

Summary of Changes: -The calculation of burden has been revised to add burden as a result of regarding dispatcher applicant knowledge testing, as required by 14 CFR 65.55.
-There has been a significant increase in the number of current aircraft dispatcher school operators (57) and number of designated aircraft dispatch examiners (51), from previous submission.

SUPPORTING STATEMENT

OMB-2120-0648

Part 65- Certification: Airmen Other Than Flight Crewmembers
Subpart C - Aircraft Dispatchers and
Appendix A to Part 65 - Aircraft Dispatcher Courses

Justification

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

Under the authority of Title 49 USC, Section 44703, (formerly the Federal Aviation Act of 1958, Section 602) specifically empowers the Secretary of Transportation to issue airmen certificates to properly qualified persons. In keeping with the FAA's policy of reviewing and updating regulations to ensure that they are consistent with changes in the aviation environment, the FAA, with the assistance of the Aviation Rulemaking Advisory Committee (ARAC), the FAA reviewed part 65, subpart C, and appendix A of 14 CFR part 65 regarding aircraft dispatcher certification requirements. In the 30 years preceding the 1999 final rule (64 FR 68923), few changes had been made to the dispatcher certification requirements, although numerous technological advances had occurred in the aviation industry regarding operational practices and training methods. This collection involves the information that each applicant for an aircraft dispatcher certificate or FAA approval of an aircraft dispatcher course must submit to the FAA to comply with 14 CFR part 65, subpart C and Appendix A. These applications, reports and training course materials are provided to the responsible Flight Standards Office of the FAA which oversees the certificates and FAA approvals.

The collection of this information supports the Department of Transportation's strategic goal on safety.

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

Each applicant for an aircraft dispatcher certificate or FAA approval of an aircraft dispatcher course must comply with Part 65, Subpart C and Appendix A. All submissions are provided to the responsible Flight Standards Office of the FAA that oversees the certificates and FAA approvals. The collection of this information is mandatory due to regulatory intent and the respondents are each applicant for an aircraft dispatcher certificate (individual) and each applicant for FAA approval or renewal of an aircraft dispatcher course (course operator). The collection is conducted initially, annually and on occasion and would include the collection of information from instructors, students/applicants, and facilities. This collection of information is required to determine whether the course operator and the aircraft dispatcher/applicant meets the regulatory requirements. The FAA uses the collected information to initially approve a course

operator, and renew on a bi-annual basis to continually ensure that student applicants have been trained properly.

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 is associated with information and recordkeeping. The FAA has traditionally encouraged, and is receptive to, the use of automation to reduce burden. In response to the Government Paperwork Elimination Act (GPEA), the agency allows 100% of this information to be submitted electronically.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose(s) described in 2 above.

We find no duplication. We know of no other agency collecting this information. The information collected is not available from any other source, it is only available from the applicant.

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.

Requirements apply to individual applicants for aircraft dispatcher certificates and those who choose to train them. Any small aircraft dispatcher school operating under the provisions of part 65 would have burdens in proportion to the size of their operation. The paperwork burden is scalable. For example, Section 65.65 requires a description of equipment and facilities and Section 65.63 requires a list of the instructors and their qualifications. An aircraft dispatcher school with little equipment, one facility, and one or two instructors would have much less complexity in terms of paperwork burden than a larger business.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The collection of information for those course operators who choose to train aircraft dispatcher applicants is to protect the applicants by ensuring that they are properly trained. The frequency of the burden largely depends on the stability of the aircraft dispatcher school and the efficacy of their training. Their burden is increased if they develop inadequate course outlines that need revision often and train students who do not satisfactorily complete the FAA tests.

If the collection is not conducted or is conducted less frequently, the applicant or aircraft dispatcher school may not be meeting regulatory intent for continuing to remain an approved aircraft dispatcher school, or may not be able to safely dispatch aircraft.

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).

There are no special circumstances.

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.

A notice soliciting public comment was published in the *Federal Register* on August 23, 2018 (83 FR 42758). No comments were received [Need to revise after 60 Day FRN is published].

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

There are no payments or gifts.

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

There have been no such assurances provided to respondents.

11. Provide additional justification for any questions of a sensitive nature such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden for the collection of information. The statements should: Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

The hour burden and the cost burden for the respondents is **6,350 hours** and **\$ 156,929.08**

The calculations of burden are based on the following Information:

- There are currently **57 approved course operators** nationwide
- Each aircraft dispatcher school conducts an average of 3 classes per year of 45 days each.
- Each class has an average of 8 students. **(1,368 total students)**
- 90% of the students complete the test (ten percent of course graduates never take the test).
- $90\% \times 8 = 7.2 \times 3 = 21.6 \times 57 = 1231$ **students take the test each year.**

- The salary of a technical specialist is calculated at \$26.95 per hour with 31.7% benefits cost for a total of **\$35.49 per technical hour**¹
- The salary of a clerical specialist is calculated at \$18.21 per hour with 31.7% benefits cost for a total of **\$23.98 per clerical hour**.²
- The burden associated with certification of dispatcher applicants who must submit an 8400-3 Application for an Airmen Certificate and/ or Rating is already addressed in collection 2120-0007.

FAA estimates **3 new applicants for aircraft dispatcher schools** per year will be the average. An average of 2 aircraft dispatcher schools per year cease operations. On average, **28.5 aircraft dispatcher schools renew on an annual basis.**

Each new aircraft dispatcher school applicant must submit:

Letter - one page, 30 minutes technical, 20 minutes clerical per year
 Course outline - 30 pages, 8 technical hours, 2.5 clerical hours per year
 Description of equipment and facilities - one page, 1 technical hour, 20 minutes clerical per year.
 List of instructors and their qualifications - one page, 1 technical hour, 20 minutes clerical hour per year.

Totals	Technical hours	-10.5 x \$35.49 = \$372.65
	Clerical hours	<u>3.5 x \$23.98 = \$ 83.93</u>
	14 hours	\$456.58 per school

14 hours X 3 new schools per year = 42 Hours
\$456.58 X 3 new schools per year = \$1,369.74

Renewals and Cancellations: The aircraft dispatcher school applicant sends another letter.

Revisions - are accomplished in the same way as original applications.

There are no specific forms.

Renewal aircraft dispatcher school applicants (due each 24 months) or aircraft dispatcher school applicants who wish to cancel authority:

Letter - one page, 20 minutes technical, 10 minutes clerical per year.

Totals	Technical hours	- .33 x \$35.49 = \$ 11.71
	Clerical hours	<u>.16 x \$23.98 = \$ 3.84</u>
	.49 hours	\$ 15.55 per renewal

.49 hours X 28.5 per year = 14 hours
\$15.55 X 28.5 per year = \$443.18

¹ BLS Occupational Employment and Wages, May 2017, Airfield Operations Specialists. Bureau of Labor Statistics, Employer Costs for Employee Compensation – September 2018, USDL-18-1941, Released December 14, 2018

² BLS Occupational Employment and Wages, May 2017, Secretaries and Administrative Assistants. Bureau of Labor Statistics, Employer Costs for Employee Compensation – September 2018, USDL-18-1941, Released December 14, 2018

Revisions: Not considered a burden since FAA does not mandate any revisions.

§65.55 Knowledge requirements.

A person who applies for an aircraft dispatcher certificate must pass a knowledge test. 1231 students take the test each year. The FAA estimates that it will take 2 hours for each applicant to take the test. There is no cost burden associated with the time for an applicant to take the test. There is an average of one test proctor per 8 applicants. The average salary of a technical specialist who must proctor the test is \$35.03 per hour.

1231 divided by 8 = 154 technical specialists x 2 hours at \$35.49 per hour (\$70.06) = **308 hours and \$10,930.92**

65.63 - Aircraft Dispatcher Certification Courses: Application, Duration, And Other General Requirements.

An applicant for approval of an aircraft dispatcher course (an FAA approval is good for 24 months.)

Burden:

New aircraft dispatcher school applicants, renewals and cancellations: Three new aircraft dispatcher school applicants per year at a rate of 70 hours per year (\$37.50 per hour)

3 new aircraft dispatcher school applicants x 14 hours = **42 hrs** x \$35.49 per hour = **\$1,490.58**

Cancellations: Two cancellations per year at a rate of .5 hours per year (\$34.98 per hour)

2 cancellations x .5 hrs = **1 hr** x \$35.49 per hour = **\$35.49**

Renewals: Twenty-eight and a half renewals per year at a rate of .5 hours per year (\$35.03 per hour)

28.5 renewals x .5 hrs = **14.25 hr** x \$35.49 per hour = **\$505.73**

Notification to the Administrator of changing the ownership, name, location of an approved course:

We do not anticipate any change in aircraft dispatcher school ownership, name, or location of courses.

Total hours/cost:	42 hours	\$1,490.58
	1 hour	\$35.49
	<u>14.5 hours</u>	<u>\$505.73</u>

57.5 hours

\$2,031.80

65.67 – Personnel

The ratio of students per instructor may not exceed 25 students for one instructor. Within the last 24 calendar months at least 80 percent of the students or graduates who applied for testing within 90 days after graduation from the school must have passed the practical test on the first attempt as per Part 65.63.

Burden: Combined with the burden of 65.70 below. This would be recorded in the same student file and a one-line statement would be in the request for renewal letter of 65.63 above.

65.70 - Records

The aircraft dispatcher school must keep a record of each student including chronological log of all instructors, subjects covered, and course examinations and results, for a period of not less than 3 years. The course operator must also prepare, retain, and transmit a report to the Administrator not later than January 31 of each year. The report contains the following information for the previous year: The names of all students graduated, together with the results of their aircraft dispatcher certification course, and the names of all the students failed or withdrawn, together with results or reasons for withdrawal. Each student who successfully completes the approved aircraft dispatcher certification course shall be given a written statement of graduation.

Burden: 57 aircraft dispatcher schools in any given year x 24 students per year per aircraft dispatcher school x 1 record for each student x 1 clerical hour per student

$57 \times 24 = 1368 \text{ students} \times 1 \text{ record} = 1368 \text{ records} \times 1 \text{ hr} = \mathbf{1368} \times \$23.98 \text{ (clerical hour)}$
 $= \mathbf{\$32,804.64}$

Update of course curriculum and training outline: Each of the 57 aircraft dispatcher certification course operators/schools is required to update the course curriculum and training outline which will be a one-time occurrence of approximately 80 hours per operator/school at a cost of \$23.98 per hour.

Burden: 57 operators/schools x 80 hrs = **4,560 hrs.** x \$23.98 = **\$109,348.80**

SUMMARY OF HOURS AND COST BURDEN BY SECTION:

<u>Section</u>	<u>Hours per Year</u>	<u>Cost per Year</u>
New	42	\$ 1,369.74
Renewals	14	\$ 443.18
65.55	308*	\$ 10,930.92
65.63	58	\$ 2,031.80
65.67	0	\$ 0
65.70	1,368	\$ 32,804.64

Update of curriculum	4,560	\$ 109,348.80
TOTALS:	6,350	\$ 156,929.08

***310 in ROCIS due to rounding.**

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

There are no additional costs not already identified in 12.

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

Currently there are 30 Dispatch Aviation Safety Inspectors overseeing 57 FAA approved dispatcher certification courses and 51 Designated Aircraft Dispatcher Examiners. Generally, these inspectors are GS-13 for a average wage of \$41.20 per hour with 31.7% benefits cost for a total of **\$54.26 per hour**.

The 57 approved aircraft dispatcher certification courses are approved for a period 24 months and must be reevaluated before the course is approved to continue.

The FAA approves an average of 3 new aircraft dispatcher certification courses per year and an average of 2 courses cease business each year.

The average number of hours for each activity is:

Review new course	40 hours
Review continuing course	20 hours
Training New Designated Aircraft Dispatcher Examiners	18 hours/examiner
Recurrent Training for each Designated Aircraft Dispatcher Examiners	10 hours
Oversight of course over year	16 hours
Administrative paperwork	57 schools
	<u>51 examiners</u>
	108

Yearly cost for overall FAR 65, subpart C dispatcher courses:

New course	2 x 40hr x \$54.26 =	\$ 4,340.80
Review existing course	28.5 x 20hr x \$54.26 =	\$ 30,928.20
Training new DADE	6 x 18hr x \$54.26 =	\$ 5,860.08
DADE recurrent training	51 x 10hr x \$54.26 =	\$ 27,672.60
Course Oversight	57 x 16hr x \$54.26 =	\$ 49,485.12
Testing applicants that do not attend FAA approved courses	10 x 8hr x \$54.26 =	\$ 4,340.80
Administrative paperwork	108 x 10hr x \$54.26 =	<u>\$ 58,600.80</u>
		\$ 182,228.40

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

The cost burdens for the public responses and for Federal processing of responses have been revised to account for current data regarding respondents and revised salary information since the previous submission. In addition, some calculation errors were corrected. Further, the calculation of burden has been revised to add burden as a result of regarding dispatcher applicant knowledge testing, as required by 14 CFR 65.55. There also has been a significant increase in the number of current aircraft dispatcher school operators (57) and number of designated aircraft dispatch examiners (51), from previous submission.

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 of the collected information.

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 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no exceptions.