

## SUPPORTING STATEMENT

OMB -2120-0680

### **Part 60 -- Flight Simulation Device Initial and Continuing Qualification and Use**

#### **Justification**

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

Title 49 U.S.C., Section 44702 empowers and requires the Secretary of Transportation to issue operating certificates and to establish minimum safety standards for the operation of air carriers and those to whom such certificates are issued. Also, Title 49 U.S.C., Section 44701 empowers and requires the Administrator of the Federal Aviation Administration (FAA) to prescribe standards applicable to the accomplishment of the mission of the FAA.

This project is in direct support of the Department of Transportation's Strategic Plan – Strategic Goal – SAFETY; i.e., to promote the public health and safety by working toward the elimination of transportation-related deaths and injuries.

This project also directly supports the following initiatives under the FAA's Corporate Project, Safer Skies:

- a. AFS Strategic Plan – Goal 1: Evolve to a Systems Approach for Safety Oversight.
- b. AFS Business Plan Initiative 2.9: Improve the Requirements Process.
- c. AFS Strategic Plan – Goal 4: Promote Positive, Responsive, and Focused Customer Relations.
- d. AFS Business Plan Initiative 2.13: Continue Efforts Associated with Safer Skies – Commercial Aviation.

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

This request for clearance reflects requirements necessary under Title 14 CFR part 61, part 63, part 91, part 121, part 135, part 141, and part 142, to ensure safety-of-flight by ensuring that complete and adequate training, testing, checking, and experience is obtained and maintained by those who operate under these parts of the regulation and use flight simulation in lieu of aircraft for these functions. The FAA will use the information it collects and reviews to ensure compliance and adherence to regulations and, where necessary, to take enforcement action on violators of the regulations.

**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.**

In accordance with the Government Paperwork Elimination Act (GPEA), the FAA allows and accepts electronic submission, and encourages the use of automation and electronic media for the gathering, storage, presentation, review, and transmission of all requests, records, reports, tests, or statements required by this rule with the provision that such automation or electronic media has adequate provision for security (i.e., that such submissions may not be altered after review and acceptance by the FAA) and that the systems or applications are compatible with the systems or applications used by the FAA. Today, a significant amount of information is submitted via e-mail, on CD/DVD, or posted on SharePoint. We expect this to grow. The National Simulator Program has also designed a system to replace the current scheduling and regulatory management application in use today. Once funded and deployed it could digitize all aspects of information collection.

**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 above.**

We have reviewed other FAA public-use reports and find no duplication. Also, the FAA knows of no other agency collecting the same information. The information sought is peculiar to a specific flight simulation training device (FSTD), constructed for and delivered to a specific operator, the FSTD sponsor. The information necessary is available from that sponsor only, and is not available from any other source.

**5. If the collection of information has a significant impact on a substantial number of small businesses or other small entities (item 5 of OMB Form 83-I), describe the methods used to minimize burden.**

The FAA believes that this rule will not impact a substantial number of small businesses or other small entities; however, the material published in conjunction with this rule is informative and explanatory with regards to the requirements, and a sponsor applicant will be guided through the administrative requirements by the local principal operations inspector or training center program manager and by representatives of the National Simulator Program staff regarding any FSTD for which the sponsor applicant seeks qualification.

**6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

The frequency of information collection for purposes of part 60 is for original qualification and continuing qualification of FSTDs used for flightcrew member training, evaluation, or flight experience requirements in lieu of the aircraft. If the applicant sponsor does not apply initially, evaluation of the FSTD and subsequent qualification will not occur. If the sponsor does not continue to provide this information, the FAA will not be able to determine if the FSTD continues to meet the required performance and handling qualities necessary for the FSTD to substitute completely and accurately for the aircraft in training, evaluation, or flight experience requirements.

**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).**

This collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2)(i)-(viii).

**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.**

In order to resolve comments and provide a forum for the FAA and the aviation community to discuss and resolve issues regarding Flight Simulation Training Devices (FSTDs), the FAA established the Flight Simulation Device Aviation Rulemaking Committee (ARC) on July 2, 2003. The ARC provided a forum for the FAA and affected members of the aviation community to discuss issues. The ARC also allowed members of the aviation community to reach consensus on certain recommendations that would be submitted to the FAA and to develop resolutions to facilitate the evolution of FSTDs. After the FAA received recommendations from the ARC the comment period was reopened on February 10, 2004, to permit interested persons to review these recommendations and submit additional comments. The recommendations from the ARC are available online at <http://dms.dot.gov> by searching for entry 84 in docket number FAA-2002-12461. The comment period closed on March 11, 2004. The overwhelming majority of the clarifications and revisions contained in the final rule are consistent with the ARC recommendations.

A 60-day notice for public comment was also published in the Federal Register on May 18, 2012, Volume 77, no. 97, pages 29748. No comments were received.

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

There are no monetary considerations for this collection of information.

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

The respondents have been given no assurance of 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 the information is requested, and any steps to be taken to obtain their consent.**

There are no questions of a sensitive nature.

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

The estimates for hours are broken down by sections of the rule below. For a cumulative estimate see the summary table at the end of this document.

### **§ 60.5 Quality Management System.**

This section calls for a sponsor to develop, review, and have approved by the FAA, policies, procedures, and processes that they will follow for each of the sections of Part 60. The purpose of this program requires the sponsor to systematically plan for and implement the requirements of part 60 and the associated Qualification Performance Standard (QPS). The estimate for this section is based on a sponsor count of 46 which has remained consistent during the previous three years and is expected to remain at this level. Sponsors have been sub-grouped into small, medium, and large based on the number of training centers. The nature of QMS is such that a program applies to the sponsor's entire operation however local differences from one site to another may exist. Single site sponsor QMS program will be relatively less complex than multi-site sponsor QMS programs.

#### For one-time cost on the industry side:

1. To develop and implement policies, procedures and processes, small sponsors would spend 56 hours, medium sponsors 112 hours, and large sponsors 720 hours. Based on the number of sponsors by size, this would result in 1,792 hours, 1,120 hours, and 2,880 hours respectively for a total of 5,792 hours.

2. To receive final approval on their QMS program, sponsors must complete an on-site assessment. During this assessment, sponsor time will be required to provide and explain records, answer questions regarding processes, and demonstrate procedures. Small and medium sponsors will spend 12 hours each in performing these actions and large sponsors would spend 60 hours. Given that large sponsors have significantly more locations, more than one visit is required and thus more effort is assigned. The total estimate for this activity is 744 hours.

See Table 1 and the Summary table at the end of this document for calculations.

#### For the continuing, annual cost on the industry side:

1. When a policy, procedure or process changes, either as a result of rule changes or a sponsor's operation, the applicable section of the QMS program must be updated. The volume of these changes has been minimal and is not expected to increase. Small and medium sponsors will spend 30 minutes documenting and revising the QMS and large sponsors would spend one hour for 16 hours, 5 hours, and 4 hours respectively - a total of 25 hours.

2. In accordance with Part 60 QMS requirements, sponsors must perform self-assessments (internal audits) every six months. Each self-assessment will focus on one quarter of the Part 60 Appendix E requirements and will vary in time with the level of complexity of the sponsor's program. Small sponsors are expected to spend 6 hours performing two internal assessments each year, medium sponsors are expected to spend 6 hours, and large sponsors 39 hours. A total of 312 hours will be spent by sponsors in this activity each year.

3. The status of each sponsor's QMS program will be reviewed every two years. This review will be in the form of an on-site assessment exactly similar to the effort outlined in the one time cost section above. The assumptions for the estimate are the same and will result in a total of 372 hours of effort annually.

4. As part of QMS requirements sponsors must set-up a process to collect feedback. Sponsors are also required to maintain this feedback for a period of time and present it during inspection/assessment periods. Based on direct observation during the initial assessment of sponsor programs, the volume of these feedback events are estimated at 360 for small sponsors, 720 for medium sponsors, and 3,600 for large sponsors each year. Each feedback item will take a sponsor approximately five minutes to record, process and file/maintain. The total effort is 2,760 hours annually.

5. Section 60.5 requires that each sponsor identify a Management Representative and make that person known to the FAA. Initially this effort was part of the documentation of policy, process, and procedures but on a continuing basis the MR may change. Any change must be reported to the FAA. Based on direct observation the average number of changes annually is approximately one. The total effort for this is estimated at 3.8 hours each year. Section 60.5 also requires that the sponsor's MR regularly brief management on the status of their QMS program and qualification of their FSTDs. The typical period of these briefings, based on assessment of sponsor programs, is quarterly and the time involved is 30 minutes for small and medium sponsors, and 1 hour for large sponsors. The estimate of time for all sponsors is 100 hours per year.

See Table 2 and the Summary table at the end of this document for calculations.

#### **§ 60.9 Additional Responsibilities of the Sponsor.**

1. This section sets out requirements for the sponsor to establish a mechanism for receiving comments from those persons using the FSTD, posting of FSTD statements of qualification, designation of an MR, and defining MR duties. The time and costs involved are accounted for under the discussion of §60.5 Quality Management System, above.

#### **§ 60.13 FSTD Objective Data Requirements.**

The time and costs involved are addressed in § 60.15, FSTD Initial Qualification Requirements, below.

#### **§ 60.15 Initial Qualification Requirements.**

Sub-Sections (a) – (i) of this section set out the requirement that a request for evaluation must be submitted as well as the requirements for the contents of that request. With the exception of the calculation for conversion to electronic format for all QTG documents, existing practices/procedures provide an acceptable mechanism for meeting all other requirements in this section and sponsors of FSTDs will incur no *additional* time costs from present practice.

The estimated effort to convert paper MQTGs assumes that devices built after 2005 already have digitized copies of this guide and the sponsor simply has to provide that file to the FAA. There

are approximately 569 devices that were built prior to 2006 and it is expected that the number of these devices which remain qualified, will shrink. For purposes of this estimate however it is assumed that the number will stay relatively constant. The devices have been categorized into levels which correspond to their fidelity. In general, lower level devices have smaller MQTGs and higher level devices have larger ones. This is directly related to the number of pages which have to be converted.

For one-time cost on the industry side:

The conversion of each page will take a clerk approximately 30 seconds. To see a detailed calculation based on the number of pages per device category and the numbers of devices in each category, see the tables at the end of this document. The total effort for this section is calculated at 8,329 hours.

See Table 3 and the Summary table at the end of this document for calculations.

For the continuing, annual cost on the industry side:

It is expected that approximately 100 changes per year will occur which will require a new conversion of 2 pages. It is again assumed that it will take a clerk 30 seconds to perform this conversion for a total effort estimate of 1356 hours per year.

See Table 4 and the Summary table at the end of this document for calculations.

**§ 60.16 Additional Qualifications for a Currently Qualified FSTD.**

This section sets out the requirements for sponsors to submit to the National Simulator Program Manager, a summary of all modifications to a qualified FSTD and/or notification of seeking additional qualifications. This is a one time effort only without a continuing cost impact. The number of notifications expected under this section is 200 per year with 50% requiring a change to the MQTG. The Management Representative will spend 0.5 hours in drafting a letter to the NSPM and a clerk would spend 0.1 preparing the letter for mailing for a total effort of 120 hours. For additional tasks (beyond those originally qualified) that require qualification test guide modification, the Management Representative would spend 0.25 hours in developing an appropriate change for a total of 25 hours. The combined total would be 145 hours [120 + 25].

See Table 5 and the Summary table at the end of this document for calculations.

**§ 60.19 Inspection, Maintenance, and Recurrent Evaluation Requirements.**

1. The first Sub-Section requires sponsors to conduct objective testing of each FSTD in a minimum of four segments each year as described in the appropriate Qualification Performance Standard document. This testing, which is mostly automated would take an FSTD technician 0.1 hours per test. The number of tests required depends largely on the fidelity of the device. For a detailed calculation see the table at the end of this document. The total effort required on a continuing basis is 7,767 hours.
2. The second Sub-section also requires a functional preflight check be completed prior to use each 24 hour period. FSTD usage is estimated at five days per week for each level device and

the preflight check would take an FSTD technician 0.1 hours to document / record. The total estimate for pre-flight based on the time, usage, and number of devices is 19,708 hours per year.

3. The third sub-section requires that each FSTD be recurrently evaluated by the NSPM (typically each year). The Management Representative is required to contact the NSPM to schedule this evaluation which is estimated to take approximately 0.1 hours for each simulator. During the evaluation, an inspector will select objective tests (typically three) at random to be run. It will take a technician approximately 0.1 hours to run each test. The total effort estimate for this sub-section is 303 hours annually.

4. The fourth sub-section requires each sponsor to maintain a discrepancy log for each device. The sponsor must record a description, corrective actions, and the name and date of personnel taking action for each discrepancy. Approximately five to ten discrepancies per FSTD per week are recorded on average, depending on the level of fidelity, and the time required to record and update this information is 15 minutes. The total effort estimate for this sub-section is 30,306 hours annually.

See Table 6 and the Summary table at the end of this document for calculations.

#### **§ 60.20 Logging FSTD Discrepancies.**

This Section requires each instructor, check airman, or representative of the Administrator to document any discrepancies found. The estimate for the effort is included in section 60.19.

#### **§ 60.23 Modifications to FSTDs.**

This Section describes what must be done in order to modify a qualified FSTD as well as the procedure to follow. This section is essentially an expansion of section 60.16 and the estimate of the effort involved is included in the section for 60.16.

#### **§ 60.25 Operation with Missing, Malfunctioning, or Inoperative Components.**

This Section defines the requirements associated with missing, malfunctioning, or inoperative (MMI) components in an FSTD. An MMI is essentially a special type of discrepancy. The effort associated with discrepancy logs is included in 60.19 above. However, if an MMI cannot be repaired or replaced within 30 days, approval to extend the repair/replace time must be made by the NSPM. Approximately 220 extension requests as well as updates once repaired/replaced are made annually. Each request to extend an MMI will take the Management Representative 0.1 hours to make and another 0.1 hours to report completion of repair/replace. The total effort is calculated at 44 hours annually.

See Table 7 and the Summary table at the end of this document for calculations.

#### **§ 60.31 Recordkeeping and Reporting.**

1. This section requires the sponsor to maintain certain records.
  - (a) The time and costs of developing the Master Qualification Test Guide (MQTG) are addressed in the discussion on §60.15. No additional time or costs are involved.

- (b) The time and costs of completing the quarterly objective tests and performance demonstrations are addressed in the discussion on §60.15. No additional time or costs are involved.
- (c) The time and costs of completing the recurrent evaluations are addressed in the discussion on §60.19. No additional time or costs are involved.
- (d) The time and costs of obtaining comments in accordance with §60.9(b)(1) are addressed in the discussion on §60.9.
- (e) The time and costs of recording discrepancies are addressed in the discussions on §60.20. No additional time or costs are involved.
- (f) The time and costs of recording modifications to the FSTD are addressed in the discussion on §60.23. No additional time or costs are involved.

The total estimated annual burden on the public is **66,840** hours. This is calculated by dividing the initial, one-time burden of 15,010 by 3 (for the 3-year clearance period, 5,003 hours) and adding it to the 61,837 recurring annual burden hours (5,003 + 61,837 = 66,840).

We approximate that we will receive a total of 16 to 17 requests for evaluation from each of the 46 Flight Simulation Device Operators (FSTD) per year, for an estimated total of 758 responses.

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

The total estimated burden on the public is:

One-Time Cost

6,536 hours + 8,329 hours + 145 hours = 15,010 hours.

Recurring Cost

3,573 hours + 135 hours + 58,084 hours + 44 hours = 61,837 hours.

Please see the tables at the end of this document for a more detailed breakdown of the estimates.

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

The estimates for hours and costs are broken down by sections of the rule below. For a cumulative estimate of the hours, see the summary table at the end of this statement.

**§ 60.5 Quality Management System.**

The burden estimate to the government associated with this section is limited to the review/approval of QMS policies, processes, and procedures as well as the evaluation of the sponsor’s QMS program on-site. The following is the breakdown by initial versus continuing costs.

Initial Cost

Review/Approval



A program analyst will spend 10 hours reviewing policies, processes and procedures for 32 separate small sponsors, 14 hours reviewing 10 medium sponsors, and 240 hours reviewing 4 large sponsor programs. This is a total of 1,420 hours. At \$47/hour, the one-time cost to the Federal Government is \$66,740.

#### On-site Assessment

A program analyst will spend 14 hours assessing 32 separate small sponsor program, 14 hours assessing 10 medium sponsor programs, and 70 hours assessing 4 large sponsor programs. This is a total of 868 hours. At \$47/hour, the one-time cost to the Federal Government is \$40,796.

The total one-time cost to the government for this section is \$107,536.

#### Continuing Cost

##### Review/Approval

Periodic updates will be made to sponsor QMS programs which require review/approval by the NSPM. A program analyst will spend 0.5 hours reviewing policies, processes and procedure updates for 32 separate small sponsors, 0.5 hours reviewing updates for 10 medium sponsors, and 1 hour reviewing updates for 4 large sponsor programs. This is a total of 25 hours. At \$47/hour, the annual cost to the Federal Government is \$1,175.

##### On-site Assessment

Assessment visits are conducted every two years. It is therefore assumed that 50% of the sponsors will be reviewed annually. An Aviation Inspector will spend 10 hours assessing 16 separate small sponsor program and a program analyst will spend 2 hours with processing the records/assessment report. An Aviation Inspector will spend 10 hours assessing 5 medium sponsor programs and a program analyst will spend 2 hours with processing the records/assessment report. An Aviation Inspector will spend 50 hours assessing 4 large sponsor programs and a program analyst will spend 10 hours with processing the records/assessment report. This is a total of 372 hours. At \$47/hour, the annual cost to the Federal Government is \$17,484.

The total continuing cost to the government for this section is \$18,659.

#### **§ 60.15 Initial Qualification Requirements.**

The burden estimate to the government associated with this section is limited to the review, approval, and storage of electronic MQTGs (EMQTG). The following is the breakdown by initial verses continuing costs:

#### Initial Cost

##### Review/Approval/Storage

An Aerospace Engineer will spend 1 hour reviewing/approving and a clerk 0.08 hours managing the storage of 569 EMQTGs for a total burden of 616.4 hours. At \$47/hour, the one-time cost to the Federal Government is \$28,970.08.

#### Continuing Cost

#### Review/Approval/Storage

An Aerospace Engineer will spend 0.5 hours reviewing/approving and a clerk 0.08 hours managing the storage of approximately 100 EMQTGs changes each year for a total burden of 58.3 hours. At \$47/hour, the annual cost to the Federal Government is \$2,740.

#### **§ 60.16 Additional Qualifications for a Currently Qualified FSTD.**

The burden to the government associated with this section is limited to one-time cost only for the review/approval of modifications to the FSTD in order to accommodate additional qualifications.

An Engineer/Pilot will spend 0.5 hours reviewing notifications of change on 200 FSTDs each year. A clerk will spend 0.1 hours preparing and mailing a letter to the sponsor in reply to those requests. The total estimate of effort is 120 hours [200 x (0.5+0.1)]. Additionally, 80 FSTDs are expected to require an evaluation based on the level of change/modification requested. It will take an Aviation Inspector approximately 0.5 hours to document that evaluation for a total of 40 hours. The total burden estimate for this section is 160 hours. At \$47/hour, the annual cost to the Federal Government is \$7,520.

#### **§ 60.19 Inspection, Maintenance, and Recurrent Evaluation Requirements.**

The estimate to the government associated with this section is limited to continuing cost only. Costs are related to the time it takes to review sponsor completed objective testing and the time related to reporting the results of continuing evaluations. The following is a breakdown by each component.

#### Objective Testing Review

An Aviation Inspector will spend 0.1 hours reviewing each of approximately 33% of all tests performed annually by the sponsor. The number of these tests will vary by level of device. The total burden estimate for this section is calculated at 2,585.4 hours. At \$47/hour for an FAA FSTD Inspector the annual recurring cost to the Federal Government is \$121,513.80.

#### Continuing Evaluations

A Program Manager will spend 0.1 hours reviewing requests for evaluations and drafting a reply. An Aviation Inspector will spend 0.5 hours preparing an evaluation report and 0.1 hours reviewing three additional objective tests, picked at random, during the evaluation. The time burden for this section is calculated at 682.2 hours. At \$47/hours the total annual cost to the Government is \$32,063.40.

The total cost to the Government for this section is \$153,577.20.

#### **§ 60.25 Operation with Missing, Malfunctioning, or Inoperative Components.**

The burden estimate to the government associated with this section is limited to continuing cost only. Costs are related to the time it takes to review a sponsor's MMI extension/report, enter it into a tracking/history database, and to clear the report once the MMI is corrected/repared. It will take a clerk 0.1 hours to enter the report and 0.1 hours to clear once corrected. It will take

an Aviation Inspector 0.1 hours to review. The total time burden for this section is calculated at 66 hours annually. At \$47/hour, the total annual cost to the Government is \$3,102.

The total cost to the Federal Government for initial and continuing collection processing procedures is \$322,104.28.

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

There is a decrease to the level of effort estimated for sponsors on both one-time costs and continuing costs. One-time costs to the Government have been revised upward but continuing costs to the Government are down slightly. Specific changes and adjustments are discussed section by section below.

60.5. There is a net increase in the estimate for this section. Both sponsor and Government costs have been revised upward on a continuing basis as well as an initial basis. The driving factors for this are: a previous under-estimate of the time required to document QMS policies, processes and procedures, an under-estimate of the time required to review and approve those policies, processes and procedures, and the omission of several required, on-going, QMS activities.

60.9. The items stated in this section relate to QMS activities. The estimate is now included in section 60.5.

60.13. No differences

60.15. There is a net increase in the estimate for this section driven by a more detailed analysis of the requirements and the effort involved. The previous analysis did not take into account the number of pages to be converted into a digital format and the fact that page count varies with the level of each device.

60.16. There is a slight increase in the estimate for this section driven by a more detailed analysis of the requirements and the effort involved. Previous assumptions limited the impact to new simulators only. This section should apply to all active simulators.

60.19. There is a significant increase in the estimate for the sponsor burden and a decrease for the Government burden. The previous estimate assumed much lower device usage than is actually occurring. Usage relates directly to the pre-flight effort. Since usage has been revised upward, the effort associated with pre-flight has also been increased for the sponsor. The previous estimate also under counted the number of discrepancies associated with devices. For each discrepancy there is an associated effort related to record keeping. This effort has been increased due to the increase in the number of discrepancies for each device.

60.20. There is a decrease in the estimate related to the sponsor burden for this section. The previous analysis effectively “double-counted” the effort associated with maintaining discrepancy records which is also included in section 60.19. Section 60.20 simply articulates the

people responsible for identifying and writing-up discrepancies. The effort to do so has been already quantified in section 60.19.

60.23. There is a significant decrease in the estimate related to the sponsor burden for this section. The previous estimate accounted for the time related to hardware and/or software changes associated with the modifications. This was an inappropriate assumption as those maintenance/repair activities do not apply to record keeping or reporting per se. The new estimate for 60.23 is combined with the effort estimate for 60.16 as both these sections deal with modifications.

60.25. There is a slight increase to the estimate for both sponsors and the Government. The previous estimate was deleted based on feedback/comments from the industry. But since there is an effort associated with MMI reporting, that effort has been included here. In comparison, the estimate completed in 2002 identified 50 hours as the level of effort required by sponsors. This estimate quantifies that effort now at 44 hours for sponsors.

60.31. No differences

**16. For collections of information whose results are planned to 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.**

There is no plan for tabulation or publication.

**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.**

No such approval is being sought.

**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.

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Table 1, Cost In Hours for §60.5 (One-Time Cost)

	<b>Small Sponsors</b>	<b>Medium Sponsors</b>	<b>Large Sponsors</b>	<b>Total Hours</b>
<b>Private Sector:</b>				
<b>Document Policies, Processes, Procedures</b>				
Management Rep hours per Sponsor	56	112	720	--
Number of Sponsors	32	10	4	--
Time for Each Type of Sponsor	1792	1120	2880	5792
<b>Initial On-Site Assessment</b>				
Management Rep hours per Sponsor	12	12	60	--
Number of Sponsors	32	10	4	--
Time for Each Type of Sponsor	384	120	240	744
<b>Government:</b>				
<b>Review/Document/Report Results of Program</b>				
Program Analyst hours to review/approve	10	14	240	--
Number of Sponsors	32	10	4	--
Total Time for Each Type of Sponsor	320	140	960	1420
<b>Initial On-Site Assessment</b>				
Program Analyst hours to audit/document	14	14	70	--
Number of Sponsors	32	10	4	--
Total Time for Each Type of Sponsor	448	140	280	868

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Table 2, Cost In Hours for §60.5 (Recurring Cost)

	<b>Small Sponsors</b>	<b>Medium Sponsors</b>	<b>Large Sponsors</b>	<b>Total Hours</b>
<b>Private Sector:</b>				
<b>Policy, Process, Procedure Changes</b>				
Management Rep hours per Sponsor	0.5	0.5	1	--
Number of Sponsors	32	10	4	--
Time for Each Type of Sponsor	16	5	4	25
<b>Self-Assessments</b>				
Management Rep hours per Sponsor	3	6	39	--
Number of Sponsors	32	10	4	--
Time for Each Type of Sponsor	96	60	156	312
<b>Continuing On-Site Assessment</b>				
Management Rep hours per Sponsor	12	12	60	--
Number of Sponsors	16	5	2	--
Time for Each Type of Sponsor	192	60	120	372
<b>Independent Feedback</b>				
Responses/Feedback items per year	360	720	3600	--
Management Rep hours per Sponsor	0.08	0.08	0.08	--
Number of Sponsors	32	10	4	--
Time for Each Type of Sponsor	960	600	1200	2760
<b>Identify Management Representative</b>				
Hours to notify NSPM of MR change	0.08	0.08	0.08	--
Number of changes per year	1	1	1	--
Number of Sponsors	32	10	4	--
Time for Each Type of Sponsor	2.7	0.8	0.3	3.8
<b>Regular Briefings to Sponsor Management</b>				
Hours to brief	0.5	0.5	1	--
Number of briefings per year	4	4	4	--
Number of Sponsors	32	10	4	--
Time for Each Type of Sponsor	64	20	16	100

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**Table 2, Cost In Hours for §60.5 (Recurring Cost) - Continuing**

	<b>Small Sponsors</b>	<b>Medium Sponsors</b>	<b>Large Sponsors</b>	<b>Total Hours</b>
<b>Government:</b>				
<b>Policy, Process, Procedure Changes</b>				
<b>Program Analyst hours to review/approve</b>	0.5	0.5	1	--
<b>Number of Sponsors</b>	32	10	4	--
<b>Time for Each Type of Sponsor</b>	16	5	4	25
<b>Continuing On-Site Assessment</b>				
<b>Program Analyst hours to audit/document</b>	2	2	10	--
<b>Aviation Inspector hours to audit/document</b>	10	10	50	--
<b>Number of Sponsors</b>	16	5	2	--
<b>Time for Each Type of Sponsor</b>	192	60	120	372

**Table 3, Cost In Hours for §60.15 (One-Time Cost)**

	<u>Level 5</u>	<u>Level 6</u>	<u>Level 7</u>	<u>Level A</u>	<u>Level B</u>	<u>Level C</u>	<u>Level D</u>	<u>Total Hours</u>
<b>Private Sector:</b>								
<b>Convert MQTG to Electronic Format</b>								
Clerk hours to convert each page of MQTG	0.01	0.01	0.01	0.01	0.01	0.01	0.01	--
Number of pages to convert	500	1000	2000	1000	1000	1500	2000	--
Number of current FSTDs	0	34	36	13	12	159	315	--
Time for Each Type of Device	0	283.3	600.0	108.3	100.0	1987.5	5250.0	8329.2
<b>Government:</b>								
<b>Review/Storage of MQTG</b>								
Aerospace Engineer hours to review	1	1	1	1	1	1	1	--
Clerk hours to store	0.08	0.08	0.08	0.08	0.08	0.08	0.08	--
Number of current FSTDs	0	34	36	13	12	159	315	--
Time for Each Type of Device	0	36.8	39.0	14.1	13.0	172.3	341.3	616.4

**Table 4, Cost In Hours for §60.15 (Recurring Cost)**

	<u>Level 5</u>	<u>Level 6</u>	<u>Level 7</u>	<u>Level A</u>	<u>Level B</u>	<u>Level C</u>	<u>Level D</u>	<u>Total Hours</u>
<b>Private Sector:</b>								
<b>Convert MQTG to Electronic Format</b>								
Clerk hours to convert each page of MQTG	0.01	0.01	0.01	0.01	0.01	0.01	0.01	--
Changes to MQTG each year	14	14	14	14	14	14	14	--
Number of pages to convert	2	2	2	2	2	2	2	--
Number of current FSTDs	0	34	36	13	12	159	315	--
Time for Each Type of Device	0	8.1	8.6	3.1	2.9	37.9	75	135.5
<b>Government:</b>								
<b>Review/Storage of MQTG</b>								
Aerospace Engineer hours to review	0.5	0.5	0.5	0.5	0.5	0.5	0.5	--
Clerk hours to store	0.08	0.08	0.08	0.08	0.08	0.08	0.08	--
Changes to MQTG each year	14	14	14	14	14	14	14	--
Time for Each Type of Device	8.3	8.3	8.3	8.3	8.3	8.3	8.3	58.3



Table 5, Cost In Hours for §60.16 (One-Time Cost)

	<b>Total Hours</b>
<b>Private Sector:</b>	
<b>Additional Tasks / Modifications</b>	
Number of notifications per year	200
Management Rep hours to draft letter	0.5
Clerk hours to prepare / mail letter	0.1
Number of additional tasks/mods that require MQTG change	100
Management rep hours to make / insert MQTG change	0.25
Time for Each Sponsor	145
<b>Government:</b>	
<b>Additional Tasks / Modifications</b>	
Number of notifications per year	200
Aerospace Engineer hours to review	0.5
Clerk hours to prepare / mail response	0.1
Number of additional tasks/mods requiring evaluation	80
Aviation Inspector hours to draft/present report	0.5
Time for Each Sponsor	160

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Table 6, Cost In Hours for §60.19 (Recurring Cost)

	<u>Level 5</u>	<u>Level 6</u>	<u>Level 7</u>	<u>Level A</u>	<u>Level B</u>	<u>Level C</u>	<u>Level D</u>	<u>Total Hours</u>
<b>Private Sector:</b>								
<b>Objective Testing</b>								
Number of FSTDs	5	54	50	13	14	170	452	--
Number of tests conducted	20	28	46	58	78	96	123	--
Simulator Tech hours per test	0.1	0.1	0.1	0.1	0.1	0.1	0.1	--
Time for Each Type of Device	10	151.2	230	75.4	109.2	1632	5559.6	7767.4
<b>Functional Pre-Flight</b>								
Number of FSTDs	5	54	50	13	14	170	452	--
FSTD usage (5 days x 52 wks)	260	260	260	260	260	260	260	--
Number of pre-flights conducted (FSTD # x usage)	1300	14040	13000	3380	3640	44200	117520	--
Simulator Tech hours to document each pre-flight	0.1	0.1	0.1	0.1	0.1	0.1	0.1	--
Time for Each Type of Device	130	1404	1300	338	364	4420	11752	19708
<b>Continuing Evaluations</b>								
Number of FSTDs	5	54	50	13	14	170	452	--
Management Rep hours to draft/send eval request	0.1	0.1	0.1	0.1	0.1	0.1	0.1	--
Simulator tech hrs to print/present additional tests	0.1	0.1	0.1	0.1	0.1	0.1	0.1	--
Number of additional tests run during evaluation	3	3	3	3	3	3	3	--
Time for Each Type of Device	2	21.6	20	5.2	5.6	68	180.8	303.2
<b>Maintain a Discrepancy Log</b>								
Number of FSTDs	5	54	50	13	14	170	452	--
Number of discrepancies per week per FSTD	5	5	10	10	10	10	10	--
Simulator Tech hrs to record/update each	0.08	0.08	0.08	0.08	0.08	0.08	0.08	--
Time for Each Type of Device	104	1123	2080	541	582	7072	18803	30306

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Table 6, Cost In Hours for §60.19 (Recurring Cost) - Continuing

	<u>Level 5</u>	<u>Level 6</u>	<u>Level 7</u>	<u>Level A</u>	<u>Level B</u>	<u>Level C</u>	<u>Level D</u>	<u>Total Hours</u>
<b>Government:</b>								
<b>Objective Testing</b>								
Number of FSTDs	5	54	50	13	14	170	452	--
Number of tests reviewed	7	9	15	19	26	32	41	--
Aviation Inspector hours to review each test	0.1	0.1	0.1	0.1	0.1	0.1	0.1	--
Time for Each Type of Device	3.5	48.6	75	24.7	36.4	544	1853.2	2585.4
<b>Continuing Evaluations</b>								
Number of FSTDs	5	54	50	13	14	170	452	--
Program Manager hours to draft/send eval request	0.1	0.1	0.1	0.1	0.1	0.1	0.1	--
Aviation Inspector hrs to draft/present report	0.5	0.5	0.5	0.5	0.5	0.5	0.5	--
Number of additional tests run during evaluation	3	3	3	3	3	3	3	--
Aviation Inspector hrs to review each additional	0.1	0.1	0.1	0.1	0.1	0.1	0.1	--
Time for Each Type of Device	4.5	48.6	45	11.7	12.6	153	406.8	682.2

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Table 7, Cost In Hours for §60.25 (Recurring Cost)

	<b><u>Total Hours</u></b>
<b>Private Sector:</b>	
<b>MMI Reporting</b>	
Number of MMIs reported per year	220
Management Rep hours to document and report	0.1
Management rep hours to update and/or clear	0.1
<b>Time for Each Sponsor</b>	<b>44</b>
<b>Government:</b>	
<b>MMI Reporting</b>	
Number of MMIs reported per year	220
Clerk hours to enter into database and file report	0.1
Aviation Inspector hours to review	0.1
Clerk hours to enter clearance into database and file report	0.1
<b>Time for Each Sponsor</b>	<b>66</b>

**Summary  
Paperwork Reduction<sup>1</sup>  
Cost to the Sponsor and the Government  
(Presented in Hours)**

Relevant Section of Part 60	Initial Cost in Hours						Annual Recurring Cost in Hours					
	To Sponsors			To Government			To Sponsors			To Government		
	2009	Now	Change	2009	Now	Change	2009	Now	Change	2009	Now	Change
§60.5	5,120	6,536	1,416	800	2,288	1,488	0	3,573	3,573	0	397	397
§60.9 <sup>1</sup>	4,650	0	(4,650)	0	0	0	0	0	0	0	0	0
§60.13 <sup>2</sup>	0	0	0	0	0	0	0	0	0	0	0	0
§60.15 <sup>3</sup>	7,085	8,329	1,244	160	616	456	0	135	135	0	58	58
§60.16 <sup>4</sup>	47	145	98	0	160	160	-----Not Applicable-----					
§60.19 <sup>5,6</sup>	-----Not Applicable-----						34,264	58,084	23,820	3,846	3,268	(578)
§60.20 <sup>7,8</sup>	-----Not Applicable-----						3,151	0	(3,151)	0	0	0
§60.23 <sup>9</sup>	-----Not Applicable-----						29,023	0	(29,023)	0	0	0
§60.25 <sup>10</sup>	-----Not Applicable-----						0	44	44	0	66	66
§60.31	0	0	0	0	0	0	0	0	0	0	0	0
<b>Totals</b>	<b>16,902</b>	<b>15,010</b>	<b>(1,892)</b>	<b>960</b>	<b>3,064</b>	<b>2,104</b>	<b>66,438</b>	<b>61,837</b>	<b>(4,601)</b>	<b>3,846</b>	<b>3,789</b>	<b>(57)</b>

- 1 Calculations are included within the calculations for §60.5.
- 2 Calculations are included within the calculations for §60.15 and §60.16.
- 3 Calculations based on 569 FSTDs.
- 4 Previous assumptions limited this effort to new simulators only. This section applies to all simulators
- 5 Previous calculations assumed lower device usage than occurs.
- 6 Previous calculations assumed a lower number of discrepancies than occurs.
- 7 Previous calculations effectively “double-counted” the effort associated with maintaining discrepancy costs.
- 8 Calculations are included within the calculations for §60.19.
- 9 Previous calculations accounted for maintenance time. Since they typically contain overlapping reporting and notifications, FSTD modifications and additional qualifications are both calculated in §60.16.
- 10 Previous calculations were dropped following comments received from the public. However since there is a record keeping/reporting impact, albeit small, they have been included again.