

SUPPORTING STATEMENT

OMB No. 2138-0040 14 CFR Part 241 T100/T100f Air Carrier Traffic and Capacity Data by Nonstop Segment and On-Flight Market

A. Justification

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

The Department collects and uses traffic, operational and capacity data reported on Schedules T-100 and T-100(f) to administer its aviation program responsibilities. In 49 U.S.C. section 41708 and 41709 the Secretary of Transportation is given the authority to require an air carrier or foreign air carrier to file annual, monthly, periodical and special reports concerning the movement of traffic, and the receipts and expenditures of money. The T-100 is the collection for the U.S. Air Carriers. The T-100(f) is the collection for the Foreign Air Carriers.

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.

Both the T-100 and T-100(f) serve the same purpose. The need for uniform content, frequency, timeliness and coverage. These requirements were described in detail in the original regulations that required the T-100 and T-100(f) reports data, and those basic needs continue. Specifically, it is critical to have adequate data for the decisions that the Secretary of DOT is required to make, and who is responsible for the accuracy and adequacy of those decisions. This need has continued to this date. Without the continuation of the essential decades-long time-series T-100 and T-100(f) reporting system, the Department is convinced the Secretary would NOT have the data content, frequency, timeliness and coverage that are necessary to meet and discharge the responsibilities for which she is responsible.

The T-100 reporting system is designed to collect nonstop segment and on-flight market data for scheduled, nonscheduled, and charter flights from U.S. and foreign air carriers for each flight to from or between U.S. points. The data elements collected are:

<u>Code</u>	<u>Description</u>
	Carrier, carrier entity code - Segment & Market
	Reporting period date - Segment & Market

- Origin airport code - Segment & Market
- Destination airport code - Segment & Market
- Service class code - Segment & Market
- Aircraft type code - Segment
- 110 Revenue passengers enplaned - Market
- 130 Revenue passengers transported - Segment
- 217 Enplaned freight - Market
- 219 Enplaned mail - Market
- 237 Transported freight - Segment
- 239 Transported mail - Segment
- 270 Available capacity payload - Segment
- 310 Available seats, total - Segment
- 510 Revenue aircraft departures performed - Segment
- 520 Revenue aircraft departures scheduled - Segment
- 610 Revenue aircraft hours (airborne) - Segment
- 630 Aircraft hours (ramp-to-ramp) - Segment
- 650 Total aircraft hours (airborne) - Segment

From the data elements reported by the air carriers, the Department computes the following data elements:

- 140 Revenue passenger-miles
- 210 Revenue cargo tons enplaned
- 230 Revenue tons transported
- 240 Revenue ton-miles
- 241 Revenue ton-miles passenger
- 247 Revenue ton-miles freight
- 249 Revenue ton-miles mail
- 280 Available ton-miles
- 320 Available seat-miles
- 410 Revenue aircraft miles flown
- 430 Revenue aircraft miles scheduled
- 501 Inter-airport distance

The data are used for the following purposes:

AIRPORT IMPROVEMENT

The Federal Aviation Administration uses enplanement data for U.S. airports to distribute the annual Airport Improvement Program (AIP) entitlement funds to eligible primary airports, i.e., airports which account for more than 0.01 percent of the total passengers enplaned at U.S. airports. Enplanement data contained in Schedule T-100/T-100(f) are used by the FAA in determining airport funding.

AIR CARRIER SAFETY

The FAA uses traffic, operational and capacity data as important safety indicators and to prepare the air carrier traffic and operation forecasts that are used in developing its budget and staffing plans, facility and equipment funding levels, and environmental impact and policy studies. The FAA monitors changes in the number of air carrier operations as a way to allocate inspection resources and in making decisions as to increased safety surveillance. Similarly, airport activity statistics are used by the FAA to develop airport profiles and establish priorities for airport inspections.

ACQUISITIONS AND MERGERS

While the Justice Department has the primary responsibility over air carrier acquisitions and mergers, the Department reviews the transfer of international routes involved to determine if they would substantially reduce competition, or determine if the transaction would be inconsistent with the public interest. In making these determinations, the proposed transaction's effect on competition in the markets served by the affected air carriers is analyzed. This analysis includes, among other things, a consideration of the volume of traffic and available capacity, the flight segments and origins-destinations involved, and the existence of entry barriers, such as limited airport slots or gate capacity. Also included is a review of the volume of traffic handled by each air carrier at specific airports and in specific markets which would be affected by the proposed acquisition or merger. The Justice Department uses T-100 data in carrying out its responsibilities relating to airline competition and consolidation.

TRAFFIC FORECASTING

The FAA uses traffic, operational and capacity data as safety indicators and to prepare the air carrier traffic and operation forecasts. These forecasts are used by the FAA, airport managers, the airlines and others in the travel industry as planning and budgeting tools.

AIRPORT CAPACITY ANALYSIS

The mix of aircraft types are used in determining the practical annual capacity (PANCAP) at airports as prescribed in the FAA Advisory Circular *Airport Capacity Criteria Used in Preparing the National Airport Plan*. The PANCAP is a safety-related measure of the annual airport capacity or level of operations. It is a predictive measure which indicates potential capacity problems, delays, and possible airport expansions or runway construction needs. If the level of operations at an airport exceeds PANCAP significantly, the frequency and length of delays will increase, with a potential concurrent risk of accidents. Under this program, the FAA develops ways of increasing airport capacity at congested airports.

AIRLINE INDUSTRY STATUS EVALUATIONS

The Department apprizes Congress, the Administration and others of the effect major changes or innovations are having on the air transportation industry. For this purpose, summary traffic and capacity data as well as the detailed segment and market data are essential. These data must be timely and inclusive to be relevant for analyzing emerging issues and must be based upon uniform and reliable data submissions that are consistent with the Department's regulatory requirements.

INTERNATIONAL NEGOTIATIONS AND ROUTES

Many air services between the United States and foreign countries are governed by bilateral agreements. Evaluations of existing bilateral agreements and proposed changes to such agreements are based on a determination of the traffic and revenues between the United States and foreign countries for scheduled passenger and cargo flights as well as charter services. In order to determine conditions of reciprocity and overall balance of trade, DOT conducts similar analyses for countries with which the United States does not have bilateral aviation agreements. Information used in these analyses includes traffic volume by countries and by city-pairs for passenger and cargo services and the corresponding traffic yields. Load factors, aircraft seating configurations, cargo capacities and aircraft unit cost are also used in the analyses. In limited entry markets, the competing air carriers are required to submit an operating plan. To analyze these plans, the Department uses current and historical traffic and capacity data to determine the reliability of the applicants' forecasts and to evaluate applicants' competing fare and service proposals.

Recently, The U.S. and the European Union agreed to open skies agreement between the two geographic areas. T-100 data will be used to measure the effectiveness of this agreement.

MAIL RATES

The Department is responsible for establishing intra-Alaska mail rates. The rates are updated to reflect changes in unit costs. Traffic and capacity data are used in conjunction with cost data to develop the required unit cost data. There are four mail rates set within the State of Alaska – mainline, part 121, part 131, and amphibious. Also, the United States Postal Services uses passenger and cargo market data from T-100 as the basis for tendering bush mail to the individual carriers.

ESSENTIAL AIR SERVICE

The Department reassesses service levels at small domestic communities to assure that capacity levels are adequate to accommodate current demand

SYSTEM PLANNING AT AIRPORTS

The FAA is charged with administering a series of grants that are designed to accomplish

the necessary airport planning for future development and growth. These grants are made to state metropolitan and regional aviation authorities to fund needed airport systems planning work. Individual airport activity statistics, nonstop market data, and service segment data are used to prepare airport activity level forecasts.

REVIEW OF IATA AGREEMENTS

The Department reviews all of the International Air Transport Association (IATA) agreements that relate to fares, rates, and rules for international air transportation to ensure that the agreements meet the public interest criteria. Current and historic summary traffic and capacity data, such as revenue ton-miles and available ton-miles, by aircraft type, type of service, and length of haul are needed to conduct these analyses: to (1) develop the volume elements for passenger/cargo cost allocations, (2) evaluate fluctuations in volume of scheduled and charter services, (3) assess the competitive impact of different operations such as charter versus scheduled, (4) calculate load factors by aircraft type, and (5) monitor traffic in specific markets.

FOREIGN AIR CARRIERS APPLICATIONS

Foreign air carriers are required to submit applications for authority to operate to the United States. In reviewing these applications the Department must find that the requested authority is encompassed in a bilateral agreement, other intergovernmental understanding, or that granting the application is in the public interest. In the latter cases, T-100 data are used in assessing the level of benefits that carriers of the applicant's homeland presently are receiving from their U.S. operations. These benefits are compared and balanced against the benefits U.S. carriers receive from their operations to the applicant's homeland.

AIR CARRIER FITNESS

The Department determines whether U.S. air carriers are and continue to be fit, willing and able to conduct air service operations without undue risk to passengers and shippers. The Department monitors a carrier's load factor, operational, and enplanement data to compare with other carriers with similar operating characteristics. Carriers that expand operations at a high rate are monitored more closely for safety reasons.

INTERNATIONAL CIVIL AVIATION ORGANIZATION

Pursuant to an international agreement, the United States is obligated to report certain air carrier data to the International Civil Aviation Organization (ICAO). The traffic data supplied to ICAO are extracted from the U.S. air carriers' Schedule T-100 submissions.

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 T-100 traffic reporting system is in compliance with the Government Paperwork Elimination Act. The reporting system was designed to take advantage of automated data processing. Carriers are required to submit data over a secure internet connection. Also, by taking advantage of information technology, BTS has eliminated the supplemental Schedules T-1, T-2 and T-3.

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.

During its original review of the Department's requirements for T-100 and T-100(f), we were unable to identify any viable alternative data sources. The Department investigated the possible use of alternative international data sources to determine whether the information contributed by member carriers of the International Air Transport Association and the data collections of ICAO could be used by the Department, in whole or in part, in lieu of the T-100 system. There are no domestic sources that are the equivalent of the current long-time-series International data of regularly scheduled passenger traffic, nonscheduled and charter traffic, and cargo traffic. Absent the current regulation requiring regular uniform periodic reports of international traffic data in the specified T-100 and T-100(f) Reports, it is quite apparent the DOT Secretary and the DOT team would be severely hampered in carrying out their responsibilities. If some domestic source of international air traffic were to arise, and one or more of the international air carriers serving the U.S. refused to cooperate and make the necessary traffic reports of their data available, the system would fall apart, leaving an intolerable gap in data required for DOT to carry out its responsibilities.

We compared these potential alternatives with our data needs in areas of content, frequency, coverage and timeliness. Namely, not only is it a fact that there are no adequate alternate data sources, but even where, as now, we have uniform data reporting requirements required by the regs., even today the reporting has to be monitored, edited, and adjusted when inadequate. So a reasonable person can understand the impossible task that would face the Department in trying to use non-uniform, sketchy, irregular data system reports which the Department has no assurance is adequate for decision-making.

The alternative data sources failed to meet DOT needs. There are no adequate alternate data sources, but even where, as now, we have uniform data reporting requirements required by the regs., even today the reporting has to be monitored, edited, and adjusted when inadequate. Originally, DOT did use private data sources to generate the capacity data elements for foreign air carriers operations. However, this method proved unsatisfactory because special operating conditions (such as weather and length of trip) can impact available capacity. Foreign air carriers currently report their own capacity data.

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

Small certificated and commuter air carriers submit data in the T-100 reporting system. Most of these carriers have taken advantage of IT to reduce their reporting burden.

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

Less frequent data collection would seriously erode DOT's ability to monitor the condition of the air transport industry. The timeliness and frequency of data collection are critical in evaluating trends as well as monitoring individual carrier operations. The filing frequencies were chosen after careful analysis which balanced the degree of reporting burden against DOT's need for current data to oversee the air transportation industry.

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.**

T-100 data are required to be submitted monthly. These collections are necessary to enable DOT to adequately monitor individual carrier and industry performance in the competitive marketplace. Quarterly data submissions obscure monthly trends that would permit a timely assessment of the impact of management decisions on individual carrier operations. Monthly reporting allows DOT to keep abreast of rapid changes taking place within the air transportation industry.

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.

A 60-day notice was published in the Federal Register on March 22, 2017, 82 FR 14800 and a 30-day's notice was published in the Federal Register on June 7, 2017, 82 FR 26567. The following comments were received from Airports Council International – North America strongly supports the Department of Transportation continuing to require U.S. and foreign air carriers to file traffic and capacity data pursuant to 14 CFR 241.19 and Part 217. Alaska Airlines also supports BTS's continued collection and publication of T-100 and T-100(f) data.

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

No payment or gift of any kind is being made to any respondents.

10. Describe any assurances of confidentiality provided to respondents.

Pursuant to 14 CFR Section 241.19-6 (b) U.S. - international on-flight market and nonstop segment data are confidential for 6 months and all U.S. air carrier foreign-to-foreign on-flight market and nonstop data are confidential for 3 years, although the Department may publish summary data when there are three or more carriers accounted for in the summary. Further, the Department may release nonstop segment and on-flight market data by carrier before the end of the confidential periods as follows: The data are stored and retrieved on a secure server and are based on World Area Codes, (WAC) which identify the countries in which the airports are located

(1) To foreign governments as provided in reciprocal arrangements between the foreign country and U.S. Government for exchange of on-flight market and/or nonstop segment data submitted by air carriers of that foreign country and U.S. carriers serving that foreign country;

(2) To parties to any proceeding before the Department as required by the Administrative Law Judge or other decision-maker of the Department. Any data to which access is granted pursuant to this provision may be introduced into evidence, subject to the normal rules of admissibility of evidence.

(3) To agencies and other components of the U.S. Government for their internal use only.

11. Are there any questions of a sensitive nature?

There are no questions of a sensitive nature.

12. Provide estimates of reporting burden.

We estimate that the reporting burden for the entire T-100/T100f system will vary between 1 hour and 12 hours per month per air carrier depending upon the individual carrier with an average of 6 hours per monthly response.

T100 Form:

Number of Respondents: 119

Number of Annual responses 1428

Total Burden Per Response: 6 hours

Total Annual Burden: 8,568 hours

Cost burden: \$20 x 8,568 = \$171,360

T100F Form:

Number of Respondents: 190

Number of Annual responses 2,280

Total Burden Per Response: 2 hours.

Total Annual Burden: 4,560 hours

Cost burden: \$20 x 4,560 = \$91,200

\$270,000 annually for industry

We estimate an average salary of \$20 per hour which we consider a reasonable estimate for the salaries of the related reporting personnel. This was taken from the Bureau of Labor Statistics (BLS) median wage scale for 43-3031 (bookkeeping personnel

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.

Since most of the data items of the T-100 System were already collected by all the respondents, we estimate that they did not incur additional indirect, overhead or computer-related operating costs.

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

The editing and processing of T-100 and T-100(f) is done by Federal Government Employees at an average hourly rate of \$35.00 per hour multiplied by 2,080 hours, (OAI estimate for a full time FTE. 40 hour week X 52 weeks in a year = 2,080 hours).

for an estimated annual cost of \$72,800. These are Office of Airline Information estimates. The computer and publishing costs are estimated to be \$12,000 annually. The allocated cost for T-100 data presentation on BTS web is \$100,000. The total annual cost is estimated to be \$184,800.

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

The number of reporting carriers changed due to mergers and acquisitions. Burden increase for T100F(Report of Traffic and capacity Statistics)due to change in the number of respondents. Burden decreased in the T100(Report of Traffic and Capacity

Statistics System was due to change in the number of respondents.

16. Is the information received published?

Extracts of the T-100 data are published accordingly and no manipulation of the data are performed:

Publication

	<u>Time Line</u>	
<i>Air Carrier Traffic Statistics - Monthly</i>	60-days	after
	month's end	
<i>Aircraft Activity Statistics - Annually</i>	160-days	after
	year's end	

Also, the information is available at

http://www.transtats.bts.gov/Tables.asp?DB_ID=111&DB_Name=Air%20Carrier%20Statistics%20%28Form%2041%20Traffic%29-%20All%20Carriers&DB_Short_Name=Air%20Carriers

17. Is the agency seeking approval not to display the expiration date for OMB approval?

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

18. Explain each exception to the Paperwork Reduction Act certification statements.

There are no exceptions.

MISSION STATEMENT

The Department of Transportation (DOT) relies on the T-100 traffic reporting system to fulfill its strategic plan. The DOT monitors and studies the movement of aircraft and passengers through the national air space system to ensure safe and efficient operations. DOT is committed to guide and oversee America's air transportation system today and into the future by taking note of statistical trends that identify airport utilization.

DOT is committed to developing transportation policies and programs that contribute to providing fast, safe, efficient and convenient transportation at the lowest cost. Traffic 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. Economic growth prospers when the real economic cost of

transportation is reduced. DOT recognizes that the collection and dissemination of traffic data are critical to identifying and solving air congestion problems. DOT performs an essential role as a catalyst for improving the quality of decisions affecting the transportation sector. In this role, DOT serves as a facilitator by providing better information to both the public and private sectors. Five economic trends impact transportation. They are globalization of commerce, growing attention to logistics in the production process, greater reliance on private investment in transportation industry and the rise of competing and complementary technologies. There will be accelerated application of advanced information technologies, competitive techniques, and traffic flow information systems within the air transportation industry. These information-related technologies will enable 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 agency activities, especially a coordinated effort by the Bureau of the Office of Secretary, the Federal Aviation Administration, the Bureau of Transportation Statistics (BTS), and the Inspector General Office to reduce airline delays. Enplanement, departures by aircraft type, and load factor data are critical in planning for infrastructure needs.