#### **Supporting Statement**

#### Certification: Pilots, Flight Instructors, and Ground Instructors

#### OMB 2120-0021

SUMMARY OF CHANGE: The FAA is reducing the burden for instrument currency requirements under § 61.57 for those pilots that use aviation training devices. The FAA estimates that, of the 102,811 active pilots with an instrument rating, that approximately 50% are maintaining currency. It is likely that only 15% of those pilots (approximately 15,422 pilots) are using an aviation training device exclusively to maintain their instrument currency. For those pilots, this change will reduce the recordkeeping requirements of logging time from 6 times a year to two times a year, when logging instrument currency exclusively in an aviation training device. The FAA estimates this burden reduction to be 6168.8 hours annually.

Additionally, § 61.159(c) allows pilots to log SIC time in part 135 operations in a single engine turbinepowered airplane or a multi-engine airplane that otherwise does not require an SIC. This will require the pilot to obtain a logbook endorsement from the PIC for each individual flight to log this time as SIC. The FAA estimates that of the 76,957 Commercial Pilots with airplane and instrument privileges that approximately 10% (7,696) may actively pursue a SIC position with a Part 135 operator that is approved for logging SIC time as described for this provision. But, because of the limited number of operators (approximately 457 operators as of 09/28/2017) that would qualify or actually pursue this authorization, the FAA estimates that only 15% (1,154 pilots) might actually become qualified annually to log SIC time under this provision. This additional record keeping requirement will be reflected in Section 61.159, Aeronautical experience. The FAA estimates this SIC training program burden increase is 1,154 hours annually.

#### Justification:

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

Title 49, United States Code, Section 44703 specifically empowers the Secretary of Transportation to issue airman certificates to properly qualified persons. This clearance request covers the burden imposed on airmen directly responsible for the control of aircraft. Each certificate issued specifies the capacity in which the holder is authorized to serve as an airman in connection with the operation of an aircraft.

Title 14 of the Code of Federal Regulations part 61 (14 CFR part 61) Certification: Pilots, Flight Instructors, and Ground Instructors prescribes minimum standards and requirements for the issuance of airman certificates, and establishes procedures for applying for airman certificates.

Subpart C of title 14 CFR part 107, Small Unmanned Aircraft Systems, provides requirements for applicants to obtain a remote pilot certificate, and establishes procedures for applicants to apply for such certificates.

This collection follows the strategic goal of safety.

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

Persons applying for an airman certificate under part 61 are mandated to report information using the Airman certificate and/or Rating Application form and the required records, logbooks and statements to the Federal Aviation Administration (FAA) Flight Standards District Offices or its representatives. This information is used to determine qualifications of the applicant for issuance of a pilot or instructor certificate, or rating or authorization.

As of December 31, 2017, there were approximately 825,000 active certificated pilot airmen.<sup>1</sup> This includes student, private, commercial, airline transport pilot certificate holders, as well as ground and flight instructors. Approximately 25% of these pilots are providing data on an annual basis. Instructor certificates must be renewed every 24 months to remain effective.

If the information collection were not conducted, the FAA would be unable to issue the appropriate certificates and ratings.

Persons applying for a remote pilot certificate with a small UAS rating under part 107, are mandated to report information using the FAA Form 8710-13, Remote Pilot Certificate and/or Rating Application. For applicants who do not hold a pilot certificate under part 61, the Remote Pilot Certificate and/or Rating Application is submitted along with a documentation demonstrating that the applicant passed an aeronautical knowledge test. For applicants who hold a pilot certificate under part 61 and meet the flight review requirements of § 61.56, the Remote Pilot Certificate and/or Rating Application is submitted with evidence of completion of the training course.

# 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 or information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection.

The FAA has an electronic data collection system called the Integrated Airman Certification and Rating Application (IACRA). IACRA is a secure web-based application that uses online validation and digital signatures to complete the airman certification documents. IACRA interfaces with multiple FAA databases such as knowledge testing and airman records for data validation and verification. It automatically ensures that applicants meet regulatory and policy requirements.

IACRA improves the airman certification process by checking for data errors that cause rejected applications. The certification processing time is reduced since the applicant, recommending instructor (if required), and inspector/examiner can complete the airman application online and can submit the completed application electronically using digital signatures. OMB has used IACRA as an example of FAA's compliance with the Government Paperwork Elimination Act.

The FAA has made the use of IACRA mandatory by its inspectors and designated pilot examiners. The FAA expects that pilot airman certification application process will soon be an almost paperless process with few exceptions. Though the use of IACRA will not reduce the time it takes for an applicant to complete and submit the information required by the 8710-1 form versus its paper version, IACRA will eventually serve to reduce the FAA's clerical review time.

#### 4. Describe efforts to identify duplication.

We have reviewed other FAA public-use reports and find no duplication. Also, we know of no other agency collecting information from pilots and flight instructors prescribing the terms, conditions, and limitations of their operating certificates. This information is required under Part 61 of the federal regulations.

### 5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.

Reporting and record keeping requirements of Part 61 and Part 107, Subpart C of the Federal Aviation Regulations pertain to individual applicants for a pilot certificate and not to business organizations.

 $<sup>^{1}\</sup> https://www.faa.gov/data\_research/aviation\_data\_statistics/civil\_airmen\_statistics/$ 

### 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.

For the most part, the applicants who submit certification applications determine the frequency of information collection. The applicant, not the FAA, governs a decrease in the frequency of collection unless safety dictates otherwise (i.e. numerous violations of the federal regulations).

### 7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with guidelines.

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2)(i)-(viii).

# 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.

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 that NPRM, the FAA proposed to reduce the burden for instrument currency requirements under § 61.57 for those pilots that use aviation training devices. 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)

In the NPRM, the FAA did not solicit comments on the proposed revision to information collection 2120-0021. Therefore, the FAA published a 60-day notice and request for comments on June 14, 2018 (83 FR 27821). No comments on the proposed revisions to information collection 2120-0021 were received during the comment period. Therefore, the FAA is finalizing the changes to information collection 2120-0021 as proposed.

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

Respondents are provided no payment or gift in connection with the information collection burden.

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

The information collected will become part of the Privacy Act system of records DOT/FAA 847, General Aviation Records on Individuals and afforded the protection offered under the Privacy Act and that particular system.

### 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.

The Airman Certificate and/or Rating Application requires the applicant to respond to questions concerning a conviction under Federal or State statutes pertaining to narcotic drugs, marijuana, and/or stimulant drugs or substances. This information is necessary to determine whether the applicant is in compliance with appropriate 14 CFR part 61 or 14 CFR part 107 certification requirements.

#### 12. Provide estimates of the hour burden of the collection of information.

A section-by-section breakdown of the applicable sections of 14 CFR part 61 and the applicable sections of part 107 is listed below, showing the number of respondents, frequency of response, annual hour burden, and how the burden has been estimated.

<u>Section 61.13</u>, <u>Application and Qualification</u> – As indicated (in Item #2 of this report), applicants for a pilot certificate and/or flight instructor certificate must submit FAA Form 8710-1 to the FAA or its representatives to determine qualifications of the applicant for issuance of a pilot or flight instructor certificate, or rating or authorization. In fiscal year 2018, **212,335** new airman applications were submitted. The FAA expects the annual number of new airman certificates to remain steady between 180,000 and 220,000. Each application takes 0.1 hours to complete.

<u>200,000</u> new applications for pilot/instructor certificates at 0.1 hours each = <u>20,000</u> hours

<u>Section 61.39</u>, <u>Prerequisites for flight tests</u> – states that to be eligible for a practical test for a certificate or rating, an applicant must present a written statement from an authorized flight instructor. The statement must certify that the applicant has received specified instruction and has shown competency for the rating sought. We estimate 200,000 applicants are annually subject to this requirement. Practical tests are not required for ground instructor certificates and ratings. Flight instructor written statements are 200,000 annually at .05 hours each.

<u>200,000</u> applicants x <u>.05</u> hours each = <u>10,000</u> hours

<u>Section 61.49 retesting after failure</u> – The numbers and hours required for reporting required by this section are included in the numbers for sections 61.13. The flight instructor statements required by this section for reapplication for original airmen certificates are about 4,400 individual applicants annually at .05 hours each. Reapplication for pilot certificates after failure is estimated to be 22,800 at .05 hours each.

4,400 statements x .05 hours each = 220 hours 22,800 statements x .05 hours each = 570 hours Total = 680 hours

<u>Section 61.51, Pilot logbooks</u> – requires pilots to enter flight time that is to be credited toward experience or training requirements for certificates or ratings in a reliable record. We estimate that of the total active certificated pilot population (633,317), 316,659 pilots must log flight time annually to meet this requirement at a total average of 1.0 hours each for entering the required records.

316,659 pilots x <u>1.0</u> hours each = <u>316,659</u> hours

<u>Section 61.56(a)</u>, <u>Flight Review</u> – Provides that except for certain exceptions for pilots required under other operating rules to have periodic proficiency checks, and certified flight instructors who pass a practical test for the issuance or renewal of a certificate, or the addition of a rating, each pilot who exercises pilot-in-command privileges must have completed a flight review within the previous 24 months. The pilot must maintain an endorsement of satisfactory completion in a logbook. We estimate that, of the total active pilot population of 633,317, some 316,659 pilots complete a flight review per year with an average time of 0.1 hours each necessary for the flight instructor to record the flight review.

316,659 pilots x <u>0.1</u> hour each = <u>31,666</u> hours

<u>Section 61.57, Pilot-in-Command</u> – Recent flight experience: Pilot-in-command provides that except for certain exceptions, no person may act as pilot-in-command of an aircraft carrying passengers or of an aircraft certificated for more than one pilot flight crewmember unless that person is current in accordance with the requirements of § 61.57. We estimate that 290,000 pilots are subject to these recordkeeping requirements at an average of 0.1 hours each.

#### <u>290,000</u> pilots x <u>0.1</u> hour each = <u>29,000</u> hours

<u>Instrument Experience</u>: A person may act as pilot in command under IFR or weather conditions less than the minimums prescribed for VFR only if a person is current within the requirements prescribed in this § 61.57(c). We estimate that 102,811 active pilots with an instrument rating are maintaining currency. It is estimated that 15% of those pilots are using an aviation training device (ATD) exclusively to maintain their instrument currency (approximately 15,422 pilots). For those pilots, this regulatory change will reduce the recordkeeping requirements of logging time from 6 times a year to two times a year, when logging instrument currency exclusively in an ATD. We estimate that 15,422 pilots are subject to this reduction in recordkeeping requirements at an average of 0.1 hours for each entry.

<u>15,422</u> pilots x <u>0.1</u> hour each = 1,542.2 hours x <u>4</u> times a year = 6168.8 hours reduction

Total hours = 29,000-6168.8 = 22,831.2 hours annually

<u>Section 61.63</u>, <u>Additional Aircraft Ratings</u> – provides authority for the addition of category, class, and type rating to an existing certificate</u>. Recordkeeping requirements are included under Section 61.39.

<u>Section 61.85, Applications</u> – Applicants for an original student pilot certificate must submit FAA Form 8710-1 to the FAA or its representatives to determine qualifications of the applicant for issuance of a student pilot certificate. We estimate 38,700 applications for new and replacement student pilot certificates are submitted annually, and FAA Form 8710-1 takes 0.5 hours to complete. Therefore, the student airman certification program imposes a 19,350 hours reporting burden per year. The following equation provides the basis for 19,350 hours.

38,700 applications for new and replacement student pilot certificates x 0.5 hours = 19,350 hours

<u>Section 61.87, Requirements for Solo Flight</u> - Provides for endorsements by an authorized flight instructor on student pilot certificates and in student pilot logbooks for competency and currency. We estimate that 80,000 student pilots are annually subject to these recordkeeping requirements and that .05 hours is the average time required for record entries.

<u>80,000</u> student pilots x <u>.05</u> hour each = 4,000 hours

<u>Section 61.93, Cross-Country Flight Requirements (student pilot)</u> – Requires flight instructor endorsements in pilot logbooks certifying the competence for cross-country flight operations. We estimate that 80,000 student pilots will annually obtain these endorsements and that 0.1 hours are required for each student pilot.

<u>80,000</u> student pilots x 0.1 hours each = 8,000 hours

<u>Section 61.105</u>, <u>Aeronautical Knowledge</u> – Provides for the logging of specified ground instruction by trainees for private pilot certification. The number estimates are included under Section 61.51.

<u>Section 61.107, Flight Proficiency</u> – Provides for logging specified flight instruction for private pilot trainees. Number estimates are included under Section 61.51.

<u>Section 61.115, Glider Rating:</u> Aeronautical Experience – Requires logging of flight time required for the rating. Number estimates are included Section 61.51.

<u>Section 61.125</u>, <u>Aeronautical Knowledge</u> – Requires that applicants for commercial pilot certificates must log specified ground instruction or use other options. We estimate that 19,000 pilots annually use this option to meet aeronautical knowledge requirements and those average 0.2 hours each to log the instruction.

#### <u>19,000</u> pilots x <u>0.2</u> hours each = <u>3,800</u> hours

<u>Section 61.127, Flight Proficiency</u> – Provides for logging specified flight instruction for commercial pilot certificate trainees. Number estimates are included under Section 61.51.

<u>Section 61.159</u>, <u>Aeronautical experience</u> – (c) Permits a commercial pilot to log second-in-command pilot time toward the aeronautical experience requirements required for the airline transport pilot certificate.

PIC endorsements will be provided so that commercial pilots will be able to log SIC time. The FAA estimates that of the 76,957 Commercial Pilots with airplane and instrument privileges that approximately 10% (7,696) may actively pursue a SIC position with a Part 135 operator that is approved for logging SIC time as described for this provision. But, because of the limited number of operators (approximately 457 operators as of 09/28/2017) that would qualify or actually pursue this authorization, the FAA estimates that only 15% (1,154 pilots) might actually become qualified annually to log SIC time under this provision. For those pilots this would increase the record keeping requirements by the addition of these logbook endorsements. The FAA estimates that the 1,154 pilots logging SIC time will require approximately 1.0 hour annually.

1154 pilots x 1.0 hour each = 1,154 hours

<u>Section 61.185</u>, <u>Aeronautical Knowledge</u> – Provides that applicants for flight instructor certificates must log specified ground instruction. We estimate that 5,800 pilots annually comply with this requirement and that they spend an average of 0.1 hour each making logbook entries for a combined total of 600 hours.

5,800 pilots x 0.1 hour each = 580 hours

<u>Section 61.187, Flight Proficiency</u> – Provides for logging specified flight instruction for applicants for a flight instructor certificate. Number estimates are included under Section 61.51.

<u>Section 61.189</u>, Flight Instructor Records – Requires each certificated flight instructor to sign the logbook of each pilot to whom he/she gives instruction, and to maintain a separate record of the instruction given to each pilot regarding solo flight as well as a record of knowledge/practical test endorsements. We estimate that 30,000 certificated flight instructors average 1.0 hour each complying with these recordkeeping requirements.

<u>30,000</u> flight instructors x <u>1.0</u> hour each = <u>30,000</u> hours

<u>Section 61.197</u>, <u>Renewal of Flight Instructor Certificates</u> – States that holders of flight instructor certificates may have their certificates renewed for an additional period of 24 months providing they- 1) pass an appropriate practical test, 2) attend an approved flight instructor refresher clinic/course, 3) endorse at least 5 applicants to take the practical test in which at least 80% passed the first time, <u>or</u> 4) serve as an air carrier check airman or flight instructor in the previous 24 calendar months. FAA Form 8710-1 is used to support the application for renewal. We estimate that 40,000 flight instructors will annually apply for renewal.

<u>40,000</u> 8710-1 applications x <u>0.1</u> hour each = <u>4,000</u> hours

Part 107, Subpart C, Remote Pilot Certification -- Section 107.61 provides the eligibility requirements for persons applying for a remote pilot certificate with a small UAS rating. To obtain it, the applicant will have to either: (1) take and pass an aeronautical knowledge test; or (2) for those part 61 pilots that have completed a flight review within the previous 24 months, take an on-line training course. Upon successful completion of either the aeronautical knowledge test or online training, the applicant will submit an application for the certificate.

In fiscal year 2018, the FAA received **45,727** Remote Pilot certificate applications (form 8710-13). The table below presents the activities and hour burdens.

Requirement	Applicant time (hours)	Total Hours (Annual)	
Application for Remote Pilot Certificate	0.25	11,432	
Knowledge Test Application	0.25	11,432	
Knowledge Test Exam Time	3.0	137,181	
On-Line Training for Current Pt 61 Pilots	2.0	91,454	
Create Online Account Current for Pt 61 Pilots	0.25	11,432	
On-line Training for Knowledge Test Applicants	2.0	91,454	
Airman Knowledge Test Report	0.25	11,432	

#### **Annual Number of Responses**

The total number of annual responses for the airman certification program is estimated to be **1,196,653**.

**Reporting Responses:** 

Section 61.13: Applications	= 200,000
Section 61.85: Applications for Student Pilot Certificates	= 38,700
Section 61.197: Renewal of Flight Instructor Certificates	= 40,000_
Section 107.61: sUAS	= 45,727
Total Reporting Responses	324,427

#### Recordkeeping Responses:

Section 61.39, Prerequisites for flight tests	= 200,000
Section 61.49, Retesting After Failure	= 13,600
Section 61.51, Pilot Logbooks	= 190,000
Section 61.56(a), Flight Review	= 181,839
Section 61.57, Pilot-in-Command	= 290,000
Section 61.87, Requirements for Solo Flights	= 80,000
Section 61.93, Cross-Country Flight Requirements	= 80,000
Section 61.125, Aeronautical Knowledge	= 9,500
Section 61.185, Aeronautical Knowledge	= 5,800
Section 61.189, Flight Instructor Records	= <u>30,000</u>
Total Recordkeeping Responses	1,080,739

Total Combined Responses1,405,166

#### **Annual Number of Respondents**

The total number of respondents in the airman certification program is estimated to be approximately 25 percent of the population of active certificated pilots and instructors. Given a population of 825,000, the result is approximately **206,250 respondents** providing data on an annual basis. The total number of applicants for a remote pilot certificate with a small UAS rating is estimated to be **45,727** annually.

The cost is determined by estimating the time required for the applicants to complete and submit FAA Form 8710-1 applications. Even though the FAA is using the IACRA system, no significant change in time required to complete and submit this form will occur. We estimate that forms are submitted for these certificates and ratings at an average preparation time of 15 minutes (0.25 hrs) each at an average of \$52 per hour, per applicant. The average time estimate of 0.25 hours assumes that many individual applicants will submit an 8710-1 form

more than once for various reasons, and that most of the information provided on the form likely will not have changed. While the burden of this ICR falls on individuals, the FAA believes that aircraft pilots and engineers will perform most of the reporting and recordkeeping requirements. This ICR evaluation uses a pilot hourly wage rate of \$44.28. The FAA increased this hourly rate by 17% to include fringe benefits, resulting in a fully burdened wage rate of approximately \$52/hour. This information is derived from the Bureau of Labor Statistics, Nonscheduled Air Transportation Industry (NAICS 481200), and is assumed to be representative of pilot and representative occupations. http://www.bls.gov/oes/current/naics4\_481200.htm

For Part 107 we estimate that an average of 45,727 forms are submitted annually that require an average preparation time of 0.25 hours to complete. Because Part 107 applicants come from a broad range of occupations, ranging from students to airline transport pilots, the FAA uses DOT data for "General Business Travel," which is based on both median household income and an averaging of wage rates across thousands of occupations. *See* https://www.transportation.gov/sites/dot.gov/files/docs/2016%20Revised%20Value%20of %20Travel%20Time%20Guidance.pdf. This results in an hourly rate of \$25.40.

#### **45,727** 8710-13 Applications **x 0.25** hours **x \$25.40 per hour = \$290,366**

#### <u>Summary</u>

We estimate that the airman certification program imposes a 371,711 hours reporting and recordkeeping burden on the public (**54,782**hours reporting and 316,329 hours recordkeeping). The annual cost is estimated at \$18,993,674 (\$2,544,566 for reporting, \$16,449,108 for recordkeeping).

	Annual Burden by Section				
Section	Hours	Respondents	Hrs. ea.	Cost (\$)	
	Reporting				
61.13, Application and	20,000	200,000	0.1	1,040,000,000	
Qualification					
61.85, Applications	19,350	38,700	0.5	1,006,200	
61.197, Renewal of Flight	4,000	40,000	.1	208,000	
Instructor Certificates					
107, Subpart C, Remote Pilot	11,432	45,727	.25	290,366	
Certification					
Subtotal	54,782	324,427		\$2,544,566	
		ecordkeeping	1		
61.39, Prerequisites for flight	10,000	200,000			
tests				520,000	
61.49 retesting after failure	680	13,600		35,360	
61.51, Pilot logbooks	190,000	190,000		9,880,000	
61.56(a), Flight Review	18,184	181,839		945,568	
61.57, Pilot-in-Command	29,000	290,000		1,508,000	
61.57, Instrument Experience	22,831	15,422		1,187,212	
61.87, Requirements for Solo	4,000	80,000			
Flight				208,000	
61.93, Cross-Country Flight	8,000	80,000			
Requirements				416,000	
61.125, Aeronautical Knowledge	1,900	9,500		98,800	
61.159, Aeronautical experience	1,154	1,154		60,008	
61.185, Aeronautical Knowledge	580	5,800		30,160	
61.189, Flight Instructor	30,000	30,000			
Records				1,560,000	

The total burden breaks down as follows:

Subtotal	316,329	1,097,315	\$16,449,108
TOTAL	371,711	1,421,742*	\$18,993,674

\*This does not represent a total number of unique respondents, because the same population is subject to multiple sections covered by this collection.

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

There are no additional start-up costs associated with this collection not already included in item number 12.

## 14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses and any other expense that would not have been incurred without this collection of information.

Estimated annual cost to the Federal Government is **\$3,934,629**. This cost is determined by estimating the time required for FAA personnel to review and process FAA 8710-1 Airman Certificate and/or Rating Application forms. Even though the FAA has begun IACRA implementation, no significant change in the time required to review this form has occurred. We estimate that 138,000 forms are submitted for these certificates and ratings at an average file processing time by a clerical worker of 30 minutes (0.5) each. For this ICR the FAA is estimating that this work would be performed by a Miscellaneous Clerk and Assistant, series 0303, at pay grade GS-7, Step 1, at an annual salary of \$41,365. For federal salaries, the FAA uses a multiplier of 36 percent to account for benefits and overhead, resulting in an hourly rate of \$27.

#### **<u>200,000</u>** 8710-1 Applications **x <u>0.5</u> hours <b>x \$27 per hour = \$<u>2,700,000</u>**

### For Part 107 we estimate that an average of 39,229 forms are submitted annually which cost \$27 per hour to process.

**45,727** 8710-13 Applications **x 1 hour x <u>\$27</u> = <b>\$1,234,629** 

#### Total: \$2,700,000 + \$1,234,629 = \$3,934,629

For software updates, the federal government incurs an annualized cost of \$0.017 million at a 7% rate and a \$0.015 annualized cost at a 3% rate.

	Total Software Update Costs							
		PV at	Annualiz	PV at	Annualiz			
	Total	7%	ed at 7%	3%	ed at 3%			
Estima	(millio	(millio	(millions	(millio	(millions			
te	ns)	ns)	)	ns)	)			
Total	\$0.130	\$0.121	\$0.017	\$0.126	\$0.015			

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### 15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of the OMB Form 83-1.

The FAA is reducing the burden for instrument currency requirements under § 61.57 for those pilots that use aviation training devices. The FAA estimates that, of the 102,811 active pilots with an instrument rating, that approximately 50% are maintaining currency. It is likely that only 15% of those pilots (approximately 15,422 pilots) are using an aviation training device exclusively to maintain their instrument currency. For those pilots, this change will reduce the recordkeeping requirements of logging time from 6 times a year to two times a year,

when logging instrument currency exclusively in an aviation training device. The FAA estimates this burden reduction to be 6168.8 hours annually.

Additionally, § 61.159(c) allows pilots to log SIC time in part 135 operations in a single engine turbinepowered airplane or a multi-engine airplane that otherwise does not require an SIC. This will require the pilot to obtain a logbook endorsement from the PIC for each individual flight to log this time as SIC. The FAA estimates that of the 76,957 Commercial Pilots with airplane and instrument privileges that approximately 10% (7,696) may actively pursue a SIC position with a Part 135 operator that is approved for logging SIC time as described for this provision. But, because of the limited number of operators (approximately 457 operators as of 09/28/2017) that would qualify or actually pursue this authorization, the FAA estimates that only 15% (1,154 pilots) might actually become qualified annually to log SIC time under this provision. This additional record keeping requirement will be reflected in Section 61.159, Aeronautical experience. The FAA estimates this SIC training program burden increase is 1,154 hours annually.

### 16. For collections of information whose results will be published, outline plans for tabulation, and publication.

There are no plans to publish this information for statistical or other purposes.

### 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.

No such approval is being sought.

### 18. Explain each exception to the certification statement identified in item "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-1.

There are no exceptions to the certification statement.