

SUPPORTING STATEMENT

OMB No. 2120-0570

Part 142, Certificated Training Centers

1. Explain the circumstances that make the collection of information necessary.

This report and the resulting paperwork burden directly support the Department of Transportation Strategic Goal on Safety. Specifically, the goal is to promote the public health and safety by working toward the elimination of transportation-related deaths, injuries, and property damage.

Chapter 447 of Title 49, United States Code, states that, applications for certificates under this title shall be in such form, contain such information, and be filed and served in such manner as the Administrator may prescribe.

14 CFR Part 142 is one of several Federal Regulation parts that implement the Public Law. Section 142.11 provides that application for a training center certificate and training specifications shall be made in a form and manner prescribed by the Administrator, shall provide specific information about each management, instructor position, and evaluator position, and contain certain other administrative information.

Section 142.37 provides that application for approval of training programs must be in a form and manner acceptable to the Administrator, and must provide specific information about curriculum and courses of the training program.

Chapter 447, Section 44701 of Title 49, United States Code, provides, in pertinent part, that the Administrator may find, after investigation, that a person found to possess proper qualifications for a position as an airman may be issued such certificate. That certificate shall contain such terms, conditions, and limitations as to duration thereof, as well as periodic or special examinations, and other matters as the Administrator may determine to be necessary to assure safety in air commerce.

Section 142.73 requires that training centers maintain records for a period of one year to show trainee qualifications for training, testing, or checking, training attempts, training checking, and testing results, and for one year following termination of employment the qualification of instructors and evaluators providing those services.

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

The information is maintained by the certificate holder and subject to review by aviation safety inspectors (operations), designated to provide surveillance to training centers to ensure compliance with airman training, testing, and certification requirements specified in other parts of the 14 CFR. Information may be reviewed on a periodic basis, and at

times of special events such as accidents, requests for certificate or course amendments, and the like. If the information were not collected, inspectors would not be able to determine if airmen who are clients are being trained, checked, or tested to meet the safety standards established in other parts of 14 CFR. To date, FAA inspectors have used the information collected to determine and assess regulatory compliance during routine program surveillance.

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 compliance with the Government Paperwork Elimination Act (GPEA), the information collected for this activity can be submitted 100% electronically, and training centers and certificate holder clients will be permitted and encouraged to use modern information technology for collection, storage, retrieval, and reporting. If, as expected, they are to be required to participate in an automated record-keeping system (FAA Operations Specifications) for certain elements of information, they are being provided with access to the system.

4. Describe efforts to identify duplication.

Section 142.73(e) provides that trainee clients of training centers may obtain all records that pertain to them, and thereby potentially avoid making individual logbook record entries substantiating the training, checking, and testing involved.

We have determined that no other agency collects this information. Information required for the initial certificate is new, and neither this agency nor any other has requested it yet.

The items of information involved would be the initial exposure for many of the trainees, to show compliance with initial training and certification requirements required by 14 CFR in the interest of aviation safety. For other students, each event requiring a record is to show compliance with recency of experience requirements and recurring training required by 14 CFR in the interest of aviation safety. Training centers may also provide approved training not required by 14 CFR pursuant to section 142.81. Section 142.73 also requires training center maintenance of applicable trainee records subsequent to the provision of such training, testing and/or checking.

No similar information concerning student records is available from any other source. Little information required for future certificate applications exists, and the FAA would use that information that is available in lieu of requiring the information again.

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

Since the requirement is to allow continuing FAA oversight of aviation safety, it is the same whether accomplished individually, from a small entity, or organization other than a

small entity. There are no methods proposed to reduce the burden on small businesses 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 obstacles to reducing burden.***

As discussed in item no. 5, the items of information are required only one time in the event of each initial qualification, or to maintain, and show compliance with, recency of experience requirements and other reoccurring pilot training requirements.. For recency of experience requirements and reoccurring pilot training requirements, the interval of experience events would have to be increased to decrease the frequency of collection. Previous research has shown that the recency of experience requirements of 14 CFR is the minimum levels that can ensure safety.

7. ***Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with 1320.5 (d)(2)(I) – (viii).***

The proposed collection of information would be consistent with the guidelines in 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.***

Much of 14 CFR Part 142 was in response to recommendations received from a joint FAA/industry task force on aviation training. Members of that committee discussed record-keeping and reporting requirements. The FAA published a Notice of Proposed Rulemaking (76 FR 13267), received comments regarding that proposal, and considered those comments in developing the requirements in the final rule.

A notice for comment was published in the Federal Register on March 10, 2011 (76 FR 13267). 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 provisions to provide payment to Part 142 Certificated Training Centers.

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

We do not assure confidentiality for the items of information collected. As this collection has no changes from the previous submission that affect privacy, it has been determined that no Privacy Impact Assessment (PIA) is necessary.

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.***

There are no questions about matters that are commonly considered private either in the student record-keeping requirements or in information that is required for application for certification.

12. ***Provide estimates of annualized cost to respondents for the hour burdens for collections of information.***

Recordkeeping

FAA records currently indicate that there are 283 training centers, (49 training centers and 234 associated satellite facilities), and the estimated number of students is 143,370. The estimated hourly rate for the respondents is approximately \$20 per hour, based on a typist (clerical) earning FG-G \$20.00 per clerical hour. During each year of operation under a Part 142 certificate, each training center would:

- a. Maintain a record for each student and provide that record once to each student.

143,370 students, 1 hour per record estimated = 143,370 hours.

143,370 hours x \$20.00 per hour = \$2,867,400

- b. Maintain a record for each instructor and evaluator and provide that record once per instructor or evaluator, excluding the initial certificate application.

1. 283 training centers
2. 67 instructors/evaluators each (estimated average) 1 hour each record = 67 hours x 283 = 18,961 hours
3. 18,961 hours x \$20.00 = \$379,220

- c. Provide a record to each Principal Operations Inspector (POI) of Part 121 and 135 certificate holders provided training in a Part 142 training center to include each course being instructed and the instructor's name.

1. 24 (Part 121) operators + 623 (Part 135) operators = 647 operators
2. 647 operators x 3 reports each (estimate 3 training courses) = 1,941 reports x 0.25 hours = 485.25 hours x \$20.00 = \$9,705

Hours/Cost

	143,370	\$2,867,400
	18,961	\$379,220
	485	\$9,705
TOTALS:	162,816	\$3,256,325

Certification

Applicants that are not already a part 121 or 135 certificate holder:

The costs incurred in applying for a Part 142 certificate would include the administrative cost of application. This cost would include the development of the training specifications and the composition of the actual application. The cost of advertising and other business expenses (new letterhead, business cards, etc.) is not included.

The FAA estimates that the paperwork burden involved in the process to become a new part 142 certificate holder and developing the necessary documents would require 100 hours each from two flight employees and one clerical support employee. The FAA estimates there will be not more than 13 such applicants during any future year.

100 hours x 3 employees = 300 hours

300 hours x 13 applicants = 3,900 hours

Applicants that are already a Part 121 or Part 135 certificate holder:

These operators are already required to establish and maintain an approved training program for crewmembers, check airmen, instructors, and other operations personnel employees. The current regulations permit these operators to use flight simulators and flight training devices for training. Testing, and checking, and many of the requirements in part 142 are parallel to concurrent requirements of Parts 121 or 135. A Part 121 or Part 135 certificate holder would be required to obtain a Part 142 certificate to implement and maintain a training program for persons who are not crewmembers for that air carrier under the same 14 CFR part as the carrier providing the training.

The FAA estimates that the paperwork burden involved in the process to become a new part 142 certificate holder and developing the necessary documents would require 36 hours each from two flight employees and one clerical support employee. The FAA estimates there will be not more than 2 such applicants during any future year.

36 hours x 3 employees = 108 hours

108 hours x 2 applicants = 216

a. New Part 142 certificate applications:

The paperwork burden incurred in applying for a Part 142 certificate would include the administrative cost of application. The paperwork burden would also include the development of the training specifications and the composition of the actual application. Applicants in this category would be required to develop at least one training program. Estimates to develop a training course vary from \$770 to \$7700. Actual certificate application might cost \$1540 to \$2310. The cost for advertising and other business expenses (new letterhead, business cards, etc.) is not included.

The FAA estimates that the total one-time paperwork burden cost to apply for a Part 142 certificate would be approximately \$11,390. The FAA estimates there will be not more than 13 such applicants during any future year.

13 applicants x 300 hours = 3900 hours 13 applicants x \$11,390 = \$148,070

b. New Part 142 certificate applicant that is a Part 121 or Part 135 certificate holder.

These part 121 or part 135 certificate holders should require only about one third of the costs to establish a training program under part 142, as a new part 142 certificate holder or 108 hours of time. These part 121 and part 135 certificate holders can basically duplicate their existing approved training programs, as well as leverage existing processes and procedures in their training and recordkeeping programs when going through the certification process to provide training under part 142.

These part 121 or part 135 certificate holders should require only about 36% of the paperwork burden (as a new part 142 certificate holder) to establish a training program under part 142. The FAA estimates that the total one-time paperwork burden cost to apply for a Part 142 certificate for these operators would be approximately \$4,180. The FAA estimates there will be not more than 2 such applicants during any future year.

2 applicants x 108 hours = 216 hours 2 applicants x \$4,180 = \$8,360

Hours/Cost

	3,900		\$148,070
	216		\$8,360
TOTALS:	4,116		\$156,430

Summary of Hours/Cost

Recordkeeping	162,816	Recordkeeping	\$3,256,325
Certification	4,116	Certification	\$156,430

TOTALS:	166,932	\$3,412,755
---------	---------	-------------

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

There are no additional costs that have not already been included in item 12.

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

The estimated annual cost for the government is \$852,076. This figure is the estimated cost for the government to approve training centers, certificate applicants, and approve training specification and training programs. Any costs for FAA publications and advisory material would be considered part of the FAA's periodic update of the regulations.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 or the OMB Form 83-1.

Whereas the number of training centers has not changed significantly, current data indicates an increased number of satellite facilities. Current data also indicates a necessary revision to the number of 121 and 135 certificate holders provided training in a Part 142 training center. This statement has been edited to reflect this change.

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

There are no plans to publish collected information, as the collection is for one-time determination of compliance with proposed certification requirements, and one-time, on demand determination of compliance with individual training requirements.

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.

Not applicable.

18. Explain each exception to the certification statement identified in Item 19, OMB Form 83-1.

There are no exceptions.