

Supporting Statement A
Advisory Circular (AC): Reporting of Laser Illumination of Aircraft

OMB Control Number: 2120-0698

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

This collection specifically supports the FAA Modernization and Reform Act of 2012 by sharing the information with legal entities (both federal and local) who in turn are able to hold accountable those who knowingly and willingly aim a laser pointer at an aircraft. The collection and dissemination of the information together improve aviation safety and capacity.

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.

Responding to the collection of the information is voluntary and essential to provide a timely method of sharing the information via the Domestic Events Network (DEN). The entities who are encouraged to respond include Pilots and Crewmembers. Daily, pilots and crewmembers report the time, location, color, and description of laser events to be used for record keeping, analysis, and disclosure. Also disclosed are the legal agencies contacted during the process of reporting. The purpose of the collection is to provide statistical awareness, analysis for safety, and in some cases legal prosecution.

The collected information is consolidated into a report and distributed to government addressees to include law enforcement/first responders. The report allows recipients or FAA leadership to use the collection for other purposes or to complete further analysis as their mission dictates. The report is also published on the FAA laser website.

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.

This collection is able to be submitted 100% electronically.

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.

No Duplication exists.

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

This collection will not involve small business or 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.

The consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently would include an inability to educate the general public of the dangers of laser illumination; as well as inability to assist federal and local law enforcement agencies in recommending and applying mitigation actions that would ensure safe and orderly flight operations. It would also severely impact the ability of law enforcement to take immediate action to locate and prosecute the offenders of the FAA Modernization and Reform Act of 2012 and source of unauthorized laser transmission.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

There are no 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 June 28, 2018 (83 FR 30474) 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 payments or gifts are provided to respondents.

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

We are not providing any 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.

There are no questions of a sensitive nature.

Note: see Supporting Information attachment for #12

#12. Total Amount of emails received: 2975 (Public burden)							
	QTY	Type/Time per response		Total Min	Total Hours	Hourly Wage Rate	Labor Cost
Reporting	2895	Long form (.pdf)	10 min	28950	482.5	\$53.49	\$25,808.93
	80	Mobile app	5 min	400	6.7	\$53.49	\$358.38

We estimate that the time required for the submission of the mobile app report to be total of 5 minutes maximum. At an estimated 80 responses per year, the total is 6.7 hours annually.

The estimated hourly burden per year is 91.7 hours for the mobile app.

We estimate that we receive 97.3% .pdf long forms via email at 2895 responses X 10 minutes = 482.5 hours

Mobile app hours = 6.7 hours

Paper questionnaire = 482.5 hour

Total annual hours 489.2 hour

The cost associated with the .pdf long form of the submission, at approximately \$53.49 per hour, times 489.2 hours, is \$26,167.31 per year.

Cost is derived from the 2017 U.S. Department of Labor, Bureau of Labor and Statistics website. Reported annual median pay is \$111, 930. This equates to GS-14 Step 9 pay on Salary Table 2017-GS, effective January 2017. Hourly rate is \$53.49.

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

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.

#14.			Total Min	Total Hours	Hourly Wage Rate	Labor Cost
Record Keeping	2975	15 min	44625	743.75	\$42.96	\$31,951.50
Third Party Disclosure		5 min	14875	247.92	\$42.96	\$10,650.64
Total		20 min	59500	991.67	\$42.96	\$42,602.14

20 minutes x 2975 total emails = 59500 min/60 min = 991.67 hours total

One contractor with annual salary of \$82,495 or \$42.96 (hourly) processes and performs record keeping and third party disclosure.

We estimate that the required time for receipt and finalization of documents to be 15 minutes maximum. Anticipate an average of 2,975 reports per year.

The estimated annualized cost to the Federal Government is \$85,184.45 per year at \$85.92 per hour, times 991.67 hours.

Labor rate x 2 (HHS fringe multiplier) = annual labor burden rate (record keepers)
 $42.96 \times 2 = 85.92$. We multiplied the hourly wage rate by 2 to account for a fringe

benefits rate of 69 percent¹ and an overhead rate of 31 percent.²

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

There has been an increase in the responses received. This could be for several reasons to include: more outreach (public announcements/news reports), education and as a result more participation from pilots in reporting the laser events.

16. For collections of information whose results are planned to 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 report is published on the FAA laser website.

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.

We are not seeking approval.

¹ Source: Congressional Budget Office, “Comparing the Compensation of Federal and Private-Sector Employees, 2011 to 2015” (April 2017), <https://www.cbo.gov/publication/52637>. The wages of Federal workers averaged \$38.30 per hour over the study period, while the benefits averaged \$26.50 per hour, which is a benefits rate of 69 percent.

² Source: U.S. Department of Health and Human Services, “Guidelines for Regulatory Impact Analysis” (2016), https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf. On page 30, HHS states, “As an interim default, while HHS conducts more research, analysts should assume overhead costs (including benefits) are equal to 100 percent of pretax wages....” To isolate the overhead rate, the Department subtracted the benefits rate of 69 percent from the recommended rate of 100 percent.

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.