

SUPPORTING STATEMENT
OMB 2120-0024
DEALER'S AIRCRAFT REGISTRATION CERTIFICATE APPLICATION

A. JUSTIFICATION

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

This information collection supports the Department of Transportation's strategic goals on safety and security. Maintaining proper registration of aircraft is fundamental to ensure compliance with operations/airworthiness safety requirements in order to promote the public health and safety by working toward the elimination of transportation-related deaths, injuries, and property damage. Proper registration of aircraft is necessary to advance the nation's vital security interest in support of national strategies by ensuring that the national transportation system is secure.

Public Law 103-272 states that all aircraft must be registered before they may be flown. It sets forth registration eligibility requirements and provides for application for registration as well as suspension and/or revocation of registration.

a. Federal Aviation Regulation (FAR) Part 47 prescribes procedures that implement Public Law 103-272 which provides for the issuance of dealer's aircraft registration certificates and for their use in connection with aircraft eligible for registration under this Act by persons engaged in manufacturing, distributing or selling aircraft. Dealer's certificates enable such persons to fly aircraft for sale immediately without having to go through the paperwork and expense of applying for and securing a permanent Certificate of Aircraft Registration. It also provides a system of identification of aircraft dealers.

b. Federal Aviation Regulations (FAR) Part 47 establishes procedures for implementing Section 505 of the Act. Specifically, Subpart C, Parts 47.61 through 47.71, describes procedures for obtaining and using dealer's certificates in FAR Part 47.63, elicit the information needed from the applicant in order to comply with Section 505 of the Act and FAR Part 47, Subpart C.

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

Individuals or companies engaged in manufacturing, distributing, or selling aircraft who want to fly those aircraft with a dealer's certificate instead of registering them permanently in the name of the entity are mandated to submit information to this collection, by completing an application for dealer's certificate. An FAA Aircraft Registry conveyances examiner reviews the application to ensure that it is completely and properly filled out. If it is correct, the Registry issues, by computer, the number of

dealer's certificates requested and mails them to the dealer. Certificates are valid for one year. The application is retained electronically for verification of action taken (certificates issued) if needed. If this information were not collected, there would be no basis for issuance of dealer's aircraft registration certificates.

The information is collected on AC Form 8050-5.

3. Describe any consideration of the use of improved information technology to reduce burden and any technical or legal obstacles to reducing burden.

The Civil Aviation Registry uses a computer system for issuing certificates. Currently 0% of the collection may be submitted electronically.

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

One application is received. The number of certificates requested is issued. To our knowledge, no other agency is collecting this same information.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe the methods used to minimize burden.

The requirements for obtaining a dealer's certificate are the same for all applicants. However, we have kept the burden to a minimum for everyone.

6. Describe the consequence to Federal program or policy activities if the collection were conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Dealer's certificates are intended to permit short-time operation of an aircraft by a method that is less restrictive and time-consuming than obtaining a certificate when registered to a permanent owner. However, by its very nature it is more open to use and abuse by persons not actually operating as dealer. The necessity of obtaining a certificate annually lessens the possibility of someone operating an aircraft on a dealer's certificate over a long period of time. A dealer's certificate, which identifies the dealer and not the aircraft, is not as efficient as a permanent certificate in establishing identification of an aircraft and/or its owner. Therefore, the efficiency and integrity of the aircraft registration/identification system would be lessened if the period of validity were increased.

7. Explain any circumstances that require collection to be conducted in a manner inconsistent with 5 CFR 1320.6.

The collection of information is consistent with the guidelines in 5 CFR 1320.5(d)(2).

8. Describe effort to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A notice for comment was published in the Federal Register on June 7, 2018 (83 FR 26537). No comments were received.

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

There is no payment involved.

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

Information collected is public information and no confidentiality is promised.

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 justification should include the reasons the agency considers the questions necessary, the specific uses to be made of the information, the explanation to given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive nature.

12. Provide estimate of the hour burden of the collection of information.

In FY17, 3,579 applications for dealer's registration certificates were filed. Each applicant could spend up to 45 minutes (.75 hour) completing the application for a total hour burden of 2,684 hours.

At an Administrative Assistant contractor's salary of \$21.16 per hour, we estimate the FY17 annual labor cost to the respondents to be \$56,793.44 (2,684 hours x \$21.16)

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

Annual postage cost to be \$1789.50 (3,579 x \$.50).

14. Provide estimates of annualized cost to the Federal government. Also provide a description of the method used to estimate cost, which 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. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Based on the FY-2010 User Fees, the cost to process an original dealer's certificate is \$11.43 for a total of \$40,907.97 (\$11.43. x 3,579).

15. Explain reasons for changes in burden including the need for any increase.

While, the Registry has determined that applicants for a Dealer's Certificate may find it necessary to gather company or corporate documents to have all needed information present when completing the Application for a Dealer's Certificate, thus increasing the projected time required from 30 minutes (.5 hour) to 45 minutes (.75 hour). The overall burden is down due to less application for temporary registrations. Labor cost inadvertently included in the previous submission, is removed from this submission.

16. For collection of information whose results are planned to be published for statistical use, outline plans for tabulation, statistical analysis, and publication.

No statistical use is made of this information.

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

FAA is not seeking this approval. There would be no reason not to display.

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

There would be no exceptions.