

INFORMATION COLLECTION SUPPORTING STATEMENT

Maryland Three Airports: Enhanced Security Procedures for Operations at Certain Airports in the Washington, DC, Metropolitan Area Flight Restricted Zone

OMB No. 1652-0029

OMB Expiration Date: 11/30/2018

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information. (Annotate the CFR parts/sections affected).**

Pursuant to 49 U.S.C. 114 and 49 CFR part 1562, TSA requires security measures to protect important national assets in the Washington, DC area and apply to flight operations at the Maryland Three (MD-3) airports (College Park Airport (CGS), Potomac Airfield (VKX), and Washington Executive/Hyde Field (W32)). TSA requires all individuals who operate an aircraft to or from these airports or who serve as an airport security coordinator to submit personal information and fingerprints to TSA for a security threat assessment. TSA's "Maryland Three" regulations were promulgated to permit flight operations that had been prohibited at these airports immediately after the terrorist attacks on September 11, 2001, and to enhance security of critical infrastructure and Federal government assets in the Washington, DC metropolitan area.

- 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.**

TSA requires aircraft operators to complete TSA Form No. 418 MD-3 Personal Identification Number (PIN) Application to operate to or from the Maryland Three airports or to serve as an airport security coordinator at one of these three airports. TSA is revising the collection by providing an electronic option for the submission of the FAA Flight Standards District Offices (FSDO) vetting information and for final approval of the application. TSA collects the following information:

- Personal information from applicants: full name; social security number (last 4 digits only); address; telephone number; date of birth; valid FAA airman or student pilot certificate number and medical certificate; and fingerprints. Applicants must also submit a list of the aircraft make, model, and FAA registration number of each aircraft the applicant intends to operate to or from one or more of the MD-3 airports.
- The applicant must submit this information either to the MD-3 airport from which the applicant wishes to fly, or directly to TSA via email to mdthree@tsa.dhs.gov. The TSA Form 418 is now being made available upon request to mdthree@tsa.dhs.gov. TSA has streamlined the application process where by all the steps are met but not all require an in person meeting.
- For collection of fingerprints, applicants may go to Metropolitan Washington Airports Authority at Ronald Reagan Washington National Airport, any participating local law enforcement agency, or a participating local airport badging office. Applicants must submit their TSA Form 418, FAA airmen certificate, State-issued identification or

passport, FAA-issued medical certification and their certificate of completion of the FAA's DC Special Flight Rules Area (SFRA) training to mdthree@tsa.dhs.gov, so that TSA can verify the applicant's airman certificates and determine if there is any FAA record of violation of certain FAA regulations. Applicants no longer need to go in person to one of two FAA FSDO to submit the documentation. They may submit by email.

- After the applicant is satisfactorily vetted, TSA will issue a PIN that enables the applicant to fly to or from the Maryland Three airports.

- 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, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden. [Effective 03/22/01, your response must SPECIFICALLY reference the Government Paperwork Elimination Act (GPEA), which addresses electronic filing and recordkeeping, and what you are doing to adhere to it. You must explain how you will provide a fully electronic reporting option by October 2003, or an explanation of why this is not practicable.]**

Because the collection involves fingerprints, the information and fingerprints are collected manually at various locations. After fingerprints are taken at Ronald Reagan Washington National Airport, a participating law enforcement agency, or participating airport badging office, the fingerprints are entered into an electronic database, which facilitates transmission of the information to TSA. Also, applicants can electronically submit their TSA Form 418, FAA airman certificate, State-issued identification or passport, FAA-issued medical certification, and their certificate of completion of the FAA's DC SFRA training to mdthree@tsa.dhs.gov.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose(s) described in Item 2 above.**

TSA is unaware of other sources for this information.

- 5. If the collection of information has a significant impact on a substantial number of small businesses or other small entities (Item 5 of the Paperwork Reduction Act submission form), describe the methods used to minimize burden.**

The general aviation airports covered by these regulations could be considered small businesses. This information collection affects the MD-3 airports, but the information collected is tailored to the information needed to conduct security threat assessments and protect the airspace of the Washington, DC, Metropolitan Area Flight Restricted Zone (FRZ). Thus, TSA believes this collection does not have a significant impact on a substantial number of small businesses. These regulations allow continued operation at the MD-3 airports located within the Washington DC FRZ.

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.***

Collecting this information is an integral part of ensuring that aircraft operator pilots who fly to or from the MD-3 airports and airport employees who serve as airport security coordinators at these airports are properly vetted, and to ensure protection of vital assets in the National Capital Region.

7. ***Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5(d)(2).***

The report of information to the agency may be collected in a manner different than the general information collection guidelines in 5 CFR 1320.5(d)(2)(ii). There is a continuing obligation on MD-3 pilots and security coordinator to notify TSA within 24 hours of a conviction or finding of not guilty by reason of insanity of certain crimes specified in TSA regulations specified in 49 CFR parts 1542 and 1572, or certain violations of FAA regulations specified in 49 CFR 1562(e)(5).

8. ***Describe efforts to consult 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. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d) soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.***

As required by 5 CFR 1320.8(d), TSA published a 60-day notice soliciting comments in the *Federal Register* on March 9, 2018 (83 FR 10510), and a 30-day notice on June 19, 2018 (83 FR 28442). Consistent with the requirements of Executive Order (E.O.) 13771, Reducing Regulation and Controlling Regulatory Costs, and E.O. 13777, Enforcing the Regulatory Reform Agenda, the notices included a specific request for comments on the extent to which this request for information could be modified to reduce the burden on respondents. No comments were submitted to TSA in response to the notices.

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

TSA does not provide any gifts or payments to respondents.

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

TSA does not provide any assurances of confidentiality. However, all information will be collected in accordance with the Privacy Act of 1974. The applicable system of records notice (SORN) for this collection is DHS/TSA-002, Transportation Security Threat Assessment System, last published in the *Federal Register* on August 11, 2014. See 79 FR

46862. Also, a privacy impact assessment (PIA), entitled DHS/TSA/PIA-022, MD-3 Airports, was published on February 20, 2009, on www.dhs.gov.

11. Provide additional justification for any questions of sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

TSA does not ask questions of a sensitive nature.

12. Provide estimates of hours burden and hour costs of the collection of information.

TSA estimates a total of 369 annual applicants who will incur a total annual hour burden of 2,859.75 hours. The total three-year time burden for this collection is 8,579.25 hours.

Estimated Public Hour Burden:

Public (Per Individual PIN Application)	Time (Hours)
Read program directions become/familiar with process	0.5
Travel time to/from the Maryland Three airport to initiate process	2.0
Fill out required forms	0.25
Travel time for fingerprinting (Fingerprinting can be done at Ronald Reagan Washington National Airport or participating local law enforcement agency or participating local airport badging office.)	4.0
Fingerprinting process	0.5
View security video at Maryland Three airport	0.5
Total	7.75

Note: All PIN applicants must go to one of the MD-3 airports to initiate process, and all fingerprinting is done at Ronald Reagan Washington National Airport, a participating law enforcement agency, or a participating airport badging office.

The estimated public burden is **2,859.75** hours annually, (369 annual applicants x 7.75 hours). The time for each step of the process is described in detail in the table above.

Estimated Public Hour Burden Cost:

The annual cost burden for 369 applicants is **\$179,003** and the total three-year time burden for this collection is **\$537,009**. The time burden and the fully loaded wage rate for a commercial pilot are used to estimate the total annual cost burden to respondents resulting from the collection of information. The wage rate for a commercial pilot is estimated from the May 2016 Bureau of Labor Statistics mean annual wage of \$86,380 for commercial pilots on nonscheduled air carrier routes or helicopters.¹ TSA divided the annual mean wage by

¹ Bureau of Labor Statistics (BLS). May 2016 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 481200 - Nonscheduled Air Transportation. Occupation Code 53-2012 Commercial Pilots. Last Modified March 31, 2017. Accessed January 12, 2018. https://www.bls.gov/oes/2016/May/naics4_481200.htm#53-0000. Ratio of Total Compensation and Wages and Salaries. BLS. Employer Costs for Employee Compensation News Release. Table 5 - Employer costs per hour worked for employee compensation and costs as a percent of total

2,080 hours to calculate an hourly wage rate of \$41.53. TSA uses a compensation factor of 1.5072² to account for benefits. TSA multiplied the mean hourly wage rate by the compensation factor to estimate a fully loaded wage rate of \$62.59.³ This is multiplied by the time burden to estimate the total annual burden per applicant and for all applicants. The details of the total annual cost burden to respondents are shown in the table below.

Description of Process	Fully Loaded Wage Rate A	Time Burden (hours) B	Annual Cost Burden Resulting from Collection of Information C = (A*B)
Read program directions/familiarize self with the process	\$62.59	0.5	\$31.30
Travel time to/from the Maryland-3 airport to initiate process		2.0	\$125.19
Fill out required forms		0.25	\$15.65
Travel to time for fingerprinting (Fingerprinting can be done at Ronald Reagan Washington National Airport or participating local law enforcement agency or participating local airport badging office.)		4.0	\$250.38
Fingerprinting process		0.5	\$31.30
View security video at Maryland-3 airport		0.5	\$31.30
Total cost burden per individual		\$62.59	7.75 hours
Total annual cost burden for 369 applicants			\$179,002.85

Note: Calculations may not be exact in tables due to rounded numbers.

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

There are no annualized capital or start-up costs for respondents due to this collection.

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, and other expenses that would not have been incurred without this collection of information.

The annual cost estimate to Federal Government agencies is **\$45,006**.

compensation: private industry workers, by major occupational group and bargaining unit status, September 2017. Production, transportation, and material moving. Released December 15, 2017. Accessed January 12, 2018. https://www.bls.gov/news.release/archives/ecec_12152017.htm

² Ratio of Total Compensation and Wages and Salaries, 1.507238606 = 28.11÷18.65. BLS. Employer Costs for Employee Compensation News Release. Table 5 - Employer costs per hour worked for employee compensation and costs as a percent of total compensation: private industry workers, by major occupational group and bargaining unit status, September 2017. Production, transportation, and material moving. Released December 15, 2017. Accessed January 12, 2018. https://www.bls.gov/news.release/archives/ecec_12152017.htm

³ \$62.5938802 = \$41.5288462 x 1.5072386.

The estimated government time burden is 772 hours annually, as described in the table below. The three-year hour burden to the Government is 2,317.

Government Time Burden	Time Estimate Per Applicant	Total Hours
TSA Inspector - for 12 inspections per year	13 hours	156.00
TSA Program Manager	0.97 hours	357.93
Technician conducting background checks	0.2 hours	73.80
Metropolitan Washington Airports Authority: Fingerprinting technician at Reagan National Airport	0.25 hours	92.25
Flight Standards District Office official who conducts FAA records checks on applicants	0.25 hours	92.25
Total Annual Time Burden to the Government for all 312 applicants		772.23

The annual cost estimate to the Federal Government is **\$45,006** and the three-year cost is **\$135,017**. The annual cost estimate to the Federal Government is determined by multiplying the time estimate by the average hourly wage rate of the applicable government employees as noted in the table below. The TSA Inspector, TSA Program Manager, and Flight Standards Official fully loaded wage rates are those of an I Band employee while the wage rates for the Technicians are proxied using a G Band employee wage.⁴ In addition to the hour burden cost to TSA, a TSA Inspector drives approximately 40 miles round-trip to conduct 12 inspections. TSA Inspectors are reimbursed for their travel at a rate of \$0.545 per mile.⁵ TSA has an annual Inspector travel reimbursement cost of \$262.

Government Burden	Total Hours (Annually, for all 312 applicants)	Average Hourly Wage Rate	Total Annual Burden
TSA Inspector - for 12 inspections per year	156	\$63.30	\$9,875.40
TSA Inspector - mileage expense for travel to inspections (\$.545/mi. x 40 miles x 12 inspections/yr)	NA	NA	\$261.60
TSA Program Manager	357.93	\$63.30	\$22,658.35
Technician conducting background checks	73.80	\$38.37	\$2,831.39
Flight Standards District Office official who conducts FAA records checks on	92.25	\$63.30	\$5,839.78

⁴ The Modular cost data include benefit components so these wage rates are fully-loaded wage rates. The annual salary for a G-Band employee is \$80,069.19 and the annual salary of an I-Band employee is \$132,115.17. TSA calculates hourly wage rates by dividing the annual salary by 2,087 hours. OPM changed the 2,080 work hours for federal employees to 2,087 by amending 5 U.S.C. 5504(b), the latter is assumed to capture year-to-year fluctuations in work hours. Source: Consolidated Omnibus Budget Reconciliation Act of 1985 (Pub. Law 99-272, 100 Stat. 82, April 7, 1986).

The hourly wage rate for a G-Band is then \$38.37 ($\$80,069.19 \div 2087$) and the hourly wage rate for an I-Band is then \$63.30 ($\$132,115.17 \div 2087$). TSA, Office of Finance, Modular Cost Data.

⁵ This is the GSA mileage rate for privately owned vehicles, effective January 1, 2018.

<https://www.gsa.gov/travel/plan-book/transportation-airfare-rates-pov-rates-etc/privately-owned-vehicle-pov-mileage-reimbursement-rates>.

Government Burden	Total Hours (Annually, for all 312 applicants)	Average Hourly Wage Rate	Total Annual Burden
applicants			
Metropolitan Washington Airports Authority: Fingerprinting technician at Ronald Reagan Washington National Airport	92.25	\$38.37	\$3,539.23
Total Annual Burden for Government	772.23		\$45,005.76

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

TSA now allows for the electronic submission of certain information from applicants, including: application, FAA Medical Certificate, FAA Airman Certificate (Pilot), DC Special Flight Rules Area (SFRA) Training Certificate, and a Government Issued Photo I.D. As a result, applicants no longer are required to travel round-trip to an FAA Flight Standards District Office (FSDO). This change has resulted in a decrease of an average of six hours travel time per applicant. TSA has submitted this collection as a Deregulatory Action.

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.

The results of the information will be not be published by TSA.

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.

TSA is not seeking such approval.

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

No exceptions are requested.