

*Supporting Statement for Paperwork Reduction Act*

OMB #2120-0663

*14 CFR 121.703 - Service difficulty reports (operational)*  
*14 CFR 121.705 - Mechanical interruption summary report*  
*14 CFR 125.409 - Service difficulty reports (operational)*  
*14 CFR 125.410 - Service difficulty reports (structural)*  
*14 CFR 135.415 - Service difficulty reports (operational)*  
*14 CFR 135.417 - Mechanical interruption report*  
*14 CFR 145.221 - Reports of defects or unairworthy conditions*  
*14 CFR 145.219 - Records and reports*

**A. Justification**

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

Title 49, United States Code, Section 44701 makes the Administrator responsible for promoting safe flight of civil aircraft in air commerce. Subsection 44701 (a) (5) authorizes the Administrator to prescribe regulations and minimum standards that the Administrator finds necessary for safety. Subsection 44701 (c) authorizes the Administrator to carry out assigned duties and responsibilities in a way that best tends to eliminate or reduce the possibility of recurrence of accidents in air transportation. The Administrator determined, based on evaluations of previous accidents and other incidents, that certain events involving malfunctions and defects may be precursors to recurrence of accidents. Regulations included in the 2005 Service Difficulty Report final rule (70 FR 76974), which modified the previously existing requirements, enumerate these events and require that operators and repair stations report them to the Administrator. Based on these reports the Administrator can systematically evaluate the circumstances and conditions that cause the events and determine whether or not corrective action is needed.

This activity supports the US DOT Strategic Plan on Safety.

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

FAA Form 8070-1, Service Difficulty Report (SDR), may be used by the air carrier industry and repair stations to submit required airworthiness information. As described in 14 CFR 121.703(e), these submitters may use another method that is suitable to their management system, provided that system is acceptable to the Administrator. Service difficulty information may also be submitted in an electronic format.

Repair stations certificated under Part 145 and Air taxi operators certificated under Part 135 are required to submit Malfunction or

Defect Reports, or Service Difficulty Reports. Federal Aviation Administration (FAA) Form 8010-4 is available to report service difficulty. However, the same information may be submitted in a different format. General Aviation is the largest user of the Form 8010-4. Report information is collected, collated by the FAA, and used to determine service performance of aeronautical products. When defects are reported which are likely to exist on other products of the same or similar design, the FAA may disseminate safety information to a particular section of the aviation community. The FAA also may adopt new regulations or issue Airworthiness Directives (AD's) to address a specific problem. AD's are mandatory repair or modifications essential for the prevention of accidents

The regulations enhance air carrier safety by collecting additional and timelier data pertinent to critical aircraft components. This data identifies mechanical failures, malfunctions, and defects that may be a hazard to the operation of an aircraft. The FAA uses this data to identify trends that may facilitate the early detection of airworthiness problems.

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

This required information is now and will in the future involve mechanical and electronic means for data collection. In compliance with the Government Paperwork Elimination Act, this collection is 100% submittable electronically. Currently, approximately 85% are voluntarily submitted in an electronic format on the Service Difficulty Reporting website at <http://av-info.faa.gov/sdrx>. The mechanical or paper form is also available. The electronic submission of data may eliminate the costs of mailing and storing service difficulty information in a paper format.

**4. Describe efforts to identify duplication.**

We have reviewed other FAA data collection reports and find no duplication. Also, we know of no other agency collecting this data. In fact, the FAA provides this information to other government agencies and foreign regulatory authorities upon request.

Most of the usable data collected is only available from certificate holders, although certain limited data would be available from FAA inspectors during the course of their daily involvement with the aviation industry.

**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 has found that this collection does not have a significant impact on a substantial number of small businesses.

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

The FAA would have no means of systematically collecting information on incidents and occurrences that are considered to be precursors of unsafe conditions that may lead to accidents and incidents. The frequency of collection is totally dependent on the amount of reportable service difficulties that a certificate holder encounters.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with the guidelines in 5CFR 1320.5(d)(2).**

There is an exception to the requirements of not submitting a report more often than quarterly. Each report of occurrences during a 24-hour period shall be submitted to the FAA within the next 96 hours. This is not anticipated to be a burden, as the existing rule requires certificate holders to report occurrences during a 24-hour period within the next 72 hours. This reporting requirement is consistent with the rest of the guidelines in 5 CFR 1320.5(d)(2).

**8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice.**

The FAA has published a notice soliciting public comment regarding this collection in the Federal Register on March 14, 2017 (82FR13706). No comments were received.

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

There are no monetary or gift considerations for the submission of information.

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

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**

There are no questions of a sensitive nature.

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

1. Sections 121.703(g), 125.410(g), 135.415(g) permit part 121, 125, and 135 certificate holders to authorize a repair station to submit an SDR on their behalf. Section 145.221 requires that the repair stations provide a copy of the report submitted by the repair station to the part 121, 125, or 135 certificate holder on whose behalf the report was submitted.

Estimated total time for clerk:	10 min
Hourly salary for clerk:	\$14.72
Total cost for clerk:	\$2.45
Total number of SDR's:	1,300
Cost:	\$3,185.00
Total Hours	217 hours

Cost of mailing report:	\$0.46
Cost of photocopying report:	\$0.10
Total processing costs:	\$0.56
Total number of reports:	1,300
Processing costs:	\$728.00

2. There are reporting requirements for part 121, 125, and 135 certificate holders. In order to give the public a reasonable cost estimate, the FAA assumes that each would generate an additional 1,035 reports a year. These sectional changes are:

§§ 121.703(a)(1), 125.410(a)(3); 135.415(a)(9),  
121.703(a)(2); 125.410(a)(4), 135.415(a)(10);  
121.703(a)(3), 125.410(b); 135.415(a)(12),  
121.703(a)(4); 135.415(a)(1), 135.415(c);  
121.703(a)(5), 135.415(a)(2), 135.415(e)(11);  
121.703(a)(6); 135.415(a)(3),  
121.703(c), 135.415(a)(4);  
121.703(e)(11), 135.415(a)(5),  
125.409(a); 135.415(a)(6)

a. Costs of SDR's to be prepared:

Estimated total time for each of the following:	10 min
Hourly salary for person writing up SDR:	\$28.48
Total salary:	\$4.74
Total number of SDR's per sectional change:	1,245
Total number of sectional changes	15
Cost:	\$88,519.50
Total Hours	3112.5 hours

b. Cost of additional SDR's from the repair stations to the air carriers:

Estimated total time for clerk:	10 min
Hourly salary for clerk:	\$14.72
Total cost for clerk:	\$2.45
Total number of SDR's per sectional change:	39
Total number of sectional changes	15
Cost:	\$1,433.25
Total Hours	97.5 hours

Cost of mailing report:	\$0.46
Cost of photocopying report:	\$0.10
Total processing costs:	\$0.56
Total number of reports per sectional change:	39

Total number of sectional changes:	15
Total Processing costs:	\$327.60
Total cost (2a plus 2b):	\$89,952.75
Total Hours	3,210 hours

The total hours sum to **4,510 hours**.

\* Total material costs: **\$1055.60**

The total annual cost burden for the Malfunction or Defect Report is **\$2,742.30** and the hour burden is 90 hours. The approximate number of Malfunction or Defect Report forms submitted annually by all Part 135, Part 145 and General Aviation users is 600. The average labor rate is \$30.47 per hour and the average time to complete the form is .15 hours (9 minutes).

**Total for 8070-1 and 8010-4= 4,600 hours annually with approximately 42,100 responses.**

**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 other than the wage and material costs described in Question 12 above.

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

1. Sections 121.703(g), 125.410(g), and 135.415(g) reduced dual reporting. Previously, when a repair station identified a failure, malfunction, or defect, this information was reported by both the repair station under § 145.219 and 145.221 as appropriate, and the part 121, 125, or 135 certificate holder. Therefore, information about the same problem may have been reported twice to the FAA. The revision was intended to eliminate these duplicate reports.

2.

Estimated total time saved for each of the following:	10 min
Hourly salary for SDR data entry person:	\$23.42
Total salary saved:	\$3.90
Total number of SDR's:	1,300
Cost Savings:	\$5,070.00

2. Sections 121.703(d), 125.409(b), and 135.415(d) may reduce the Primary Maintenance Inspector's (PMI)'s workload. Currently, all reports go from the certificate holder to the Flight Service District Office (FSDO) where the PMI spends time reviewing the SDR before forwarding it to the SDRS in Oklahoma City. The rule will require certificate holders to submit these reports directly to Oklahoma City, thus possibly reducing the PMI's workload. However, under the rule, the certificate holder will still be required to make the SDR data available to the FSDO for examination. This will allow PMI's to remain informed of SDR activity.

Estimated total time saved for PMI: 5 min

Hourly salary for PMI:	\$40.39
Total cost savings for PMI:	\$3.37
Total number of reports:	41,500
Total Cost Savings:	\$139,855

3. Sections 121.703(e)(13), 125.410(d), 135.415(e), will add a requirement that an SDR include a unique control number for an occurrence. This will yield some cost savings. Many certificate holders currently use such a number. Because all certificate holders need somehow to identify and assign a unique number to an SDR, adopting a uniform code is no more time consuming than developing another numbering system.

Estimated total time saved for data entry person:	30 min
Hourly salary for data entry person:	\$23.42
Total cost savings for data entry person:	\$11.71
Total number of supplemental reports:	1,200
Total Cost Savings:	\$14,052.00

4. There are fifteen sections that the FAA requested comment on. The changes will add reporting requirements for part 121, 125, and 135 certificate holders. These additional requirements are for information that has not been collected before or had been collected through voluntary reporting. Therefore, because there is little or no historical data on this information, the FAA does not know how many extra reports these new requirements would generate. In order to give the public a reasonable cost estimate, the FAA assumed that each would generate an additional 1,245 reports a year.

These fifteen sections are:

- §§ 121.703(a)(1), 121.703(c), 135.415(a)(5); §§
- 121.703(a)(2), 125.409(a); 135.415(a)(6)§§
- 121.703(a)(3), 125.410(a)(3), 135.415(a)(9)§§
- 121.703(a)(4), 125.410(a)(4), 135.415(a)(10)§§
- 121.703(a)(5), 125.410(b), 135.415(a)(12)§§
- 121.703(a)(6), 135.415(a)(1), §§
- 121.703(a)(9), 135.415(a)(2), §§
- 121.703(a)(10), 135.415(a)(3), §§
- 121.703(a)(12), 135.415(a)(4), §§

a. Costs of additional SDR's that would need to be written up:

Estimated total time for each of the following:	10 min
Hourly salary for SDR data entry person:	\$23.42
Total salary:	\$3.90
Total number of SDR's per sectional change:	1,245
Total number of sectional changes:	15
Cost:	\$72,832.50

Hence, two types of federal employees that will be affected on an annual basis are the SDRS data entry personnel and the PMI. There will be an annual net cost savings to the Federal Government of \$18,382.00 as shown in the following table:

	# 1	# 2	#3	#4	TOTAL
-The SDRS data entry person					
Estimated time (minutes)	-10		-30	10	

Total cost for 1 SDR	(\$3.90)		(\$11.71)	\$3.90	
Total cost	(\$5,070.00)		(\$14,052.00)	\$72,832.50	\$121,473.00
-The PMI					
Estimated time (minutes)			-5		
Total cost for 1 SDR			(\$3.37)		
Total cost			(\$139,855.00)		(\$139,855.00)
<b>TOTAL COST</b>	(\$5,070.00)	(\$139,855.00)	(\$14,052.00)	\$72,832.50	(\$18,382.00)

where:

- #1 - §§ 121.703(g), 125.410(g), and 135.415(g)
- #2 – §§ 121.703(d), 125.409(b), and 135.415(d)
- #3 - §§ 121.703(e), 125.409(a), 125.410(d)(9), 135.415(e)
- #4 – New Reporting Requirements

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

FAA has adjusted the calculations for reporting requirements in the ROCIS burden table to reflect the addition of form 8010-4, Malfunction or Defect Report previously reported on 2120-0003.

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

Collection of the required data is an ongoing effort. Publication of data will be on the FAA, Flight Standards Service, Service Difficulty Reporting web site, < <http://av-info.faa.gov/sdrx/>>. Data is available to query on-line with tools available on the web site. It is also available for download in flat file format in both weekly and yearly summaries.

**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 expiration date.

**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.