request must include reasons for modification, what the modification will be and how long they will take.

We estimate that only about 57 such requests to be made annually each requiring 3 hours to complete.

(57)(3) = 171 hours.

Item J Sections 171.13(a), 171.33(a), 171.275(a), 171.117(a), 171.163(a), 171.213, FAA Form 6030-17 (formerly 198) Technical Reference Data Record - require that the sponsor fill out this form at the end of commissioning of the facility which will include equipment adjustments and all meter readings.

We estimate 113 commissionings annually and FAA Form 198 requiring 1 hour to complete.

(113)(1) = 113 hours.

Item K Sections 171.13(a), 171.33(a), 171.53(a), 171.275(a), 171.117(a), 171.163(a), 171.213(a), FAA Form 6030-17 (formerly 198) Technical Reference Data Record - require that sponsors complete the forms after major repairs, modernization or returning of a facility to service and will include all equipment adjustments and all meter readings.

We estimate 113 major repairs, modernizations or returns to service annually and FAA Form 198 requiring 1 hour to complete.
(113)(1) = 113 hours.

Item L Sections 171.75(a),(b)(1),(2) and (3), Requests for approval of facilities having identical characteristics. Non-identical characteristics and deviation from approved facilities - requires sponsor to receive approval of a facility type whether or not it is identical to an approved facility.

We estimate only about 57 such requests annually requiring 3 hours each.
(57)(3) = 171 hours

Item M Sections 171.13(b), 171.33(b), 171.53(b), 171.275(b), 171.117(b), 171.163(b), 171.213(b), FAA Form 6030-1 Facility Maintenance Log requires that sponsor fill out this log, which is a permanent record of all equipment malfunctioning including adjustments made and causes of failures. These logs are kept for all the facilities in the system and take about .5 hours to complete each month for a total of 6 hours per facility per year.

There are 2,300 facilities in the system.
(2,300)(6) = 13,800 hours

Item N Sections 171.13(c), 171.33(c), 171.53(c), 171.275(c), 171.117(c), 171.163(c), 171.213(c), FAA Form 6790-5 (formerly 418) Technical Performance Record - requires that sponsors complete the form on each scheduled visit to the facility and will contain a complete record of meter readings. These logs are kept for all facilities in the system and take about .5 hours to complete each month for a total of 6 hours per facility per year.

There are 2,300 facilities in the system
(2,300)(6) = 13,800 hours

Item O Section 171 13(e) FAA Form 6790-4 (formerly 2396) VOR Ground Check Error Data - requires that sponsors of VOR facilities record the results of the monthly course accuracy ground check

We estimate about 5 hours per VOR each month. There are 64 VORs.
(64)(6) = 384

Item P Section 171 13(e) FAA Form 6790-4 (formerly 2397) VOR Ground Check Error Data - requires that sponsors of VOR facilities record the results of the monthly course accuracy ground check We estimate about 5 hours per VOR each month.

There are 64 VORs
(64)(6) = 384

Estimation of Respondent Reporting Burden - We estimate that FAR Part 171 require an annual reporting burden of 4,748 hours and a recordkeeping burden of 28,368 hours as follows:

<u>ITEM</u>	<u>HOURS</u>
A	28
B	19
C	28
D	565
E	1,130
F	2,373
G	9
H	28
I	171
J	113
K	113
L	<u>171</u>
Total reporting burden	4,748
M	13,800
N	13,800
O	384
P	<u>384</u>
Total recordkeeping burden	28,368

Total reporting and recordkeeping burden **33,116 hours**

Estimate of Cost to Respondents

Costs to respondents are based on an estimate of an annual salary of approximately \$41,000 or \$19.70 per hour for the personnel responsible for compiling the required information. This is not a real cash outlay cost but only a time/effort compilation for administrative purposes only. The total number of hours involved is 33,116.

Approximate cost of burden to respondents: (33,116) (\$19.70) = \$652,385.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers.

There are no additional material costs for this collection.

14. Provide estimates of annualized costs to the Federal government.

The FAA reviews all submissions, reports, narratives, forms, etc. associated with Items A through P, as outlined in question 12, which are submitted by sponsors.

Items A through H are generally reviewed by FAA as one submission from the respondent(s) for approval of an IFR procedure. These submissions take approximately 4 hours to review, with 113 submissions per year.

$$(113)(4) = 452$$

Item I requires .5 hours for FAA review, with 57 submissions each year.

$$(57)(.5) = 28.5$$

Item J requires .5 hours for FAA review of respondent compliance with technical standards, with an estimated 113 submissions per year.

$$(113)(.5) = 56.5$$

Item K requires .5 hours for FAA review of technical data to ensure compliance with standards.

$$(113)(.5) = 56.5$$

Item L requires .5 hours of review by FAA, with an estimated submission of 57 requests per year.

$$(57)(.5) = 28.5$$

Item M is estimated to require .5 hours for FAA review, with 2,300 submissions each month.

$$(2,300)(.5)(12) = 13,800$$

Item N requires .5 hours for FAA to review, with 2,300 submissions each month.

$$(2,000)(.5)(12) = 13,800$$

Item O is estimated to require .5 hours for FAA review for each monthly submission. There are 64 of these installations.

$$(64)(.5)(12) = 384$$

Item P requires .5 hours for FAA review of each monthly submission. There are 64 of these installations.

$$(64)(.5)(12) = 384$$

<u>ITEM</u>	<u>HOURS</u>
A through H	452
I	28.5
J	56.5

K	56.5
L	28.5
M	13,800
N	13,800
O	384
P	<u>384</u>

Total time required to review submissions – 28,990

Estimate of Cost to the Federal Government

Government cost is based on an estimate of an annual salary of \$ 102,932, (GS-13 step 5) or \$49.32 per hour for the personnel responsible for reviewing required information and insuring compliance with FAA standards. This is not a real cash outlay cost but only a time/effort compilation for administrative purposes only. The total number of hours involved is 28,990. Approximate cost of burden to the Federal Government is (28990) (49.32)= \$1,429,787.

15. Explain reasons for any program changes or adjustments in /items 13 or 14 of OMB form 83-1.

The hourly burden figures remain consistent. The cost burden figures have been updated for currency.

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

The question is not applicable. The information is not published.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The forms that are provided for the respondents' convenience are printed and stocked by the FAA. These forms are also used by FAA for internal reporting. As the stock level gets low, the forms are automatically reprinted. It would not be cost effective to destroy unused dated forms.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-1.

There are no exceptions to Item 19.