

Supporting Statement A
Pilot Certification and Qualification Requirements for Air Carrier Operations
2120-0755

A. Justification

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

Title 49 U.S.C., Section 44702 empowers and requires the Secretary of Transportation to issue operating certificates and to establish minimum safety standards for the operation of pilots and those to whom such certificates are issued. Also, Title 49 U.S.C., Section 44701 empowers and requires the Administrator of the Federal Aviation Administration (FAA) to prescribe standards applicable to the accomplishment of the mission of the FAA.

This project is in direct support of the Department of Transportation's Strategic Plan – Strategic Goal – SAFETY; i.e., to promote the public health and safety by working toward the elimination of 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.

Although additional detail is being provided, there is no change to what reporting and recordkeeping information is being collected or how it is being used by FAA. There are two distinct collections described here. First, Training providers that want to and are eligible to deliver the Airline Transport Pilot (ATP) Certification Training Program (CTP) submit a course for approval. This includes curriculum information, training resources, flight simulation training devices and other training aids to be used, instructor training information, and course and testing materials. FAA aviation safety inspectors review all of the information to determine if the program complies with the applicable requirements of 14 CFR 61.156. The programs that comply with the minimum requirements receive approval and are issued an operation specification (OpSpec), training specification (TSpec), or letter of authorization (LOA), as appropriate to the applicant, to begin offering the course for applicants that seek an ATP certificate with a multiengine class rating. The OpSpecs and TSpecs are tracked in the FAA's Web-Based Operations Safety System (WebOPSS) so principal inspectors can manage what their certificate holder is authorized to train. Principal inspectors of pilot schools also track LOAs issued to their certificate holder. Continuing to allow training providers to seek approval for the ATP CTP is necessary because this specific course of training is required for all pilot applicants seeking a multiengine ATP certificate. This is a one-time submission for initial course approval. Any program revisions are accomplished through the existing course revision processes and do not apply to this collection.

Second, institutions of higher education that seek the authority to certify its graduates meet the minimum requirements of 14 CFR 61.160 will submit an application for approval. The collection requires the applicant to provide its pilot school certificate number as well as the pilot school certificate number that is being contracted to perform flight training. The application also requires aviation degree and course information to enable a determination for what meets the requirements of 14 CFR 61.160. The applications are received and reviewed by an FAA aviation safety inspector. If the application meets the requirements, the institutions of higher education receive a LOA for its degree program(s) and are then authorized to place a certifying statement on the transcripts of eligible graduates indicating he or she is eligible for a restricted privileges ATP certificate. This information is collected on occasion. There is a one-time submission for authorization. Additional submissions are only required if there are significant changes in the program or the institution of higher education seeks to add eligible courses or degree programs to its authorization.

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.

In accordance with the Government Paperwork Elimination Act (GPEA), the FAA allows, accepts, and encourages the use of automation and electronic media for the gathering, storage, presentation, review, and transmission of all ATP CTP requests as well as applications for authority to certify graduates by institutions of higher education required by this collection activity. The submission of this collection is available 100% electronically. If the ATP CTP cannot be sent via email, electronic storage media are used and sent to FAA HQ for review. The FAA will ensure that such automation or electronic media has adequate provision for security (i.e., that such submissions may not be altered after review and acceptance by the FAA) and that the systems or applications are compatible with the systems or applications used by the FAA. One hundred (100) % of the rule is available electronically. The FAA is working to insure that the process maintains this 100% availability to respondents throughout the world.

4. Describe efforts to identify duplication. Show specifically why any similar information already available can be used for the purpose described in Item 2 above.

We have reviewed other FAA public-use reports and find no duplication. Also, the FAA knows of no other agency collecting the same information. The information sought is particular to the proposed ATP Certification Training Program training offered by providers certified under part 121, 135, 141 or 142. The information necessary is available from the certificate holders only, and is not available from any other source. The information sought from institutions of higher education seeking the authority to certify their graduates is particular to their degree program(s) and associated aviation coursework required by this rule and can only be provided by them and is not available from any other source.

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

The FAA believes this will not impact a substantial number of small businesses or other small entities; however, the guidance material is informative and explanatory with regards to the requirements. Certificate holders seeking to obtain approval to offer or provide the ATP CTP are guided through the administrative requirements by the local principal operations inspector/training course program manager using published guidance material. The local FAA representative forwards an ATP CTP for approval to a representative of the Washington headquarters staff. Institutions of higher education seeking the authority to certify graduates of its degree program can contact the General Aviation and Commercial Division at the Washington headquarters office for assistance with the application and any other questions concerning the process.

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.

If the collection for original certification and review and approval of an ATP CTP is not conducted, training providers will not receive approval to conduct the training that is required for pilots seeking a multiengine ATP certificate. This is a one-time application; therefore, it cannot be accomplished less frequently. Any program revisions are accomplished through the existing course revision processes and do not apply to this collection.

If an institution of higher education is unable to submit an application to receive approval to certify graduates for an ATP certificate with reduced aeronautical experience, no pilot will be able to take advantage of the time credits afforded to them in the regulations. This is a one-time application; therefore, it cannot be accomplished less frequently. Any revisions to the authorization to certify graduates are submitted on an ad hoc basis for adding additional courses or degree programs or for any significant changes in the program.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with 1320.5(d)(2)(i)-(viii).

This collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2)(i)-(viii) and 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 data elements to be recorded, disclosed, or reported.

A Federal Register notice published on July 31, 2018 (83 FR 37039) solicited public comment. No comments were received.

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

No payment or gifts will be provided to respondents.

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

The respondents are not given any assurance of confidentiality.

11. Provide additional justification for any questions of a sensitive nature.

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden to respondents or record keeper from the collection of information from respondents or record keepers.

The FAA updated the hourly rates in 2019 with the most current data available at the time.

Airline Transport Pilot (ATP) Certification Training Program (CTP)

The rule levies requirements that must be met by part 121, 135, 141, or 142 certificate holders who choose to offer or provide the ATP CTP. The estimates for hours and costs are broken down by initial development and approval of an ATP CTP, followed by pilot training record keeping.

While requiring the gathering and maintaining of information and, in certain cases, the reporting of some of that information to the FAA, these sections require no additional burden on the certificate holders beyond what is currently required by rule or currently borne by certificate holders in regular practice. Exceptions to this are the following:

- a. One time development and submission of an ATP CTP to the FAA for approval. It requires one instructor 120 hours for each certificate holder who initially would offer the course.
- b. Requires one instructor 0.1 hours for course completion record keeping for each applicant for an ATP certificate with an airplane category multiengine class rating.

The FAA uses a mean hourly wage of \$35.44 for transportation inspectors from the Bureau of Labor Statistics (BLS).¹ The FAA notes that BLS does not have a separate category for training center instructors and we believe this category most closely matches the salary and function of a training center instructor. Using BLS's Employer Costs for Employee Compensation memo

¹ <https://www.bls.gov/oes/current/oes536051.htm>

released December 14, 2018,² the FAA calculated the mean hourly wage, plus benefits, for a training center instructor to be \$51.89 (\$35.44 + \$16.45).

Assumptions for Cost Burden to Respondents

120 hours	Instructor time for course development and submission
\$51.89	Instructor hourly rate
\$6,227	Cost to develop an ATP CTP (120 hours * \$51.89 hourly rate)
14	Initial number of certificate holders received approval (2015)
8	Initial number of certificate holders received approval (2016)
1	Initial number of certificate holders received approval (2017)
1	Initial number of certificate holders received approval (2018)
1	Annual increase in no. of certificate holders offering the ATP CTP
0.1	One-time per pilot record keeping instructor hours for records on course completion

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

Table 1. Burden to Develop and Submit an ATP CTP

Year	Course Development Hours	Course Development Costs	Estimated No. of ATP Applicants	Record Keeping Hours	Record Keeping Costs	Total Hours	Total Costs
2015	1,680	\$87,175	3,754	375	\$19,459	2,055	\$106,634
2016	960	\$49,814	3,776	378	\$19,614	1,338	\$69,429
2017	120	\$6,227	3,799	380	\$19,718	500	\$25,945
2018	120	\$6,227	3,821	382	\$19,822	502	\$26,049
2019	120	\$6,227	3,844	384	\$19,926	504	\$26,153
2020	120	\$6,227	3,867	387	\$20,081	507	\$26,308
2021	120	\$6,227	3,891	389	\$20,185	509	\$26,412
2022	120	\$6,227	3,914	391	\$20,289	511	\$26,516
2023	120	\$6,227	3,938	394	\$20,445	514	\$26,671
2024	120	\$6,227	3,961	396	\$20,548	516	\$26,775
2025	120	\$6,227	3,985	398	\$20,652	518	\$26,879
2026	120	\$6,227	4,009	401	\$20,808	521	\$27,035
2027	120	\$6,227	4,033	403	\$20,912	523	\$27,138
2028	120	\$6,227	4,057	406	\$21,067	526	\$27,294
2029	120	\$6,227	4,81	408	\$21,171	528	\$27,398
2030	120	\$6,227	4,106	411	\$21,327	531	\$27,554
2031	120	\$6,227	4,131	413	\$21,431	533	\$27,657
2032	120	\$6,227	4,155	416	\$21,586	536	\$27,813
Total	4,560	\$236,618	71,122	7,112	\$369,042	11,672	\$605,660
Average Annual Burden	253	\$13,145	3,951	395	\$20,502	648	\$33,648

The average annual hour burden to respondents is 648 and the average annual cost burden is \$33,648.

The total burden for 2018-2020 will be 1,513 hours and \$78,510. This is an annual average of 504 hours and \$26,170.

Application for Authority to Certify Graduates for a Restricted Privileges ATP Certificate

The rule provides a method for an institution of higher education to seek the authority to certify its graduates of a degree program with an aviation major for a restricted privileges ATP certificate. The rule requires the institution to hold a part 141 pilot school certificate from the FAA to provide pilot training within the degree program. The estimates for hours and costs are broken down by the assumed number of institutions applying for this authority and the initial aviation coursework mapping that needs to be documented by the institution of higher education, as this information is not typically collected from them.

While requiring the gathering and maintaining of pilot training information and, in certain cases, the reporting of some of that information to the FAA, these sections generally require no additional burden on the part 141 certificate holders beyond what is currently required by rule or what is currently borne by certificate holders in regular practice. Exceptions to this are the following:

- a. One-time application to the FAA by an institution of higher education that seeks this authority. Requires one individual from the institution of higher education 8 hours to review the instructions in Advisory Circular 61-139, obtain part 141 pilot school information as well as degree and coursework details, and complete the application.
- b. Requires an academic advisor 0.5 hours to review the transcript of each graduate to determine eligibility for a restricted privileges ATP certificate.
- c. During the part 141 certificate holders' renewal every 24 calendar months, the chief instructor will review the letter of authorization with an FAA inspector. The associated costs are minimal additional recurring because the review is included as part of existing duties for approved pilot training and record keeping.

The FAA uses a mean hourly wage of \$52.80 for an college engineering professor from the Bureau of Labor Statistics (BLS) ($\$109,830 / (52 * 40)$).³ Using BLS's Employer Costs for Employee Compensation memo released December 14, 2018,⁴ the FAA calculated the mean hourly wage, plus benefits, for an engineering college professor to be \$77.31 ($\$52.80 + \24.51).

Assumptions for Cost Burden to Respondents

- 8 Initial application: College professor from the institution of higher education (hours)
- 0.5 Academic advisor (college professor) one-time per graduate for record keeping to review their transcript for eligibility for a restricted privileges ATP certificate
- \$77.31 College professor / Academic advisor hourly rate
- 18 Number of institutions of higher education that applied (2015-2017)
- 2 Annual increase in no. of institutions of higher education applying (2018-2020)

³ <https://www.bls.gov/oes/current/oes251032.htm>

⁴ <https://www.bls.gov/news.release/pdf/ecec.pdf>

1 Annual increase in no. of institutions of higher education applying (beyond 2020)

Table 2. Burden to Certify Graduates for an ATP

Year	School Application for FAA Approval-- Hours	School Application for FAA Approval-- Costs	Estimated No. of Graduates	Review of Transcripts-- Hours	Review of Transcripts-- Costs	Total Hours	Total Costs
2015	48	\$3,711	1360	680	\$52,568	728	\$56,279
2016	48	\$3,711	1368	684	\$52,877	732	\$56,588
2017	48	\$3,711	1376	688	\$53,187	736	\$56,897
2018	16	\$1,237	1384	692	\$53,496	708	\$54,733
2019	16	\$1,237	1393	697	\$53,882	713	\$55,119
2020	16	\$1,237	1401	701	\$54,192	717	\$55,428
2021	8	\$618	1409	705	\$54,501	713	\$55,119
2022	8	\$618	1418	709	\$54,810	717	\$55,428
2023	8	\$618	1426	713	\$55,119	721	\$55,738
2024	8	\$618	1435	718	\$55,506	726	\$56,124
2025	8	\$618	1443	722	\$55,815	730	\$56,433
2026	8	\$618	1451	726	\$56,124	734	\$56,743
2027	8	\$618	1461	731	\$56,511	739	\$57,129
2028	8	\$618	1469	735	\$56,820	743	\$57,438
2029	8	\$618	1478	739	\$57,129	747	\$57,748
2030	8	\$618	1487	744	\$57,516	752	\$58,134
2031	8	\$618	1496	748	\$57,825	756	\$58,443
2032	8	\$618	1505	753	\$58,211	761	\$58,830
Total	288	\$22,264	25,760	12,885	\$996,088	13,173	\$1,018,352
Average Annual Burden	16	\$1,237	1,431	716	\$55,338	732	\$56,575

The average annual hour burden to respondents is 732 and the average annual cost burden is \$56,575.

The total annual burden for 2018-2020 will be 2,138 hours and \$165,280. This is an annual average of 713 hours and \$55,093.

Revision Application for Authority to Certify Graduates for a Restricted Privileges ATP Certificate

For those institutions of higher education that have received the Letter of Authorization (LOA) from the FAA to certify graduates for a restricted privileges ATP certificate that would like to add degree programs or additional coursework to the authorization, they must submit an application for revision. FAA will review the revised application, and amend the LOA accordingly.

a. An application for revision to the FAA by an institution of higher education that seeks to amend its authority. Requires one individual from the institution of higher education 2 hours to review the instructions in Advisory Circular 61-139, obtain part 141 pilot school information as well as any new degree and coursework details as needed for the revision, and complete the applicable sections of the application. A revision uses the same application form (FAA form 8700-1) as the initial application.

The FAA uses a mean hourly wage of \$52.80 for an college engineering professor from the Bureau of Labor Statistics (BLS) ($\$109,830 / (52 * 40)$).⁵ Using BLS's Employer Costs for Employee Compensation memo released December 14, 2018,⁶ the FAA calculated the mean hourly wage, plus benefits, for an engineering college professor to be \$77.31 ($\$52.80 + \24.51).

Assumptions for Cost Burden to Respondents

2 Initial application: College professor from the institution of higher education (hours)

\$77.31 College professor / Academic advisor hourly rate

30 Number of institutions of higher education that will send a revised application (2018 and beyond)

⁵ <https://www.bls.gov/oes/current/oes251032.htm>

⁶ <https://www.bls.gov/news.release/pdf/ecec.pdf>

Table 3. Burden to Review the Revised Application

Year	School Revision Application for FAA Approval-- Hours	Total Costs
2018	60	\$4,638
2019	60	\$4,638
2020	60	\$4,638
2021	60	\$4,638
2022	60	\$4,638
2023	60	\$4,638
2024	60	\$4,638
2025	60	\$4,638
2026	60	\$4,638
2027	60	\$4,638
2028	60	\$4,638
2029	60	\$4,638
2030	60	\$4,638
2031	60	\$4,638
2032	60	\$4,638
Total	900	\$69,575
Average Annual Burden	60	\$4,638

The average annual hour burden to respondents is 60 and the average annual cost burden is \$4,638.

The total annual burden for 2018-2020 will be 180 hours and \$13,915. This is an average of 60 hours and \$4,638 annually.

Combining the average annual burden for the ATP CTP, Application for Authority to Certify Graduates for a Restricted Privileges ATP Certificate, and Revision Application for Authority to Certify Graduates for a Restricted Privileges ATP Certificate for 2018-2010 produces a total annual hourly burden of 1,277 hours (504 + 713 + 60) and \$85,902 (\$26,170 + \$55,093 + \$4,638).

13. Provide an estimate of 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.

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

The FAA updated the hourly rates in 2019 with the most current data available at the time.

ATP CTP

The estimates for hours and costs are for the FAA to issue initial approval and then ultimately final approval of an ATP Certification Training Program. After final approval, there are minimal additional recurring costs for the Federal Government because an ATP Certification Training Program would be included as part of current FAA certificate management duties for approved pilot training and record keeping.

The website federalpay.org reports that the average annual wage for a transportation specialist is \$97,857 or \$47.05 hourly ($\$97,857/(40*52)$).⁷ The FAA notes that federalpay.org does not have a separate category for an FAA aviation safety inspector and we believe this category most closely matches the salary and function of an aviation safety inspector. The Office of Management and Budget guidance for civilian federal employees determined that the full fringe benefit cost factor is 36.25%.⁸ Using OMB's guidance, the FAA calculated the mean hourly wage, plus benefits, for an FAA safety inspector to be \$73.80 ($\$47.05 + \26.75).

The website federalpay.org reports that the average annual wage for an FAA program clerical assistant is \$57,685 or \$27.73 hourly ($\$57,685/(40*52)$).⁹ The FAA notes that federalpay.org does not have a separate category for an FAA clear or secretary and we believe this category most closely matches the salary and function of an FAA clerk or secretary. The Office of Management and Budget guidance for civilian federal employees determined that the full fringe benefit cost factor us 36.25%.¹⁰ Using OMB's guidance, the FAA calculated the mean hourly wage, plus benefits, for an FAA clerk or secretary to be \$43.50 ($\$27.73 + \15.77).

Assumptions for Cost to the Federal Government

\$73.80	FAA Aviation Safety Inspector average hourly rate
\$43.50	FAA Clerk/Secretary average hourly rate
156	Inspector time (hours) to review an ATP CTP submitted for approval

⁷ <https://www.federalpay.org/employees/occupations/transportation-specialist>

⁸ <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2008/m08-13.pdf>

⁹ <https://www.federalpay.org/employees/occupations/management-and-program-clerical-and-assistance>

¹⁰ <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2008/m08-13.pdf>

0.5 Clerical Assistant time (hours) to type approval letter

- a. Requires one FAA inspector (Field Inspector) 30 hours, one FAA inspector (Headquarters Inspector) 30 hours, and two additional FAA inspectors (Headquarters Inspector) 25 hours each to review each ATP Certification Training Program submitted for initial approval. This initial approval permits the certificate holder to deliver the ATP Certification Training Program for one year.
- b. Requires two FAA inspectors 20 hours of review and 6 hours of travel for one FAA inspector (Headquarters Inspector) for final approval. Final approval will be granted after review of the certificate holder's training program performance measures, site visit and FAA inspector (Headquarters Inspector) observation of the program.

Table 4. Cost Burden to Federal Government to Issue and Approve an ATP Program

Year	Review of ATP Training Program Course-- Hours	Review of ATP Cert. Training Program Course— Costs	Approval Letter Hours	Approval Letter Costs	Total Hours	Total Costs
2015	2,184	\$161,176	7	\$305	2,191	\$161,481
2016	1,248	\$92,101	4	\$174	1,252	\$92,275
2017	156	\$11,513	0.5	\$22	157	\$11,534
2018	156	\$11,513	0.5	\$22	157	\$11,534
2019	156	\$11,513	0.5	\$22	157	\$11,534
2020	156	\$11,513	0.5	\$22	157	\$11,534
2021	156	\$11,513	0.5	\$22	157	\$11,534
2022	156	\$11,513	0.5	\$22	157	\$11,534
2023	156	\$11,513	0.5	\$22	157	\$11,534
2024	156	\$11,513	0.5	\$22	157	\$11,534
2025	156	\$11,513	0.5	\$22	157	\$11,534
2026	156	\$11,513	0.5	\$22	157	\$11,534
2027	156	\$11,513	0.5	\$22	157	\$11,534
2028	156	\$11,513	0.5	\$22	157	\$11,534
2029	156	\$11,513	0.5	\$22	157	\$11,534
2030	156	\$11,513	0.5	\$22	157	\$11,534
2031	156	\$11,513	0.5	\$22	157	\$11,534
2032	156	\$11,513	0.5	\$22	157	\$11,534
Total	5,928	\$437,478	19	\$827	5,947	\$438,305
Average Annual Burden	329	\$24,304	1	\$46	330	\$24,350

The total annual cost to the Federal Government to Issue and Approve an ATP Program for 2018-2020 is \$34,603.

Application for Authority to Certify Graduates for a Restricted Privileges ATP Certificate

The estimates for hours and costs are for initial application processing and issuance of a letter of authorization to an institution of higher education. After initial approval, there will be 2 hours of time added to an already scheduled event for a part 141 certificate holder with an Aviation Safety Inspector (Operations). The additional recurring costs for the Federal Government are minimal

because a part 141 pilot school is included as part of current FAA certificate overall management duties for approved pilot training and record keeping.

Requires one FAA inspector 6 hours to review each initial application by an institution of higher education for authority to certify graduates.

The website federalpay.org reports that the average annual wage for a transportation specialist is \$97,857 or \$47.05 hourly ($\$97,857 / (40 * 52)$).¹¹ The FAA notes that federalpay.org does not have a separate category for an FAA aviation safety inspector and we believe this category most closely matches the salary and function of an aviation safety inspector. The Office of Management and Budget guidance for civilian federal employees determined that the full fringe benefit cost factor is 36.25%.¹² Using OMB's guidance, the FAA calculated the mean hourly wage, plus benefits, for an FAA safety inspector to be \$73.80 ($\$47.05 + \26.75).

Assumptions for Cost to the Federal Government

6	Inspector time (hours) to process and issue letter of authorization
\$73.80	FAA Aviation Safety Inspector average hourly rate

¹¹ <https://www.federalpay.org/employees/occupations/transportation-specialist>

¹² <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2008/m08-13.pdf>

Table 5. Cost Burden to Federal Government for Letter of Authorization

Year	Review & Approval of Course-- Hours	Review & Approval of Course-- Costs
2015	36	\$2,657
2016	36	\$2,657
2017	36	\$2,657
2018	12	\$886
2019	12	\$886
2020	12	\$886
2021	6	\$443
2022	6	\$443
2023	6	\$443
2024	6	\$443
2025	6	\$443
2026	6	\$443
2027	6	\$443
2028	6	\$443
2029	6	\$443
2030	6	\$443
2031	6	\$443
2032	6	\$443
Total	216	\$15,941
Average Annual Burden	12	\$886

The total annual cost to the Federal Government to issue a letter of authorization for 2018-2020 is \$2,657.

Revision Application for Authority to Certify Graduates for a Restricted Privileges ATP Certificate

For those institutions of higher education that have received the Letter of Authorization (LOA) from the FAA to certify graduates for a restricted privileges ATP certificate that would like to add degree programs or additional coursework to the authorization, they must submit an application for revision. FAA will review the revised application, and amend the LOA accordingly.

Requires one FAA inspector 3 hours to review each initial application by an institution of higher education for authority to certify graduates.

The website federalpay.org reports that the average annual wage for a transportation specialist is \$97,857 or \$47.05 hourly ($\$97,857 / (40 * 52)$).¹³ The FAA notes that federalpay.org does not have a separate category for an FAA aviation safety inspector and we believe this category most closely matches the salary and function of an aviation safety inspector. The Office of Management and Budget guidance for civilian federal employees determined that the full fringe benefit cost factor is 36.25%.¹⁴ Using OMB's guidance, the FAA calculated the mean hourly wage, plus benefits, for an FAA safety inspector to be \$73.80 ($\$47.05 + \26.75).

Assumptions for Cost to the Federal Government

- 3 Inspector time (hours) to review and issue a letter of authorization (LOA) for a submitted application
- \$73.80 FAA Aviation Safety Inspector average hourly rate.

Table 6. Cost Burden to Federal Government to Review and Amend an LOA

Year	Review & Approval of Revision- -Hours	Review & Approval of Revision- -Costs
2018	90	\$6,642
2019	90	\$6,642
2020	90	\$6,642
2021	90	\$6,642
2022	90	\$6,642
2023	90	\$6,642
2024	90	\$6,642
2025	90	\$6,642
2026	90	\$6,642
2027	90	\$6,642
2028	90	\$6,642
2029	90	\$6,642
2030	90	\$6,642
2031	90	\$6,642
2032	90	\$6,642
Total	1,350	\$99,628
Average	90	

¹³ <https://www.federalpay.org/employees/occupations/transportation-specialist>

¹⁴ <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2008/m08-13.pdf>

Annual Burden	\$6,642
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The total annual cost to the Federal Government to review and amend a letter of authorization for 2018-2020 is \$19,926.

Total estimated Federal costs for 2018-2020 is \$57,185 (\$34,603 + \$2,627 + \$19,926). This is an annual cost of \$19,062.

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

ATP CTP

The number of ATP Certification Training Program submissions was higher in 2016 than projected, however since then it has settled to approximately 1 per year.

Application for Authority to Certify Graduates for a Restricted Privileges ATP Certificate

At the time of our last application, FAA had 72 institutions of higher education that had received letters of authorization to certify graduates for a restricted privileges ATP certificate. From 2015-2017, 18 additional institutions of higher education were added. This average of 6 per year is now reflected in the table. This number is slightly lower than projected. We anticipate the average number of applications will continue to decline in the coming years as a majority of programs already have the authorization.

The agency has separated collection activity into appropriate information collections, there has not been additional forms or applications added.

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.

FAA publishes a list of approved ATP CTP providers and a list of authorized institutions of higher education on its Web site: <http://www.faa.gov/pilots/training/atp/>

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.