

## SUPPORTING STATEMENT A

OMB 2120-0007

### **Flight Engineers and Flight Navigators**

#### **Justification**

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

This information collection directly supports the Department of Transportation's strategic goal on Safety. Specifically, the goal is to promote the public health and safety by working toward the elimination of transportation-related deaths, injuries, and property damage.

The information collection is necessary to determine applicant eligibility for flight engineer or flight navigator certificates, as well as to determine training course acceptability for those schools training flight engineers or navigators.

49 USC 44702(a) empowers the secretary to issue airman certificates to properly qualified persons. This clearance request covers the burden imposed on persons applying for certificates that will authorize them to perform the duties of flight engineers and flight navigators.

49 USC 44707(1) empowers the Secretary to provide for the examination and rating of civilian schools that give instruction in flying. The clearance request also covers the burden imposed on persons applying for approval of flight engineer and flight navigator training courses.

49 USC 44702(a)(2) requires the application for certificates under this act shall be in such a form, contain such information, and be filed as the Administrator may prescribe.

Federal Aviation Regulation Part 63-Certification: Flight Crewmembers other than Pilot (14 CFR 63) prescribes requirements for certification of flight engineers and flight navigators. Part 63 also prescribes requirements for training courses for these two categories of airmen.

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

Flight engineers and flight navigators seeking to receive or maintain certification and flight schools seeking approval of related training courses are mandated to report to this collection. Certificates are effective until surrendered, suspended, or revoked. There are 7 schools that annually train an average of 4 flight engineers each. These schools are required to have their proposed training courses approved by FAA before they can be implemented, and course approval must be renewed every 24 months thereafter.

Training course operators are also required to keep accurate records of students training activities, and to make annual reports to FAA about the activities.

FAA Form 8400.3, Application for an Airman Certificate and/or Rating, (for flight engineer and flight navigator applicants) and applications for approval of related training courses are submitted to FAA for evaluation. The submission of this information to the FAA is mandatory, occurs on occasion and is considered reporting and record keeping. The information is reviewed by FAA personnel to determine applicant eligibility and compliance with prescribed provisions

of FAR Part 63, Certification: Flight Crewmembers Other Than Pilots. Form 8400-3 is multiple-use form also used for control tower operators and aircraft dispatchers.

**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.**

Some progress has been made to collect the information on FAA Form 8400-3 through automated means (the Federal Office Modernization Program). No discernible technical or legal obstacles are anticipated, and we are working to reach compliance with the criteria of the Government Paperwork Elimination Act. However, other information collections with a much higher number of respondents remain a much higher priority. The 8400-3 Form is available electronically at: <https://www.faa.gov/forms/index.cfm/go/document.information/documentID/1019810>. We have not yet accomplished the automation in full. Currently roughly 2% of the information gathered can be submitted electronically.

**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 2 above.**

The use of Form 8400-3 is an effort to avoid duplication by consolidating on one form, Flight Navigator, Aircraft Dispatcher and Control Tower Operator applicants for certification. Previous separate forms are no longer in use.

The information collected is only available from the applicants applying for certification or for training course approval and not from any other source.

**5. If the collection of information has a significant impact on a substantial number of small businesses or other small entities (item 5 of OMB Form 83-I), describe the methods used to minimize burden.**

The collection of this information does not involve small businesses. In any case, we believe there is minimum burden to all concerned.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

Frequency of collection is determined by the applicant requesting the benefit of certification or approval under FAR 63. An applicant that does not complete FAA Form 8400-3 will not obtain certification.

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

This collection of information is conducted in a manner consistent with the guidelines in CFR 1320.5(d)(2)(i)-(viii). There are no special circumstances.

**8. 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.

**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 the data elements to be recorded, disclosed, or reported.**

A Notice for public comment was published in the Federal Register on July 23, 2018(83 FR 34910). 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 or gift to respondents.

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

Applicants are provided confidentiality under the provision of the Privacy Act and the Privacy system of records DOT/FAA 847, General Air Transportation Records on Individuals.

**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 why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be 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 estimates of the hour burden for the collection of information.**

The hour burden to all respondents is 268.1 and the cost burden is \$27,365.08 The estimated cost for the respondents is approximately \$102.07<sup>1</sup>.00 per hour<sup>2</sup> (fully loaded wages including fringe and overhead).. The specific reporting and recordkeeping requirements covered by this request are as follows:

**Section 63.3, Certificates and ratings required**, states that no person may act as a flight engineer or a flight navigator of a civil aircraft of U.S. registry unless that person has in his personal possession a current flight engineer or flight navigator certificate.

**Section 63.11, Application and Issue**, states that applications for flight engineer and flight navigator certificates with appropriate class rating are to be made in a form and manner prescribed by the Administrator. Persons applying for these certificates must submit FAA Form 8400-3.

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<sup>1</sup> BLS Occupation Code 53-2010, [www.bls.gov](http://www.bls.gov)

<sup>2</sup> Bureau of Labor Statistics, Employer Costs for Employee Compensation – September 2018, USDL-18-1941, Released December 14, 2018

We estimate 34 new annual applications for certificate including appropriate class ratings.

Estimated new applications	34
Estimated burden of time (.2 hour each)	<u>X .2</u>
(total time)	6.8 hrs
Estimated cost for technical time	<u>x\$102.07</u>
	\$694.08

**Section 63.23 - Special Purpose Flight Engineer, Flight Navigator Certificates**, states that the holder of a current foreign flight engineer or flight navigator certificate, license, or authorization issued by a foreign contracting state to the ICAO, who meets the requirements of this section, may hold a special purpose flight engineer or flight navigator certificate, as appropriate, authorizing the holder to perform flight engineer or flight navigator duties on a civil airplane of U.S. registry, leased to a person not a citizen of the U.S. carrying persons or property for compensation or hire.

We estimate 4 annual applications for flight engineer certificates.

Estimated annual applications	4
Estimated burden of time (.2 hour each)	<u>x.2</u>
(total time)	.8 hrs.
Total time	.8 hrs
Estimated cost for technical time	<u>x\$102.07</u>
	\$81.65

**Section 63.33, Aircraft Ratings**, states that additional aircraft class ratings may be issued to eligible flight engineers after their original certificates and class rating have been issued. Applicants for additional class ratings must submit FAA Form 8400-3.

We estimate 4 annual applications for additional aircraft class ratings.

Estimated number annual applications	4
Estimated burden of time (.2 hour each)	<u>x.2</u>
	.8 hrs
3	
Total time	.8hrs
Estimated cost for technical time	<u>x\$102.07</u>
	\$81.65

**Section 63.42 - Flight Engineer Certificate Issued on Basis of Foreign Flight Engineer License**, requires the holder of a current foreign flight engineer license issued by a contracting state to the ICAO, who meets the requirement of this section, may have a flight engineer certificate issued to him for the operation of civil aircraft of U.S. Registry.

We estimate 4 annual applications for certificates.

Estimated number annual applications	4
Estimated burden of time (.2 hour each)	<u>x.2</u>
	0.8 hrs.

Total time	0.8 hrs.
Estimated cost for technical time	<del>x\$102.07</del>
	\$81.65

**Section 63.43, Flight Engineer Courses**, requires an applicant for approval of a new training course to submit a letter requesting approval of each proposed course. An applicant must also submit an outline for each course description of the facilities and equipment to be used, and a list of the instructors and their qualifications. Approval of a course is effective for 24 months.

We estimate no annual requests for a new flight engineer course.

COST = \$0

**Section 63.61, Flight Navigator Courses**, requires an applicant for approval of a new training course to submit a letter to FAA requesting approval of each proposed course. An applicant must also submit an outline for each course, a description of the facilities and equipment to be used, and a list of the instructions and their qualifications. Approval of a course is effective for 24 months.

We estimate no annual requests for approval of a new flight navigator course.

COST = \$0

**Appendix C(e), Revisions**, states that the flight engineer course operators may apply for revisions to their approved course outlines, their facilities or their equipment. Each of the 7 flight engineer schools has an average of 2 approved courses (with an average of 1 course revision annually).

Estimated number of course revisions annually	7
Burden of time is 10 hrs per revision	<del>x10</del>
	70 hrs

Total time	70 hrs
Estimated cost for technical time	<del>x\$102.07</del>
	\$7,145

**Appendix C(f), Ground School Credits**, states that training course operators may grant credit to students for any comparable previous flight engineer training or experience that is provable. The hours credited shall be incorporated as part of the student's training records.

We estimated 25 students will annually have credit allowances entered into their records.

Estimated number of record entries	25
Estimated burden of time (.5 hour each)	<del>x.5</del>
	12.5 hrs

Total time	12.5 hrs.
Estimated cost for technical time	<del>x\$102.07</del>
	\$1,275.88

**Appendix C(g), Records and Reports**, requires that flight engineer course operators must keep a record of each student's training activities and make an annual report to FAA about students that graduate, fail, or drop out. Each of the 7 flight engineer schools will annually train an average of 4 students.

We estimated that each course operator will spend an annual average of .5 hours keeping records for each student.

It is estimated that each course operator will spend an average of 20 hours preparing an annual report to the FAA.

Estimated training activity records (7 x 4)	28
Estimated burden of time (.5 hours)	<u>.5</u>
	14 hrs
Estimated cost for technical time	<u>x\$102.07</u>
	\$1,428.98

Estimated number of annual reports	7
Estimated burden of time (20 hours)	x <u>20</u>
	140 hrs
Estimated cost for technical time	x <u>\$102.07</u>
	\$14,289.80

TOTAL ESTIMATED HOURS	14 + 140 = 154
TOTAL ESTIMATED COST	\$1,428.98+ \$14,289.80 = \$15,718.78

**Appendix C(m), Cancellation of Approval, Item (2)**, says that flight engineer course operators may cancel an approved course by submitting a written notice.

We estimate that 2 training course will be canceled annually.

Number of canceled courses annually	2
Estimated burden of time (.7 hour each)	<u>X .7</u>
(total time)	1.4 hrs.

Total time	1.4 hrs.
Estimated cost for technical time (@\$77.50 an hour)	<u>x\$102.07</u>
	\$142.90

**Appendix C(o), Renewal, Item (2)**, states that application for renewal of approval for flight engineer courses may be made to FAA at any time within 60 days before the termination date approval. Approval of each course must be renewed every 24 months. Each of the 7 flight engineer schools has an average of 2 approved courses.

We estimate that each of the 7 flight engineer schools will renew approval on 1 course annually.

Estimated number of renewals annually	7
Estimated burden of time (3 hours each)	<u>x3</u>
	21 hrs

Total time	21 hrs
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Estimated cost for technical time  $\times \$102.07$   
 \$2,143.47

**SUMMARY OF BURDEN**

<u>Section</u>	<u>Hours per Year</u>	<u>Cost Per Year</u>
§63.11	6.8	\$ 694.08
§63.23	.8	\$ 81.65
§63.33	.8	\$ 81.65
§63.42	.8	\$ 81.65
§63.43	0	0
§63.61	0	0
Appendix C(e)	70	\$ 7,145
Appendix C(f)	12.5	\$ 1,275.88
Appendix C(g)	154	\$15,718.78
Appendix C(m)	1.4	\$ 142.90
Appendix C(o)	<u>21</u>	<u>\$ 2,143.47</u>
<b>TOTAL =</b>	<b>268.1 hrs. and</b>	<b>\$27,365.08 per yr.</b>

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

There are no additional costs not already included in question 12.

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

The cost to the federal government is estimated to be **\$1,175.72**. That figure was determined, based on an FG-12 median salary and 30% benefits cost (34/hr + \$10.2 = \$44.20) as follows:

New applications for certificate and rating	34
Estimated cost to process 1 application at \$44.20 an hour (.7 hr per app.)	<u>x \$30.94</u>
	\$1,051.96
Applications for additional aircraft class rating	4
Estimated cost to process 1 application at \$44.20 an hour (.7 hr per application)	<u>x \$30.94</u>
	\$123.76
<b>TOTAL</b>	<b>\$1,175.72</b>

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

In sections 63.11 and 63.23 the time per application changed from .1 in the previous submission to .2 in this submission. This was an error in the previously approved collection. The text noted .2, but the calculations indicated .1. The math error was corrected in this renewal.

The labor cost for this submission is based on an hourly rate of 77.50 in the previous submission the rate used was 32.00. This was an error in the previously approved collection. Many of the tasks would require flight engineer technical expertise. The job classification was corrected in this renewal to reflect the necessary technical skills.

The agency has separated collection activity into appropriate information collections, there has not been additional forms or applications added. Rounding of the individual ICs resulted in a 5 hour burden increase.

**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.**

There is no plan for publication.

**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.**

FAA is not seeking this approval.

**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.