

# **INFORMATION COLLECTION SUPPORTING STATEMENT**

## **Aircraft Repair Station Security**

**OMB Control Number 1652-0060**

**Exp. 4/30/2019**

- 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 statute and regulation mandating or authorizing the collection of information. (Annotate the CFR parts/sections affected).**

TSA's Aircraft Repair Station regulations, codified at 49 CFF part 1554, implement a statutory requirement for the Department of Homeland Security (DHS) to ensure the security of aircraft repair stations. See 49 U.S.C. 44924.

Consistent with the statutory mandate, repair stations certificated by the FAA under 14 CFR part 145 and located on or adjacent to an airport (as defined in 49 CFR 1554.101(a)(1) and (2)), are required to implement security requirements. With a limited exception for repairs stations located on a military installation, these repair stations are also subject to inspection by TSA. The required security measures include designating a TSA point of contact and preventing the operation of unattended large aircraft that are capable of flight. A repair station owner or operator also is responsible for maintaining updated employment history records to demonstrate compliance with the regulatory requirements. These records must be made available to TSA upon request. They must also comply with security directives (SD) if issued by TSA, which could include requirements to maintain additional records or provide information to TSA. TSA may issue an SD when TSA determines that additional security measures are necessary to respond to specific threats or intelligence information. Repair stations must adopt each SD issued by TSA within the timeframe established by the SD. TSA will determine compliance with the requirements of an SD, which may include recordkeeping requirements, when conducting inspections.

TSA uses the collected information to determine compliance with the security measures required under 49 CFR part 1554. As a general practice, TSA limits regulator inspections to repair stations located on, or adjacent to, an airport. Other repair stations are inspected as necessary to comply with the requirement in 49 U.S.C. 44924 to conduct a security audit of all covered repair stations located outside the United States to evaluate security risks, as conditions warrant, and for compliance with any SDs that TSA may issue. As required by the statute, TSA has completed a security review and audit of 707 repair stations outside the United States. There is no further requirement in the regulations to perform these audits. See 49 U.S.C. 44924(a).

If TSA discovers security deficiencies, a repair station may be subject to suspension or, in extreme cases, withdrawal of its certification by the FAA if such deficiencies are not corrected. A repair station owner or operator may petition for reconsideration (appeal) of a determination by TSA that FAA must suspend or revoke its certificate.

TSA conducts the following information collections:

- (1) **Recordkeeping.** Under 49 CFR 1554.3, repair stations that verify employee background information using employment history will be required to maintain employment history records and other records to demonstrate compliance with the security measures and directives, and make the records available for inspection by TSA upon request.
- (2) **Petition for Reconsideration.** TSA has established procedures for a repair station operator or owner to request reconsideration of a determination that its certificate must be suspended or revoked. The petition must be in writing, in English, signed by the repair station operator or owner, and follow the procedures in 49 CFR 1554.201 and 1554.203.

**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.***

As necessary to ensure compliance with 49 CFR part 1554, TSA will review the employment history records and other records related to SDs.

The TSA Administrator will review information submitted as part of a petition for reconsideration of a determination that a repair station certificate must be suspended or revoked before issuing a final agency order. The TSA Administrator will either direct the TSA-designated official to notify FAA and the repair station that the determination is rescinded and the certificate may be reinstated or affirm the determination.

**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 recordkeeping, 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.]***

This collection of information is in compliance with the GPEA in that TSA will allow transmission of all documents via email, [ars@tsa.dhs.gov](mailto:ars@tsa.dhs.gov) (United States), [frs@tsa.dhs.gov](mailto:frs@tsa.dhs.gov) (outside the United States) or fax, 703-603-4044, and retention of all records to be conducted electronically. See 42 U.S.C. 3504.

**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.***

This collection is not a duplication of existing Federal requirements. TSA's promulgation of 49 CFR part 1544 created a new requirement for covered repair stations. As the scope is determined by FAA-certifications, TSA and FAA coordinate to avoid duplication of effort. Once the FAA issues a new certificate to a repair station, the FAA sends an email to TSA with the aircraft repair station's information. Applications to become an FAA-certified

aircraft repair station are available at: <https://www.faa.gov/aircraft/repair/become/>. Once TSA receives this information from the FAA, they send an email to the aircraft repair station to collect the information of the point(s) of contact, and notify them that they are subject to the requirements in 49 CFR 1554. TSA has also entered into an agreement with FAA, whereby it lists the responsibilities of each office, lists the POCs in each office, and explains how to share new repair station information following FAA certification of a new station.

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.***

This collection of information does not have a significant impact on a substantial number of small businesses or other small entities.

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 will not be able to meet its statutory requirements under 49 U.S.C. 44924 if the information described in this Supporting Statement is not collected.

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).***

None of the requirements are inconsistent with the guidelines in 5 CFR 1320.5.

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 Federal Register 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 respectively published two *Federal Register* notices, with a 60-day and a 30-day comment period, soliciting comments on this information collection request. See 83 FR 52777 (July 6, 2018) and 83 FR 5102 (February 20, 2019). 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. The agency did not receive any comments on the collection of information.

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

TSA will not provide any payment or gifts to respondents for this information collection.

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

Although TSA will not provide any assurances of confidentiality to respondents, information collected that is determined by TSA to be Sensitive Security Information (SSI), in accordance with 49 CFR part 1520, will be protected as such. This information collection is covered under two Privacy Impact Assessments (PIAs): DHS/TSA/PIA-038 Performance and Results Information System (PARIS) (Sep. 18, 2012) and DHS/ALL/PIA-006 General Contact Lists (June 15, 2007). In addition, the collection is covered by a System of Records Notice (SORN), DHS/TSA-001 Transportation Security Enforcement Record System. See 71 FR 44223 (August 4, 2006).

**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.**

This information collection does not involve any questions of a sensitive nature.

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

Repair stations are responsible for maintaining updated employment history records and other records to demonstrate compliance with the regulatory requirements and security directives issued by TSA. These records must be made available to TSA upon request. Additionally, a repair station operator or owner may appeal a determination by TSA that FAA must suspend or revoke its certificate.

The respondents to this information collection are the owners and/or operators of repair stations certificated by the FAA under 14 CFR part 145. To estimate the burden for domestic and foreign aircraft repair stations, TSA multiplies the fully-loaded<sup>1</sup> wage rate of the industry employee responsible for their respective information collection activity, by the time it takes to meet the compliance requirements. TSA uses a fully loaded wage rate of \$23.01<sup>2</sup> for an administrative assistant and the fully loaded hourly wage rate for a first-line supervisor of

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<sup>1</sup> A fully-loaded wage rate accounts for the non-salary elements of employee compensation, such as health and retirement benefits.

<sup>2</sup> The unloaded wage rate is for an administrative assistant is \$15.20. BLS. May 2017 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 481000-Air Transportation. Occupational Code: 43-4171 Receptionists and Information Clerks. Last Modified March 30, 2018 (accessed May 11, 2018), [https://www.bls.gov/oes/2017/May/naics3\\_481000.htm#43-0000](https://www.bls.gov/oes/2017/May/naics3_481000.htm#43-0000). TSA calculates a compensation factor to inflate the wage so it accounts for all elements of employer costs of employee compensation. TSA calculates this by dividing the total compensation for workers in the production, transportation, and material moving industry (\$27.93) by the wage and salaries component (\$18.45). TSA calculates a compensation factor of 1.51382 (\$27.93/\$18.45). BLS. Employer Costs for Employee Compensation-December 2017. Table 5. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: private-industry workers, production, transportation and material moving occupation. Last modified March 20, 2018 (accessed May 11, 2018), [https://www.bls.gov/news.release/archives/ecec\\_03202018.htm](https://www.bls.gov/news.release/archives/ecec_03202018.htm). TSA then multiplies the unloaded wage rate by the compensation factor to calculate a fully loaded wage rate of \$23.01 (1.51382 x \$15.20).

mechanics, installers, and repairers of \$60.46.<sup>3</sup> Lastly, TSA uses a fully-loaded wage rate of \$94.67<sup>4</sup> for a Corporate Security Director.

### Updating Point of Contact (POC) Information

Repair Stations are required to designate a POC with TSA. TSA estimates that approximately 10 domestic and 10 foreign repair stations (20 total) either submit or update POC information each year. TSA estimates that it takes approximately 1.5 minutes (0.025 hours) to submit or update this information. This burden would typically be undertaken by an administrative assistant with a fully-loaded wage rate of \$23.01. TSA estimates an annual hour burden of 0.5 hours (1.5 hours over three years) and an annual hour burden cost of \$11.51 (34.52 over three years). Table 1 summarizes these estimates.

**Table 1. Hour Burden Cost for Submitting or Updating POC Information**

<b>Number of Domestic Stations</b>	<b>Number of Foreign Stations</b>	<b>Hour Burden to Submit or Update POC information</b>	<b>Annual Hour Burden</b>	<b>Annual Hour Burden Cost</b>
<b>A</b>	<b>B</b>	<b>C</b>	<b>D = (A + B) x C</b>	<b>E = D x \$23.01</b>
10	10	0.025	0.5	\$11.51

### Repair Station Inspections

TSA conducts multiple types of inspections of repair stations: domestic comprehensive inspections, domestic targeted inspections, Compliance Security Enhancement Through Testing (COMSETT) inspections, and foreign inspections. Annually, TSA conducts approximately 350 domestic comprehensive inspections, 44 domestic targeted/supplemental inspections, 9 COMSETT inspections, and 77 foreign inspections. Each inspection places an administrative burden on the repair station to comply with the inspections. TSA estimates each foreign and domestic comprehensive inspection places an approximate burden of 2 hours on the repair station Security Manager, a domestic targeted/supplemental inspection places a 30 minute (0.5 hour) time burden on the Security Manager, and a domestic COMSETT inspection places a 15 minute (0.25 hour) burden on the Security Manager. TSA estimates the fully-loaded wage rate of a repair station Security Manager to be \$94.67. TSA estimates a total annual hour burden of 879 hours (2,636 over three years) and an annual hour burden cost of \$83,186 (\$249,557 over three years). Table 2 summarizes these estimates.

<sup>3</sup> The unloaded wage rate for first-line supervisors is \$39.94. BLS. May 2017 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 481000-Air Transportation. Occupational Code: 49-1011 First-Line Supervisors of Mechanics, Installers, and Repairers. Last Modified March 30, 2018 (accessed May 11, 2018), [https://www.bls.gov/oes/2017/May/naics3\\_481000.htm#43-0000](https://www.bls.gov/oes/2017/May/naics3_481000.htm#43-0000). TSA uses the same compensation factor as above to adjust this wage to make it fully-loaded. The fully-loaded wage rate is \$60.46 (1.51382 x \$39.94).

<sup>4</sup> The unloaded wage rate for operations managers is \$62.54. BLS. May 2017 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 481000-Air Transportation. Occupational Code: 11-1021 General and Operations Managers. Last Modified March 30, 2018 (accessed May 11, 2018), [https://www.bls.gov/oes/2017/May/naics3\\_481000.htm#43-0000](https://www.bls.gov/oes/2017/May/naics3_481000.htm#43-0000). TSA uses the same compensation factor as above to adjust this wage to make it fully-loaded. The fully-loaded wage rate is \$94.67 (1.51382 x \$62.54).

**Table 2. Hour Burden Cost of Repair Station Inspections**

Type of Inspection	Number of Inspections	Hour Burden per Inspection	Annual Hour Burden	Annual Hour Burden Cost
	A	B	C = A x B	D = C x \$94.67
Foreign Repair Station	77	2	154	\$14,579.85
Domestic Repair Station, comprehensive	350.34		700.67	\$66,335.79
Domestic Repair Station, targeted	43.59	0.5	21.80	\$2,063.61
COMSETT	8.72	0.25	2.18	\$206.36
<b>Total</b>	<b>479.65</b>		<b>878.65</b>	<b>\$83,185.62</b>

Petitions for Reconsideration

A repair station operator or owner may request reconsideration of a determination that its certificate must be suspended or revoked. The petition must be in writing, in English, and signed by the repair station operator or owner. TSA estimates that, on an average annual basis, one repair station within the United States and one outside the United States will undergo the suspension and revocation process.

Within the United States, TSA estimates that it takes a repair station's first-line supervisor approximately 10 hours to fill-out a petition and send it to TSA. TSA calculates an annual cost and hour burden for domestic repair station revocations at \$604.62. Outside the United States, TSA estimates that it takes a repair station's first-line supervisor approximately 12 hours to fill out a petition and send it to TSA. TSA calculates an annual hour and cost burden for foreign repair station revocations at \$725.54. This represents a total annual hour burden of 22 hours (66 hours over three years) and an annual hour burden cost of \$1,330 (\$3,990 over three years). Table 3 summarizes these calculations.

**Table 3. Hour Burden Cost for Petition for Reconsideration**

Status of Petitioner	Number of Petitions	Hours Burden Per Petition	Annual Hour Burden	Annual Hour Burden Cost
	A	B	C = A x B	D = C x \$60.46
Domestic Station	1	10	10	\$604.62
Foreign Station	1	12	12	\$725.54
<b>Total</b>	<b>2</b>		<b>22</b>	<b>\$1,330.16</b>

Summary

In summary, TSA estimates a total annual hour burden for this collection to be 901 hours (2,703 over three years) with a total annual hour burden cost of \$84,527 (\$253,582 over three years). Table 4 summarizes the annual hour burden costs.

**Table 4. Summary of Public Burden**

<b>Burden Cost for Submitting or Updating POC information</b>	<b>Burden Cost for Inspections</b>	<b>Burden Cost for Petition for Reconsideration</b>	<b>Total Annual Hour Burden Cost</b>
<b>A</b>	<b>B</b>	<b>C</b>	<b>D = A + B + C</b>
\$11.51	\$83,185.62	\$1,330.16	\$84,527.29

**13. Provide an estimate of annualized capital and start-up costs.**

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

**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.**Point of Contact (POC) Updates and Changes

TSA personnel must process updates and/or changes to POC information submitted by repair stations. TSA estimates it receives 20 updates or changes to POC information each year. TSA estimates it takes a J-Band employee 5 minutes (0.0833 hours) to process the information change, for an annual hour burden to TSA personnel of 1.67 hours. The fully-loaded hourly wage rate for a J-Band employee is \$78.65. Therefore, TSA estimates an annual hour burden cost to TSA of \$131.08. Table 5 summarizes these calculations.

**Table 5. TSA Hour Burden Cost to Process New or Updated POC Information**

<b>Number of POC Contact Information Submissions</b>	<b>Hour Burden per Submission</b>	<b>Annual Hours</b>	<b>Annual Hour Burden Cost</b>
<b>A</b>	<b>B</b>	<b>C = A x B</b>	<b>D = C x \$78.65</b>
20	0.083333333	1.666666667	\$131.08

Inspections

The Federal Government is responsible for conducting live inspections and validating that repair stations store the employment records of their security point of contact among other requirements. TSA expects to conduct 436 comprehensive inspections and 64 targeted inspections on domestic repair stations each year. TSA estimates it takes an inspector one hour to complete a comprehensive inspection and 30 minutes (0.5 hours) to conduct a targeted inspection. TSA estimates that there will be an annual hour burden of 350 hours to TSA inspectors conducting comprehensive investigations and an annual hour burden of 33 for conducting targeted inspections. Domestic inspections are conducted by TSA inspectors under multiple pay bands, and TSA uses a weighted average hourly wage rate of \$48.53<sup>5</sup> for

<sup>5</sup> This is a weighted average of the hourly wage rate for G- and H-Band inspectors (\$40.44) and I-Band employees (\$66.79). There are 323 G- and H-Band Inspectors and 143 I-Band Inspectors, for a total of 466 Inspectors. \$48.53 =  $[(323 \div 466) \times \$40.44] + [(143 \div 466) \times \$66.79]$ . TSA, Office of Finance, FY2018 Modular Cost Data.

domestic inspectors. TSA estimates an average annual hour cost burden of \$17,000 for comprehensive inspections and \$1,058 for targeted inspections.

TSA expects to conduct 77 live inspections at foreign repair stations each year. TSA estimates it takes one hour to perform a live inspection. TSA estimates an average annual hour burden of 77 hours for foreign inspections. Foreign inspections are conducted by I-Band (international) Inspectors with a fully-loaded hourly wage rate of \$91.77<sup>6</sup>. TSA estimates an annual hour burden cost of \$7,066 to TSA for foreign inspections.

The total annual hour burden to TSA for all inspections is 449 (1,347 over three years) and the average annual hour burden cost to TSA of inspections is \$25,124 (\$75,371 over three years). Table 6 summarizes these calculations.

**Table 6. TSA Hour Burden Cost to Conduct Inspections**

Type of Inspection	Number of Inspections	Hour Burden per Inspection	Annual Hour Burden	TSA Wage	Annual Hour Burden Cost
	A	B	C = A x B	D	E = C x D
Foreign Repair Station	77	1	77	\$91.77	\$7,065.92
Domestic Repair Station, comprehensive	350.34	1	350.34	\$48.53	\$17,000.18
Domestic Repair Station, targeted	43.59	0.5	21.80	\$48.53	\$1,057.70
COMSETT	8.72	0.5	4.36	\$48.53	\$211.54
<b>Total</b>	<b>479.65</b>		<b>453.49</b>		<b>\$25,335.35</b>

#### Summary

TSA estimates a total yearly average hour burden of 455 hours (1,366 over three years) to the Federal Government at a cost of \$25,466.42 (\$76,399 over three years). Table 7 summarizes these estimates.

**Table 7. Summary of TSA Hour Burden Costs**

Annual Cost to Process New POC information	Annual Costs to Conduct Inspections	Total Annual TSA Costs
A	B	C = A + B
\$131.08	\$25,335.35	\$25,466.42

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

TSA's burden estimates have been adjusted to reflect accurate data, allowing for the burden to increase. Data was provided for repair stations located outside the United States, through a memorandum of understanding with the FAA.

<sup>6</sup> TSA, Office of Finance, Modular Cost Data.



**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.**

This information collection will not be published for statistical 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.**

TSA will display the OMB number and 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 to the certification requirement.