

## SUPPORTING STATEMENT

### A. Justification

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

BTS collects flight performance data to create an air carrier incentive to improve operational performance. Before the data was collected and published, the Department of Transportation was receiving an excessive number of consumer complaints dealing with late arrivals. One of the results of BTS publishing monthly on-time statistics is that air carriers have improved their operations. Recently, there has been considerable public attention on flights that sit long hours on the tarmac with passengers unable to deplane. The Department of Transportation expanded the on-time data collection to include tarmac times for flights (1) that are cancelled after the aircraft leaves the boarding gate, (2) tarmac times for gate returns, and (3) tarmac times for flights that are diverted to alternate airports. DOT requiring carriers to file their Airline Service Quality Performance Reports (Authority: 49 U.S.C 329 and Sections 41708 and 41709). Large certificated air carriers to file On-Time Flight Performance reports and Mishandled Baggage reports pursuant to 14 CFR 234.4 and 234.6. These reports are used to monitor the quality of air service that larger carriers provide to the flying public.

**2. Indicate how, by whom, and for what purpose the information is to be used. Indicate the actual use the agency has made the information received from the current collection.**

On-time data are collected from air carriers that account for at least 1 percent of domestic scheduled passenger revenues. The Federal Aviation Administration use on-time data collected and processed by BTS to pinpoint and analyze air traffic delays that occur under FAA control. By being able to focus on delays that are attributed to the national aviation system and eliminating the delays that were caused by extreme weather, the air carriers or by the late arrival of an aircraft delayed on a previous flight, the Department is able to focus its attention on solving problem areas within its domain. Aircraft tail number, Gate-departure time wheels-up time, wheels-down time, and gate arrival time provides FAA the times that aircraft are spending on tarmac awaiting take-off, which enables the FAA for analyzing air traffic delays. BTS is now collecting tarmac delay data for flights that are ultimately cancelled and tarmac delays at alternate airport

after a flight has been diverted. This additional data will give the FAA a more complete picture of what is happening at the airports especially at times when operations have service difficulties caused by bad weather.

Wheels-up and wheels-down time are used in conjunction with departure and arrival times to show the extent of ground delays. Elapsed flight time reveal delays experienced in the air. The reporting of the aircraft tail number allows the FAA to track an aircraft through the air network, which enables the FAA to study the ripple effects of delays at hub airports. Data by aircraft type allows the FAA to calculate the capacity impacted by air traffic congestion

Originally, on-time data and mishandled baggage report system was developed as a consumer protection reporting system. While the utility of the reporting system has gone far beyond its original purpose, it remains one of primary resources used by consumers to make air carrier selections. Since Part 234 has been effected, air carriers' quality of service has improved resulting in a decrease in the number of consumer complaints with an exception for the year 2000. The Department discloses the air carriers' on-time performances, the reasons for delays and cancellations, and carriers' ratio of mishandling passenger baggage. Airline passengers are now more informed to make carrier selections based on the quality of service provided.

Consumers may use the reports in their selection of which carrier to fly.

**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 submissions 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.**

The on-time flight performance reporting requirements are in compliance with the Government Paperwork Reduction Act. The Office of the Assistant Secretary for Research and Technology's Bureau of Transportation Statistics issued a final rule which was published in the 75 Federal Register, No. 136, page 41580 on July 16, 2010 that requires reporting carriers to submit their recurrent reports to the Department via the internet using a comma separated values format or where applicable, PDF (portable document format). Carriers are able to use their browsers to upload the reports into the new system. 100% of the carriers submit the requested data via the internet using their browsers.

**4. Describe efforts to identify duplication. Show specifically why similar**

**information already available cannot be used or modified for use for the purposes described in Item 2 above.**

We looked at OPSNET data as a substitute data source. OPSNET data are collected by air traffic controllers to track air traffic control delays of 15 minutes or more. We determined the OPSNET cannot be used because it captures only about 25% of delays. There is also a question concerning the accuracy of the data.

**5. If the collection of information impacts small businesses or other small entities, describe efforts to minimize burden.**

The carriers that are required to submit causal data are all large air carriers with over \$861 million in annual scheduled domestic passenger revenues. Small entities do not submit Part 234 On-Time data.

**6. Describe the consequence to the Federal Program or policy activities if the collection were not collected or conducted less frequently.**

Less frequent filing of on-time data would not reduce reporting burden. Airlines collect data on an individual flight segment basis. Less frequent reporting would not change this practice. On-time data can become stale over time and lose their usefulness.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, government contracts, grant-in-aid, or tax records for more than 3 years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of statistical data classification that has not been reviewed**

and approved by OMB;

- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **Requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

Because of the time-sensitive nature of the on-time performance data, carriers submit monthly reports within 15 days after the end of the applicable month. Most of the air carriers use a computer system called the ACARS system that amasses the data for on-time reporting. ACARS allows for almost real-time data submission.

**8. 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 the notice and describe actions taken by the agency in response to these comments.**

On June 15, 2015, BTS published a 60 day notice in the Federal Register (FR 80, Number 114, page 34198). There were no comments. On August 28, 2015, a 30 day notice was published in the Federal Register (FR 80, Number 167, page 52371).

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

There are no payments or gifts to respondents.

**10. Describe any assurances of confidentiality provided to respondents.**

There are no assurances of confidentiality.

**11. Are there any questions of a sensitive nature?**

There are no questions of a sensitive nature.

**12. Provide estimates of reporting burden.**

**Part 234 – On-Time Data**

Number of Respondents: 14

Number of Annual Respondents: 168

Total Burden Per Response: 10 hours

Total Annual Burden: 1680

This equates to 14 carriers/respondents x 12 monthly reports (14 x 12 = 168 responses), 168 x 10 hours = 1680 total annual burden

**Part 234.6 – Mishandled Baggage**

Number of Respondents: 14

Number of Annual Respondents: 168

Total Burden Per Response: 10 hours

Total Annual Burden: 1680

This equates to 14 carriers/respondents x 12 monthly reports (14 x 12 = 168 responses), 168 x 10 hours = 1680 total annual burden

**13. Provide an estimate of cost to the respondents. Do not include the cost of any hour burden shown in items 12 and 14. General estimates should not include purchase of equipment or services or portions thereof made prior to October, 1995.**

Other than the hourly burden costs, there are no additional costs. The carriers would not make any purchases to report causal data.

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

**Federal Costs**

Manpower	\$300,000
Loading data into database, validating data for accuracy and contacting carrier for corrections.	

Information Technology	\$ 25,000
Server and Program costs	
Total Government Cost	\$325,000

The Department has expanded its Air Travel Consumer Reports and increased the exposure of on-time data on the OST-R/BTS website.

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

Due an agency adjustment. Information was not capturing both reports on an annual basis. The report was only capturing one of the reports. Adjustments were made in the number of responses due to not having including the monthly calculations of the second report Mishandled Baggage Part 234.6

**16. Is the information received published?**

Yes. DOT’s Office of the Secretary publishes the monthly *Air Travel Consumer Report*. The Bureau of Transportation Statistics exhibits on-time data on its web site. See the following web sites:

[http://www.rita.dot.gov/bts/sites/rita.dot.gov.bts/files/subject\\_areas/airline\\_information/taxi\\_out\\_and\\_other\\_tarmac\\_times/index.html](http://www.rita.dot.gov/bts/sites/rita.dot.gov.bts/files/subject_areas/airline_information/taxi_out_and_other_tarmac_times/index.html)

[http://www.rita.dot.gov/bts/sites/rita.dot.gov.bts/files/subject\\_areas/airline\\_information/airline\\_ontime\\_tables/index.html](http://www.rita.dot.gov/bts/sites/rita.dot.gov.bts/files/subject_areas/airline_information/airline_ontime_tables/index.html)

<http://www.bts.gov/5PctCancels/index.html>

<http://www.bts.gov/xml/ontimesummarystatistics/src/index.xml>

[http://www.transtats.bts.gov/Tables.asp?DB\\_ID=120&DB\\_Name=Airline%20On-Time%20Performance%20Data&DB\\_Short\\_Name=On-Time](http://www.transtats.bts.gov/Tables.asp?DB_ID=120&DB_Name=Airline%20On-Time%20Performance%20Data&DB_Short_Name=On-Time)

**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 seeking approval to not display the OMB expiration date on the data.

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

There are no exceptions.

## **MISSION STATEMENT**

The Department of Transportation (DOT) relies on the on-time flight performance data to fulfill its strategic plan. The DOT monitors and studies the movement of aircraft through the national air space system to ensure safe and efficient operations. DOT is committed to guiding and overseeing America's air transportation system today and into the future by recognizing statistical trends that identify recurring delays and bottlenecks in air traffic control.

DOT is committed to developing transportation policies and programs that foster fast, safe, efficient, and convenient transportation at the lowest cost. On-time data are used in assessing long-term air traffic control and airport development needs. Air traffic delays cost the airline industry, air travelers, and the government billions of dollars each year. ATA estimates that its annual cost for delays is over \$9.1 billion (see <http://airlines.org/data/per-minute-cost-of-delays-to-u-s-airlines/>). The Department expanded the on-time data reporting system to include tarmac delays that occur before a flight is cancelled and after a flight lands at an alternate airport when there is a flight diversion. The additional information will be used by the Federal Aviation Administration (FAA) to identify problem areas within their control.

Economic growth prospers when the real economic cost of transportation is reduced. DOT recognizes that the collection of delay data is critical to identifying and solving air congestion problems effectively reducing transportation costs. DOT performs an essential role as a catalyst for improving the quality of decisions affecting the transportation sector. In this role, the Bureau of Transportation Statistics serves as a facilitator in providing missing critical data to the FAA. Four economic trends impact transportation: (1) the globalization of commerce, (2) a growing attention to logistics in the production process, (3) a greater reliance on private investment in transportation industry, and (4) the rise of competing and complementary technologies. The accelerated application of advanced information technologies, competitive techniques, and traffic flow information systems affect the transportation industry. Adoption of these information-related technologies will facilitate the collection, management, integration, and distribution of more transportation information in less time with better accuracy and broader application

DOT's information systems are being integrated into an agency-wide activity. Reflective of this one DOT approach in meeting the challenges faced by our national transportation system is a coordinated effort by the Office of the Secretary, the Federal Aviation Administration, the Bureau of Transportation Statistics (BTS), and Office of the Inspector

General Office to reduce airline delays.