

**Department of Transportation
Federal Aviation Administration**

SUPPORTING STATEMENT

Organization Designation Authorization-Part 183, Subpart D. OMB-2120-0704

INTRODUCTION

This information collection is submitted to the Office of Management and Budget (OMB) to request a three-year approval clearance for the information collection entitled, Organization Designation Authorization, (OMB Control No. 2120-0704, which is currently due to expire on Aug 31, 2018.

Part A. Justification

1. Circumstances that make collection of information necessary.

The purpose of Title 49, U.S.C. Subtitle VII - Aviation Programs, is to provide for a safe, secure, and efficient aviation system that contributes to national security and encourages civil aviation.

49 U.S.C. Section 40113(a) empowers the Secretary of Transportation (or the Administrator of the Federal Aviation Administration) to issue such regulations as he/she shall deem necessary to carry out the provisions of the Act.

49 U.S.C. Section 44701 empowers the Administrator of the Federal Aviation Administration to prescribe reasonable rules and regulations, or minimum standards necessary for safety in air commerce.

49 U.S.C. Section 44702(a) empowers the Administrator of the Federal Aviation Administration to issue and amend type certificates, and supplemental type certificates for aircraft, aircraft engines, propellers, and appliances. The section specifies that applications shall be as the Secretary prescribes as to form, content, retention, and manner served.

49 U.S.C. Section 44702(d) empowers the Administrator of the Federal Aviation Administration to delegate to any properly qualified private person functions related to the examination, inspection, and testing necessary to the issuance of certificates.

Subpart D to part 183 establishes the Organization Designation Authorization. This rule allows the Federal Aviation Administration to appoint organizations as representatives of the administrator. As authorized, these organizations perform certification functions on behalf of the FAA. These functions may include approving data, issuing various kinds of aircraft and organization certificates, and any other functions the Administrator may deem necessary. Application, reporting, and recordkeeping requirements are contained in the rule.

This information collection supports the Department of Transportation strategic goal on safety.

This is accomplished by promoting the public health and safety by working toward the elimination of transportation – related deaths, injuries, and property damage.

2. How, by whom, and for what purpose is the information used.

Organizations who wish to begin or continue performing certification functions on behalf of the FAA are mandated to submit information to the Federal Aviation Administration (FAA) on occasion. The FAA reviews submitted application forms to determine whether the applicant meets the qualification requirements necessary to be authorized as a representative of the Administrator.

Organizations submit Procedures manuals for approval by the FAA as a means to ensure the organizations utilize the correct processes when performing functions on behalf of the FAA. The management of such activity is provided for in 49 USC 44702(d).

Reporting and recordkeeping requirements are necessary to manage the various approvals issued by the organization. The reporting and recordkeeping requirements are necessary to document approvals issued and must be maintained in order to address future safety issues which may arise.

3. Extent of automated information collection.

In compliance with the Government Paperwork Elimination Act (GPEA), applications and notifications may be submitted 100% electronically, at the discretion of the authorization holder. Electronic storage arrangements are acceptable providing the applicant has an FAA-approved agreement addressing the means of storage.

4. Efforts to identify duplication.

This information collection is not a duplication of other reporting.

5. Efforts to minimize the burden on small businesses.

The information required is the minimum needed to appoint and manage the activities of organizations authorized as a representative of the administrator. The collection is necessary to ensure the safety of the aircraft transportation system.

6. Impact of less frequent collection of information.

This collection is required to ensure the future safety of products on which delegated organizations perform functions. Failure to collect the information would impact the FAA's ability to respond to and correct aviation safety deficiencies.

7. Special circumstances.

This information collection is consistent with the guidelines in Title 5 CFR 1320.5(d)(2)(i)-(viii).

8. Compliance with 5 CFR 1320.8:

A notice was published in the Federal Register on June 7, 2018, vol. 83, no. 2018-12299 pages 26538-26539 requesting public comments. No comments were received.

9. Payments or gifts to respondents.

We do not provide any payments or gifts.

10. Assurance of confidentiality:

We do not assure confidentiality, other than that provided for proprietary business information.

11. Justification for collection of sensitive information:

There are no sensitive questions in this collection of information.

12. Estimate of burden hours for information requested:

The estimated reporting (Aerospace Engineers) burden imposed by the rule is 605 hours. The estimated recordkeeping (Material Recording Clerks) burden imposed by the rule is 4192 hours.

We estimate the proposed rule imposes an annual public reporting burden of \$244963.42. (See attached spreadsheet

The estimated Aerospace Engineers, based on 605 hours at \$161.00 per hour is \$97,407.24. The estimated recordkeeping costs are \$147556.18 based on 4192 hours at \$3 per hour for Material Recording Clerks. (See tab "Number 12" on the statics spreadsheet for calculations.)

Reporting - Aerospace Engineers	
	https://www.bls.gov/ooh/architecture-and-engineering/aerospace-engineers.htm
\$ 54.34	wage and salary per above - (All workers, goods producing industries - Management, Professional, and related 67.5%)
	https://www.bls.gov/news.release/ecec.t09.htm
\$ 26.16	Benefits per above professional group 32.5%
	https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf
	Overhead cost is 100% - benefits which would be 67.5%

Aerospace Engineers Calculations	
80.50	54.34 is 67.5% of ____
26.16	32.5% of 80.50 is ____ benefits
54.34	67.5% of 80.50 is ____ overhead
161.00	TOTAL COST TO EMPLOYER

Aerospace Engineers Calculations		
80.50	54.34 is 67.5% of ____	
26.16	32.5% of 80.50 is ____	benefits
54.34	67.5% of 80.50 is ____	overhead
161.00	TOTAL COST TO EMPLOYER	

Recordkeeping - Material Recording Clerks	
	https://www.bls.gov/ooh/office-and-administrative-support/material-recording-clerks.htm
\$ 13.27	wage and salary per above - (Occupational group - service 71.2%)
	https://www.bls.gov/news.release/ecec.t05.htm
\$ 4.33	Benefits per above Occupational group - service 24.6%
	Overhead cost is 100% - benefits which would be 71.2%

Material Recording Clerks Calculations	
17.60	13.27 is 75.4% of ____
4.33	24.6% of 17.60 is ____
13.27	75.4% of 17.60 is ____
35.20	TOTAL COST TO EMPLOYER

A section-by-section breakdown of the proposed rule follows, showing frequency of response, burden and how the burden has been established (based on the previous three years).

The Organization Designation Authorization rule imposes the following burdens:

Section 183.43. Application. The applicant for an authorization must submit an application and proposed procedures manual to the FAA.

Estimated number of annual applications	4
Estimated reporting burden hours per application	5 hours
Estimated reporting burden for proposed procedures manual	60 hours
Estimated annual reporting burden	260 hours

Section 183.45. Issuance of Organization Designation Authorizations. An authorization holder must apply to and obtain approval for any changes to the authorized functions or limitations.

Estimated application for changes	8
Estimated preparation time	1 hours
Estimated annual reporting burden	8 hours

Section 183.53. Procedures manual. An authorization is not issued until the applicant submits and obtains approval of a procedures manual. The manual submission requirements are included in Section 183.43.

Section 183.55. Limitations. An authorization holder may not perform an authorized function if there has been a change in the authorization holder's staff or organization until the FAA is notified of the change and it is documented in the approved procedures manual.

Estimated procedures manual changes	8
Estimated preparation time	2 hours
Estimated annual reporting burden	16 hours

Section 183.57. Responsibilities of an ODA Holder. Each authorization holder shall continue to meet the requirements for issuance of the authorization or shall notify the Administrator within 48 hours of any change that could affect meeting those requirements.

Estimated notifications	4
Estimated time per notification	1 hours
Estimated annual reporting burden	4 hours

Section 183.61. Records. Each authorization holder shall maintain at its facility current records that document the approvals they perform for the FAA. Each authorization holder must submit reports as required by the FAA. The recordkeeping requirements are dependent on the type of authorization holder. The following estimates are based on the assumption that there will be 9 organizations with large ODA systems covering multiple ODA types, 20 organizations with significant ODA systems covering multiple approvals, and 55 organizations with very limited authority.

Estimated large authority authorization holders maintaining records	10
Estimated recordkeeping burden per holder	200 hours
Estimated recordkeeping burden	2000 hours

Estimated significant authority authorization holders	20
Estimated recordkeeping burden per holder	100 hours
Estimated recordkeeping burden	2000 hours

Estimated limited authority authorization holders	60
Estimated recordkeeping burden per holder	20 hours
Estimated recordkeeping burden	1200 hours

Section 183.63 Continuing Requirements: Products, parts or appliances. If requested by the FAA, the authorization holders must investigate safety concerns and report the results of investigation to the FAA. If requested, the ODA holder must submit the information required for corrective action.

Estimated safety concerns requiring investigation	4
Estimated reporting burden per investigation	48 hours
Estimated total reporting burden	240 hours

Estimated items requiring corrective	3
Estimated reporting burden per corrective action	40 hours
Estimated total reporting burden	120 hours

Section 183.65 Continuing Requirements: Operational approvals. Authorization holders that issue operational approvals must notify the FAA of errors it makes in issuing certificates and if it finds out it issued a certificate to a unqualified applicant.

Estimated notifications of errors made or unqualified applicants	5
Estimated reporting burden per notification	1
Estimated total reporting burden	5

13. Estimate of total annual costs to respondents.

No cost other than indicated in 12.

14. Estimate of cost to the Federal government.

The annual cost to the Federal Government to analyze and process the information received is estimated to be \$15,019.33 per year. This estimate is based on 160 hours at \$93.87 per hour (\$68.90 salary [https://www.faa.gov/jobs/working_here/benefits/ average of I and J band minimum and maximum] plus \$24.97 benefits [36.25% per <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2008/m08-13.pdf>]). (See tab “Number 14” on the statics spreadsheet for calculations.)

Estimated number of Applications/Procedures Manuals	4
Estimated hours to review/approve	25
Estimated total hours	100
Estimated changes in functions	10
Estimated hours to review/approve	1
Estimated total hours	10
Estimated procedures manual changes	10
Estimated hours to review/approve	5
Estimated total hours	50

15. Explanation of program changes or adjustments.

The burden has changed due to the reasonably stable number of ODA appointments. All delegated organizations have been appointed under ODA and there are a minimal number of new ODA applications yearly.

16. Publication of results of data collection.

Numbers/descriptions of approvals issued by the organization may be published in on-going FAA data products. Tabulation and publication are not specific to this data collection, but follow FAA standard practice for the publication of such data. For example, the FAA routinely publishes a description of certificates issued. Certificates issued by these organizations will be

included in such a publication.

17. Approval for not displaying the expiration date of OMB approval.

No request for seeking approval not to display expiration date for OMB.

18. Exceptions to certification statement.

No exceptions.