

## Supporting Statement A

OMB 2120-0682

### Certification of Repair Stations, Part 145 of Title 14, CFR

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

Part 145 of Title 14, Code of Federal Regulations (14 CFR) prescribes the requirements for the issuance of repair station certificates and associated ratings to maintenance and alteration organizations. 14 CFR part 145 states that a repair station application must be made in a format acceptable to the FAA. In order to remain consistent and provide ease of application, the FAA designed and made available to the public FAA Form 8310-3 Application for Repair Station Certificate and/or Rating. The form contains information that will identify the repair station and its ratings and limitations, which are necessary to ensure that the repair station meets the minimum acceptable standards to hold the certificate. The form captures information such as, but not limited to, official name of repair station, location where business is conducted, official mailing address, any doing business as name, changes in ratings, or if initial certification, ratings sought, changes in location or housing and facilities, change in name or ownership, or any other purpose for which the applicant requests, including a request for approval to contract maintenance functions to outside entities.

**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.**

This information collection is required to receive a benefit and is reported to the FAA on occasion. Persons requesting to obtain an initial air agency certificate to operate as a repair station or changes to an existing repair station (air agency) certificate do so by voluntarily submitting the request in a format acceptable to the FAA. In order to remain consistent and provide ease of application, the FAA designed and made available to the public the FAA Form 8310-3 Application for Repair Station Certificate and/or Rating. The FAA finds this form as an acceptable means of making application to become a certificated repair station, and also to inform the FAA of changes to the existing repair station certificate. The form is made available to the applicant/respondent for obtaining initial repair station certification or any changes to the operating certificated repair station, such as changes to the ratings.

Once the FAA reviews the submitted application and finds by inspection that the applicant has the ability to comply with the 14 CFR part 145 requirements for certification, an air agency certificate and ratings is issued as requested by the applicant. The FAA retains a copy of the application in the FAA office that issued the certificate for an indefinite time or a time-period specified by mandated file retention laws. The applicant is not required to retain a copy of the

form. The FAA does not provide other persons or entities with information contained in the form.

**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.**

In accordance with the Government Paperwork Elimination Act, this rule allows repair station certificate holders and applicants to submit information or transact with the FAA 100% electronically. The rule also allows repair stations to maintain records electronically and use electronic signatures. For example, after a repair station has requested that the FAA change the capabilities listed on its operations specifications, the FAA will sign the amended operations specifications using an electronic signature and transmit the operations specifications to the repair station. The repair station reviews the operations specifications, signs them with an electronic signature and electronically transmits them back to the FAA. Additionally, a repair station certificate holder is required to maintain FAA a repair station manual. The manual must be in a format acceptable to the FAA, which may include maintaining the manual on a local network or on CD-ROM.

**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.**

We have reviewed the other public use reports and information and find no duplication. Also, we know of no other agency requiring this information from repair stations and repair station applicants for the purpose of certification or rating. The information collected is only available from the applicants applying for a repair station certificate and is not available from any other source.

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

The information submittal/collection burden is related to the size and the number of ratings for which a repair station is certificated. These requirements are the absolute minimum necessary to ensure effective compliance with Part 145. Small organizations would have a proportionally smaller burden under the rule.

**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.**

Only persons who wish to obtain an air agency certificate to conduct business as an FAA certified repair station or an existing certificated repair station owner wishing to make changes to their certificate voluntarily submit the FAA Form 8310-3 form. The applicant enters information

onto the form that will support their need for certification or changes. Without this form being submitted, the FAA will not have the information that is contained in the form and therefore, no repair station certificate could be issued or in the case of an existing certificate, no changes could be made to the certificate.

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

There are no special circumstances.

**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.**

A notice for public comment was published in the Federal Register on August 28, 2018 (83 FR 43954). No comments were received.

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

No payments or gifts are made to respondents.

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

Respondents have not been given an 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.**

There are no questions of a sensitive nature.

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

Respondents who wish to obtain an air agency certificate to conduct business as an FAA certified repair station are required to submit the FAA Form 8310-3 form. The applicant is required to submit this form only once for initial certification. If the certificated repair station owner wishes to make changes to the certificate, such as, a change in ratings, he/she will be required to submit an FAA Form 8310-3 to make those changes.

The FAA predicts that an applicant or the certificated repair station owner will spend 15 minutes to fill out the FAA Form 8310-3 and submit the form via email or standard mail.

Total Number of 8310-3 received (FY) 2018	193
Total revised 8310-3 existing repair stations	127
Number of 8310-3 new applicants out of 193	66
Number of minutes per application/8310-3	15
Total time burden FY 2018	48.25 total hours per FY18

The cost equation is an administrative clerk at 15.14\$ per hour derived from the bureau of labor statistics\*. Overall, cost estimate is 15.14 X 48.25 =7305.05\$

\*<https://www.bls.gov/ooh/office-and-administrative-support/general-office-clerks.htm>

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

There are no annual cost burdens for the responder.

**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.**

This cost is determined based on FAA aviation safety inspector’s (ASI) time to review and process FAA Form 8310-3 applications, issuance of certificate or changes to the existing certificated repair station. The typical inspector is a FG-13, having a hourly wage of \$53.00. This is not an annualized cost. This is a one-time cost for initial certification and subsequent changes to an existing certificate.

FAA	ASI		Hours	Total Cost
Reviewing application	2		2	\$212.00
Conducting inspection	2		8	\$848.00
Issuing certificate	2		2	\$212.00
Filing and entering	2		1	\$106.00

information into database				
Hourly wage ASI	2		\$53.00	\$106.00
Total Cost				\$1,378.00

The total cost for an initial repair station certification is calculated by \$53.00 per hour, per 13 hours of time for each inspector, multiplied by 2 equals \$1,378.00.

The total cost to the federal government for changes to an existing certificate can be reduced to one inspector reviewing application, inspecting facility, issuing revised or amended certificate, and filing the certificate. That cost is estimated at \$689.00 per each change requested by the existing certificated repair station.

FAA	ASI		Hours	Total Cost
Reviewing application	1		2	\$106.00
Conducting inspection	1		8	\$424.00
Issuing certificate	1		2	\$106.00
Filing and entering information into database	1		1	\$53.00
Hourly wage ASI	1		\$53.00	\$53.00
Total Cost				\$689.00

\$1,378.00	66	\$90,948.00
\$689.00	127	\$87,503.00
=====	=====	=====
=====	=====	=====
		\$178,451.0
		0

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

In the past renewal of 2015, the FAA had implemented a regulatory requirement for the repair stations to submit their training program for FAA approval. Since that time frame, this form is now utilized for repair station certification and or rating and we are no longer requiring the reporting of training. These labor costs and time to fill out have changed and are reflected in question number 12 based on the lessening of burden placed.

**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.**

Information is not published.

**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.**

We shall seek approval to not display the expiration date. FAA Form 8310-3 is a recurring form that is printed and stocked for continuous use. When the supply gets low, the form is automatically reprinted and stocked so that there will be no interruptions in services. The FAA therefore requests an exemption from placing the expiration date on the form.

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

There are no exceptions to the Certification for Paperwork Reduction Act Submissions.