

Supporting Statement

Disclosure of Seat Dimensions to Facilitate the Use of Child Safety Seats on Airplanes During Passenger-Carrying Operations

OMB Control No. 2120-0760

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

Section 412 of the FAA Modernization and Reform Act of 2012 (Public Law 112-95) specifically required the Federal Aviation Administration (FAA) to conduct rulemaking, “[T]o require each air carrier operating under part 121 of title 14, Code of Federal Regulations, to post on the Internet Web site of the air carrier the maximum dimensions of a child safety seat that can be used on each aircraft operated by the air carrier to enable passengers to determine which child safety seats can be used on those aircraft.” As a result, the FAA amended 14 CFR § 121.311, which requires passenger carrying air carriers to make available on their Web sites the width of the narrowest and widest passenger seats in each class of service for each make, model, and series of airplane used in passenger-carrying operations (80 FR 58575). This amended rule necessitates this collection of information, and specifically, this information collection renewal.

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.

Passenger carrying air carriers are mandated to comply with this regulation and, thus, this information collection, which requires passenger carrying air carriers to make available on their Web sites the width of the narrowest and widest passenger seats in each class of service for each make, model, and series of airplane used in passenger-carrying operations. This information helps to facilitate the use of child restraint systems (CRS) onboard airplanes by providing greater information to caregivers to help them determine whether a particular CRS will fit in an airplane

seat. Affected air carriers initially provided information on their Web sites in order to comply with the regulation. After initial implementation, the only times air carriers need to update their Web sites are on occasion that a new airplane make, model, or series is introduced to its fleet, or when the narrowest or widest seat in a class of service in a currently listed make, model, or series of airplane is replaced with a narrower or wider seat. Failure to update a Web site when an air carrier adds a new aircraft make, model, or series to its fleet or replaces an existing aircraft's seats with a different model would result in non-compliance with the regulatory information disclosure requirements. Failure to review the accuracy of the information on an annual basis could result in the air carrier's display of incorrect seat dimension information.

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.

Section 412 of Public Law 112-95 requires that all air carriers provide this required information on their Internet Web sites. Therefore, this information collection is 100% electronic.

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.

FAA is the only Federal agency that requires this information to be provided to the public. This information disclosure is a result of a mandate in Public Law 112-95 for the FAA to conduct rulemaking. The FAA has also reviewed other FAA information disclosure requirements and has found no duplication. Therefore, this information collection renewal does not duplicate any other requirements.

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

The Small Business Administration small entity size standard for air carriers is 1,500 employees or less. Of the 44 part 121 air carriers to whom this information collection initially applied, 29 were classified as large entities and 15 as small entities.

As stated in the Regulatory Flexibility Act analysis for the final rule that authorized this information collection, the head of the FAA expects that the recordkeeping requirements of this information collection to not result in a significant economic impact on a substantial number of 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 vast majority of this burden occurred on a one-time basis as air carriers initially provided information on their Web sites in order to comply with the regulation. After initial implementation, the only time air carriers need to update their Web sites is when a new airplane make, model, or series is introduced to its fleet, or when the narrowest or widest seat in a class of service in a currently listed make, model, or series of airplane is replaced with a narrower or wider seat. Failure to update a Web site when an air carrier adds a new aircraft make, model, or series to its fleet or replaces an existing aircraft's seats with a different model would result in non-compliance with the regulatory information disclosure requirements. Failure to review the accuracy of the information on an annual basis could result in the air carrier's display of incorrect seat dimension information.

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

There are no special circumstances associated with this information collection.

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.

This collection renewal was included in two notices and requests for comments (83 FR 35308, July 25, 2018; 83 FR 48683, September 26, 2018). The agency received no comments about either of these collection requests.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

No payments or gifts were provided to respondents.

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

No assurances of confidentiality are provided in this information collection.

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.

Questions of a sensitive nature are not included in this information collection.

12. Provide estimates of the hour burden of the collection of information. The statement should:

This collection requires Part 121 passenger air carriers to post seat dimension information to their Web sites. The labor required to comply with this collection is for the collection of

information, thus the labor hours estimated for the regulatory evaluation equates to the paperwork hour burden. To estimate labor hours, the FAA used assumptions for job skills and labor hours from the regulatory analysis¹ of the DOT's "Enhancing Airline Passenger Protections"² rule. One provision of the DOT's rule requires an air carrier to post on its Web site a tarmac delay plan and a customer commitment plan, and the FAA believes that the skills and labor hours estimated for this task are similar to those required to post information about seat dimensions. In the DOT rule, it was estimated that it would take a computer programmer and a supervisor/manager a combined total of eight hours to post the customer commitment plan and tarmac delay plan to an air carrier's Web site. The FAA is using the DOT estimate of eight hours as the foundation for the time required to perform the work required to comply initially with the seat dimension disclosure collection.

In its initial collection, the FAA identified 58 air carriers affected by this collection. To show a range of costs for the 58 air carriers affected by this collection, the FAA first estimated a low and high case of hours worked by staff (database and systems administrators) and management.³ The estimated hours consist of two components: base hours and variable hours. The base hour component is applicable to both staff and management. For staff, base hours represent the time it takes to identify the tasks required to post seat dimension disclosure information to an air carrier's Web site. For management, base hours represent the time expended verifying that Web sites are in compliance with this collection. Base hours are assumed to be equal across all air carriers. For this renewal, the number of respondents impacted in the original collection is reduced from 58 to 44. The reduced number of respondents is due to mergers and acquisitions in the industry, which resulted in a lower aggregate number of part 121 air carriers with Web sites. Additionally, at this point, Year 1 costs are purely historical; Year 2-4 costs estimates are those under consideration. The hour burden and the cost burden for the respondents is 616 hours and \$100,266. Labor is the only cost associated with the collection of information. Summed across all carriers, a total of 220 hours in the low case and 396 hours in

¹ Final Regulatory Analysis, Consumer Rulemaking: Enhancing Airline Passenger Protections II at p. 43. This document can be found in Docket No. DOT-OST-2010-0140 or at <http://www.regulations.gov/#!documentDetail;D=DOT-OST-2010-0140-2046>.

² 76 FR 23110, April 25, 2011.

³ To estimate costs for this collection, labor hours are composed of staff hours and management hours. Staff hours are assumed to be performed by BLS Job Series 15-1140 - Database and Systems Administrators and Network Architects. Management hours are performed by BLS Job Series 15-3021 - Computer and Information Systems Managers.

the high case will be required to comply with paperwork burden in years 2, 3, and 4. Summed across all carriers, a total of \$36,912 in the low case and \$63,354 in the high case will be required to comply with paperwork burden in years 2, 3, and 4.

In its initial collection, the FAA identified one passenger carrying air carrier that does not have a Web site. That air carrier is still operating, and it still does not have a Web site. Should that air carrier create a Web site, which is required to contain the information required by this collection, those costs would be similar to the costs required for a new entrant carrier to comply with the regulation. New entrant carriers would have to comply with this regulation in the normal course of business as they go through initial certification if they have a Web site, instead of having to respond retroactively to the regulation.

The variable hour component is only applicable to the staff labor group. It accounts for the incremental labor required to make Web sites compliant to this collection for air carriers operating a fleet of multiple aircraft makes, models, and series, versus those that may operate only one make, model, and series of aircraft. Thus, the variable hour component increases for each make, model, and series of aircraft operated by an individual carrier. Total paperwork costs of this collection for initial compliance are calculated by multiplying the hours expended for each of the labor groups by their respective hourly compensation, which are then summed across all carriers.

DERIVATION OF PAPERWORK HOUR BURDEN ESTIMATE – INITIAL IMPLEMENTATION

Tables 1, 2, and 3 are provided to show derivation of labor hours on an individual carrier basis during the first year (initial implementation). A brief description of each table follows:

Table 1: This table shows the assumptions for staff and management hours that are used to calculate total labor hours required for an individual air carrier to initially comply with the seat dimension disclosure rule. (Again, the labor hours required to bring an air carrier's Web site into compliance represents the paperwork burden). Assumptions for estimating labor hours are provided for both the low and high case.

Table 1
Year 1
Assumptions for Paperwork Hours Required
for an Air Carrier to Comply with Seat Dimension Disclosure Rule

Low Case			High Case		
Staff Hours		Management Hours	Staff Hours		Management Hours
Base	Variable		Base	Variable	
8	1	2	16	same as low case	

Table 2: Table 2 shows the low case estimate for paperwork burden hours based upon each carrier’s count of make, model, and series of aircraft in its fleet. The estimate is derived using the assumptions in Table 1. Table 2 provides the paperwork hour burden for a carrier with a count of up to 14 different make, model, and series of aircraft (the most of any carrier at the time of the final rulemaking and the most of any carrier when this collection was renewed).

Table 2
Year 1 - Low Case
Estimate of Paperwork Hours Required for an Air Carrier to Comply with the
Seat Dimension Disclosure Rule*

Count of Aircraft by Make, Model and Series	Staff Hours		Management Hours	Total Hours
	Base	Variable		
1	8	1	2	11
2	8	2	2	12
3	8	3	2	13
4	8	4	2	14
5	8	5	2	15
6	8	6	2	16
7	8	7	2	17
8	8	8	2	18
9	8	9	2	19
10	8	10	2	20
11	8	11	2	21
12	8	12	2	22
13	8	13	2	23
14	8	14	2	24

*Staff variable hours and management hours do not vary between the low and high case.

Table 3: Table 3 is similar to Table 2 except that it reflects the labor hour assumptions for the high case.

Table 3
Year 1 - High Case
Estimate of Paperwork Hours Required for an Air Carrier to Comply with the
Seat Dimension Disclosure Rule*

Count of Aircraft by Make, Model and Series	Staff Hours		Management Hours	Total Hours
	Base	Variable		
1	16	1	2	19
2	16	2	2	20
3	16	3	2	21
4	16	4	2	22
5	16	5	2	23
6	16	6	2	24
7	16	7	2	25
8	16	8	2	26
9	16	9	2	27
10	16	10	2	28
11	16	11	2	29
12	16	12	2	30
13	16	13	2	31
14	16	14	2	32

*Staff variable hours and management hours do not vary between the low and high case.

Example: Paperwork Hour Burden Computation for an Individual Air Carrier:

For illustrative purposes, the initial implementation computation of the paperwork hour burden for a single carrier operating seven different make, model, and series of aircraft in its fleet is provided for the low case. Looking at Table 2, a carrier operating a fleet of 7 different make, model, and series of aircraft requires 17 hours to initially comply with the collection. The equation used to calculate the 17 labor hours is below:

$$[8 \text{ staff base hrs} + (7 \text{ make/model/series} * 1.0 \text{ staff variable hrs}) + 2 \text{ mgmt hrs}] = 17 \text{ hrs}$$

Paperwork Burden Hours -- Summed Across All Carriers:

Tables 4, 5, and 6 are provided to show the summation of total hours across all air carriers to initially comply with the seat dimension disclosure collection. A description of each of these tables follows:

Table 4: Table 4 is a matrix showing the classification of the 44 affected Web sites by the following criteria:

- 1) The count of make, model, and series of aircraft in an individual carrier’s fleet.
- 2) Whether the air carrier primarily performs scheduled or nonscheduled operations (Note: This attribute is required only for the purpose of calculating costs and does not have a bearing on the computation of labor hours).

Table 4
Count of Aircraft Make, Model, and Series
In an Air Carrier’s Fleet*

# of Aircraft Make, Model, and Series in a Carrier’s Fleet	Carrier Type		Total
	Scheduled	Non-Scheduled	
1	5	9	14
2	8	3	11
3	5	1	6
4	3	1	4
5	3		3
6		1	1
7			
8	2		2
9	1		1
10			
11			
12			

13			
14	2		2
Total Web sites	29	15	44

*Shaded cells indicate that no carriers with the attributes described existed at the time of the calculations.

How to read this table: The last cell of each row identifies the number of air carriers with a fleet consisting of the number of make, model, and series of aircraft indicated by the first cell of the same row. For example, six air carriers operate a fleet consisting of three different make, model, and series of aircraft. Of the six carriers, five are scheduled and one is nonscheduled.

Table 5: Table 5 is derived by multiplying the labor hours from Table 2 by the corresponding cell values of Table 4 on a row-by-row basis. It is necessary to calculate hours for scheduled carriers independently of nonscheduled carriers since labor costs vary between the two.

Table 5
Estimate of Total Paperwork Hours for Affected Carriers
By Count of Aircraft Make, Model, and Series in an Individual Air Carrier's Fleet
Year 1-Low Case

# of Aircraft Make, Model, and Series in a Carrier's Fleet	Staff Hours		Management Hours*		Total Hours		
	Scheduled	Non-scheduled	Scheduled	Non-scheduled	Staff	Management	Total
1	45	81	10	18	126	28	154
2	80	30	16	6	110	22	132
3	55	11	10	2	66	12	78
4	36	12	6	2	48	8	56
5	39	-	6	-	39	6	45
6	-	14	-	2	14	2	16
7	-	-	-	-	-	-	-
8	32	-	4	-	32	4	36
9	17	-	2	-	17	2	19
10	-	-	-	-	-	-	-
11	-	-	-	-	-	-	-
12	-	-	-	-	-	-	-

13	-	-	-	-	-	-	-
14	44	-	4	-	44	4	48
	348	148	58	30	496	88	584

Example: Computation of Total Hourly Burden for Collection of Information - All Carriers (Based on count of Make, Model, and Series of Aircraft in a Carrier's Fleet):

For illustrative purposes, the total labor hours reported in row 3 of Table 5 (78 hours) is calculated below. Seventy-eight hours is the total paperwork burden hours computed for the 6 air carriers (Table 4, Line 3) that operate a fleet of 3 different make, model, and series of aircraft.

1) Staff Paperwork Hours:

Scheduled Air Carriers:

$$5 \text{ carriers} * [8 \text{ base hours} + (1 \text{ variable hour} * 3 \text{ make/model/series})] =$$

55 scheduled air carrier staff hours

Nonscheduled Air Carriers:

$$1 \text{ carrier} * [8 \text{ base hours} + (1 \text{ variable hour} * 3 \text{ make/model/series})] =$$

11 nonscheduled air carrier staff hours

Total Staff Hours:

$$55 \text{ scheduled hours} + 11 \text{ nonscheduled hours} = 66 \text{ staff hours}$$

2) Management Paperwork Hours:

Scheduled Air Carriers:

$$5 \text{ carriers} * 2 \text{ management hours} =$$

10 scheduled air carrier management hours

Nonscheduled air Carriers:

$$1 \text{ carrier} * 2 \text{ management hours} =$$

2 nonscheduled air carrier management hours

Total Management Hours:

$$10 \text{ scheduled hours} + 2 \text{ nonscheduled hours} = 12 \text{ mgmt hours}$$

3) Total Paperwork Hours:

$$66 \text{ staff hours} + 12 \text{ management hours} = 78 \text{ hours}$$

Table 6: Table 6 is similar to Table 5 except that Table 6 reflects the labor hour assumptions for the high case.

Table 6
Estimate of Total Paperwork Hours for Affected Carriers
By Count of Aircraft Make, Model, and Series in an Individual Air Carrier's Fleet
Year 1-High Case

# of Aircraft Make, Model, and Series in a Carrier's Fleet	Staff Hours		Management Hours*		Total Hours		
	Scheduled	Non-scheduled	Scheduled	Non-scheduled	Staff	Management	Total
1	85	153	10	18	238	28	266
2	144	54	16	6	198	22	220
3	95	19	10	2	114	12	126
4	60	20	6	2	80	8	88
5	63	-	6	-	63	6	69
6	-	22	-	2	22	2	24
7	-	-	-	-	-	-	-
8	48	-	4	-	48	4	52
9	25	-	2	-	25	2	27
10	-	-	-	-	-	-	--
11	-	-	-	-	-	-	--
12	-	-	-	-	-	-	--
13	-	-	-	-	-	-	--
14	60	-	4	-	60	4	64
	580	268	58	30	848	88	936

*Management hours are estimated to be 2 hours per website in both the low case and high case.

Labor Hours after Initial Implementation:

For years 2, 3 and 4 after initial implementation of the collection requirement, it is assumed that through the ordinary course of business, less time is required, relative to year 1 (initial implementation), to maintain accuracy of seat dimension information posted to a carrier’s Web site. During these years, it is established that air carriers have already posted seat dimension information, thus air carriers may only need to revise the data periodically. Table 7 shows the total hours estimated for the paperwork burden in the low and high case during years two, three, and four.

In the low case, it is assumed that 5 hours per Web site are required on an annual basis to comply with the paperwork burden. The 5 hours consists of 4 staff hours and 1 management hour. In the high case, an annual total of nine hours (8 staff hours plus 1 management hour) per carrier is required for the paperwork burden. Summed across all carriers, a total of 220 hours in the low case and 396 hours in the high case will be required to comply with paperwork burden.

Table 7
Hours Required on an Annual Basis to Comply with Paperwork Requirement
By Operator Type (Scheduled vs. Nonscheduled)
Year 2, Year 3, and Year 4

Case	Websites Affected	Annual Hours Per Carrier			Total Annual Hours		
		Staff	Management	Total	Staff	Management	Total
Low Case							
Scheduled	29	4	1	5	116	29	145
Nonscheduled	15	4	1	5	60	15	75
Total	44				176	44	220
High Case							
Scheduled	29	8	1	9	232	29	261
Nonscheduled	15	8	1	9	120	15	135
Total	44				352	44	396

Respondents:

There are a total of 44 respondents. Each respondent maintains one (1) Web site. The average total hours per year is 308.

COSTS – Paperwork Burden Collection of Information:

Labor is the only cost associated with the collection of information. Tables 8 through 13 provide detail to show how the costs for the paperwork burden are calculated.

Table 8: Table 8 contains the Bureau of Labor Statistics (BLS) fully-burdened staff and management wage rates for the work performed toward the collection of information. The wage table below includes wages, benefits, and overhead costs.

Table 8

Assumptions: Hourly Wage and Benefits Compensation*

NAICS**	Job Series	Job Category	Job Title	Hourly Wage	Benefits***	Overhead Costs****	Total Hourly Compensation
481100 Scheduled Air Transportation	15-1140	Staff	Database and System Administrators and Network Architects	\$43.82	\$15.03	\$7.44	\$66.29
	11-3021	Mgmt.	Computer and Information System Managers	\$70.70	\$24.25	\$12.02	\$106.97
481200 Nonscheduled Air Transportation	15-1140	Staff	Database and System Administrators and Network Architects	\$41.54	\$14.24	\$7.06	\$62.84
	11-	Mgmt.	Computer and	\$63.20	\$21.67	\$10.74	

	3021		Information System Managers				\$95.61
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*Source: U.S. Department of Labor, Bureau of Labor Statistics May 2017 Occupational Employment Statistics Survey (released in March 2018) (<https://www.bls.gov/oes/tables.htm>)

**North American Industry Classification System – US Census Bureau

***Source: U.S. Department of Labor, Bureau of Labor Statistics News Release dated June 18, 2018 “Employer Costs for Employee Compensation – March 2018” Page 5- Table 1. Hourly wage rates are 65.7 percent of total hourly compensation.

(<https://www.bls.gov/news.release/pdf/ecec.pdf>)

**** Source: Cody Rice, U.S. Environmental Protection Agency, “Wage Rates for Economic Analyses of the Toxics Release Inventory Program” (June 10, 2002),

<https://www.regulations.gov/document?D=EPA-HQ-OPPT-2014-0650-0005>.

Tables 9 and 10: Table 9 shows the low case cost estimate (on an individual carrier basis) for labor hours associated with the paperwork burden. These estimates are calculated by multiplying the paperwork burden hours identified in the low case (Table 2) by the fully-burdened wage rates (Table 8). Table 10 is similar to Table 9 except that it contains the high case estimate for paperwork burden costs. This estimate is calculated by multiplying paperwork burden hours identified in Table 3 by the wage rates identified in Table 8.

Table 9
Estimate of Paperwork Costs for an Individual Air Carrier
Year 1 – Low Case
(In 2018\$)

# of Aircraft Make, Model, and Series in a Carrier’s Fleet	Scheduled Carriers			Nonscheduled Carriers		
	Staff	Management	Total	Staff	Management	Total
1	\$ 729	\$ 214	\$ 943	\$ 691	\$ 191	\$ 882
2	663	214	877	628	191	819
3	729	214	943	691	191	882
4	795	214	1009	754	191	945
5	862	214	1076	817	191	1008
6	928	214	1142	880	191	1071
7	994	214	1208	943	191	1134
8	1061	214	1275	1005	191	1196

9	1127	214	1341	1068	191	1259
10	1193	214	1407	1131	191	1322
11	1260	214	1474	1194	191	1385
12	1326	214	1540	1257	191	1448
13	1392	214	1606	1320	191	1511
14	1458	214	1672	1382	191	1573

Table 10
Estimate of Paperwork Costs for an Individual Air Carrier
Year 1 - High Case
(In 2018\$)

# of Aircraft Make, Model, and Series in a Carrier's Fleet	Scheduled Carriers			Nonscheduled Carriers		
	Staff	Management	Total	Staff	Management	Total
1	\$ 1127	\$ 214	\$ 1341	\$ 1068	\$ 191	\$ 1259
2	1193	214	1407	1131	191	1322
3	1260	214	1474	1194	191	1385
4	1326	214	1540	1257	191	1448
5	1392	214	1606	1320	191	1511
6	1458	214	1672	1382	191	1573
7	1525	214	1739	1445	191	1636
8	1591	214	1805	1508	191	1699
9	1657	214	1871	1571	191	1762
10	1724	214	1938	1634	191	1825
11	1790	214	2004	1697	191	1888
12	1856	214	2070	1760	191	1951
13	1922	214	2136	1822	191	2013
14	1989	214	2203	1885	191	2076

Tables 11 and 12: The total paperwork burden costs associated with bringing all 44 Web sites of Part 121 passenger carriers affected by this collection into compliance are calculated by multiplying the fully-burdened wage rates shown in Table 8 by the paperwork burden hours in Table 5 (for the low case) and Table 6 (for the high case). The results of these calculations are shown in Tables 11 and 12. The bottom-right cell in each of these tables is the combined total paperwork burden cost for all carriers.

Table 11
Total Paperwork Costs
Year 1 - Low Case
(in 2018 Dollars)

# of Aircraft Make, Model, and Series in a Carrier's Fleet	Staff Costs (\$)		Management Costs (\$)		Total Costs (\$)		
	Scheduled	Nonscheduled	Scheduled	Nonscheduled	Staff	Management	Total
1	2983	5090	1070	1721	8073	2791	10,864
2	5303	1885	1712	574	7188	2286	9474
3	3646	691	1070	191	4337	1261	5598
4	2386	754	642	191	3140	833	3973
5	2585	-	642	-	2585	642	3227
6	-	880	-	191	880	191	1071
7	-	-	-	-	-	-	-
8	2121	-	428	-	2121	428	2549
9	1127	-	214	-	1127	214	1341
10	-	-	-	-	-	-	-
11	-	-	-	-	-	-	-
12	-	-	-	-	-	-	-
13	-	-	-	-	-	-	-
14	2917	-	428	-	2917	428	3345
Total Paperwork Costs	23,068	9300	6206	2868	32,368	9074	41,442

Note: Details may not add to row or column totals due to rounding.

Table 12
Total Paperwork Costs
Year 1 – High Case
(in 2018 Dollars)

# of Aircraft Make, Model, and Series in a Carrier's Fleet	Staff Costs (\$)		Management Costs (\$)		Total Costs (\$)		
	Scheduled	Nonscheduled	Scheduled	Nonscheduled	Staff	Management	Total
1	5635	9615	1070	1721	15,250	2791	18,041
2	9546	3393	1712	574	12,939	2286	15,225
3	6298	1194	1070	191	7492	1261	8753
4	3977	1257	642	191	5234	833	6067
5	4176	-	642	-	4176	642	4818
6	-	1382	-	191	1382	191	1573
7	-	-	-	-	-	-	-
8	3182	-	428	-	3182	428	3610
9	1657	-	214	-	1657	214	1871
10	-	-	-	-	-	-	-
11	-	-	-	-	-	-	-
12	-	-	-	-	-	-	-
13	-	-	-	-	-	-	-
14	3977	-	428	-	3977	428	4405
Total Paperwork Costs	38,448	16,841	6206	2868	55,289	9074	64,363

Note: Details may not add to row or column totals due to rounding.

Paperwork Burden Costs for Years 2, 3, and 4 Following Initial Implementation:

For years 2, 3, and 4 of the collection’s renewal, it is assumed that through the ordinary course of business, less time is required than in the initial implementation to maintain accuracy of seat dimension information posted to a carrier’s Web site. The paperwork burden costs for years 2, 3, and 4 following initial implementation are calculated by multiplying the paperwork burden hours shown in Table 7 by the fully-burdened wages rates shown in Table 8. The paperwork burden hours for the low and high case are shown in Table 13. The paperwork burden costs for the low and high case are shown in Table 14.

Table 13
Summary of Total Paperwork Hours for Initial Implementation (Year 1) and Years 2, 3, and 4
By Carrier Type (Scheduled vs. Nonscheduled)

HOURS									
Hours	Scheduled Carriers			NonScheduled Carriers			Total Hours		
	Staff	Management	Total	Staff	Management	Total	Staff	Management	Total
Low Case									
Year 1	348	58	406	148	30	178	496	88	584
Years 2-4	116	29	145	60	15	75	176	44	220
High Case									
Year 1	580	58	638	268	30	298	848	88	936
Years 2-4	232	29	261	120	15	135	352	44	396

Table 14
Summary of Total Paperwork Costs for Initial Implementation (Year 1) and Years 2, 3, and 4
By Carrier Type (Scheduled vs. Nonscheduled)

COSTS (in 2018 Dollars)										
Hours	Scheduled Carriers			NonScheduled Carriers			Total Costs			Present Value (7%)
	Staff	Management	Total	Staff	Management	Total	Staff	Management	Total	
Low Case										
Year 1	16,877	5509	22,386	9126	2547	11,673	26,003	8056	34,059	31,675
Year	7690	3102	10,792	3770	1434	5204	11,460	4536	15,996	

2										14,876
Year 3	7690	3102	10,792	3770	1434	5204	11,460	4536	15,996	13,835,
Year 4	7690	3102	10,792	3770	1434	5204	11,460	4536	15,996	12,866
High Case										
Year 1	34,133	5509	39,642	14,949	2547	17,496	49,082	8056	57,138	53,138
Year 2	15,379	3102	18,481	7541	1434	8975	22,920	4536	27,456	25,534
Year 3	15,379	3102	18,481	7541	1434	8975	22,920	4536	27,456	23,747
Year 4	15,379	3102	18,481	7541	1434	8975	22,920	4536	27,456	22,084

Note: Details may not add to row or column totals due to rounding.

SUMMARY OF HOURS AND COST FOR INITIAL IMPLEMENTATION (YEAR 1) AND YEARS 2-4

Tables 13 and 14 summarize paperwork burden hours and costs for the low and high cases during the three years of the collection's extension.

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

No cost other than those in question 12.

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.

The FAA estimates that the total estimated annual cost to the Federal Government associated with this information collection is \$121.00. This cost is based on the FAA employee time spent confirming that the air carrier's Web site contains the required information. As an average salary, we have used the same cost for technical expertise (\$82.00) that was used in question #12

for the information collection associated with OMB Control No. 2120-0008. We estimate that it takes an inspector 2 minutes to confirm the inclusion of this information on the operator's Web site. \$82/hour divided by 60 minutes equals \$1.37/minute. \$1.37 X 2 minutes equals \$2.74 per inspector. There are 44 operators required to comply with this burden of 2 minutes each, which equals \$120.56, rounded to \$121.00.

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

Section 412 of Public Law 112-95 requires this information collection. Changes to the estimates occurred because the number of respondents impacted in the original collection is reduced from 58 to 44.

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 FAA does not collect or publish data as part of this information collection. This information collection is a third-party disclosure by air carriers on their Web sites.

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

No such approval is sought because this information collection does not involve the use of a standard form to submit information to the agency.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

The agency certifies compliance with all provisions of the Paperwork Reduction Act. There are no exceptions.