

**Department of Transportation
Federal Aviation Administration**

**Supporting Statement
Aviation Maintenance Technician Schools – CFR Part 147
OMB 2120 0040**

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

Section 44707 (49 USC) empowers the Administrator of the Federal Aviation Administration (FAA) to examine and rate air agencies.

Section 44707 (49 USC)

The Administrator of the Federal Aviation Administration may examine and rate the following air agencies:

(1)

civilian schools giving instruction in flying or repairing, altering, and **maintaining aircraft, aircraft engines, propellers, and appliances**, on the adequacy of instruction, the suitability and airworthiness of equipment, and the competency of instructors.

(2)

repair stations and shops that repair, alter, and **maintain aircraft, aircraft engines, propellers, and appliances**, on the adequacy and suitability of the equipment, facilities, and materials for, and methods of, repair and overhaul, and the competency of **the individuals** doing the work or giving instruction in the work.

(3)

other air agencies the Administrator decides are necessary in the public interest.

CFR part 147 implements the provisions of the sections of the Public Law above by prescribing the requirements for issuing aviation maintenance technician school certificates and associated ratings and the general operating rules for the holders of those certificates and ratings.

The collection of information (application for a certificate and rating or required recordkeeping) is necessary to ensure that Aviation Maintenance Technician Schools (AMTS) meet the minimum requirements for procedures and curriculum set forth by the FAA in CFR part 147. Also, it was necessary for the FAA to develop minimum standards for properly qualified persons who would enter the aviation industry. CFR part 147 provides the necessary standardization.

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.

Organizations, which hold Certificates as Aviation Maintenance Technician Schools and those wishing to become certificate holders, are mandated to report information to the FAA for this collection. All parties must send information to their appropriate FAA district office for review. If the application (including supporting documentation) is satisfactory, an on-site inspection is conducted. When all CFR part 147 requirements have been met, an Aviation Maintenance Technician School certificate and/or the appropriate ratings is issued. This information collection provides both the certificate holder and the FAA with assurance that they are continuing to meet the requirements of their certificate.

Although the information collected may be not expected to be disseminated directly to the public, results may be used in scientific, management, technical or general informational publications.

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.

An AMTS certificate applicant makes initial submission of its application on paper. Much of the process requires substantiating documents and this is amenable to electronic submission. Submission of supporting documentation can be made electronically depending on the applicant's capabilities. A certificated AMTS typically uses paper and/or electronic submission, at their discretion.

In response to the Government Paperwork Elimination Act (GPEA), the FAA Form 8310-6 is available in electronic format and can be downloaded from the Internet or e-forms service. In the event the applicant submits the 8310-6 signed digitally, the local office retains this in their electronic files. However, digital signature collection is minimal because the application process lends itself to periodic face to face contact with representatives of the technician schools.

The results of the information collection will not be made available to the public over the Internet.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

We have reviewed the other FAA public use reports and find no duplication. We know of no other agency collecting information about Aviation Maintenance Technician Schools, and the reporting and recordkeeping information required by CFR part 147 can only be supplied by applicants for Aviation Maintenance Technician School certificates or ratings. The information is not available from any other source.

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

The reporting/information collection burden is related to a school's curriculum, facilities, instructors, student enrollment, training records and operation specifications (OpSpecs). The requirements are the absolute minimum necessary to ensure effective compliance with CFR part 147. Organizations with a small enrollment would have a proportionally smaller reporting requirement under the rule.

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.

This information collection is not conducted on a specific time schedule. If an applicant is seeking an AMTS certificate, the rules and requirements of CFR part 147 must be met to ensure they meet the FAA's standards. This provides an assurance that the student mechanics they graduate are properly prepared to work in the aviation transportation industry. The applicant fills out the application when certification or additional ratings are desired. Other than recordkeeping, the ongoing information collection is driven by an AMTS making some change to their program i.e. curriculum or facilities. Failure to provide the requested information and recordkeeping would hinder certification and surveillance.

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, medical, government contract, grant-in-aid, or tax records, for more than three 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 a 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.*

There are no special circumstances for this information collection. The information collection is conducted in a manner consistent with the guidelines in Title 5 CFR 1320.5(d)(2)(i)-(viii).

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the 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 the data elements to be recorded, disclosed, or reported.

A Federal Register Notice published on April 3, 2018 (83 FR 14309) solicited public comment. No comments were received.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

No gifts or payments are provided to respondents.

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

Respondents are not given an 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 information collection does not collect information of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices. * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under item 13.**

Title 14 CFR part 147 prescribes certification standards for Aviation Maintenance Technician Schools (AMTS). The respondents to this information collection are part 147 certificate holders or applicants. Currently, there are 177 FAA certificated AMTSs. The FAA uses the information collected to determine compliance with applicant eligibility, via FAA Form 8310-6 and supporting documentation, ensuring that certificated AMTSs meet the minimum requirements for procedures and curriculum set forth by the FAA in CFR part 147. The data in the tables below reflect annual estimates of reporting and recordkeeping burden.

This revised information collection corrects the September 30, 2016, supporting statement approved for part 147. The information collection burden hours and costs will be noticeably higher than posted in the 2016 supporting statement for three primary reasons:

- First, due to program changes as implemented by FAA Notice N 8900.278, dated November 21, 2014, operations specifications (OpSpecs)¹ were introduced to Title 14 of the Code of Federal Regulations (14 CFR) part 147 AMTSs. OpSpecs must be issued to institutions with part 147 certificates by July 21, 2015. The part 147 pertinent OpSpecs are listed below in Table VI. This correction includes the burden added by OpSpecs not addressed in the 2016 information collection.
- Second, the current enrollment figures cited in 2016 were 12,500 students but are now 17,800 students. A February 2018 search of the FAA’s website for part 147 school data documents a current enrollment population of 17,800. Therefore, we are using 17,800 students as a total AMTS population at any given time. This number is important for the recordkeeping requirements of part 147.
- Third, some sections of part 147 were not represented as collecting information and the FAA is including them in this revised report.

Assumptions

The following assumptions in table I below reflect annual estimates of reporting and recordkeeping burden.

Table I. Summary of Assumptions

§ 147	Basis	Frequency	Total Time/ Occurrence	Director Hours	Instructor Hours	Admin Hours
§ 147.5	Initial Certification	10/yr	64 hrs	600	0	40
§ 147.5	Amendments	4/yr	22 hrs	80	0	8
§ 147.5	Initial OpSpec	65/yr	5 hrs	325	0	0
§ 147.5	Amendments	26/yr	5 hrs	13	0	0
§ 147.21	Initial Curriculum	10/yr	240 hrs	1,200	900	300
§ 147.23	Initial Instructors	10/yr	3 hrs	20	0	10
§ 147.23	Amendments	90/yr	1.5 hrs	90	0	45
§147.33a	Recordkeeping	17,800/yr	3 hrs	0	35,600	17,800
§ 147.33b	Recordkeeping	17,800/yr	2 hrs	0	17,800	17,800
§ 147.37	Facility, equipment amendments	5/yr	5 hrs	10	10	5
§ 147.38	Curriculum amendments	42/yr	22 hrs	672	168	84
§ 147.41	Change of location	1/yr	32 hrs	32	0	0

Hourly Wages and Benefit Overhead

¹ Operation Specification (OpSpec) OpSpecs are approved documents indicating authorizations, limitations, and certain procedures under which each kind of operation is to be conducted. OpSpecs are maintained in an internet accessible program known as Web-based Operations Safety System (WebOPSS).

The FAA has determined that three primary positions at an AMTS will be performing the information and record collection activities. They are the school’s Director, at a salary of \$51.11/hour, an Instructor at a salary of \$25.77/hour, and an Administrative Assistant at a salary of \$17.01/hour. Wage rates for these positions came from the Department of Labor, Bureau of Labor Statistics, May 2016 NAICS 481000 - Air Transportation codes for the AMTS Director, #11-3131, AMTS Instructor #25-0000, and AMTS Administrative Assistant #43-6014. In addition, we add employee benefits (such as health benefits, vacation, sick time, etc.) to estimate the costs for each employee. Therefore, we add a benefit overhead, which is based on the percent of total compensation for transportation employees.

The fully-burdened FAA safety inspector rate of \$45.86 was obtained from the 2016 General Schedule Salary Table as published by the U. S. Office of Personnel Management. The fully-burdened salary used for calculating costs savings is the base hourly salary of \$45.86 for a GS 13 Step 5, which is the mid-range salary for this position multiplied by the FAA fringe benefit salary multiplier of 1.3625 to yield the fully-burdened rate of \$62.48.

Table II shows the hourly wages, the estimated hourly benefits, and total hourly costs for the aforementioned employees.

Table II. Hourly Wages and Benefit Overhead

Job Category	Hourly wage	Benefit Overhead	Total
Director	\$51.11	\$23.72	\$74.83
Instructor	\$25.77	\$11.96	\$37.73
Administrative Assistant	\$17.01	\$7.89	\$24.90
FAA safety inspector	\$45.86	\$16.62	\$62.48
Benefit % of Employee Compensation (1)(2)		31.70%	
Federal Fringe Benefit Factor (3)(4)		36.25%	
(1) https://www.bls.gov/news.release/pdf/ecec.pdf			
(2) Percent of total compensation.			

(3) <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2008/m08-13.pdf>

(4) Percent of position's basic pay.

Note: The sum of individual items may not equal totals due to rounding.

Conclusion

The total estimated paperwork impact to the private sector is estimated at \$3.2 million, taking 93,612 hours annually, as shown in Table III. The total estimated paperwork impact to the Federal Government is estimated at \$105.6 thousand, taking 1,690 hours annually.

Table III. Summary of Estimated Annual Burden

§ 147	Basis	Director	Instructor	Administrative	Estimated	FAA Inspector	Estimated
		@ \$74.83/hour	@ \$37.73/hour	@ \$24.90/hour	Annual	@ \$62.48/hour	Annual
		Estimated Annual Hours	Estimated Annual Hours	Estimated Annual Hours	Cost	Estimated Annual Hours	Cost
§ 147.5	Initial Certification	600	0	40	\$45,894	400	\$24,992
§ 147.5	Amendments	80	0	8	\$6,186	40	\$2,499
§ 147.5	Initial OpSpec	325	0	0	\$24,320	33	\$2,062
§ 147.5	Amendments	13	0	0	\$973	13	\$812
§ 147.21	Initial Certification	1,200	900	300	\$131,223	360	\$22,493
§ 147.23	Initial Certification	20	0	10	\$1,746	20	\$1,250
§ 147.23	Amendments	90	0	45	\$7,855	90	\$5,623
§147.33a	Ongoing	0	35,600	17,800	\$1,786,408	N/A	N/A
§ 147.33b	Ongoing	0	17,800	17,800	\$1,114,814	N/A	N/A
§ 147.37	Amendments	10	10	5	\$1,250	30	\$1,874
§ 147.38	Amendments	672	168	84	\$58,716	672	\$41,987
§ 147.41	Amendments	32	0	0	\$2,395	32	\$1,999
Total estimated	Initial Cert hours	2,145	900	350	\$203,182	813	\$50,797
Part 147 burden	Post Cert hours	897	53,578	35,742	\$2,978,596	877	\$54,794
	Total hours burden	3,042	54,478	36,092	\$3,181,779	1,690	\$105,591

Table IV. Summary of Reporting Requirements

<i>Provision</i>	<i>Director Hours</i>	<i>Instructor Hours</i>	<i>Administrative Hours</i>	<i>Total Costs</i>
<i>§ 147.5 estimated annual initial certification</i>	925	0	40	\$70,214
<i>§ 147.5 estimated annual post certification</i>	93	0	8	\$7,158
<i>§ 147.21 estimated annual initial certification</i>	1,200	900	300	\$131,223
<i>§ 147.37 estimated annual</i>	10	10	5	\$1,250
<i>§ 147.38 estimated annual post certification</i>	672	168	84	\$58,716
<i>§ 147.41 estimated total annual</i>	32	0	0	\$2,395
<i>Total Est. Annual Reporting Burden</i>	2,932	1,078	437	\$270,956

Table V. Summary of Recordkeeping Requirements

<i>Provision</i>	<i>Director Hours</i>	<i>Instructor Hours</i>	<i>Administrative Hours</i>	<i>Total costs</i>
§ 147.23 estimated annual initial certification	20	0	10	\$1,746
§ 147.23 estimated annual post certification	90	0	45	\$7,855
§ 147.33 estimated annual recordkeeping	0	53,400	35,600	\$2,901,222
<i>Total Est. Annual Recordkeeping Burden</i>	110	53,400	35,655	\$2,910,823

Starting on July 21, 2015, AMTSs were required to hold all mandatory OpSpecs and any optional OpSpecs, if applicable, as listed in Table VI below. This revised information collection accounts for the burden of a new AMTS applicant filling out and gaining authorization of these 13 OpSpecs.

Table VI. Part 147 Operations Specifications

Part 147 OpSpecs	Operations Specifications (OpSpecs) Title
A001	Issuance and Applicability (Mandatory)
A002	Definitions and Abbreviations (Mandatory)
A003	Aviation Maintenance Technician School Ratings (Mandatory)
A004	Summary of Special Authorizations and Limitations (Mandatory)
A005	Exemptions (Optional)
A006	Management Personnel (Mandatory)
A007	Designated Persons (Mandatory)
A013	Instructors (Mandatory)
A025	Recordkeeping System (Mandatory)
A026	Authorizations/Limitations (Optional)
B002	Required Minimum Curriculum for General (Part 147 Appendix B) (Mandatory)
B003	Required Minimum Curriculum for Airframe (Part 147 Appendix C) (Mandatory)
B004	Required Minimum Curriculum for Powerplant (Part 147 Appendix D) (Mandatory)

Section 147.5 Application and Issue. The Applicants for an aviation maintenance technician school certificate and rating, or for an additional rating, are required to submit FAA Form 8310-6, Aviation Maintenance Technician School Certificate and Ratings Application, and the required supporting documentation, to the FAA. The supporting documentation will contain:

- A description of the proposed curriculum.
- A list of facilities and materials to be used.
- A list of its instructors, including the kind of certificate and ratings held, the certificate number, and the subjects taught by each.
- A statement of the maximum number of students it expects to teach at any one time.

FAA Form 8310-6 is divided into 3 parts:

1. The top portion of the front side is used by the applicant.
2. The lower portion of the front side is used by the FAA to record certification action of the applicant.
3. The reverse side is used by the FAA to record findings during certification inspection and/or for surveillance inspections.

The FAA estimates that approximately 10 initial AMTS applications are submitted annually. All applicants do not achieve certification, and therefore are not issued OpSpecs, but they are required to submit the required supporting documentation at the time application is made. Furthermore, there are periodic amendments that may be required, either to the application or to the OpSpecs, depending on the operational changes initiated by the AMTS.

Table VII. § 147.5 Provision

§ 147.5 Provision	Basis	Estimated Annual Changes	Director @ \$74.83/hour		Instructor @ \$37.73/hour		Administrative @ \$24.90/hour		Estimated Annual Cost
			Estimated Hours per change	Estimated Annual Hours	Estimated Hours per change	Estimated Annual Hours	Estimated Hours per change	Estimated Annual Hours	
New applications	Initial Certification	10	60	600			4	40	\$45,894
Preparation of OpSpec A001	Initial Certification	5	5	25					\$1,871
Preparation of OpSpec A002	Initial Certification	5	5	25					\$1,871
Preparation of OpSpec A003	Initial Certification	5	5	25					\$1,871
Preparation of OpSpec A004	Initial Certification	5	5	25					\$1,871
Preparation of OpSpec A005	Initial Certification	5	5	25					\$1,871
Preparation of OpSpec A006	Initial Certification	5	5	25					\$1,871
Preparation of OpSpec A007	Initial Certification	5	5	25					\$1,871
Preparation of OpSpec A013	Initial Certification	5	5	25					\$1,871
Preparation of OpSpec A025	Initial Certification	5	5	25					\$1,871
Preparation of OpSpec A026	Initial Certification	5	5	25					\$1,871
Preparation of OpSpec B002	Initial Certification	5	5	25					\$1,871
Preparation of OpSpec B003	Initial Certification	5	5	25					\$1,871
Preparation of OpSpec B004	Initial Certification	5	5	25					\$1,871
§ 147.5 estimated annual initial certification reporting burden				925		0		40	\$70,214
Amendment to application	On Occasion	2	20	40			2	4	\$3,093
Amendment to ratings	On Occasion	2	20	40			2	4	\$3,093
Amendment of OpSpec A001	On Occasion	2	0.5	1					\$75
Amendment of OpSpec A002	On Occasion	2	0.5	1					\$75
Amendment of OpSpec A003	On Occasion	2	0.5	1					\$75
Amendment of OpSpec A004	On Occasion	2	0.5	1					\$75
Amendment of OpSpec A005	On Occasion	2	0.5	1					\$75
Amendment of OpSpec A006	On Occasion	2	0.5	1					\$75
Amendment of OpSpec A007	On Occasion	2	0.5	1					\$75
Amendment of OpSpec A013	On Occasion	2	0.5	1					\$75
Amendment of OpSpec A025	On Occasion	2	0.5	1					\$75
Amendment of OpSpec A026	On Occasion	2	0.5	1					\$75
Amendment of OpSpec B002	On Occasion	2	0.5	1					\$75
Amendment of OpSpec B003	On Occasion	2	0.5	1					\$75
Amendment of OpSpec B004	On Occasion	2	0.5	1					\$75
§ 147.5 estimated annual post certification reporting burden				93		0		8	\$7,158
§ 147.5 estimated total annual reporting burden				1,018		0		48	\$77,372

Section 147.21 Curriculum requirements. An applicant for an AMTS certificate must have an approved curriculum that covers the subject areas and items listed in Appendices B, C, & D of part 147. The curriculum must show—

- The required practical projects to be completed.
- For each subject, the proportions of theory and other instruction to be given.
- A list of the minimum required school tests to be given.

Applicants must develop a curriculum covering general, airframe, and powerplant topics, and submit the curriculum to the FAA for approval.

Table VIII. § 147.21 Provision

§ 147.21 Provision	Basis	Estimated Annual Changes	Director @ \$74.83/hour		Instructor @ \$37.73/hour		Administrative @ \$24.90/hour		Cost
			Estimated Hours per change	Estimated Annual Hours	Estimated Hours per change	Estimated Annual Hours	Estimated Hours per change	Estimated Annual Hours	
Development of General Curriculum	Initial Certification	10	40	400	30	300	10	100	\$43,741
Development of Airframe Curriculum	Initial Certification	10	40	400	30	300	10	100	\$43,741
Development of Powerplant Curriculum	Initial Certification	10	40	400	30	300	10	100	\$43,741
§ 147.21 estimated annual initial certification reporting burden				1200		900		300	\$131,223

Section 147.23 Instructor requirements. The applicant is required to maintain a list of the names and qualifications of specialized instructors, and upon request, provide a copy of the list to the FAA.

Table IX. § 147.23 Provision

§ 147.23 Provision	Basis	Estimated Annual Changes	Director @ \$74.83/hour		Instructor @ \$37.73/hour		Administrative @ \$24.90/hour		Cost
			Estimated Hours per change	Estimated Annual Hours	Estimated Hours per change	Estimated Annual Hours	Estimated Hours per change	Estimated Annual Hours	
Create Instructor List with names and qualifications of specialized instructors.	Initial Certification	10	2	20			1	10	\$1,746
§ 147.23 estimated annual initial certification recordkeeping burden				20		0		10	\$1,746
Revise Instructor List	On Occasion	90	1	90			0.5	45	\$7,855
§ 147.23 estimated annual post certification recordkeeping burden				90		0		45	
§ 147.23 estimated annual recordkeeping burden					110		0	55	\$9,601

Section 147.33 Records. Records must be kept on each student attending an AMTS. The estimated AMTS population of 17,800 students was used. Record requirements include:

- AMTS must keep current records of students' attendance, tests, and grades, any instruction credited under 147.31(c) and the authenticated transcript of students' grades from that school, if any. Records must be retained for at least 2 years after the end of a student's enrollment.
- AMTS must keep a current individual progress record for each student showing practical projects completed, or to be completed in each subject.

Table X. § 147.33 Provision

§ 147.33 Provision	Basis	Estimated Annual Student Population	Director @ \$74.83/hour		Instructor @ \$37.73/hour		Administrative @ \$24.90/hour		Cost
			Estimated Hours per student	Estimated Annual Hours	Estimated Hours per student	Estimated Annual Hours	Estimated Hours per student	Estimated Annual Hours	
(a) Keep records of a student's attendance, test, grades, and any credited instruction.	Ongoing	17,800			2	35,600	1	17,800	\$1,786,408
(b) Keep a student's individual progress record for practical projects.	Ongoing	17,800			1	17,800	1	17,800	\$1,114,814
§ 147.33 estimated annual recordkeeping burden						53,400		35,600	\$2,901,222

Section 147.37 Maintenance of facilities, equipment and materials. If an AMTS elects to make a substantial change to its facilities, instructional equipment or materials, the changes must be submitted and approved beforehand.

Table XI. § 147.37 Provision

§ 147.37 Provision	Basis	Estimated Annual Changes	Director @ \$74.83/hour		Instructor @ \$37.73/hour		Administrative @ \$24.90/hour		Cost
			Estimated Hours per change	Estimated Annual Hours	Estimated Hours per change	Estimated Annual Hours	Estimated Hours per change	Estimated Annual Hours	
Submit substantial changes to FAA in advance and receive approval.	On Occasion	5	2	10	2	10	1	5	\$1,250
§ 147.37 estimated annual reporting burden				10		10		2	

Section 147.38 Maintenance of curriculum requirements. A school may not change its approved curriculum unless the change is approved in advance. The AMTS must make any proposed amendments to the affected curriculum content and submit those changes to the FAA for approval.

Table XII. § 147.38 Provision

§ 147.38 Provision	Basis	Estimated Annual Changes	Director @ \$74.83/hour		Instructor @ \$37.73/hour		Administrative @ \$24.90/hour		Cost
			Estimated Hours per change	Estimated Annual Hours	Estimated Hours per change	Estimated Annual Hours	Estimated Hours per change	Estimated Annual Hours	
Amendment of General Curriculum	On Occasion	14	16	224	4	56	2	28	\$19,572
Amendment of Airframe Curriculum	On Occasion	14	16	224	4	56	2	28	\$19,572
Amendment of Powerplant Curriculum	On Occasion	14	16	224	4	56	2	28	\$19,572
§ 147.38 estimated annual post certification reporting burden				672		168		84	\$58,716

Section 147.41 Change of location. An AMTS must notify the FAA in writing of a relocation at least 30 days in advance. A change of location must be approved in advance.

Table XIII. § 147.41 Provision

§ 147.41 Provision	Basis	Estimated Annual Changes	Director @ \$74.83/hour		Instructor @ \$37.73/hour		Administrative @ \$24.90/hour		Cost
			Estimated Hours per change	Estimated Annual Hours	Estimated Hours per change	Estimated Annual Hours	Estimated Hours per change	Estimated Annual Hours	
Notify FAA in advance, in writing, and receive approval for change of location.	On Occasion	1	32	32					\$2,395
§ 147.41 estimated total annual reporting burden				32		0		0	\$2,395

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

This information collection does not require the mailing or faxing of the requested information since the FAA would typically view the information onsite. A new

applicant's supporting documentation is an exception; a new applicant would be responding to their local Flight Standards District office in person or by email, therefore no additional burden beyond the labor cost is associated with this activity.

14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

Total hours burden 1690hrs@\$105,560 (Please see Table III above in item #12 for FAA Inspector related burden summary.) FAA Inspectors perform an objective evaluation of the applicant's and certificate holder's facilities, personnel, procedures, and curriculum content to ensure compliance with part 147.

FAA Estimated Annual Burden

Section 147.5 Application and Issue. The Applicants for an aviation maintenance technician school certificate and rating, or for an additional rating, are required to submit FAA Form 8310-6, Aviation Maintenance Technician School Certificate and Ratings Application, and the required supporting documentation, to the FAA.

The FAA estimates that approximately 10 initial AMTS applications are submitted annually. All applicants do not achieve certification, and therefore are not issued OpSpecs, but they are required to submit the required supporting documentation at the time application is made. Furthermore, there are periodic amendments that may be required, either to the application or to the OpSpecs, depending on the operational changes initiated by the AMTS.

Table XIV. § 147.5 Provision

§ 147.5 Provision	Basis	Estimated Annual Changes	Inspector @ \$62.48/hour		Estimated Annual Cost
			Estimated Hours per change	Estimated Annual Hours	
New applications	Initial Certification	10	40	400	\$24,992
Preparation of OpSpec A001	Initial Certification	5	0.5	2.5	\$156
Preparation of OpSpec A002	Initial Certification	5	0.5	2.5	\$156
Preparation of OpSpec A003	Initial Certification	5	0.5	2.5	\$156
Preparation of OpSpec A004	Initial Certification	5	0.5	2.5	\$156
Preparation of OpSpec A005	Initial	5	0.5	2.5	\$156

Preparation of OpSpec A006	Certification Initial	5	0.5	2.5	\$156
Preparation of OpSpec A007	Certification Initial	5	0.5	2.5	\$156
Preparation of OpSpec A013	Certification Initial	5	0.5	2.5	\$156
Preparation of OpSpec A025	Certification Initial	5	0.5	2.5	\$156
Preparation of OpSpec A026	Certification Initial	5	0.5	2.5	\$156
Preparation of OpSpec B002	Certification Initial	5	0.5	2.5	\$156
Preparation of OpSpec B003	Certification Initial	5	0.5	2.5	\$156
Preparation of OpSpec B004	Certification Initial	5	0.5	2.5	\$156
§ 147.5 estimated annual initial certification FAA burden				432.5	\$27,023
Amendment to application	On Occasion	2	10	20	\$1,250
Amendment to ratings	On Occasion	2	10	20	\$1,250
Amendment of OpSpec A001	On Occasion	2	0.5	1	\$62
Amendment of OpSpec A002	On Occasion	2	0.5	1	\$62
Amendment of OpSpec A003	On Occasion	2	0.5	1	\$62
Amendment of OpSpec A004	On Occasion	2	0.5	1	\$62
Amendment of OpSpec A005	On Occasion	2	0.5	1	\$62
Amendment of OpSpec A006	On Occasion	2	0.5	1	\$62
Amendment of OpSpec A007	On Occasion	2	0.5	1	\$62
Amendment of OpSpec A013	On Occasion	2	0.5	1	\$62
Amendment of OpSpec A025	On Occasion	2	0.5	1	\$62
Amendment of OpSpec A026	On Occasion	2	0.5	1	\$62
Amendment of OpSpec B002	On Occasion	2	0.5	1	\$62
Amendment of OpSpec B003	On Occasion	2	0.5	1	\$62
Amendment of OpSpec B004	On Occasion	2	0.5	1	\$62
§ 147.5 estimated annual post certification FAA burden				53	\$3,311
§ 147.5 estimated total annual FAA burden				485.5	\$30,334

Section 147.21 Curriculum requirements. An applicant for an AMTS certificate must develop a curriculum that covers the subject areas and items listed in Appendices B, C, & D of part 147 and submit it to the FAA for approval.

Table XV. § 147.21 Provision

§ 147.21 Provision	Basis	Estimated Annual Changes	Inspector @ \$62.48/hour		Cost
			Estimated Hours per change	Estimated Annual Hours	
Review of General Curriculum	Initial Certification	3	40	120	\$7,498
Review of Airframe Curriculum	Initial Certification	3	40	120	\$7,498
Review of Powerplant Curriculum	Initial	3	40	120	\$7,498

Certification		
§ 147.21 estimated annual initial certification FAA burden	360	\$22,493

Section 147.23 Instructor requirements. During initial certification the FAA must review the instructor list. The FAA may request to review the list at any time, or when any revisions to the list are made.

Table XVI. § 147.23 Provision

§ 147.23 Provision	Basis	Estimated Annual Changes	Inspector @ \$62.48/hour		Cost
			Estimated Hours per change	Estimated Annual Hours	
Review of Instructor List with names and qualifications of specialized instructors. § 147.23 estimated annual initial certification FAA burden	Initial Certification	10	2	20	\$1,250
Review revises Instructor List § 147.23 estimated annual post certification FAA burden	On Occasion	90	1	90	\$5,623
§ 147.23 estimated annual FAA burden				110	\$6,873

Section 147.33 Records. Keeping of required records under this part does not cause any burden to the FAA.

Section 147.37 Maintenance of facilities, equipment and materials. If an AMTS elects to make a substantial change to its facilities, instructional equipment or materials, the changes must be submitted and approved beforehand, and the FAA must do on-site inspections to verify the changes meet all requirements.

Table XVII. § 147.37 Provision

§ 147.37 Provision	Basis	Estimated Annual Changes	Inspector @ \$62.48/hour		Cost
			Estimated Hours per change	Estimated Annual Hours	
Review substantial changes from the AMTS in advance and provide approval. § 147.37 estimated annual FAA burden	On Occasion	5	6	30	\$1,874
				30	\$1,874

Section 147.38 Maintenance of curriculum requirements. A school may not change its approved curriculum unless the change is approved in advance. The AMTS must make any proposed amendments to the affected curriculum content and submit those changes to the FAA. The FAA must review the amended material and provide approval of the curriculum.

Table XVIII. § 147.38 Provision

§ 147.38 Provision	Basis	Estimated Annual Changes	Inspector @ \$62.48/hour		Cost
			Estimated Hours per change	Estimated Annual Hours	
Review of amended General Curriculum	On Occasion	14	16	224	\$13,996
Review of amended Airframe Curriculum	On Occasion	14	16	224	\$13,996
Review of amended Powerplant Curriculum	On Occasion	14	16	224	\$13,996
§ 147.38 estimated annual post certification FAA burden				672	\$41,987

Section 147.41 Change of location. An AMTS must notify the FAA in writing of a relocation at least 30 days in advance. The FAA must conduct inspections, review changes to documents, and approve the change in advance.

Table XIX. § 147.41 Provision

§ 147.41 Provision	Basis	Estimated Annual Changes	Inspector @ \$62.48/hour		Cost
			Estimated Hours per change	Estimated Annual Hours	
Review and approve an AMTS change of location.	On Occasion	1	32	32	\$1,999
§ 147.41 estimated total annual FAA burden				32	\$1,999

15. Explain the reasons for any program changes or adjustments.

This revised information collection corrects the September 30, 2016, supporting statement submitted for part 147. The information collection burden hours and costs will be noticeably higher than posted in the 2016 supporting statement for three primary reasons. First, due to program changes as implemented by FAA Notice N 8900.278 dated November 21, 2014, operations specifications (OpSpecs) were introduced to Title 14 of the Code of Federal Regulations (14 CFR) part 147 Aviation Maintenance Technician Schools (AMTS). OpSpecs must be issued to institutions with part 147 certificates by July 21, 2015. The part 147 pertinent OpSpecs are listed above in Table II. This correction includes the burden added by OpSpecs not addressed in the 2016 information collection. Second, the current enrollment figures cited in 2016 were 12,500 students but are now 17,800 students. Third, some sections of part 147 were not represented as collecting information and the FAA is including them in this revised report. Requested responses in ROCIS are according to the number of schools reporting rather according to the number of students in each school as previously submitted.

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. 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.

The results of this information collection will not be published.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

The FAA is not seeking approval to not display the date of expiration of this information collection.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions to the certification statement for this information collection.

OMB CONTROL NUMBER: 2120-0040

EXPIRATION DATE: 09/30/2019

Paperwork Reduction Act Burden Statement

A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a currently valid OMB Control Number. The OMB Control Number for this information collection is 2120-0040. Public reporting for this collection of information is estimated to be approximately 63 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing and reviewing the collection of information.

All responses to this collection of information are required to obtain or retain a benefit, Title 14 CFR Part 147. Respondents are not given an assurance of confidentiality. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, Federal Aviation Administration, 10101 Hillwood Parkway, Fort Worth, TX 76177-1524