

SUPPORTING STATEMENT

OMB-2120-0039

Part 135- Operating Requirements: Commuter and on-Demand Operations and Rules Governing Persons on Board such Aircraft

Justification

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

Title 49 USC, Section 44702 empowers the Secretary of Transportation to issue air carrier certificates and to establish minimum safety standards for the operation of the air carrier to whom such certificates are issued. Under the authority of Title 49 USC, Section 44701, Title 14 Code of Federal Regulations (14 CFR) part 135 prescribes the terms, conditions, and limitations as are necessary to ensure safety in air transportation.

This collection of information supports the Department of Transportation's strategic goal of safety.

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

Each operator which seeks to obtain, or is in possession of, an air carrier or FAA operating certificate is mandated to comply with the requirements of 14 CFR part 135 in order to maintain data which is used to determine if the carrier is operating in accordance with minimum safety standards. Air carrier and commercial operator certification is completed in accordance with 14 CFR part 119. Part 135 contains operations and maintenance requirements. The burden associated with 14 CFR part 135 is associated with reporting, recordkeeping and disclosure.

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.

The burden associated with 14 CFR part 135 is associated with reporting and recordkeeping. The FAA has encouraged the use of automation by the air carriers and commercial operators to reduce their burden. The FAA has deployed a Web based Operations Safety System (WebOPSS) which facilitates issuance of operators' operations specifications. This system also facilitates reporting requirements by its report features. This system allows operators to electronically submit and electronically sign the operations specifications. FAA ensures the consistent application of FAA regulations and policy through the use of standard template forms for operations specifications. Operators have the option of using the electronic operations specifications system to input their operator-specific information into draft operations specifications and electronically transmit them for FAA review and approval if the certificate holder meets all requirements. Currently 1,061 operators with part 135 operating authority have elected and are equipped to use the electronic operations specifications system. Electronic operations specification management complies with the Government Paperwork Elimination Act.

Operations specifications are issued to approve of new authorizations/limitations or new aircraft. In addition to operations specifications, changes to manuals, procedures, minimum equipment lists, briefing cards or other documents are required. The required maintenance and inspection programs are authorized to be kept and maintained electronically. Certain relief is provided from carrying maintenance manuals onboard the aircraft.

All reporting provisions and approval processes can be accomplished electronically, including operations and maintenance manuals, crewmember and aircraft dispatcher records, maintenance records, and minimum

equipment lists; however, certain documents such as passenger briefing cards and flight and operational manuals must currently be available in paper form for safety reasons.

The FAA continues to work with operators to develop procedures to allow expedited changes to operations specifications, such as adding aircraft that are substantially similar to aircraft currently approved for operation.

Email facilitates communications between the operator and the FAA.

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.

We have reviewed our other FAA public-use reports and find no duplication. Also, we know of no other agency collecting information from air carriers and commercial operators prescribing the terms, conditions, and limitations of their operating certificate.

This information, required by 14 CFR part 135, is to ensure safety in air transportation.

Further the information collected is only available from the applicant applying for an operating certificate and from certificate holders operating under part 135. The applicant/operator must prescribe his/her own data based on the operation. The information is not available from any other source.

However, if a certificate holder also conducts fractional ownership programs under part 91 of the regulations, the proposed rule for those operations authorizes the operator to use certain records required by part 135 to satisfy the equivalent requirements and recordkeeping provisions of a fractional ownership program. The paperwork reduction provisions are further discussed and applied in the fractional ownership proposed rule and paperwork reduction package for that rule.

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.

All applicants are provided guidance for the certification and administrative processes by the Certificate Holding District Office. FAA guidance documents (guidance for FAA inspectors for approving programs) are available to the public through the internet. This information and availability greatly assists in the preparation of required documents. Use of email facilitates communications between the approving inspectors and the applicants. WebOPSS facilitates issuance of authorizations. Operations specifications outlining authorizations and limitations are issued specific to an operator's operation. For other reporting or recordkeeping burdens listed, the smaller operators have burdens in proportion to the size of their operation. For example, single pilot operations are not required to prepare a manual or training program which significantly reduces the burden. The number of records and required reports are proportional to the number of pilots and aircraft used by the operator. Further, in several cases, such as for passenger briefings or aircraft checklists, commercially produced products are available from the aircraft manufacturer.

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

The frequency of information collection is dependent on the applicant's business plan and application for new kinds of operation or types of aircraft. The frequency of information collection, for the most part, is determined by the business activity of the operator. There may be safety implications for some forms of information.

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

5 CFR 1320.5 (d) (2) (i)-(viii), with the exception that some records are maintained longer than three years. Qualification records for crewmembers are maintained for as long as the person is employed by the operator. With respect to maintenance recording/recordkeeping requirements, section 135.439 specifies maintenance record and retention requirements and states the records must be transferred with the aircraft at the time it is sold. This means that there are certain aircraft maintenance records that stay with the aircraft for the life of the aircraft and are transferred from owner to owner.

8. 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.

The FAA published the notice of proposed rulemaking, Regulatory Relief, Aviation Training devices; Pilot Certification, Training, and Pilot Schools; and Other Provisions on May 12, 2016 (81 FR 29719). In the NPRM, the FAA proposed to amend § 135.99 by adding paragraph (c) to allow a certificate holder to receive approval of a second in command (SIC) professional development program (SIC PDP) via operations specifications (Ops Specs) to allow the certificate holder's pilots to log SIC time in operations conducted under part 135 in an airplane or operation that does not otherwise require a SIC. As explained in the NPRM, the FAA believes that a comprehensive SIC PDP will provide opportunities for beneficial flight experience that may not otherwise exist and also provide increased safety in operations for those flights conducted in a multicrew environment. The FAA proposed requirements in § 135.99(c) for certificate holders, airplanes, and flightcrew members during operations conducted under an approved SIC PDP. Those changes are reflected in this information collection. The FAA finalized this proposal in the final rule Regulatory Relief: Aviation Training Devices; Pilot Certification, Training, and Pilot Schools; and Other Provisions, on June 27, 2018 (83 FR 30232)

The FAA also proposed changes to certain logging requirements to enable the logging of SIC time obtained under a SIC PDP. Those changes are reflected in a revision to information collection 2120-0021.

In the NPRM, the FAA did not solicit comments on the proposed revision to information collection 2120-0039. Therefore, the FAA published a 60-day notice and request for comments on June 14, 2018 (83 FR 27822). No comments on the proposed revisions to information collection 2120-0039 were received during the comment period. Therefore, the FAA is finalizing the changes to information collection 2120-0039 as proposed.

Principal Operations Inspectors confer with their assigned carrier on a yearly basis to verify VIS data. The data is then updated in VIS. The POI notes the date of the update in VIS.

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

There are no monetary considerations for this collection of information.

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

Respondents have been given no 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. 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.

There are **2,003** part 135 operators. The specific 14 CFR part 135 reporting requirements are prescribed by the following regulatory sections. This report lists the numbers of affected air carriers and commercial operators and bases cost figures on updated salary estimates. The number of air carriers and commercial operators changes daily as a result of mergers or by the surrendering of certificates. The numbers of air carriers and commercial operators used in this report represent January 2019 levels, the most recent available.

Operator employee salaries in all of question 12 are based on 2018 data (real wages that are adjusted for inflation) provided by PayScale, Inc., 542 1st Avenue S, Suite 400, Seattle, WA. The FAA has applied a multiplier of **31.4 percent**¹ to account for fringe benefits and overhead, resulting in the following fully loaded wage rates:

FBO General Manager =	\$ 53.87
Flight Operations Manager =	\$ 56.50
Secretary =	\$ 21.02
Maintenance Manager =	\$ 55.19

Pilot = Note: There is a wide range in salaries that reflects the diversity of the part 135 industry. Data received for pilot salaries was from a Pilot Compensation Survey done published in the June 2018 issue of Professional Pilot Magazine. The Pilot salaries below are the averages of First Officer and Captain pay across varying aircraft. The salary survey provided numbers based on types of turbojet airplanes, rotorcraft, turboprops, fractional ownership operations, but did not consider lower salaries of pilots for single engine or multiengine reciprocating powered airplanes that make up a large segment of the industry (4000 reciprocating powered airplanes). An average salary was estimated based on the pilot in command/ second in command turboprop, turbojet, fractional ownership, and helicopter average salaries and an estimate of airplane pilot salaries = \$41.00 per hour; Flight Attendant = \$22.00 per hour. The estimates reflect slight changes or increases on the previously reports. *However, previous iterations of this collection did not account for fringe benefits and overhead; therefore, total compensation amounts in this collection are significantly higher.*

§135.2, Compliance Schedule for Transition to Part 121. This was a one-time event associated with the transition of part 135 operators with aircraft of 10 or more seats that are operated in scheduled service, to comply with part 121 requirements. This action was completed by March 20, 1997.

§135.3, Rules applicable to operations subject to this part. Required a one-time application burden for a transition plan. This plan was to be submitted by March 19, 1996, and detail plans for compliance with the training requirement by March 19, 1997. This section also has a voluntary provision for operators to comply with the training requirements of subparts N and O of part 121 instead of the training requirements of subparts E, G, and H of part 135.

§135.19, Emergency operations. Requires a person who exercises emergency authority to deviate from a rule of part 135 to send a report of the aircraft operation, description of the deviation and reasons for it. This report must be sent to the FAA Flight Standards Office charged with the overall inspection of the certificate holder.

Estimated number of reports a year	100 responses
Estimated technical time	x .5
Total estimated technical time	50.0 hrs.
Estimated cost for technical time (pilot)	x\$53.87 per hour
Total estimated burden of technical time	\$2,694

¹ U.S. DOL/BLS: <https://www.bls.gov/news.release/ecec.nr0.htm>

Total hour burden:	50 hrs
Total cost burden:	\$2,694

§135.21 Manual requirements

Requires each certificate holder, except those who use only one pilot, to prepare and keep current a manual for the use of flight, ground, and maintenance personnel. The original preparation of a manual is part of certification and covered in part 119 (119.35) under OMB clearance number 2120-0593, Certification: Air Carriers and Commercial Operators—FAR Part 119.

§135.21 (d) requires that the manual, or appropriate portions of the manual (and changes and additions) be made available to maintenance, ground personnel, flight crewmembers, and representatives of the Administrator. This one-time or incidental activity does not lend itself to a burden calculation.

§135.21 (e) requires each employee to keep his/her manual up-to-date with changes furnished to them. No burden is associated with this section.

135.21 (b), (f), and (g), requires parties to maintain copies of the manual at specified locations. In a change effective 1997, it allows the maintenance part of the manual to be provided in other than printed form provided there is a compatible reading device available and instructions, or a system able to retrieve maintenance information.

Certificate holders of a limited size operation are authorized deviations from all or part of the manual.

Additionally, §135.23 contains guidance as to the content of the manual.

Numerous procedures are listed that require inclusion in the manual. Manual guidance is required appropriate to the size and authorizations applicable to an individual operator. A single pilot operator is not required to have a manual. There are approximately 2003 operators of which 104 operators are single pilot operations and not required to have a manual.

Estimated number of operators required to have a manual	1,899
Estimated revisions per year	<u>x 7</u>
Total estimated number of manual revisions	13,293 responses
Estimate 2 technical hrs. per revision	<u>x 2</u>
Total estimated technical time	26,586
Cost of technical time (Flt ops mgr/Maint mgr averages)	<u>x \$56.50</u>
Total estimated burden for technical time	\$1,502,109

Estimated number of revisions	13,293
Estimate .5 secretary hrs per revision	<u>x .5</u>
Total estimated secretary time	6,647
Cost of secretary time	<u>x \$21.02</u>
Total estimated burden for secretary time	\$139,720

Total hour burden	33,233
Total cost burden:	\$1,642,829

§135.25, Aircraft requirements.

135.25 (d)(4) requires the operator to file a copy of an aircraft lease or charter agreement with the FAA Aircraft Registry. This requirement only applies to foreign registered aircraft.

Estimated number of agreements annually	3 responses
Approximately .2 hours of secretary time	<u>x.2</u>

Total estimated secretary time	.6
Cost of secretary time	<u>x\$21.02</u>
Total estimated burden for secretary time	\$12.61
Total hour burden:	.6
Total cost burden:	\$12.61

§135.63 Recordkeeping requirements.

(a) Each certificate holder shall keep the following records:

Current list of aircraft used or available for use. It is estimated that one half of all operators will update aircraft records each year. It is estimated that these operators will update records 2 times per year.

Estimated number of revisions	2,003
	x .5 (one half of operators)
	x 2 records per year
	2,003 revisions
Approximately 1 hours of technical time per revision	2003 hours
Cost of technical time (Flt ops/Maint. Mgr average)	<u>x \$ 55.19</u>
Total estimated burden cost	\$110,546
Total estimated burden hours	2003

Requires individual records of each pilot be maintained. This includes information on certificates, ratings, experience, duties, medical information, results of tests, flight time, training and action concerning release from employment.

PILOTS:

Estimated number of pilots (pilot in command and second in command)	25,365
Average number of entries annually per pilot (other than flight and duty)	<u>x 4</u>
Total estimated number of entries	101,460
Approximately .1 hour of secretary time per entry	<u>x .1</u>
Total estimated secretary time	10,146
Cost of secretary time	<u>x \$21.02</u>
Total estimated cost burden for secretary time	\$213,269

Flight and duty for pilots:

Estimated number of pilots	25,365
Average number of entries annually per pilot	x 200
Total estimated number of entries	5,073,000
Approximately .1 hour of secretary time	<u>x .1</u>
Total estimated secretary time	507,300 hrs
Cost of secretary time (pilot)	<u>x \$21.02</u>
Total estimated cost burden for secretary time	\$10,663,446

Requires individual records for each flight attendant showing compliance with duty and rest requirements.

Estimated number of flight attendants	656
Average number of flight attendant personnel records	<u>x3</u>
Total estimated number of records	1968
Approximately .1 hour of secretary time per record	<u>.1</u>
Total estimated secretary time	196.8
Cost of secretary time	<u>x\$21.02</u>
Total estimated cost burden for secretary time	\$4,137

Flight and duty for flight attendants:

Estimated number of flight attendants	656
Average number of entries annually per attendant	<u>x 200</u>
Total estimated number of entries	131,200 responses
Approximately .1 hour secretary time per entry	<u>x .1</u>
Total secretary time	13,120
Cost of secretary time	<u>x\$21.02</u>
Total estimated cost burden for secretary time	\$275,782

Requires for multiengine aircraft, the preparation of a load manifest for each flight.

Approximately 7700 multiengine aircraft make an average of 2 takeoffs daily making the paper burden for technical time approximately .1 hour per takeoff.

Approximate number of multiengine aircraft	7,700
Average number of takeoffs daily	<u>x2</u>
	15,400 responses
Estimated number of annual takeoffs	<u>x365</u>
Estimated total takeoffs annually	5,621,000
Approximately .1 hour technical time per takeoff	<u>x .1</u>
Total estimated technical time	562,100
Cost of technical time (pilot)	<u>x\$53.87</u>
Total estimated burden for technical time	\$30,280,327

The total burden for 135.63 is 1,094,866 hours and \$41,436,961.

§135.64 Retention of contracts and amendments: Commercial operators who conduct intrastate operations for compensation or hire.

It is estimated:

15 contracts annually x 50 operators = 750 contracts:

670 (written contracts) x .5 hour technical time

80 (oral contracts) x .5 hour secretary time (memo)

Total estimated number of written contracts	670 responses
Approximately .5 hours technical time	<u>x .5</u>
Total estimated technical time	335
Cost for technical time (General Mgr)	<u>x\$53.87</u>
Total estimated burden of technical time	\$18,046
Total estimated number of oral contracts	80 responses
Approximately .5 hour secretary time	<u>x.5</u>
Total estimated secretary time	40
Cost for secretary time	<u>x\$21.02</u>
Total estimated burden of secretary time	\$841

Total time and cost of burden 375 hours and \$18,887

§135.65 Reporting mechanical irregularities. Pilots are required to record each mechanical irregularity that comes to the pilot's attention during flight.

Estimated number of operators	2,003
Estimated 75 irregularities per year per operator	<u>x75</u>

Total number of irregularities	150,225 responses
Approximately .25 hours of technical time per entry	<u>x .25</u>
Total estimated technical time	37,556
Cost of technical time (Pilot)	<u>x \$53.87</u>
Total estimated cost burden of technical time	\$2,023,142

§135.79 Flight locating requirements. Each certificate holder must have procedures for locating each flight for which a flight plan is not filed. This procedure is part of the manual requirement of 135.21. Flight plans are cleared by OMB 2120-0026, Domestic and International Flight Plans. The flight locating information shall be prepared for each flight that is not on a FAA flight plan, and shall be retained until completion of the flight.

Approximate number of newly certificated operators per year	60
Approximate 25% will apply for separate flight locating procedures	<u>x .25</u>
Total estimated number of applicants	15 responses
Estimate .5 hours technical time	<u>x .5</u>
Total estimated technical time	7.5
Cost of technical time (Flt Ops Mgr)	<u>x\$56.50</u>
Total estimated cost burden of technical time	\$424

§135.83 Operating information required: Requires each operator to provide cockpit checklists. Most companies will use checklists provided by the aircraft manufacturer. Some will develop their own checklists based on manufacturer's procedures. It is estimated that 10% of the companies will develop their own checklists (average of 2 aircraft types per company).

Number of part 135 operators x 10% x 2 checklists per co.	401 responses
Estimate 2 hours technical time	<u>x 2</u>
Total estimated technical time	802 hr
Cost of technical time (Flt Ops Mgr)	<u>x\$56.50</u>
Total estimated cost burden of technical time	\$45,313

§ 135.117, Briefing of passengers before flight. This section requires an oral safety briefing supplemented by a printed briefing card. Many companies will use briefing cards provided by the aircraft manufacturer. Others will develop their own customized briefing cards. Cards must be available at each aircraft seat and an oral briefing must be given for each flight, unless the passengers have been previously briefed on another leg. Part 91, Subpart K, Section 91.1035 requires oral briefings and briefing cards. This section requires additional information be provided. Figures reflect the differences in requirements. Figures are adjusted to account for passengers that were previously briefed on another leg, and for the use of recorded briefings. It is estimated that 10% of the companies will develop their own printed briefing cards (average 2 aircraft types per operator)

Number of part 135 operators x 10% x 2 cards per co.	401 responses
Estimate 2 hours technical time	<u>x 2</u>
Total estimated technical time	802 hr
Cost of technical time (Flt Ops Mgr)	<u>x\$56.50</u>
Total estimated cost burden of technical time	\$45,313

Oral briefings:

Est. number of briefings per year (adjusted for recorded/ previous briefings)	1,100,000 responses
Estimate average time per briefing	<u>x 2 minutes</u>
Total estimated hours	36,667 hours
Cost of technical time (pilot)	<u>x 53.87</u>
Total estimated technical burden for oral briefings	\$1,975,251

The total burden for 135.117 = 37,469 hours and \$2,020,564 cost.

§135.129, Exit row seating. Each new entrant operator with airplanes of 20-30 seats would be required to submit an exit row seating program for approval. This program requires information on passenger information cards available at each exit seat.

Estimated number of new applicants annually (required to submit program)	20 responses
Estimate 2 hours of technical time	<u>x 2</u>
Total technical time	40
Cost of technical time (Flt Ops Mgr)	<u>x\$56.50</u>
Total estimated burden of technical time	\$2,260
Estimate 2 hours of secretary time per applicants	20 x 2
Total estimated secretary time	40
Cost of secretary time	<u>x\$21.02</u>
Total estimated burden of secretary time	\$841

Totals for new applicants 80 hours and \$3,101 cost of burden

Revisions to programs of 20-30 seat airplanes	
Estimated number of revisions	20 responses
Estimate 1 hour technical time	<u>x 1</u>
Total estimate technical time	20
Cost of technical time (Flt Ops Mgr)	<u>\$56.50</u>
Total estimated burden of technical time	\$1,130

Estimated number of revisions	20 responses
Estimate 1 hour of secretary time	<u>x 1</u>
Total estimated secretary time	20
Cost of secretary time	<u>x\$21.02</u>
Total estimated burden of secretary time	\$420
Totals for revisions to programs	40 hours and \$1160 cost of burden

Total burden for 135.129 = 120 hours and \$4,651.

§135.179, Inoperable instruments and equipment. Requires an approved minimum equipment list to authorize operation with certain instruments and equipment inoperative.

It is estimated that there are 60 new applicants per year, each with one aircraft requiring a minimum equipment list. In addition, approximately 200 operators will add/change aircraft in their fleets requiring a new minimum equipment list. Approximately 500 operators per year will add equipment requiring a revision to an existing minimum equipment list.

Initial:

Approximate number of new minimum equipment lists annually	260 responses
Estimate 10 hours of technical time per list	<u>x 10</u>
Total estimated technical time	2,600
Cost of technical time (Flt Ops Mgr/ Maint Mgr average)	<u>x\$55.19</u>
Total estimated burden of technical time	\$143,494

Estimated 3 hours of secretary time per list	780
Cost of secretary time	<u>x\$21.02</u>
Total estimated burden of secretary time	\$16,396

Total initial costs: 3380 hours and \$159,890 cost of burden

Revisions:

Approximate number of revisions annually	500 responses
Estimate 1 hour of technical time per revision	<u>x 1</u>
Total estimated technical time	500
Cost of technical time	<u>x\$55.19</u>
Total estimated burden of technical time	\$27,595

Estimated .5 hours of secretary time per revision	250 hrs
Cost of secretary time	<u>x\$21.02</u>
Total estimated burden of secretary time	\$5,255

Total revision costs: 750 hours and \$32,850 cost of burden

Total burden for 135.179 = 4130 hours and \$192,740 cost.

§ 135.227, Icing limitations. Requires a deicing program or checking procedures which are contained in the operator's manual. New entrants would be required to submit a program or manual procedures. Approximately 1/4th of these operators would submit a full program; the other 3/4th would submit manual procedures for pre-takeoff checks, or not operate in icing conditions.

Costs are computed for program development and program revisions only. If an operator elects manual procedures, those costs are contained in part 119 for initial certification. Revisions to the manual are covered in 135.21 above.

Estimated number of new entrant operators electing to have a deicing program	15 responses
Approximately 20 hours technical time per program	<u>x20</u>
Total estimated technical time	300 hrs
Cost of technical time (Flt Ops Mgr/ Maint Mgr average)	<u>x\$55.19</u>
Total estimated burden for technical time	\$16,557

Approximately 5 hours of secretary time per new program	15 x 5	75 hrs
Cost of secretary time		<u>x\$21.01</u>
Total estimated burden for secretary time		\$1,576

Estimated number of program revisions per year	50 responses
Approximately 2 hours of technical time per program revision	<u>x 2</u>
Total estimated technical time	100
Cost of technical time	<u>x\$55.19</u>
Total estimated burden for technical time	\$5,519

Approximately 1 hour of secretary time per program revision	50 hrs
Cost of secretary time	<u>x\$21.02</u>
Total estimated burden for secretary time	\$1,051

Total burden for deicing program option (new and program revisions)
525 hours and \$24,703

§135.273(c), Duty period limitations and rest time requirements. This paragraph establishes an alternate provision for flight attendant flight and duty limits. If the operator does not use the flight crewmember limits, it can establish written procedures for flight attendants that are approved by the Administrator and referenced in operations specifications.

It is estimated that all companies use the flight and duty time requirements specified above in the recordkeeping section (same as the flight crewmembers (pilots)). No cost is associated with this burden.

§ 135.325, Training program and revision. Each applicant for a certificate, other than a single pilot operator, must submit an outline of the proposed curriculum for a training program that meets the minimum standards in the regulation. This outline varies depending on the size and complexity of the operations.

A single pilot operator has no training program requirements. A small operator with 2 or 3 pilots and/or 2 or 3 aircraft, or aircraft of the same type, would require approximately 80 to 100 hours to prepare such a curriculum outline. A large operator with, for example 30 to 40 pilots and a variety of aircraft might require 600 to 800 hours. The contents of the curriculum are determined in accordance with section 135.327 and will vary dependent on numbers and types of aircraft and kinds of operations authorized. Paragraph (b) (2) of 135.327 requires a list of all training aids that the operator will use.

The operator applies for initial approval; and after evaluation of the effectiveness of the program, the operator would be issued final approval, with or without revision to the outline as required by the FAA. *Burden for the original preparation (for initial approval) of a training program is part of the initial certification process covered in Part 119 (119.35) under OMB clearance number #2120-0593, Certification: Air Carriers and Commercial Operators—FAR Part 119.*

The operator may also make revision to the curriculum based on changes in its operation, such as addition of another type of aircraft or a change in procedures or authorizations.

There are **2,003** part 135 operators. 104 of these are single pilot operations that do not require a training program. Therefore, 1,899 operators require a training program; complexity of the program will vary based on size of the operator. It is expected that one half of new applicants (approximately 30) will require a training program approval.

Assuming each operator holding a training program would submit one revision annually, estimated revisions would total 1,899 taking 15 hours of technical time and 5 hours secretary time per revision:

Estimated number of training program revisions:	1899 responses
Estimate 15 hours of technical time	<u>x 15</u>
Total estimated technical time	28,485
Cost of technical time (Flt. Ops Mgr)	<u>x\$56.50</u>
Total estimated burden of technical time	\$1,609,403
Total estimated secretary time of 5 hours per revision x 1899 revisions	= 9,495
Cost of secretary time	<u>x\$21.02</u>
Total estimated burden of secretary time	\$199,585

Total training program revision requirements 37,980 hours and \$1,808,988 cost of burden

Development of an SIC Professional Development Program and submission to the FAA for approval (revising an existing 119 certificate) will take an operator approximately 40 hours to develop and submit for approval. We estimate that approximately 20 operators will submit a newly developed training program for approval annually.

35 hours (technical) x 20 responses/operators = 700 hours.

700 hours x \$56.50 per hour = \$39,550 cost

5 hours (secretary time) x 20 operators = 100 hours

100 hours x \$21.02 = \$2,102 cost

700 hours + 100 hours = 800 total hours

\$39,550 + \$2,102 = \$41,652 total cost

Adjusted total burden annually for 135.325

37,980 current annual revision hours + 800 hours (new SIC program) = 38,780 total hours

\$1,808,988 + \$41,652 (new SIC program) = \$1,850,640 total cost

We estimate that the remaining 50 operators (of the total of 70) will request a “revised” SIC training program for the authorization of logging SIC time. This additional burden will be:

15 hours (technical time) x 50 operators = 750 hours

750 hours x \$56.50 = \$42,375 cost

5 hours (secretary time) x 50 = 250 hours

250 hours x \$21.02 = \$5,255 cost

750 hours + 250 hours = 1000 total revision hours

\$42,375 + \$5,255 = \$47,630 total revision cost

Total Burden for 135.325 revisions

37,980 (current annual hours) + 1,800 hours (SIC training program) = 39,780 hours

\$1,850,640 + \$47,630 = \$1,898,270 total cost

§ 135.415, Mechanical reliability reports—This requires the operator to report occurrences or detection of each failure, malfunction, or defect in an aircraft.

Estimated number of aircraft	12055
Average number of reports per aircraft annually	<u>x 1</u>
Total number of reports	12,055 responses
Estimate 1 technical hour per report	<u>x 1</u>
Total technical hours	12,055
Cost of technical time (Maint Mgr)	<u>x\$55.19</u>
Total estimated burden of technical time	\$665,315

§ 135.417, Mechanical interruption summary report. An operator shall mail or deliver a monthly summary report of the following occurrences that happen to multiengine aircraft: each interruption to a flight, unscheduled change of aircraft en route, or unscheduled stop or diversion from a route, caused by known or suspected mechanical difficulties or malfunctions that are not required to be reported under 135.415.

Estimated number of operators with multiengine aircraft	1,500
Estimate 12 reports annually per operator	<u>x12</u>
Total estimated number of reports	18,000 responses
Estimate 1 hour technical time	18,000
Cost of technical time (Maint. Mgr)	<u>x\$55.19</u>
Total estimated burden of technical time	\$993,420

§ 135.419, Approved aircraft inspection program. Certificate holders are required to have an approved aircraft inspection program. The program is part of their operations specifications. This section says that the Administrator may amend the certificate holder's operations specifications and it says that the certificate holder may apply for any amendment to an approved program. The application for amendment must include the proposed changes to the aircraft inspection program. After the inspection program or amendments are approved, they become a part of the manual required by section 135.21.

The burden for the initial preparation of the inspection program and the subsequent amendments are covered by OMB 2120-0028, Operations Specifications.

Estimated number of amendments to program	50 responses
Estimate 1 hour technical time	<u>x 1</u>
Total estimated technical time	50
Cost of technical time (Maint. Mgr)	<u>x\$55.19</u>
Total estimated burden of technical time	\$2,760

Estimate number of amendments to program	50
Estimate .5 hours secretary time	<u>x .5</u>
Total estimated secretary time	25
Cost of secretary time	<u>x\$21.02</u>
Total estimated burden of secretary time	\$526

Totals: Time 75 hours and \$3,286

§135.421, Additional maintenance requirements. Certificate holders operating aircraft of nine seats or less must comply with either a manufacturer's recommended maintenance program or one approved by the FAA for aircraft engines, propellers, rotors, or items of emergency equipment. Operators covered by this section tend to elect the manufacturer's maintenance program. Therefore, no reporting burden is anticipated. If an operator of single engine aircraft desires to use this aircraft in passenger carrying instrument operations, it must incorporate into its maintenance program either the manufacturer's recommended engine trend monitoring program or an FAA approved engine trend monitoring program. In addition, written maintenance instructions are required to maintain the additional equipment required for this authorization. Most single engine programs are limited to turbine powered aircraft. A program and instructions would be the same for all same type aircraft in an operator's fleet.

Estimated number of new single engine IFR trend monitoring programs	20 responses
Estimate 20 hours technical time for program and instructions	<u>x20</u>
Total estimated technical time	400
Cost of technical time (Maint. Mgr)	<u>x\$55.19</u>
Total estimated burden of technical time	\$22,076

Estimate 5 hours of secretary time	100 hrs
Cost of secretary time	<u>x\$21.02</u>
Total estimated burden of secretary time	\$2,102

Total: 500 hours and \$24,178

§ 135.427, Manual requirements. Certificate holders operating aircraft of 10 or more seats must provide in their manual, adequate maintenance and inspection programs for the airworthiness of all these aircraft and inform personnel of their responsibilities.

Maintenance, preventative maintenance, alteration procedures, inspection methods, and procedures to release aircraft for service must be included. The manual will also contain a maintenance organization and list of

persons with whom it has arranged for the performance for any required inspection. The burden for this initial requirement is included under section 119.35 and burden for revisions are addressed under 135.21.

§135.429, Required inspection personnel. Certificate holders are required to determine that each person with whom it arranges to perform its required inspections maintain a current listing of persons who have been trained, qualified, and authorized to conduct required inspections. These persons must be identified by name, occupational title, and the inspections they are authorized to perform.

§135.431, Continuing analysis and surveillance. Certificate holders are required to establish and maintain a system for the continuing analysis and surveillance of the performance and effectiveness of its inspection program and the program covering other maintenance, preventive maintenance, and alterations and for the correction of any deficiency of those programs, regardless of whether those programs are carried out by the certificate holder or by another person.

Estimated number of operators maintaining a system	100 responses
Estimate 70 hours of technical time	<u>x 70</u>
Total estimated technical time	7,000
Cost of technical time (Maint. Mgr)	<u>x\$55.19</u>
Total estimated burden of technical time	\$386,330

§135.439, Maintenance record requirement. Certificate holders are required to keep certain maintenance records using the system specified in the manual by section 135.427. The records must contain information necessary for the issuance of an airworthiness release. The records must contain information regarding total time in service of the airframe, engine, and propeller; the current status of life-limited parts of each airframe, engine, propeller, rotor and appliance; the items installed on the aircraft which are required to be overhauled on a specified time basis. The records must contain the current inspection status of the aircraft, the current status of applicable airworthiness directives, and a list of current major alterations to each airframe, engine, propeller, rotor, and appliance. Each certificate holder shall retain the records for a certain specified time and make them available for inspection by the Administrator or any representative of the National Transportation Safety Board (NTSB).

Estimated number of aircraft involved in recordkeeping system	200 responses
Estimate 60 hours of technical time	<u>x60</u>
Total estimated technical time	12,000
Cost of technical time (Maint. Mgr)	<u>x\$55.19</u>
Total estimated burden of technical time	\$662,280

§135.443, Airworthiness release or aircraft log entry. Certificate holders are required to prepare or cause the person with whom the certificate holder arranges for the performance of the maintenance, preventive maintenance, or alterations to prepare an airworthiness release or an appropriate entry in the aircraft log. The airworthiness release or log entry must be prepared in accordance with the procedure set forth in the certificate holder's manual and be signed by an authorized certificated mechanic or repairman.

Estimated number of aircraft requiring airworthiness release or aircraft log entry daily	200
Estimate 1 daily entry per aircraft	<u>x365</u>
Total estimated number of entries annually	73,000 responses
Estimate 1 hour technical time	73,000 hrs
Cost of technical time (Maint. Mgr)	<u>x\$55.19</u>

SUMMARY

FAR Section	Technical	Admin	Total Hours	Technical	Admin	Responses	Total Cost
REPORTING							
135.25	0	0.60	0.60	-	\$13	3	\$13
135.129	60	60	120	\$3,390	\$1,261	40	\$4,651
135.179	3100	1030	4130	\$171,089	\$21,651	760	\$192,740
135.415	12055	0	12055	\$665,315	0	12,055	\$665,315
135.417	18000	0	18000	\$756,000	0	18,000	\$993,420
135.419	50	25	75	\$2,760	\$ 526	50	\$3,286
TOTAL			34,381			30,908	\$1,859,425
RECORDKEEPING							
135.2	0	0	0	-	-	-	-
135.3	0	0	0	-	-	-	-
135.19	50	0	50	\$2,694	-	100	\$2,694
135.21	-	-	-	-	-	-	-
135.21(b), (f), (g)	26,586	6,647	33,233	\$1,502,109	\$139,720	13,293	\$1,642,829
135.63	564,103	530,763	1,094,866	\$30,280,327	\$11,156,634	5,325,781	\$41,436,961
135.64	335	40	375	\$18,046	\$ 841	750	\$18,887
135.65	37,556	0	37,556	\$2,023,142	-	150,225	\$2,023,142
135.79	7.50	0	7.50	\$424	-	15	\$424
135.83	802	0	802	\$45,313	-	401	\$45,313
135.227	400	125	525	\$22,076	\$2,627	65	\$24,703
135.273 (c)	0	0	0	0	0	0	0
135.325	29,935	9,845	39,780	\$1,691,328	\$206,942	1,919	\$1,898,270
135.421	400	100	500	\$22,076	\$2,102	20	\$24,178
135.427	0	0	0	0	0	0	0
135.429	0	0	0	0	0	0	0
135.431	7000	0	7000	\$386,330	0	100	\$386,330
135.439	12000	0	12000	\$662,280	0	200	\$662,280
135.443	73000	0	73000	\$4,028,870	0	73,000	\$4,028,870
TOTAL			1,299,695			5,565,869	\$52,194,881
THIRD-PARTY DISCLOSURE							
135.117	37,469	0	37,469	\$ 2,020,564	-	1,100,401	\$2,020,564
TOTAL	822,909	548,635.6	1,371,545	-	-	6,697,178	\$56,074,870

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

The burden is shown in question 12. There are no additional costs.

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

The FAA estimates that the total estimated annual cost to the Federal Government is **\$5,402,027**. The fully burdened FAA aviation safety inspector (ASI) rate of \$48.90 was obtained from the 2018 General Schedule Salary Table² as published by the U. S. Office of Personnel Management. The fully burdened salary used for calculating costs savings is the base hourly salary of \$48.90 for a GS 13 Step 5, which is the mid-range salary for this position multiplied by the FAA fringe benefit salary multiplier³ of 1.3625 to yield the fully burdened rate of **\$66.63**.

Listed below are only those sections that involve a routine or emergency FAA oversight, review or approval component.

§135.19, 100 reports per year x 0.5 hours of ASI time.

$100 \times 0.5 = 50$.

$50 \times \$66.63 = \$3,332$

135.21 (b), (f), and (g), 1 ASI hour per year x 1,899 operators = 1,899 hours.

$1,899 \times \$66.63 = \$126,530$

§135.63, 2,003 revision x 1 ASI hour = 2,003 hours.

$2,003 \times \$66.63 = \$133,460$

§135.64, 1 ASI hour per year x 750 contracts = 750 hours.

$750 \times \$66.63 = \$49,973$

§135.65, 1 ASI hour per year x 2,003 reports.

$2,003 \times \$66.63 = \$133,460$

§135.79, 1 ASI hour her year x 15 responses = 15 hours.

$15 \times \$66.63 = \999

§135.83, 5 ASI hours per year x 401 responses = 2,005

$2,005 \times \$66.63 = \$133,593$

§ 135.117, 5 ASI hours per year x 401 responses = 2,005

$2,005 \times \$66.63 = \$133,593$

§135.129, 5 ASI hours per year x (20 initial + 20 revisions) = 200

$200 \times \$66.63 = \$13,326$

§135.179, 5 ASI hours per new list x 260. 3 ASI hours x 500 revisions. 2,800 hours.

$2,800 \times \$66.63 = \$186,564$

§ 135.227, 5 ASI hours x 15 responses = 75 hours

$75 \times \$66.63 = \$4,997$

§ 135.325, 25 ASI hours x 1,899 responses = 47,475

$47,475 \times \$66.63 = \$3,163,259$

§ 135.415, 1 ASI hour x 12,055 reports = 12,055 hours.

$12,055 \times \$66.63 = \$803,225$

§ 135.417, 4 ASI hours per year x 1,500 aircraft = 6,000 hours

$6,000 \times \$66.63 = \$399,780$

§135.421, 7 ASI hours per year x 20 responses = 140 hours.

$140 \times \$66.63 = \$9,328$

§135.439, 4 ASI hours per year x 200 responses = 800 hours

$800 \times \$66.63 = \$53,304$

§135.443, 4 ASI hours per year x 200 responses = 800 hours

$800 \times \$66.63 = \$53,304$

SUMMARY

² <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/19Tables/html/RUS.aspx>

³ <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2008/m08-13.pdf>

Section	ASI Hours/Year	Cost to FAA
135.19	50	\$3,332
135.21 (b), (f), and (g)	1,899	\$126,530
135.63	2,003	\$133,460
135.64	750	\$49,973
135.65	2,003	\$133,460
135.79	15	\$999
135.83	2,005	\$133,593
135.117	2,005	\$133,593
135.129	200	\$13,326
135.179	2,800	\$186,564
135.227	75	\$4,997
135.325	47,475	\$3,163,259
135.415	12,055	\$803,225
135.417	6,000	\$399,780
135.421	140	\$9,328
135.439	800	\$53,304
135.443	800	\$53,304
TOTALS	81,075 hours	\$5,402,027

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

The wage tables used to calculate the burden were updated to better reflect the wages paid today.

The burden for 135.153 was removed as that regulation is no longer in effect.

Section 135.99(c) permits a certificate holder to seek approval of an SIC professional development program via issuance of operations specifications (Ops Specs) to allow the certificate holder's pilots to log SIC time. Under an approved SIC professional development program, pilots may log SIC time in part 135 operations conducted in multiengine airplanes and single engine turbine-powered airplanes that do not otherwise require an SIC, if those pilots: (1) meet certification, training, and qualification requirements for pilots in part 135 operations, and (2) serve under the supervision of a part 135 PIC who meets certain experience requirements.

Operators who currently possess an FAA approved PIC or SIC training program could revise and utilize those existing programs to qualify their pilots seeking approval to log SIC time. Those operators that do not already possess an approved PIC/SIC training program (that must include CRM training) would be required to submit a proposed new SIC training program for FAA approval. This would be amending an existing 119 certificate. As of September 28, 2017 there are approximately 457 part 135 operators with single engine turbine-powered airplanes or multiengine airplanes that would qualify or actually pursue the authorization to conduct a SIC professional development program.

We estimate that approximately 20 operators would be required to submit a newly developed SIC Professional Development Training Program for approval in the first year that the program is available. We estimate that 50 operators will request an amendment to their existing PIC/SIC training program. This time burden is reflected in §135.325, Training program and revision.

The FAA estimates that 20 operators will take approximately 40 hours to develop and submit an acceptable new SIC training program. This program change will result in a burden increase of 800 hours in the first year of information collection only.

The FAA estimates that 50 operators will take approximately 20 hours to revise and submit an acceptable SIC training program. This program change will result in a burden increase of 1000 hours.

The new or revised SIC training program will result in a burden of 1800 total hours in the first year of information collection.

In addition, the FAA has adjusted the burden in section 135.325 to remove the calculation of the burden for new applicants (for initial approval of training programs), as this burden is addressed in a previously approved collection OMB No. 2120-0593 Certification: Air Carriers and Commercial Operators—FAR Part 119.

The Federal Government burden was also reduced, as this ICR no longer accounts for burdens already covered by previously approved collection OMB No. 2120-0593 Certification: Air Carriers and Commercial Operators—FAR Part 119.

This correction will reduce the overall total burden for 135 operations even with the additions reflected for the SIC training program considerations.

The overall burden was previously estimated at 1,154,674 hours. With the removal of the initial certification burden already accounted for in the part 119 statement, addition of the SIC training program development and approval burden, the total new annual burden estimate is 1,371,545 hours. This is an increase of 216,871 hours from the previous estimate.

The part 135 operator population was also adjusted to reflect changes from 2017 to 2019.

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 publication plan.

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.

Not applicable.

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 in Item 19 OMB Form 83-I.