SUPPORTING STATEMENT for Certification of Airmen for the Operation of Light-Sport Aircraft 2120-0690

Justification

1. Explain the circumstances that make the collection of information necessary.

The purpose of Title 49 United States Code, Subtitle VII, Aviation Programs, is to encourage and foster the development of civil aeronautics, and to promote safety in air commerce.

<u>Section 40113(a)</u> empowers the Secretary of Transportation (or the Administrator of the Federal Aviation Administration with respect to aviation safety duties and powers designated to be carried out by the Administrator) to take action he/she considers necessary to carry out this part, including conducting investigations, prescribing regulations, standards and procedures, and issuing orders.

<u>Section 44701</u> empowers the Administrator to promote safety by prescribing minimum safety standards and regulations necessary for safety in air commerce. It also empowers the Administrator to grant an exemption from a requirement of a regulation-if it is in the public interest.

<u>Section 44702(a)</u> specifies that applications shall be as the Administrator prescribes as to form, content, retention, and manner served.

<u>Section 44702(d)</u> empowers the Administrator to delegate to a qualified private person, or an employee under the supervision of that person, matters related to examination, testing and inspection necessary to issue a certificate; and issuing the certificate.

<u>Section 44703</u> specifically empowers the Administrator to issue airman certificates to properly qualified persons.

<u>Part 21</u>

Federal Aviation Regulation (FAR) Part 21, Certification Procedures for Products and Parts, implements the provisions of 49 U.S.C., Subtitle VII, Sections 40113, 44701, 44702, and 44704, prescribing procedural requirements for the issue of of airworthiness approvals; the certificates; the issue of support airworthiness approvals; the issue of Technical Standard Orders; the related approval of materials, parts, processes and appliances; and rules governing the holder of such certificates and approvals.

<u>Part 61</u>

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 light-sport aircraft. Each certificate issued specifies the capacity in which the holder is authorized to serve as an airman in connection with the operation of a light-sport aircraft.

Federal Regulations Part 61, Certification: Pilots, Flight Instructors, and Ground Instructors, prescribes minimum standards and requirements for the issuance of airman certificates, and they establish procedures for applying for airman certificates.

<u>Part 183</u>

Title 49, United States Code, Section 44702, states that the Secretary of Transportation may, subject to such regulations as he may prescribe, delegate to any properly qualified private person, the examination and testing necessary for issuance of certificates.

Part 183 of the federal regulations (14 CFR 183), Representatives of the Administrator, implements the provisions of Section 44702. Part 183 of the federal regulations describes the requirements for delegating to private individuals the authority to examine and test persons for the purpose of issuing airman certifications to those individuals.

In addition to the regulatory basis, the purpose of this information collection is to make designated examiners readily available to the public, especially in those areas where Federal Aviation Administration (FAA) inspector resources are limited.

This final rule required the addition of designated pilot examiners to certificate sport pilots and flight instructors with a sport pilot rating who are qualified in these new light sport aircraft. Also, it will require additional designated airworthiness representatives to issue lightsport and experimental, kit-built airworthiness certificates for the newly manufactured lightsport aircraft over the course of ten years.

This information collection supports the Department of Transportation's strategic goals on safety and security. This collection is fundamental in order to promote the public health and safety by working toward the elimination of transportation-related deaths, injuries, and property damage.

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

This information collection mandates that applicants who wish to obtain or maintain certification as sport pilots or light sports aircraft flight instructors; entities seeking to obtain or maintain light-sport aircraft airworthiness certification; and individuals wishing to become or remain Designated Pilot Examiners to report information to the FAA on occasion.

<u>Part 21</u>

FAA designated inspectors confirm the appropriate manufacturer's self-certification is presented with the aircraft, and inspects the aircraft to confirm that it is in a condition for safe operation. Those products that comply with the minimum requirement are issued the appropriate airworthiness certificate. The airworthiness certificate indicates to the purchaser

of the aircraft that the product was designed and produced in compliance with the referenced industry developed consensus airworthiness standards. This will permit the purchaser of the aircraft to use the aircraft for purposes of flight instruction and rental for pilot proficiency training. This will lead to a higher skill level and resulting higher level of safety for the owners and operators of these aircraft.

<u>Part 61</u>

The Airman certificate and/or Rating Application Form and the required records/logbooks/statements required by the federal regulations are submitted to Federal Aviation Administration (FAA) district offices or its representatives to determine qualifications of the applicant for issuance of a pilot or instructor certificate, rating, privilege, or authorization.

Approximately 10,000 pilots and flight instructors have sought certification to date. Applicants for a new certificate for the student pilot, sport pilot, ground, and flight instructor with a sport pilot rating or new category or class privileges are required to submit FAA Form 8710-11, Sport Pilot Airman Certificate and/or Rating Application.

<u>Part 183</u>

This rule will require the addition of new designated examiners and will require modifications to the forms listed below. Collection of this information is for the purpose of obtaining essential information concerning the applicants' professional and personal qualifications. The FAA uses the information provided to screen and select the designees who act as representatives of the Administrator in performing various certification and examination functions.

The collection of information is accomplished by use of the following forms:

FAA Form 8710-12. Light-Sport Standardization Board-Designated Pilot Examiner Candidate Application. The designated examiners impacted by this rule:

• DPEs – Sport pilot Examiners and Sport Pilot Flight Instructor Examiners (SPE and SFIEs).

The FAA estimates a total of 20 respondents per year for the first year.

The FAA is planning to phase out FAA Form 8710-12 in the next year, which is only used by Sport pilot Examiners and Sport Pilot Flight Instructor Examiners (SPE and SFIEs).

3. Describe any consideration of the use of improved information technology to reduce burden and any technical or legal obstacles to reducing burden.

<u>Part 21</u>

Efforts are ongoing to improve information technology through internal automation systems designed to collect, organize, store, and transmit diverse information. We are working with industry to develop systems for allowing on-line data entry of safety reporting data to reduce burden in industry. Currently, in compliance with the Government Paperwork Elimination Act (GPEA), 100% of the information collection is available electronically through pdf-fillable forms and online data bases.

Part 61, Part 65, Part 183

At the present time, there are two methods available to evaluate an applicant's qualifications. One is a review of the form completed and signed by the applicant and the other is a major automation initiative being developed by the FAA. The initiative is defined as Integrated Airman Certification and Rating Application (IACRA).

The system is fully implemented, to include the use electronic signatures. All airmen that will be issued airman certificates under this rulemaking initiative will be utilizing IACRA. The IACRA initiative incorporates the capability of the applicant and the designee to digitally sign the airman application for a designee to meet the initiatives of the Government Paperwork Reduction Act (GPEA) P.L. 105-277, Title XVII.

Another major automation initiative, the Designee Management System (DMS) is being developed by the FAA. When the system is fully implemented, to include the use electronic signatures, all designees that will apply through this method, in lieu of FAA Form 7711-12 to meet the initiatives of the Government Paperwork Reduction Act (GPEA) P.L. 105-277, Title XVII.

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.

<u>Part 21</u>

We have checked our other public reports and are satisfied that no duplication exists. No other agency is responsible for collecting information on the certification of aircraft products and parts. The rule revision specifically excludes existing type certificated aircraft from its applicability, so there is no duplication and only new categories of aircraft are subject to its data collection requirements.

The information requested by the FAA established a record of essential data concerning the applicant and product(s) involved and is available only from the applicant. The information is not available elsewhere.

<u>Part 61, Part 183</u>

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 involves small businesses or other small entities, describe the methods used to minimize burden.

<u>Part 21</u>

The manufacturer of the aircraft is permitted to use any means or methods for recordkeeping that will support the manufacturer's issuance of the statement of compliance. The information is not submitted to the government, nor is it submitted to the purchaser of the aircraft. It is retained by the manufacturer as process and product records.

Part 61, Part 183

This information collection does not involve small businesses. It involves only individuals who are required to complete an application form.

6. Describe the consequences to Federal program or policy activities if the collection were conducted less frequently.

<u>Part 21</u>

The frequency of collection of this information is not a set time; it is established as needed by the respondent.

The frequency of collection of this information is not determined by a FAA mandated requirement. The recording of major repairs and major alterations is determined by the respondent as needed.

<u> Part 61</u>

The frequency of information collection is determined by the applicants who submit certification applications to the FAA. A decrease in the frequency of collection is governed by the applicant, not the FAA, unless safety dictates otherwise (i.e. numerous violations of the federal regulations).

<u>Part 65</u>

If the collection of this information were not conducted, FAA inspectors would not be able to determine applicant eligibility and qualifications. Without this determination, the appropriate certificate could not be issued.

<u>Part 183</u>

The information is collected only when the applicant wishes to apply for a designated examiner/representative position and such a designation is necessary to provide adequate certification service.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.5(d)(2).

<u>Part 21, Part 61, Part 183</u>

The collection of information is consistent with the guidelines in 5 CFR 1320.5(d)(2)(i)-(viii), except records concerning aircraft registration which are maintained for the life of each aircraft. Consensus standards call for the manufacturer to permanently retain design and performance analysis information for safety of the product, and liability and marketability of the manufacturer's design.

8. Describe efforts to consult with person outside the Agency to obtain their views on the availability of data.

A notice was published in the Federal Register on August 22, 2018, FR Doc. 2018–18505. No comments were received.

9. Explain why decision to provide any payment or gift to respondents, other than re-enumeration of contractors or grantees.

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

10. Describe any assurance of confidentiality.

<u>Part 21, Part 183</u>

No assurance of confidentiality is provided or needed.

<u>Part 61,</u>

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.

There are no sensitive questions in this collection of information.

<u>Part 61</u>

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 substance. This information is necessary to determine whether the applicant is in compliance with appropriate federal regulation 61 certification requirements.

12. Provide estimates of the hour burden of the collection of information. Provide estimates of cost to respondents for the hour burdens for collections of information.

Pilot and Instructor Certification

This information collection requires applicants for certification as sport pilots to complete FAA form 8710–11, log training, take and pass a knowledge test, and requires organizations to develop and maintain training courses for sport pilots. The total of sport pilot applicants is estimated to be 500, with a burden of 1485 hours.

In addition, applications for certification as sport pilot instructors are required to take and pass a knowledge test, and purchase a training course. This affects an estimated 40 applicants, with a total annual burden of 85 hours.

The FAA is using the following hourly wages, which include all fringe benefits:

Pilot wage:	\$31.50
Instructor wage:	\$34.65
DPE wage:	\$100.00
Clerical wage for manufacturer:	\$17.93

The FAA is also using the following assumptions:

Percent of Pilots and instructors that fail knowledge test	10%
Percent of Pilots and instructors that fail practical test	10%
Cost of the training	\$100

<u>Part 21</u>

This analysis of the cost to the public of the light-sport aircraft airworthiness certification program will use the following assumptions:

Annual impact:

<u>New</u>

Of 297 new aircraft, on average, about 50% will be factory-built and 50% will be kit-built The FAA estimates that approximately 297 respondents are required to complete FAA form 8130–15, with a total annual burden of 3782 hours.

<u>§21.190(b)(3)</u> states that to be eligible for a special airworthiness certificate in the light-sport category, the aircraft must be inspected and found to be in a condition for safe operation. This cost is paid by the customer to obtain the inspection needed to obtain the special light-sport category airworthiness certificate.

<u>\$21.191(i)(2)</u> applies to obtaining experimental certificates for eligible aircraft that have been assembled from a kit.

The DAR will process the applications. The total charge for the DAR is \$350 if the inspection is performed at the factory or at a workshop, and \$650 if the inspection is not

performed at the factory or at a workshop. The FAA is assuming an average of about 5.4 hours per inspection for the former situation and 10 hours per inspection for the latter, given the DAR's hourly rate of \$65. The relevant table is Table 1 on page 40 of the Regulatory Evaluation.

The burden for these sections is covered under OMB #2120-0018.

<u>§21.190(c)(3)</u> states that the manufacturer must determine that the aircraft conforms to the manufacturer's design data using an acceptable quality assurance system. This cost applies only to the manufacturer of new aircraft seeking to obtain the special light sport aircraft airworthiness certificate. For the "simple" class aircraft, this is assumed to require two hours for recordkeeping, while for the more complex aircraft, this is multiplied a ratio of 12 equivalent to that used in the preceding cost item ("Complex" is 12 times the burden of "simple"). For the 297 aircraft per year, the average recordkeeping burden will be 10.3 hours per aircraft, which is derived by taking the average of 2 hours for the 28 manufacturers of "simple" aircraft and 24 hours for 17 manufacturers of "complex" aircraft. Costs are calculated using this range of hours assuming that ³/₄ of the time will be supplied by management and ¹/₄ by a clerical assistant. The relevant table is Table E.2 on page 173 of the Regulatory Evaluation.

respondents: **297** Annualized cost burden = 297 aircraft X 10.3 hours X (\$55 per hour x $\frac{34}{4}$ + \$17.93 per hour x $\frac{1}{4}$) = **\$679,122** Total time = 297 aircraft X 10.3 hours = **3059** hours

<u>§21.190(c)(5)</u> requires manufacturers to monitor and correct safety-of-flight issues, using a continued airworthiness system that meets the identified consensus standard. The relevant table is Table E.6 on page 176 of the Regulatory Evaluation.

Annualized cost burden: - "simple" class products – 28 manufacturers X 2 hours per model X (\$55 per hour x $\frac{1}{2}$ + \$17.93 per hour x $\frac{1}{2}$) = \$2,042 - more complex class aircraft – 17 manufacturers X 24 hours per model X (\$55 per hour x $\frac{1}{2}$ + \$17.93 per hour x $\frac{1}{2}$) = \$14,878 - Total cost = \$16,917

Annualized hour burden: - "simple" class products – 28 manufacturers X 2hours per model = 56 hours - more complex class aircraft – 17 manufacturers X 24 hours per model = 408 hours - Total time = 464 hours

Total cost = \$16,917 Total hour burden = 464 hours

<u>§21.190(c)(7)</u> states that the manufacturer must have a final acceptance test procedure for evaluation of completed aircraft, and that records for each aircraft produced must show successful completion of the test procedure. This cost applies only to the manufacturer of new aircraft seeking to obtain the special light sport aircraft airworthiness certificate. For this analysis, inspection, test, and documentation for "simple" class aircraft is assumed to require one hour, while the same task for more complex aircraft is assumed to require three hours. Average required

recordkeeping time is 1.75 hours, which is derived by taking the average of 1 hours for the 28 "simple" aircraft and 3 hours for 17 "complex" aircraft. Costs are calculated using this range of hours assuming that ³/₄ of the time will be supplied by management and ¹/₄ by a clerical assistant. The relevant table is Table E.2 on page 173 of the Regulatory Evaluation.

respondents – 148 aircraft annually **Total cost** = 148 aircraft X 1.75 hours per aircraft X (\$55 per hour x $\frac{3}{4}$ + \$17.93 per hour x $\frac{1}{4}$) = **\$11,655**

Total time = 148 aircraft X 1.75 hours per aircraft = 259 hours

Summary of the part 21 burden:

Section	Cost	Hours
21.190(c)(3)	\$679,122	3059
21.190(c)(5)	\$16,917	464
21.190(c)(7)	\$11,655	259
Total	\$707,694	3782

<u>Part 61</u>

A breakdown of the applicable sections of Federal Regulation Part 61 is listed below, showing the number of respondents impacted by this rule, frequency of response, annual hour burden, and how the burden has been estimated for the completion of FAA Form 8710-11 (the regulatory evaluation referenced FAA Form 8710-1) or required logbook endorsement.

Average No. of Sport Pilots (SP) and Flight Instructors (FI) Impacted Annually					
EXISTIN annual	G SPs EX annual	XISTING FIs	NEW SPs/	NEW FIs	
9200	900	500	40		

A. Costs of Training, Testing, and Registering Sport Pilots

<u>§ 61.309</u> require a candidate for sport pilot certification to receive and log ground training on specified knowledge and proficiency areas. While the time spent in training is not a paperwork burden, the cost of the home study course is.

of new pilots (annually) – 500

Cost of home study course - \$55

Paperwork burden = (500) x \$55 = **\$27,500**

<u>§ 61.307</u> stipulates that one must take and pass a knowledge test in order to receive sport pilot certification. Before taking the knowledge test, the applicant must receive a logbook endorsement from an authorized instructor:

a) Each pilot must receive a logbook endorsement from an authorized instructor and all pilots must purchase a knowledge test (\$90), and

b) For purposes of this evaluation, we estimate that 10% of the pilots will fail the knowledge test and be required to retake the test. Under <u>§ 61.49</u>, an applicant who fails a knowledge or practical test may reapply for the test only after receiving training from an authorized instructor and a logbook endorsement from an authorized instructor. This includes repurchasing a knowledge test.

For a)and b): # of new pilots (annually) – 500 - + 50 (10% retake) + 550 Amount of time for logbook endorsement – 5 minutes

Cost of logbook endorsement to pilots and instructors = $(550) \times 5/60 \times 31.50$ /hour = 2079Cost of logbook endorsement from instructors = $(550) \times 5/60 \times 34.65 = 2287$ Cost of purchasing knowledge test = $(550) \times 90 = 49,500$ Amount of time for logbook endorsement for pilots and instructors = $(550) \times 5/60 = 66$ hours Amount of time for logbook endorsement from instructors = $(550) \times 5/60 = 66$ hours **Total Cost = 2079 + 2287 + 49,500 = 53,866 Total Time = 66 + 66 = 132 hours**

<u>§ 61.311</u> requires that an applicant for a sport pilot certificate receive and log ground and flight training from an authorized instructor on certain areas of operation. # new pilots (annual) = 500 + 10% retake (50) = 550Average hours spent in training = 20Average logbook endorsement = 5 minutes Cost of logbook endorsements for pilots = $550 \times 20 \times (5/60) \times 31.50 = $41,580$ Cost of logbook endorsements for instructors = $550 \times 20 \times (5/60) \times 34.65 = $45,738$ Time for logbook endorsements (pilots and instructors) = $2 \times 550 \times 20 \times (5/60) = 2640$ hrs

Total cost = \$41,480 + \$45,738 = \$87,218 Total time = 2640

<u>§ 61.13</u> requires the applicant for a pilot certificate and/or flight instructor certificate to submit FAA Form 8710-11 to the FAA district office or its representatives to determine qualifications of the applicant for issuance of a pilot or flight instructor certificate, rating, or authorization. Both pilots and instructors will need to work with an existing instructor in filling out the form.

of new pilots (annual) – 500 + 10% retake (50) = 550

Time to fill out form for both pilot and instructor -15 min. Time for DPE to verify form -10 min.

Cost to fill out application for pilots $= (550 \times 0.25 \times \$31.50) = \$4331$ Cost of DPE and instructor verifying information $= (550 \times (10/60) \times \$100) + (550 \times (10/60) \times \$34.65) = \$7113$

Time to fill out applications = $2 \times (550) \times 0.25 = 275$ hours Time for DPE to verify information = $2 \times (550) \times (10/60) = 110$ hours

Total cost = \$4331 + \$7113 = \$11, 444 Total time = 270 + 108 = 385 hours

§ 61.39 – New sport pilot candidates are required to take a practical test.
a) As a prerequisite to taking the practical test,
§ 61.39 states that the applicant must have a logbook endorsement signed by an authorized instructor, and each pilot must purchase the practical test, which costs \$200.
b) An estimated 10% who take the practical test may fail it. These pilots and instructors will need to reapply to take the test using FAA Form 8710-11 (the regulatory evaluation referenced FAA Form 8710-1) after failure, resulting in the logbook endorsement time and costs, as well as purchasing another practical test.

of new pilots (annual) -500 + 10% retake (50) = 550 Time for logbook endorsement -5 minutes Cost of practical test = \$200

Cost for pilots $-(550) \ge 31.50 \ge (5/60) \ge 200 = 415,800$ Cost for instructors $-(550) \ge 33.4.65 \ge (5/60) = 33,811$ Time for pilots $-(550) \ge (5/60) = 66$ Time for instructors $-(550) \ge (5/60) = 66$ **Total cost = 415,800 + 33,811 = 419,611 Total time = 66 + 66 = 132 hours**

The FAA requires FAA Form 8710-11, Sport Pilot Airman Certificate and/or Rating Application, (the regulatory evaluation referenced FAA Form 8710-1), be completed by the airman receiving this additional category or class privilege, and signed by the recommending instructor, and the authorized instructor conducting the proficiency check. The authorized instructor conducting the proficiency check will be required to submit the completed FAA Form 8710-11, Sport Pilot Airman Certificate and/or Rating Application, (the regulatory evaluation referenced FAA Form 8710-1) to the FAA upon satisfactory completion of the proficiency check. While this requirement will result in additional paperwork, the FAA has no record as to the number of sport pilots who would seek additional category and class ratings. Accordingly, the FAA is unable to estimate the cost and hour burden.

Summary of the Costs of Training, Testing, and Registering Sport Pilots:

	Number of			
Part Number	Respondents	Hours	Costs	Comment
61.309	500	N/A	\$27,500	
61.307	550	132	\$53,866	
61.311	550	2640	\$87,218	
61.13	550	385	\$11,444	
61.39	550	132	\$419,611	
TOTAL	2700	3289	\$599,639	

B. Cost to become certified as a flight instructor with a sport pilot rating

Cost of the knowledge test - A person applying for a flight instructor certificate with a sport pilot rating must pass knowledge tests on the fundamentals of instructing, as listed in § <u>61.407(a)</u> and the aeronautical knowledge areas listed in § <u>61.407(c)</u>. While there is no hour burden with this, there is a paperwork cost; the relevant table is Table 20 on page 74 of the Regulatory Evaluation:

new instructors (annually) -40

Cost of the knowledge test - \$90

Total cost of purchasing training courses = 40 x \$90 = **\$3,600**

An estimated 10% who take the knowledge test may fail it. These pilots and instructors will need to reapply to take the test completing FAA Form 8710-11, Sport Pilot Airman Certificate and/or Rating Application, after failure, as well as repurchase the knowledge test; the relevant table is Table 21 on page 75 of the Regulatory Evaluation.

of new instructors (annually) -40 + 4 (10 % retake)

Amount of time to fill out 8710-11 form $-\frac{1}{4}$ hour

Cost of the knowledge test - \$90

Cost to fill out form and purchase knowledge test = $(44 \times \frac{1}{4} \times \frac{34.65}{4}) + (44 \times \frac{90}{5}) = \frac{381 + 3360}{5}$

Amount of time to fill out 8710-11 form = $44 \times \frac{1}{4} = 11$ hours

<u>Flight training costs</u> - The FAA estimates, on average, an applicant will need an additional 10 hours of flight training with an instructor before being ready for the practical test. Each of these tests requires a logbook endorsement; the relevant table is Table 23 on page 79 of the Regulatory Evaluation.

of new instructors (annual) -40Hours of flight training experience -10Cost for new instructors $-40 \ge 10 \ge (5/60) \ge 1,512$ Cost for instructors teaching the new instructors $-40 \ge 10 \ge (5/60) \ge 34.65 = 1,663$ Time for instructors = $2 \ge 40 \ge 10 \ge (5/60) = 96$ hours Total Cost = 1,512+ 1,663 = 3175

<u>Cost of purchasing training courses</u> - The FAA assumes all instructors will purchase the training curriculum that has been developed by the ultralight associations and other organizations; the relevant table is Table 24 on page 80 of the Regulatory Evaluation. # of new instructors (annual) = 40

Cost for training course = \$100 Total cost = \$**4,000**

<u>Applying to become an instructor</u> - The FAA estimates, on average, that an instructor and a DPE will each need ¼ hour for the paperwork for new instructors to become an instructor; the relevant table is Table 25 on page 81 of the Regulatory Evaluation. # of new instructors (annual) – 40 + 4 = 44 Cost of applying = $(44 \times \$31.50 \times \cancel{4})208 + (44 \times \$100 \times \cancel{4}) = \868 Time to apply = $(44 \times \cancel{4}) + (44 \times \cancel{4}) = 13.2$ hours

<u>Practical tests for instructor candidates</u> - New instructors will have to take the practical tests; the relevant tables are Table 26 and 27 on page 83 of the Regulatory Evaluation. a) As a prerequisite to taking the practical test, the applicant must have a logbook endorsement signed by a DPE.

b) An estimated 10% who take the practical test may fail it. These instructors will need to reapply to take the test completing FAA Form 8710-11, Sport Pilot Airman Certificate and/or Rating Application, (the regulatory evaluation referenced FAA Form 8710-1) after failure.

a) # of new instructors (annual) -40 + 4Time for logbook endorsement -5 minutes Cost for instructors $-44 \times 334.65 \times (5/60) = 33049.20$ Cost for DPE's $-44 \times 100 \times (5/60) = 528$ Time for instructors $-44 \times (5/60) = 528$

Total cost = \$3049.20 + \$52,800 = **\$55,849** Total time = 528 + 528 = **1056 hours**

<u>§ 61.309 - Developing ground-training courses for instructors</u> – The paperwork costs are included in the costs of training, testing, and registering sport pilots

Summary of costs to become certified as a flight instructor with a sport pilot rating:

	Number of			
Part	respondents	Time	Cost	Comment
61.407(a)	44	11	\$4341	Cost of knowledge test = retake
61.433				
	44	96	\$3175	Flight training costs
	40		\$4,000	Purchase training course
	44	13.2	\$868	Apply to become instructor
	44	1056	\$55, 859	Practical test for instructors
TOTAL	216	1176	\$68,243	

Part 183 - Designated Pilot Examiners (DPE's)

The FAA estimated that the cost of completing applications and writing renewal letters for relate to FAA Form 8710-12,

Light-Sport Standardization Board-Designated Pilot Examiner Candidate Application. This is the form that will be used by new DPEs (SPE and SFIEs).

<u>§ 183.23 - Training of DPE's</u> - All sport pilot DPE's will require special training. Because before sport pilots and flight instructors with a sport pilot rating can be certified there must be sport pilot designated pilot examiners (DPE's). The relevant table is Table E.12 on page 183 of the Regulatory Evaluation.

of DPE's initially applying (annual) – 20

Time for DPE to fill out application FAA Form 8710-12 (The FAA referenced in the regulatory evaluation FAA Form 8710-6 and FAA Form 8710-10= 1 hour Cost of knowledge test = \$100

Postage per application = \$0.37

Total cost = $20 \times (\$100 + \$0.37) = \$2007.40$

Total time = 20 x 1 = 20 hours

	Number of respondents	Time	Cost	Comment
183.23	20	1	\$100 + .37	8710-12
Total	20	20	\$2007.40	8710-12

Summary of all Burden Hours and Costs

Part	Time	Reponse s	Time per response	Cost	Comment	Number of Répondants	Form Number
21	3782	891	See chart	\$707,694	LSA - light- sport aircraft airworthiness certification	297	8130- 15
21	3289	2700	See chart	\$599,639	Pilots	550	8710- 11
61	1176	216	See chart	\$68,243	Instructors	44	8710- 11
183	20	20	1 hr	\$2007.40 (material)	Designated Pilot Examiners	20	8710- 12

Total 8267 38	7 \$		911
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13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in items 12 and 14).

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

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

No additional burdens to be accounted for.

15. *Explain reasons for changes in burden, including the need for increase.*

Federal government processing costs for activities that have been completed have been removed from the Federal Government burden calculations.

16. For Collections of information whose results are planned to be published for statistical use, outline plans for tabulation, statistical analysis, etc.

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.

The FAA is seeking approval to not display the expiration date. Due to the new technologies used to automate the completion, processing, and retention of these forms we do not want to impose an unnecessary need for software modifications.

The subject FAA forms are also recurring forms that are printed and stocked for continuous use. When the supply gets low, the forms are automatically reprinted and stocked so that there will be no interruption in services. It would not be cost effective to destroy unused, dated stock.

18. Explain each exception to the certification statement identified in Item 19, Certification of Paperwork Reduction Act Submissions, of OMB Form 83-1.

No exception to the certification statement of OMB Form 83-1 is requested.