Supporting Statement
FAA Entry Point Filing Form
OMB 2120-0697

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating and authorizing the collection of information.

This information collection supports the Department of Transportation's strategic goals regarding safety and security. The information collected is necessary to obtain an authorization code for transmission of information to the International Registry.

The Convention on International Interest in Mobile Equipment, as modified by the Protocol to the Convention on International Interests in Mobile Equipment on Matters Specific to Aircraft Equipment (herein after the Cape Town Treaty or Treaty), provides for the creation of the International Registry. The International Registry is an electronic registry system that works in tandem with the current system operated by the FAA Civil Aviation Registry (Registry) for the United States.

Congress has designated the Registry as the exclusive United States Entry Point for transmissions to the International Registry. To transmit certain types of interests or prospective interests to the International Registry, interested parties must file a completed FAA Entry Point Filing Form – International Registry, AC Form 8050-135, with the Registry. Upon receipt of the completed form, the Registry, upon verifying the accuracy of the submitted data, issues the unique authorization code.

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

It is mandatory that any entity wishing to transmit certain types of interests or prospective interests to the International Registry file a completed FAA Entry Point Filing Form – International Registry, AC Form 8050-135, with the Registry. Upon receipt of the reported information, completed form, the Registry, upon verifying the accuracy of the submitted data, issues the unique authorization code.

14 CFR 49.61 designates the FAA Registry as the entry point for authorizing the transmission of information to the International Registry affecting United States civil aircraft. The FAA Registry enters the party name(s), collateral description(s), and the authorization code into its existing database system. Interested parties may access the information to determine if an authorization code was issued. Interested parties may request a copy of the completed AC Form 8050-135 by submitting a written request identifying the authorization code.

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 submission of responses and the basis for the decision for adopting this means of collection.

The form is available for download via the FAA Forms website. However, the completed form will be hand delivered or mailed to the FAA Registry when documents representing the transaction must be included. The related documents must meet the recording requirements of 14 CFR Part 49. Prospective interests (the form alone), however, may be submitted by fax. Documents related to prospective interests are not recordable under 14 CFR Part 49. The issuance of the authorization code is a manual process. Upon submission of the form, Registry personnel review it for completeness and acceptability to issue the authorization code, pass it through a printer that imprints the unique authorization code, make a copy of the form to keep in our office, and return the original form to the respondent. Because the Registry is required to issue a unique code, we maintain control of these numbers. If these forms were also accepted in an electronic format, we would be required to create a system capable of generating the unique authorization code automatically, in addition to the manual process. The data will be input into the Aircraft Registration database to allow for search capabilities. The AC Form 8050-135 is scanned and the image stored in an electronic administrative file. These images are retrievable by entering the authorization code in the database and accessing the imaging system software.

Currently none of these responses are received by FAA electronically. However, the respondent will electronically transmit the code data to the International Register.

4. Describe efforts to identify duplication. Show specifically why any similar information already available can be used for the purpose described in Item 2 above.

The Registry is the exclusive U.S. entry point for transmissions to the International Registry. Therefore, there is no duplication of records or recordkeeping.

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

We have reduced the respondent burden to a minimum. However, the procedures and information needed to obtain an authorization code are the same for all respondents.

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.

The frequency of the collection is determined by the respondent.

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 collection of information is 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 recordkeeping,

disclosure, or reporting format (if any) and on data elements to be recorded, disclosed, or reported.

A notice was published in the Federal Register on March 28, 2018 (83 FR 13340) soliciting public. No comments were received.

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

No payment or consideration is given.

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

The Registry does not assure confidentiality.

11. Provide additional justification for any questions of a sensitive nature.

No information of a sensitive nature is requested nor required to obtain an authorization code.

12. Provide estimates of hour burden of the collection information. This information should: Provide number of respondents, frequency of response, annual burden, and an explanation of how the burden was estimated.

The annualized cost is $191,775 (15,000 filings (FY17) * 0.5 hours x Paralegal mean hourly wage of $25.57)

Responses	Hours
15,000	7,500

Most companies that file the types of security agreements are law firms and a technical level (paralegal) person usually completes the form for submission to the Registry. The public cost burden is based upon the mean hourly wage for a paralegal derived from the Bureau of Labor Statistics website for the May 2016 National Occupational Employment and Wage Estimates for Legal Occupations (SOC number 23-2011).

13. Provide estimates of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

There are no additional costs not already included in question 12.

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

The annualized cost burden for the Federal Government is $178K. The Registry staffs its Cashier's section with full-time employees who, with part of their time, support the Registry's responsibility as portal to the International Registry both in issuing the needed code and QA processing of completed

work packets. In addition, a very small amount of the Cashier's section supervisor's time is required for this function. Contractors perform the preparation, indexing and scan functions. Copier, printer, and computer equipment are required for performing the process. We use a five-year life cycle for equipment in calculating the annualized equipment cost for the government. The copier requires an annual maintenance contract/agreement. Copier paper and printer ribbon are the only additional supplies the Registry anticipates requiring supporting this function. The Registry mainframe computer usage is costed at $2.29 per unit. This figure is based on calculations used in the development and submission of user fees. A unit is loosely defined as a transaction between the Registry and the mainframe. Each time the Registry communicates with the mainframe a transaction occurs. The Registry estimates 15,000 filings annually and only the indexing and QA functions will require accessing the computer network mainframe.

	Driving Item Count		Qty per Item	Unit		Rate	Cost	Annual Cost
Personnel								$53,717.25
Cashier Supervisor	6	Actions	0.250	Hrs	@	$38.50	$57.75	
Legal Assistant IR	15,000	Form Packets	0.083	Hrs	@	$21.55	$26,829.75	
Legal Assistant QA	15,000	Form Packets	0.083	Hrs	@	$21.55	$26,829.75	
Contract Personnel Time Required								$51,837.75
Prep	15,000	Form Packets	0.020	Hrs	@	$24.60	$7,380.00	
Index	15,000	Form Packets	0.083	Hrs	@	$24.60	$30,627.00	
Scan	15,000	Form Packets	0.015	Hrs	@	$20.49	$4,610.25	
Store	15,000	Form Packets	0.015	Hrs	@	$20.49	$4,610.25	
Dispose	15,000	Form Packets	0.015	Hrs	@	$20.49	$4,610.25	
Supplies								$2,538.45
Portfolio Folders	15,000	Form Packets	1.000	Each	@	$0.1400	$2,100.00	
Blue Paper	15,000	Form Packets	1.000	Sheet	@	$0.0082	$123.45	
White Paper	15,000	Form Packets	3.000	Sheets	@	$0.0070	$315.00	
Computer Time								$68,700.00
Index	15,000	Form Packets	1.000	Unit	@	$2.29	$34,350.00	
QA	15,000	Form Packets	1.000	Unit	@	$2.29	$34,350.00	
Equipment and Maintenance								$1,090.00
Copier Purchase & Maintenance $7500/5 yrs				Used for IR 50%			$750.00	
Gov't Computer $1200/5 yrs							$240.00	
Printer $500/5 yrs							$100.00	
						Total Annual Cost		**$177,883.45**

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

The annual burden/costs used in initial request were estimates. Figures in this report are based on volume submitted in previous year.

In February 2008 the Registry implemented the Registry Modernization System (RMS), a document imaging and management system that initially creates images or incoming documents and routes them to appropriate parties for processing. Received International Registry documents (8060-135 and

accompanying documents) are prepped and placed in individual portfolio packets for indexing, scanning and quality assurance before adding the image as a permanent file in RMS.

16. For collections of information whose results will be published, outline plans for tabulation, and publication. Address any complex analytical techniques that will be used.

No publication is planned for this information.

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 seeking approval to <u>not</u> display the expiration date on the AC Form 8050-135. This form is available for download from our website or by mail upon receipt of a written or telephonic request. It is a recurring, non-changing form that may be printed and/or stocked for continuous use. It is not cost effective to destroy unused, dated stock. Currently we accept documents, forms, etc., regardless of the expiration date as long as we still have approval to collect the information.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-1.

There are no exceptions.