

Supporting Statement A
REPORT OF INSPECTION REQUIRED BY
AIRWORTHINESS DIRECTIVES

Title 14, CFR part 39

OMB No. 2120-0056

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

Title 49 United States Code, Subtitle VII - Aviation Programs encourages the development of civil aeronautics, and promotes safety in air commerce. Sections 44701 and 40113(a) of the Code empower the Secretary of Transportation, or the Administrator of the Federal Aviation Administration (FAA) to issue the rules and regulations they think necessary to carry out this Act. The Secretary or Administrator issue regulations and minimum standards governing the:

- (a) Inspection, servicing, and overhaul of aircraft, aircraft engines, propellers and appliances;
- (b) Equipment and facilities for such inspection, servicing and overhaul. This includes examinations and reports by qualified private persons. The Secretary of Transportation may accept their examinations and reports instead of those made by Department of Transportation (DOT) or FAA officers and employees.

Section 44702 of the Code empowers the Secretary of Transportation or FAA Administrator to issue an airworthiness certificate when the FAA finds that an aircraft conforms to the type certificate and is in condition for safe operation. An airworthiness directive (AD) amends an airworthiness certificate.

Title 14 CFR part 39, Airworthiness Directives (AD), authorized by §§ 40113(a), 44701, and 44702 of the Code, prescribes how we issue ADs. One of the FAA's primary functions is to require the correction of an unsafe condition discovered in aircraft or aircraft parts bearing an airworthiness certificate issued by us. Each aircraft coming off the assembly line must receive an airworthiness certificate indicating that it is safe for civil use.

The FAA issues ADs when an unsafe condition is discovered on a specific aircraft type. If the condition is serious enough and we need more information to develop corrective action, we may require specific information from aircraft owners/operators. If it is necessary for the aircraft manufacturer or airworthiness authority to evaluate the information, we will instruct owners/operators to send the information to them.

We may also require reports if the unsafe condition results from manufacturing quality control problems. We need these reports to determine the scope of the problem and

how adequate the manufacturer's corrective actions are. Each reporting situation is unique.

This information supports the Department of Transportation's strategic goal---to promote the public health and safety by working toward eliminating transportation-related deaths and injuries.

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.

The Administrator uses ADs to notify aircraft owners and operators that an unsafe condition exists. ADs prescribe the conditions, limitations, or both, under which the product may continue to be operated.

Aircraft owners and operators are mandated to report information concerning their aircraft on occasion of an AD.

The Aircraft Certification Office (ACO) initiating the AD analyzes the reports and determines if the AD's corrective action will eliminate the unsafe condition. If not, the ACO issues a new AD to correct the unsafe condition.

To date, we have no other method for collecting this information. If we do not collect it by issuing an AD, we must conduct a directed safety investigation. This is a burden on both the FAA and the owner/operator.

It is anticipated that the information collected will be used to support publicly disseminated information. FAA ACO will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with FAA standards for confidentiality, privacy, and electronic information. See response to Question 10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines.

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.

Following the Government Paperwork Elimination Act (GPEA), we use e-mail and the Internet for corresponding with industry, accepting their 100% electronic submission of information. How to send the information to us, however, is up to owners and operators. We cannot mandate electronic submission of reports, because some of the affected parties are small businesses and/or individuals lacking electronic/Internet communication. Each AD with a reporting requirement will specify what information is

required to be reported (e.g., inspection results), when the report must be submitted, and the address(es) where the report should be sent.

The specific results of the information collection will not be made available to the public. The FAA ACO uses the information to determine if the corrective action will eliminate the unsafe condition (see response to question 1 above).

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.

Only the FAA issues ADs. Each AD is unique and concerns a specific condition. We have no other way to require reports of information. The information we collect is only available from the owner/operator whose aircraft or aircraft product is inspected, modified, or repaired under an AD that applies to it.

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

While we cannot predict exactly who will be affected by an AD, only a few ADs include a reporting requirement, and that happens only when we need more information to determine if the corrective action is adequate. We make every effort to minimize the burden on small businesses or other small entities, including our preparation of a Regulatory Flexibility Act analysis for non-emergency ADs.

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.

We keep the information collection requirement to a minimum because we search our own databases and work with the manufacturer first before issuing an AD. We ask for reports only when we need more information. The technical and legal obstacles to reducing the burden are:

- (1) We will not obtain needed technical data in an emergency when safety is at risk, and,
- (2) We cannot carry out our responsibilities under Title 49 §§ 40113(a) and 44701.

As we stated before, the only other way to collect information is through a directed safety investigation, at a substantial cost to us and an increased burden on the owner/operator.

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

We collect information following Title 5 CFR §1320.5(d)(2)(i)-(viii) with one exception: the time a record is maintained. In our procedure, airworthiness directives are regulations issued under 14 CFR Part 39, and no person may operate a product unless all applicable ADs have been complied with. Compliance with ADs must be recorded in the aircraft maintenance log. The aircraft maintenance log shows proof of compliance with ADs, and is retained and transferred with the aircraft at the time the aircraft is sold.

For ADs issued as “Final rule; request for comment,” we may require information to be reported 10 days after the effective date of the AD. These types of ADs are issued when an unsafe condition presents an immediate risk to safety of flight or requires immediate action by owners/operators.

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 Federal Register Notice published on September 19, 2018 (83 FR 47397), solicited public comment for the last renewal. No comments were received.

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

We do not provide any payment or gifts to respondents.

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

We give respondents no 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 sensitive questions.

12. Provide estimates of the hour burden of the collection of information. The statement should:

We estimate that 25 ADs yearly will require reports of information and findings. The average AD affects about 1,120 owners/operators. Therefore, 25 ADs times 1,120 owners/operators per year equal 28,000 reports. These reports, requiring an average of 1 hour each to prepare, consume 28,000 reporting hours.

The estimated fully loaded hourly rate for an aircraft mechanic is \$85/hour. The FAA used the mean hourly wage for aircraft mechanics and technicians of \$30.32/hour¹, adjusting it by 1.4 percent² for benefits to become \$42.45. We then doubled this rate to achieve the fully loaded labor rate of \$85/hour.

The total annualized cost to respondents is \$2,380,000. We base this on the 28,000 reporting hours times an estimated hourly rate of \$85/hour per respondent. The average cost to the respondents per AD per year is \$85.00 (\$2,380,000 divided by 28,000).

The information collection burden is a reporting burden only. AD record keeping is covered as follows: Title 14 §§ 43.9, 43.11, and 91.417 require each registered owner/operator to keep records regarding the work performed on each aircraft. The records must include the current status of applicable ADs including, for each, the method of compliance, AD number, and the revision date. If the AD requires future actions, the owner/operator must record the time and date the next action is required. The record-keeping burden of ADs is covered and approved in reports 2120-0005 (14 CFR part 91), and 2120-0020 (14 CFR part 43).

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

There are no additional costs not already included in Item 12 above.

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.

¹ <https://www.bls.gov/ooh/installation-maintenance-and-repair/aircraft-and-avionics-equipment-mechanics-and-technicians.htm>

² <https://www.bls.gov/news.release/pdf/ecec.pdf>

The total estimated annual cost to the Federal government is \$494,000. We determined this cost based on time required by FAA aviation safety engineers (ASE) to review the inspection reports. The typical ASE is an I-band, having an hourly wage listed in the table below dependent on the location of their aircraft certification office (ACO):

FAA ACO Office	I-Band Salary with Locality	Mean Salary per Hour
Anchorage	\$82,367-\$127,656	\$50.49
Atlanta	\$77,953-\$120,816	\$47.78
Boston	\$82,019-\$127,118	\$50.27
Chicago	\$82,013-\$127,108	\$50.27
Denver	\$80,726-\$125,114	\$49.48
Fort Worth	\$79,394-\$123,050	\$48.66
Los Angeles	\$84,007-\$130,199	\$51.49
New York	\$85,011-\$131,755	\$52.11
Seattle	\$80,495-\$124,755	\$49.34
Wichita (Rest of US)	\$74,228-\$115,042	\$45.50
Average Salary/hour		\$49.54

The annual estimate of 28,000 reports requires an average of 15 minutes each to review, totaling 7,000 total hours. For this ICR, the FAA is using the average pay over all ACOs of \$49.54. For Federal salaries, the FAA uses a multiplier of 36 percent to account for benefits and overhead, resulting in an hourly rate of \$67/hour. The total annual salary cost to the Federal government is \$469,000 (\$67 times 7,000 hours). The estimated annual operational and support cost to review the report is \$25,000. Adding this, the total annual cost to the Federal government is \$494,000.

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

There was a small adjustment in the costs to the Federal government. The reason for the increase is due to an increase in the hourly engineer's wage from \$58/hour to \$67/hour. This is an inflationary increase.

Additionally, there was an adjustment to the response times for the existing requirement. The preparation time increased from 5 minutes to 1 hour to better reflect the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing and reviewing the collection of information.

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.

We have no plans for statistical use, and/or publication of this information. The results of the collection will not be made available to the FAA web pages because it is used only to determine if the corrective action will eliminate the unsafe condition or whether additional action must be mandated in another AD (see response to question 1 above).

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 do not seek approval to not display the expiration date of the OMB approval.

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

There are no exceptions.