

## **Supporting Statement A Reduced Vertical Separation Minimum (RVSM)**

- Updated to reflect the current level of activity (**4,756 respondents and 23,017 hours**) for aircraft operators of United States (U.S.) registry seeking operational approval to conduct RVSM operations.
- Appendix G to 14 CFR Part 91 was recently revised to remove the requirement for operators to submit a separate RVSM maintenance program for FAA approval when applying for a RVSM authorization, (81 FR 47009, Jul. 20, 2016).
  - o Removal of submitting a separate maintenance program for approval **reduced both the time** required by the operator **to make application** and Government processing time of the application.
- Previously, a material cost of \$28,502 had been included. These costs are no longer included due to electronic submission of information.

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

The authority to collect data from aircraft operators seeking operational approval to conduct Reduced Vertical Separation Minimum (RVSM) operations is contained in Part 91, Section 91.180, as established by a final rule published in the Federal Register on October 27, 2003 (68 FR 61304). Aircraft operators seeking operational approval to conduct RVSM operations within the 48 contiguous states of the United States (U.S.), Alaska and that portion of the Gulf of Mexico where the FAA provides air traffic services must submit their application to the Certificate Holding District Office (CHDO). The CHDO registers RVSM approved airframes in the FAA RVSM Approvals Database to track the approval status for operator airframes.

### **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.**

Aircraft operators seeking operational approval to conduct RVSM operations are mandated to initially submit application to their CHDO. The CHDO registers RVSM approved airframes in the FAA RVSM Approvals Database. When operators complete airworthiness, continued airworthiness and operations program requirements, the CHDO grants operational approval. Although the information collected may not be 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.**

Using the guidance provided on the RVSM Webpage, operators can develop and submit their application for RVSM authority to the FAA 100% electronically. The Government Paperwork Elimination Act (GPEA) is an important tool to improve customer service and governmental efficiency through the use of information technology. This improvement involves transacting business electronically with Federal agencies and widespread use of the Internet and its World Wide Web. The FAA RVSM Web Page permits operators to obtain electronic copies of an example operator application, guidance material, and related documentation. The website provides a suitable mechanism for dissemination of information via downloading of materials relating to RVSM operational approval in accordance with the GPEA

**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.**

Some elements of the application package such as a minimum equipment list are furnished to the FAA when the operator applies for other operating authorities. However, duplication in data collection is necessary because the data must be modified to reflect the specific requirements of RVSM. The duplicate data elements are easily provided by the respondents without additional search of existing data sources. The duplicate data collection therefore would not require a significant burden.

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

The information requested does not pose a significant burden on small entities.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

If this collection is not renewed or conducted less frequently, operators will be unable to initiate the process to receive specific operational approval by submitting their application to their respective CHDO.

**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.*

The collection does not require any special circumstances.

**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 March 30, 2018 (83 FR 13810), 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.**

There are no payments or gifts to respondents.

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

We do not provide any assurance of confidentiality for this submission.

**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.**

No questions of a sensitive nature are asked.

**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.

The total number of applications estimated to be processed annually is 4,756: 1,426 applications where RVSM was new to the operator and 3,330 applications where the operator was updating an existing authorization. The estimated preparation time for an operator to complete and submit an application for a new operational approval to their

CHDO would be 6.8 hours. The estimated preparation time to update an existing authorization would be 4.00 hours. The 1,426 operators estimated to seek a new operational authorization would result in 9,697 hours in preparation time. The 3,330 operators estimated to update an existing operational authorization would result in 13,320 hours in preparation time. The estimated total annual burden in hours would be 23,017 hours.

The estimated total annual operator cost burden, assuming the value of an owner or operator's time is \$44.23 per hour, will be \$1,018,042. The fully burdened operator rate of \$44.23 assumes an operations research analyst rate of \$37.80 per hour and a multiplier of 1.17 fringe benefit salary multiplier.

	Number Responses	Time per Response (hours)	Total Hour Burden
New applications	1,426	6.8	9,697
Updated applications	3,330	4.0	13,320

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

No cost other than those in question 12 and 14.

**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.**

The FAA assumes that it would take Inspectors on average 4.85 hours to process each applicant submission. Assuming each inspector at a GS-12 level, the time and cost to the Federal Government for processing 4,756 application packages is 23,067 hours and \$1,057,852, assuming an Inspector rate of \$45.86 per hour including benefits.

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

The previously reported 1560 respondents for an estimated annual burden of 46,800 hours has been updated to reflect the current level of activity(4,756 respondents and 23,017 hours) for aircraft operators of United States (U.S.) registry seeking operational

approval to conduct RVSM operations. Appendix G to 14 CFR Part 91 was recently revised to remove the requirement for operators to submit a separate RVSM maintenance program for FAA approval when applying for a RVSM authorization, (81 FR 47009, Jul. 20, 2016). Removal of submitting a separate maintenance program for approval reduced both the time required by the operator to make application and Government processing time of the application. RVSM has been implemented for more than 10 years and operators seek to update existing authorizations more than applying for new authorizations annually. A recent analysis of operator RVSM approval data within the U.S. Minimum Aircraft System Performance Specification (MASPS) indicates that on average, 1,426 operators per year seek new RVSM authorizations and 3,300 operators seek to update existing authorizations. Previously, a material cost of \$28,502 had been included due to electronic submission of information. These costs are no longer included due to electronic submission of information. The agency has separated collection activity into appropriate information collections, there has not been additional forms or applications added.

**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.**

Results will not be published except for listings of airframes that have received operational approval, which are maintained by the North American Approvals Registry and Monitoring Organization (NAARMO) and are available at [http://www.faa.gov/air\\_traffic/separation\\_standards/naarmo/rvsm\\_approvals/](http://www.faa.gov/air_traffic/separation_standards/naarmo/rvsm_approvals/).

**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.**

Not applicable.

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

There are no exceptions.