

**Federal Aviation Administration**  
**Supporting Statement A**  
**Safety Analysis System (SAS) External Portal**

**Introduction**

This Information Collection is submitted to the Office of Management and Budget (OMB) to request an automated method of an existing Information Collection currently under Information Collection 2120-0593 and 2120-0682, and to request a new collection. This request will allow the Federal Aviation Administration (FAA) to leverage a web portal for the purpose of collecting and processing initial certification application and data collection tools.

**Part A Justification**

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

Safety Assurance System (SAS) is a web based tool used by the Federal Aviation Administration (FAA) Office of Flight Standards (FS) to conduct initial certification, routine surveillance, and certificate management for applicants and certificate holders under 14 CFR parts 121, 135, and 145. SAS is not a separate safety standard and does not impose additional requirements on certificate holders. SAS policy and procedures provide aviation safety inspectors (ASI) with standardized protocols to evaluate certificate holder programs required by regulations to be approved or accepted. SAS is deployed to all FAA geographical locations across the country as a decision making tool for ASIs and FAA managers to support FAA's oversight responsibilities of the aviation industry operating under Title 14 CFR parts 121, 135, and 145.

SAS External Portal is a web-based tool used by applicants and certificate holders to exchange information with the FAA, primarily with Certification Project Managers and Principal Inspectors. SAS External Portal allows industry (also referred to as external users) to register and gain secure access to SAS functions for initial certification and certificate holders' configuration changes and to collaborate with their FAA counterparts in the execution of the following functions:

- Submitting a Preapplication Statement of Intent (PASI) Form (FAA Form 8400-6)
- Submitting an Application for Repair Station (FAA Form 8310-3)
- Submitting data collection tools

The FAA's authority to collect this information is derived generally from 49 U.S.C. § 106(f) which establishes the FAA Administrator's responsibilities with respect to aviation safety. The collection of this information is consistent with the Administrator's authority under 49 U.S.C. 44701(c). The following requirements in 49 U.S.C. are also applicable to SAS; § 44702, Issuance of Certificates, § 44705, Air Carrier Operating Certificates, and §44707, Examining and Rating Air Agencies.

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

*How application information is currently collected:*

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14 CFR part 121, 135 and 145 applicants that desire to become or remain certified as air carriers, air agencies or commercial operators are mandated to report information to the FAA. The information collected reflects requirements necessary under parts 121, 135, and 145 to comply with Federal Aviation Regulation part 119 – Certification: Air Carriers and Commercial Operators and part 145- Repair Stations. The FAA will use the information it collects and reviews to ensure compliance and adherence to regulations and, if necessary, to take enforcement action on violators of the regulations. This information is currently collected using the following forms:

- Preapplication Statement of Intent (PASI) (FAA Form 8400-6) (OMB No. 2120-0593)
- Application for Repair Station (FAA Form 8310-3) (OMB No 2120-0682)

*How application information will be collected with the SAS External Portal:*

The same will apply above, except the information will be collected using a web portal instead of a form that is submitted via email or mail.

*Data Collection Tools*

Data collection tools (DCTs) are tools used by the FAA to determine if an applicant meets regulatory and other requirements to be approved as an operator (parts 121 and 135) or air agency (part 145). Data collection tools are also used by the FAA to approve or accept certificate holder new program requests. The DCTs are exchanged between the FAA and the applicant/certificate holder to verify information and responses are correct. Currently, the DCTs are exchanged using email.

The FAA intends to use the information submitted (electronically formatted through SAS' External Portal) by the applicants and certificate holders to better facilitate efficient initial certification activities, process certificate holders' configuration changes and document certificate management activities.

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

The SAS External Portal streamlines the process of submitting information and electronic documents from applicants and certificate holders. The SAS External Portal is accessible via the web regardless of geographical location of the applicants or certificate holders. The SAS External Portal provides a more efficient process for applicants and certificate holders to communicate and collaborate with the FAA.

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

We have reviewed other FAA public reports and find no duplication. Also, the FAA knows of no other agency collecting the same information. The information sought is required information regarding certification activities for a specific applicant or certificate holder. The information necessary is available from that applicant or certificate holder only, and is not available from any other source.

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

The FAA has developed electronic Data Collection Tools to ease the burden associated with this information collection to better facilitate efficient certification, surveillance and certificate management activities. Additionally, the SAS External Portal is now accessible to all users via the internet, regardless of geographical location of the certificate holder or applicant, thus making it easier for small entities in remote locations to collaborate with the FAA.

**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 an organization applies for a certificate or collaborates with the FAA about an existing certificate, the External Portal provides an efficient method for an external user to enter data or collaborate with the FAA. Without this information collection, the FAA will be unable to efficiently facilitate initial certification activities, process configuration changes and document certificate management activities.

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

This collection of information is conducted in a manner 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.**

The FAA published a notice in the Federal Register on [insert date of publication in the Federal Register] concerning its intent to request OMB approval for this collection activity.

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

No payment nor gift will be made to air carriers or operators who provide information regarding SAS data through the SAS External Portal.

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

The respondents have been given no assurance of confidentiality.

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

There are no questions of a sensitive nature.

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

The annual burden is summarized in the following table:

<b>Collection Instrument</b>	<b>Type of Respondent</b>	<b># of Respondents</b>	<b>Hours Per Respondent</b>	<b>Total Hours</b>	<b>Loaded Rate</b>  (See comment C for source)	<b>Total Cost (annual)</b>
<b>PASI Form And Data Collection Tools</b>	CFR 121, 135	126	320	40,320	\$42.67	\$1,720,454
<b>Initial Certification Data Collection Tools</b>	CFR 145	174	20	3,480	\$42.67	\$148,492
<b>Total:</b>		<b>300</b>		<b>43,800</b>		<b>\$1,868,946</b>

The estimate of burden is based on the following:

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- (A) Initial Certification Data Collection Tools for CFR parts 121 and 135 will be developed and submitted by 126 applicants. (The number of applicants (126) was a snap shot taken at the time of the number of applicants for parts 121 and 135 currently going through the certification process).
- (B) This will require approximately 320 hours per applicant, for a total of 40,320 hours.
- (C) Initial Certification Data Collection Tools for CFR part 145 will require one Custom Data Collection Tool completed per applicant. This will require approximately 20 hours per applicant, for a total of 3,480 hours.
- (D) Since the identity of the personnel completing the reports/ applications varies widely from the owner / operator of for a small business to junior employees for a large business, the hourly rate for salaries recorded for OCC Code 13-0000 (Business and Financial Operations Occupations) median rate of \$66,530 per year. Dividing by 2080 gives an hourly rate \$32, which when an overhead factor of 33% is applied gives the reported rate of \$42.67.<sup>1</sup>

**Note:** Although information associated with FAA Form 8400-6, Pre-Application Statement of Intent (OMB No. 2120-0593) and FAA Form 8310-Application for Repair Station Certificate and/or Rating (OMB No. 2120-0682) is submitted via the SAS External Portal, this information is part of previously approved collections.

**13. Provide estimates of the total annual cost burden to respondents or record-keepers resulting from the collection of information.**

There are no costs associated with this collection that have not already been identified in the responses to item Nos. 12 and 14.

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

FAA Training Costs

The training to support the External Portal consists of two courses both are web based courses that have no cost associated with them. This information was provided by the Workforce Development Division.

<b>Course</b>	<b>Type of Course</b>	<b># of Attendees</b>	<b>Cost</b>
27100205 Intro to SAS External	2 hour Web-based course.	524	No cost associated with this course due to the virtual

<sup>1</sup> OMB Circular A-76

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Portal for Certificate Holders and Applicants:	Delivered through a virtual platform.		delivery
27100215 Intro to the SAS External Portal for AFS	5 hour Web-based. Delivered through a virtual platform.	2,393	No cost associated with this course due to the virtual delivery

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IT Costs

IT operations and maintenance (O&M) costs for the External Portal are contained within the cost to maintain the internal portal and are not broken out as a separate cost. The costs are estimated to be minimal anywhere from 1% to 2% per year. For example, 01 times the average going forward of \$4.22M = ~\$40-50K per year. Table below provides the projected O&M costs for the SAS internal portal. This information was provided the SAS IT Program Manager.

**Funding Profiles**

SASO	Funding Source	Prior	FY14	FY15	FY16	FY17	FY18	FY19	FY20	FY21	FY22	FY23
<b>Phase 2</b>												
	F&E	90.0	12.5	17.0	7.4	0	0	0	0	0	0	0
	Ops		0	0	0	7.6	8.1	4.1	4.1	4.2	4.3	4.4
<b>Phase 3</b>												
	F&E	0	0	5.5	11.5	17.2	25.8	25.4	18.1	12.7	11.4	8.0
	Ops	0	0	0	0	0	0	0	0	0	0	0

**SASO Phase 2**

- F&E (Activity 3) funded through FY 16 per CIP
- O&M funded FY 17 and beyond
  - FY 17 and FY 18 received TOM funding approval

**SASO Phase 3**

- F&E (Activity 3) funded FY 15-23 per CIP
- O&M funding begins FY 24

**15. Explain reasons for program changes or adjustments reported in Items 13 or 14 of OMB Form 83–I.**

This is a new collection; therefore, it is a program change.

**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.**

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 that display would be inappropriate.**

The FAA is not seeking approval to eliminate display of the expiration date for OMB approval of the information collection.

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**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 to the certification statement identified in item No. 19 of OMB Form 83-I.