

**Supporting Statement For**  
**Paperwork Reduction Act Submission**

**Justification**

**SUBJECT:** Aircraft Certification Systems Quality System Audit (QSA)  
Customer Feedback Report, FAA Form 8100.7

- 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.*

The Aircraft Certification Systems Quality System Audit (QSA) is a component of certificate management and includes as one of its key features a structure for continuous improvement. Means for collecting information from both the agency customers and industry customers relative to continuous improvement have been implemented, as well as a process to review the information received and to take appropriate action when required. The existing method for collecting information from industry is through an attachment to a letter notifying a specific facility of a forthcoming Quality Systems Audit. This specific information collection process has been subsequently adopted by the agency for reporting as a Customer Service Standard in fulfillment of Executive Order 12862, Setting Customer Service Standards, dated September 11, 1993. In addition, the DOT Strategic Plan-Organizational Excellence Goal supports this data collection as a method to identify, trends, opportunities and performance gaps to target areas needing improvement. (DOT Strategic Plan, 2000-2003, paragraph 11.2.2)

- 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.*

The information collected will be used by the Aircraft Certification Service's Manufacturing Inspection Offices, Aircraft Certification Offices, and the Design, Manufacturing & Airworthiness Division to improve the administration and conduct of the QSA at the local and national levels. Improvements to FAA Order 8120.23, Certificate Management of Production Approval Holders, have been and will continue to be incorporated as a result of the on-going collection of data. It will also be used for reporting as a Customer Service Standard in fulfillment of Executive Order 12862, Setting Customer Service Standards, dated September 11, 1993.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques of 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.*

In accordance with the provisions of the Government Paperwork Elimination ACT (GPEA), the feedback report is 100% available electronically.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.*

The information to be collected is not currently available elsewhere since the information is unique to the Certificate Management Quality System Audit.

- 5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods use to minimize burden.*

The collection of information has no impact on small business or other small entities.

- 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 obstacle to reducing burden.*

Firstly, the Aircraft Certification Quality System Audit would be deprived of a valuable input from the facilities that are audited under the certificate management agenda, and any efforts to improve the program would be biased in the government's favor. Secondly, we would be unable to meet our commitment in reporting Customer Service Standards in fulfillment of Executive Order 12862, Setting Customer Service Standards, dated September 11, 1993.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with the guidelines in Title 5 Code of Federal regulations (CFR) 1320.5(d)(2)(i)(viii).*

This information collection is consistent with the guidelines in Title 5 Code of Federal regulations (CFR) 1320.5(d)(2)(i)-(viii).

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register. Provide the following response:*

A notice was published in the Federal Register on May 29, 2015, vol. 80, #103 page 30756, to allow for comment. No comments were received.

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

We do not provide any payment or gifts.

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

We do not assure confidentiality.

- 11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions*

*necessary, the specific uses to be made of the information, the explanation to be given to persons from whom information is requested, and any steps to be taken to obtain their consent.*

There are no sensitive questions in this collection of information.

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

On average, approximately 200 respondents are subject to Quality System Audits annually. Submission of the information to be collected is voluntary, and is requested to be accomplished within 30 days after the completion of QSA.

The total estimated information collection burden for FAA Form 8100.7 is 100 hours. The annual cost burden to respondents is estimated to be \$2,000 per year. The figure is based on 200 respondents requiring .5 hours each to complete FAA Form 8100.7 at approximately \$20 per hour.

Estimated number of annual respondents	200
Estimated reporting burden hours per submission	.5 hours
Estimated annual reporting burden	100 hours
Estimated respondent cost per hour	\$20.00
Estimated annual cost burden	\$2,000.00

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

No additional cost over and above the hourly burden in Item 12 of the Supporting Statement For Paperwork Reduction Act is required for the collection of information from respondents.

*14. Provide estimates of annualized cost to the Federal government.*

The annual cost to the Federal government to analyze and process the information received is estimated to be \$2,000 per year. This estimate is based on 200 FAA Form(s) 8100.7 received per year which take federal employees an average of .5 hours to analyze and process at approximately \$20 per hour.

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

There is no burden change from the previous submission. The title of the collection activity has been changed from ACSEP Evaluation Customer Feedback Report to QSA Customer Feedback Report; this change does not affect the collection activity.

*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 reports, publications dates, and other actions.*

The Customer Service Standard established in fulfillment of Executive Order 12862 dated September 11, 1993, utilizes six elements rated on a scale of 1 to 5, where “1” equates to a rating of “unsatisfactory” and “5” equates to a rating of “excellent”. The standard for each element is based on the average of the indicated ratings for all FAA Form(s) 8100.7 received. The six elements and the standard established for each are as follows:

<b>ELEMENTS</b>	<b>STANDARD</b>
1. Pre-evaluations arrangements	3.5
2. Pre-evaluations conference	3.5
3. Daily meetings	3.5
4. Conduct of the evaluation	3.5
5. Post-evaluation	3.5
6. QSA team professionalism	4.0

*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.*

We are not requesting approval to not display the expiration date for OMB approval of the information collection.

*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 to Item 19.