INFORMATION COLLECTION SUPPORTING STATEMENT

Security Programs for Foreign Air Carriers
(OMB No. 1652-0005)
Exp. 10/31/2015

1. ***Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statue and regulation mandating or authorizing the collection of information. (Annotate the CFR parts/sections affected).***

Under 49 U.S.C. 114, the Transportation Security Administration (TSA) has broad authority to secure all modes of transportation. Section 44906 of title 49 U.S.C. includes a mandate for TSA to require foreign air carriers (FAC) flying into and out of the United States to adopt and use a security program approved by TSA. This statutory authority is implemented by regulation in 49 CFR 1546. Additionally, under 49 CFR 1546.105(c) and (d), the FAC is required to update the security program through amendments issued by TSA. Respondent FACs are required to submit amendments and/or complete and implement amendments directed by TSA so that TSA Transportation Security Inspectors (TSIs) can inspect those FACs to verify compliance with the provisions of the TSA-accepted program. Further, under 49 CFR 1546.105(b), the FAC is required to request and update as necessary their security program through amendments completed by the carrier.

The Model Security Program (MSP), which includes all TSA-issued amendments, requires FACs to maintain certain records and provide certain information to TSA, or make it available for inspection. Reporting and recordkeeping requirements are described in the MSP, and include requirements such as verifying compliance, training and related records, incident and suspicious activity reporting, and submission of Secure Flight data for vetting of passengers and watch list vetting of employees against government lists, which are explained further below. Some of these records include Sensitive Security Information (SSI), which must be protected from disclosure. *See* 49 CFR part 1520.

Security Program and TSA-Issued Security Program Amendments. TSA will accept a security program from a FAC only when it determines that the security program provides passengers of the FAC a level of protection similar to the level of protection passengers would receive from domestic carriers using the same U.S. airport. Foreign air carriers must employ procedures equivalent to those required of U.S. aircraft operators serving the same airport, if TSA determines that such procedures are necessary to provide a similar level of protection. This information collection request covers the collections associated with these requirements.

Carrier-Requested Security Program Amendments. A FAC may submit a request to TSA to amend its accepted security program. TSA will approve a request to amend a security program if the requirements of 49 CFR 1546.105(b) are met.

Compliance Recordkeeping requirement. Upon request of TSA, each FAC must provide evidence of compliance with 49 CFR part 1546 and its security program, including copies of

records. Records may be maintained in either hardcopy or electronic format at corporate offices or stations. FACs must also make their security programs available for annual review.

Training Recordkeeping Requirements. FACs are required to include training in their security programs. They are specifically required to provide their crewmembers and other individuals performing security-related functions with initial training and recurrent training covering a number of subjects. Depending on the subject matter, the training is delivered via several methods such as web-based training, classroom training, hands on training, and home study. The FACs must retain training records for varying specified periods of time.

Incident and Suspicious Activity Reporting. TSA's regulations require FACs to immediately report to the Transportation Security Operations Center (TSOC) all incidents, suspicious activities, and threats that could affect the security of U.S. civil aviation. Incidents, suspicious activities, and threat information may include, but are not limited to, interference with the flight crew, possible surveillance of an aircraft or airport facility, bomb threats, and air piracy. In light of the urgency of this type of reporting, FACs give this report orally, in writing, or over the telephone.

Watch lists. FACs must submit Secure Flight Passenger Data (SFPD) to TSA Secure Flight for the watch list vetting of every passenger traveling to and from the United States. This data is required 72 hours in advance of the flight when available that early. The FAC also submits subsequent SFPD received up until flight departure. The vetting of the information is done internally within TSA Secure Flight operations and takes place almost instantaneously. The majority of these submissions are covered under the TSA's Secure Flight ICR (OMB Control Number 1652-0046).

However, there are times when certain passengers may be on a watch list and other processes must take place to clear the passenger for travel, prevent travel, or require additional processes before the passenger can travel. The provision of non-personally identifiable information to TSA is necessary to allow TSA to effectively prioritize watch list matching efforts and communicate with the covered aircraft operator.

In addition, TSA has assumed the responsibility for pre-flight screening of passengers and certain non-traveling individuals against the Federal Government watch list from the private sector as required by 49 U.S.C. 44903(j)(2)(C) and consolidation of the aviation passenger watch list matching function within one agency of the Federal Government. *See* Secure Flight ICR (OMB Control Number 1652-0046), which addresses the requirement for covered aircraft operators (including FACs) to transmit Secure Flight Passenger Data (SFPD) for each passenger which consists of the passenger's full name, date of birth, and gender and, to the extent available, Redress Number or known traveler number, information from the passenger's passport (full name, passport number, country of issuance, and expiration date), as well as certain non-personally identifiable information used to manage messages, including itinerary information. Secure Flight, however, does not eliminate the requirements for aircraft operators to conduct watch list matching. For example, aircraft operators are required to conduct a comparison of their employees against the TSA No Fly and Selectee Lists and report any matches to TSA. Additionally, on the rare occasions when there is a Secure Flight outage, aircraft operators are required to conduct further comparison of their passengers against the TSA No Fly and Selectee Lists and report any matches to TSA.

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.*

   TSA uses the information collected to ensure the FACs are performing required security measures. TSA inspects each FAC against its security program, which includes security program amendments, at its domestic and foreign locations to ensure that the FAC's security program is being carried out. Such inspections protect the security of the passengers, the general public, baggage, cargo, and aircraft.

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, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden. [Effective 03/22/01, your response must SPECIFICALLY reference the Government Paperwork Elimination Act (GPEA), which addresses electronic filing and record keeping, and what you are doing to adhere to it. You must explain how you will provide a fully electronic reporting option by October 2003, or an explanation of why this is not practicable.]*

   Due to the importance of receiving and determining acceptability of a security program, TSA requires a paper copy of the security program with original signatures from each FAC. A FAC is also required to submit a paper copy of any requests for amendments to its security program. TSA may require such specialized amendments to address individual FAC security concerns.

   Before receiving the official paper copy with original signatures, FACs may request amendments via email or fax. The email or fax request begins the process of review by TSA. In turn, TSA provides approval responses electronically, followed by official paper copies. This allows for immediate implementation of the agreed upon security measure.

   FAC employees must have access to all applicable TSA security measures, which they carry out on behalf of the FAC. FACs may access these measures via electronic means; normally accomplished through the air carriers' internal computer files.

   In limited instances, TSA needs the immediate personal contact with FACs to address issues pertaining to the vetting of passengers, crew members, and FAC personnel. The urgency may pertain to whether or not an individual (passenger or FAC employee, including a crewmember) matches a government watch list and will be permitted to enter, overfly, or depart from the United States. In light of fiscal concerns, it is to the FAC's advantage to have that decision made before the carrier enters U.S. airspace.

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 Item 2 above.*

   No other Government entity has a Congressional mandate to require an FAC to adopt and carry out a security program. Prior to TSA's existence, this information collection was

conducted by the Federal Aviation Administration. To TSA's knowledge, since the responsibility for this collection transferred to TSA, it has not been duplicated anywhere else.

5. ***If the collection of information has a significant impact on a substantial number of small businesses or other small entities (Item 5 of the Paperwork Reduction Act submission form), describe the methods used to minimize burden.***

TSA has determined the collection of information does not have a significant impact on a substantial number of small businesses.

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.***

TSA has the responsibility of ensuring the security of persons and property traveling to and from the United States. Part 1546 of title 49 CFR requires FACs seeking to provide air travel into or out of the United States to adopt and implement a FAC security program.

It is imperative that all FACs provide adequate security measures for all flights to and from the United States. Due to potential security threats and ever changing security risks and assessments, it is necessary to require FACs to perform certain security measures, which may involve maintaining records and providing information to TSA. TSA conveys the needed security measures to the FACs via mechanisms provided within the FAC security program.

FACs are provided an opportunity to indicate when they cannot meet such requirements due to their respective national laws. Further, FACs may provide to TSA an alternate means by which they can meet the intent of the required TSA security measures. TSA handles such requests on a case-by-case basis.

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

Certain circumstances may trigger the need for aircraft carriers to notify TSA more often than quarterly. For example, FACs are required to provide timely reports of incidents and suspicious activities to the Transportation Security Operation Center (TSOC). In addition, although Secure Flight is fully operational, on the rare occasions when there is a Secure Flight outage, aircraft operators are required to conduct further comparison of their passengers against the TSA No Fly and Selectee Lists and report any matches to TSA. Otherwise, the collection of information is conducted in accordance with 5 CFR 1320(d)(2).

8. *Describe efforts to consult 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. If applicable, provide a copy and identify the date and page number of publication in the <u>Federal Register</u> of the agency's notice, required by 5 CFR 1320.8(d) soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.*

TSA published the 60-day notice on June 19, 2018 (83 FR 28444) and the 30-day notice was published on October 29, 2018 (83 FR 54369). Consistent with the requirements of Executive Order (E.O.) 13771, Reducing Regulation and Controlling Regulatory Costs, and E.O. 13777, Enforcing the Regulatory Reform Agenda, the notices included a specific request for comments on the extent to which this request for information could be modified to reduce the burden on respondents. TSA has not received any comments in response to the notices published.

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

TSA will not provide payment to respondents.

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

All created security programs and reporting information will be protected from disclosure to the extent required by existing laws and regulations. TSA does not provide any assurances of confidentiality to respondents. To the extent applicable, information provided by respondents will be protected in accordance with the Privacy Act and TSA privacy and information technology policy. A Privacy Impact Assessment (PIA), DHS/ALL-006 DHS General Contacts, was published June 17, 2007 on www.dhs.gov. (PIA coverage for the collection of PII as part of Secure Flight or incident reporting is provided by DHS/TSA/PIA-016, Secure Flight, published August 5, 2008, or DHS/TSA/PIA-029, Operations Center Incident Management System, published July 7, 2008.) TSA assures respondents that the portion of their responses that are deemed Sensitive Security Information will be handled as such, as described in 49 CFR parts 15 and 1520.

11. *Provide additional justification for any questions of sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.*

TSA does not ask questions of a sensitive nature.

12. *Provide estimates of hour and cost burdens of the collection of information.*

The estimates presented in this section represent the annual hours and cost burdens to comply with the reporting and recordkeeping requirements of the Foreign Air Carrier (FAC) security programs. The hour and cost burden calculations depend on the number of FACs responding

to the requirements in the Model Security Program (MSP), number of requirements in the MSP, amount of time it takes to complete the requirements, and the hourly average wage rate of the personnel completing the requirements. On average, 180 FACs have regularly scheduled and charter flight (indicating their flights are on-demand) operations to and from the United States annually. TSA estimates approximately six new FACs apply per year.[1] Table 1 presents the summary of the information collection burden at the end of this question. TSA estimates that the total annual hour burden incurred by FACs to comply with the MSP requirements is 1,278,352 hours, which results in the total annual hour burden cost of $120,391,994. The detailed information on these estimates are presented below:

(a) TSA-Issued Security Program Amendments. TSA may issue an amendment to the TSA-accepted security program, if safety and the public interest require it. TSA estimates on average 18 new amendments to be issued per year. Each of the 180 FACs would be required to respond to each new amendment, resulting in a total of 3,240 responses (180 FACs × 18 amendments). TSA estimates that each response will require one hour to complete, for an annual average hour burden of 3,240.

TSA expects a Corporate Security Director or Security Manager will complete the task. TSA uses a fully loaded[2] hourly average wage rate of $94.37[3] to estimate the hour burden cost. TSA estimates an annual average hour burden cost of $305,753.

(b) Carrier-Requested Security Program Amendments. A FAC may submit a request to TSA through its assigned TSA International Industry Representative (IIR) to amend its TSA-accepted security program or adopt alternative procedures of complying with the TSA-issued amendments. Based on past requests, TSA estimates that it receives on average 83 requests annually from the population (180) of FACs. TSA estimates that each FAC takes approximately one hour to prepare a document for each request and a Corporate Security Director or Security Manager completes the task, and assumes a fully loaded hourly average wage rate of $94.37.[4] TSA estimates an annual hour burden of 83 hours and an annual hour burden cost of $7,833.[5]

(c) Compliance Recordkeeping Requirement. TSA estimates that an average of four hours is required for each FAC to maintain copies and to make its security program available for review. TSA assumes this task is done by a position equivalent to an Administrative Service Manager in the Air Transportation industry in the United States and takes the corresponding fully loaded hourly average wage rate of $66.44 as a proxy.[6] Based on information obtained from GS, TSA estimates that each foreign air carrier has an average of

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[1] In the 2016 ICR submission, TSA included a time burden for new FACs. TSA has since removed the time burden because TSA sends the MSP to the FAC and the FAC forwards the FAA documents to TSA to verify compliance with FAA documentation requirements. Therefore, time burden is estimated for TSA review in question 14 but no longer included in question 12 for FACs as their time is attributed to the FAA application.

[2] A fully-loaded wage accounts for the full employer cost of employee compensation, including non-salary compensation such as health and retirement benefits.

[3] A Corporate Security Director has an unloaded wage rate of $62.61. BLS. May 2016 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 481000 - Air Transportation, OCC 11-1000 Top Executives. Last modified 3/31/17; accessed 3/15/18. Https://www.bls.gov/oes/2016/may/naics3_481000.htm. TSA estimates a compensation load factor of 1.5072 by dividing the total compensation ($28.11) for private industry workers by the salary and wage component ($18.65). TSA then multiplies the unloaded wage rate by the load factor to estimate a fully loaded wage ($62.61 x 1.5072 = $94.37).

[4] Wage rate calculation details are identical to those in the previous section.

[5] $7,833 = 83 x $94.37.

seven yearly inspections for compliance with the MSP.[7] TSA estimates that each inspection places a four hour burden on the carrier being inspected. Therefore, TSA estimates an annual average hour burden of 5,350.[8] TSA estimates the average annual burden cost to be $355,462.[9]

(d) Training Recordkeeping Requirement. Based on information obtained from GS, TSA estimates that the average annual hour burden per FAC associated with training and related records is 24 hours. TSA assumes that this task could be completed by a Training and Development Manager in the Air Transportation industry in the U.S. and takes the estimates a fully loaded hourly average wage rate of $72.89.[10] TSA estimates an annual average hour burden of 4,320, and an average annual burden cost of $313,322.[11]

(e) Incident and Suspicious Activity Reporting. Based on incident reporting data from TSOC, TSA estimates that all FACs combined report approximately 60 incidents annually. TSA also estimates that it takes 0.5 hours (30 minutes) to report an incident. TSA assumes that a Corporate Security Director or Security Manager completes this task. TSA estimates a fully loaded hourly average wage rate of $94.37.[12] TSA estimates an average annual hour burden of 30 hours, with an average annual hour burden cost of $2,831.[13]

(f) Watch list. The majority of information collection related to watch lists is covered under TSA's Secure Flight ICR (OMB Control Number 1652-0046).

The following estimates are based on the small number of passengers subject to additional screening processes and on a random selection of FACs. TSA estimates that there will be an average of 21,089 flights annually[14] for which each FAC will be required to submit Secure Flight Passenger Data (SFPD) of passengers subject to additional screening to TSA Secure Flight for the watch list vetting. TSA estimates that it takes 0.33 hours (20 minutes) for

[6] An Administrative Service Manager has an unloaded wage rate of $44.08. BLS. May 2016 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 481000 - Air Transportation, OCC. Last modified 3/31/17; accessed 3/15/18. Https://www.bls.gov/oes/2016/May/naics3_481000.htm. TSA estimates a compensation load factor of 1.5072 by dividing the total compensation ($28.11) for private industry workers by the salary and wage component ($18.65). TSA then multiplies the unloaded wage rate by the load factor to estimate a fully loaded wage ($44.08 x 1.5072 = $66.44).
[7] TSA conducts inspections on different FACs at different rates. TSA calculated the average number of inspections per FAC by dividing the total number of inspections by the number of Air Carriers. 7.43 = 1,880 ÷ 253 (253 is the total number of air carriers, 180 foreign and 73 domestic).
[8] 5,350 = 180 x 7.43 x 4.
[9] $355,462 = 5,350.1976 x $66.4391.
[10] A Training and Development Manager has an unloaded wage rate of $48.12. BLS. May 2016 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 481000 - Air Transportation, OCC 11-3131 Training and Development Managers. Last modified 3/31/17; accessed 3/15/18. Https://www.bls.gov/oes/2016/May/naics3_481000.htm. TSA estimates a compensation load factor of 1.5072 by dividing the total compensation ($28.11) for private industry workers by the salary and wage component ($18.65). TSA then multiplies the unloaded wage rate by the load factor to estimate a fully loaded wage ($48.12 x 1.5072 = $72.53).
[11] $313,322 = 4,320 x $72.5283.
[12] See above for details on the estimation of fully-loaded wages for Corporate Security Directors.
[13] $2,831 = 30 x $94.37.
[14] TSA estimates this number by using data from the Department of Transportation, U.S. International Air Passenger and Freight Series, https://www.transportation.gov/sites/dot.gov/files/docs/mission/office-policy/aviation-policy/282961/us-international-air-passenger-and-freight-statistics-report-december-2016.pdf. The last full year of data available is for 2016. TSA calculates the growth rate of international flights inbound to the United States over the 2014-2016 period and uses that to project the number of flights over the period covered by this collection.

FACs to submit SFPD to TSA Secure Flight. TSA assumes that a Corporate Security Director or Security Manager completes this task and estimates a fully loaded hourly average wage rate of $94.37.[15] Therefore, TSA estimates an average annual hour burden of 1.27 million hours[16] and an average annual hour cost burden of $119.4 million.[17]

Table 1: Summary of Information Collection Annual Cost and Hour Burdens

MSP Requirements	Average Number of Respondents (a)	Number of Occurrences (b)	Average Number of Responses (c = a x b)	Hour Burden per Response (d)	Total Hour Burden (e = c x d)	Total Cost Burden (f = e x wage rate)
(a) TSA-Required Amendments	180	18	3,240	1	3,240	$305,753
(b) Carrier-Requested Amendments			83	1	83	$7,833
(c) Compliance Recordkeeping Req.	180	7.43	1,337	4	5,350	$355,462
(d) Training Recordkeeping Req.	180	1	180	24	4,320	$313,322
(e) Incident and Suspicious Activity Reporting			60	0.5	30	$2,831
(f) Watch list	180	21,089	3,796,020	0.33	1,265,329	$119,406,793
Total			**3,800,920**		**1,278,352**	**$120,391,994**

Note: Totals may not add due to rounding

13. *Provide an estimate of the annualized capital and start-up costs resulting from the collection of information.*

There are no capital or start-up costs associated with the collection of information.

14. *Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, and other expenses that would not have been incurred without this collection of information.*

The estimates presented in this section represent the annual cost burden to the Federal Government. The cost burden calculations depend on the number of FACs responding to the requirements in the Model Security Program (MSP), number of security program amendments issued by TSA or amendment requests by FACs, amount of time TSA takes to complete the tasks, and the hourly average wage rate of TSA personnel completing the tasks.

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[15] See above for details on the wage calculations for Corporate Security Directors.
[16] 1.27 million = 180 x 21,089 x 0.3333.
[17] 119.4 million = 1.265 million x $94.37.

TSA estimates that the total annual cost incurred by the Federal Government is $562,201. The detailed information on these estimates is presented below:

Annual Cost Burden Estimates:

(a) New FACs Implementing the MSP Requirements. TSA estimates that six new FACs will seek to adopt and implement the Model Security Program yearly in order to initiate operations to or from the United States. TSA staff must onboard the FAC to Secure Flight, conduct a Master Crew List set-up and start inspections. TSA estimates each new FAC requires approximately 50 hours[18] of TSA staff time at an hourly average wage rate of $72.72.[19] TSA estimates an annual hour burden of 300 hours and an average annual burden cost of $21,815.[20]

(b) TSA-Issued Security Program Amendments. TSA projects that it will issue 18 amendments per year based on information obtained from GS. Since this is a global issuance, TSA estimates that it takes approximately 30 minutes (0.5 hours) for IIRs to issue to each of the 180 FACs as a TSA-initiated amendment. TSA uses an hourly average wage rate of $78.65 for a J-Band IIR. TSA estimates an annual hour burden of 1,620 hours[21] and an annual hour cost burden of $127,409.[22]

(c) Carrier-Requested Security Program Amendments. Based on past requests, TSA estimates that it receives requests from a FAC for a change to its security program 83 times annually. Based on information obtained from TSA Global Strategies (TSA GS), TSA estimates that an average of 4 hours is necessary for a J-Band IIR to review a request from an FAC, conduct any related research, and draft appropriate related paperwork. TSA uses a fully-loaded hourly wage rate of $78.65 for a J-Band IIR.[23] TSA estimates the average annual hour burden to be 322 hours[24] and the average annual hour burden cost to be $26,111.[25]

Additionally, various TSA Headquarters personnel review the paperwork drafted by IIRs and the FACs requesting changes to their security programs. TSA estimates that it takes an average of 6.75 hours for TSA Headquarters personnel to review the information. TSA uses hourly average fully loaded wage rate of $79.37 for the various personnel involved in reviewing the document.[26] For review, TSA estimates an average annual hour burden of 560 hours,[27] and an average annual hour cost burden of $44,466.[28] Taken completely, TSA estimates a total annual hour cost burden of $70,577.

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[18] Information provided by TSA GS.

[19] This represents the average of an I-Band ($66.79) Inspector and a J-Band ($78.65) International Industry Representative (IIR). Source: TSA Global Strategies, Budget and Finance Branch.

[20] $21,815 = 300 x $72.717

[21] 1,620 = 18 x 0.5 x 180.

[22] $127,408 = 1,620 x $78.65.

[23] This is the same wage rate shown in the previous sub-section.

[24] 332 = 83 x 4.

[25] $26,111 = 83 x 4 x $78.647.

[26] Fully loaded hourly weighted average wage rate for H through Senior Executive Service (SES) band personnel reviewing the document, calculated using data from Economic Analysis Branch (EAB) database, FY2018 Modular Cost Standards.

[27] 560 = 83 x 6.75.

[28] $44,466 = 560.25 x $79.347.

(d) Compliance and Training Recordkeeping and Review Requirement. TSA estimates that each FAC is inspected for compliance and training record keeping requirements 4 times a year based on information obtained from TSA GS. TSA estimates that the time necessary to inspect and for record keeping is approximately 150 minutes (2.5 hours), as TSA would conducts multiple forms of recordkeeping and review requirements during a single FAC inspection. TSA conducts approximately 7.43 inspections per air carrier (1,338 FAC inspections), resulting in a total TSA average annual hour burden of 3,344. These inspections are conducted abroad by an international J-Band inspector, with a fully-loaded hourly wage of $91.77.[29] TSA estimates an average annual hour burden cost of $306,851.[30]

(e) Reports of Suspicious Activity Requirement. TSA estimates it will receive 60 reports of suspicious activity from the total population (180) of FACs. TSA estimates that each report of suspicious activity will require two hours of work, for a total annual hour burden of 120. This work will be done by a J-Band IIR with a fully loaded hourly wage of $78.65.[31] TSA estimates an annual hour cost burden to the Federal Government of $9,438.[32]

TSA estimates the annual average hour cost burden to TSA to be $562,201.[33]

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

There have been no program changes or adjustments, the estimated burden hours and costs account for the latest populations and compensation rates.

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.

TSA will not publish or tabulate information on this collection.

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.

TSA will not be seeking a request not to display expiration date.

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

TSA is not seeking any exceptions.

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[29] TSA, ModCost Standards, TSA Finance and Administration.
[30] $306,851 = 3,343.8735 x $91.77.
[31] TSA, ModCost Standards, Finance and Administration.
[32] $9,438 = 120 x $78.65.
[33] $562,201 = $21,815.103 + $127,408.622 +$26,110.903+ $70,577.294 + $306,851.098 + $9,437.376.