

## Supporting Statement

### Pilot Certification Unmanned Aircraft Systems

OMB # TBD

The FAA, with the Office of the Secretary, Department of Transportation (DOT), proposes to update existing regulations related to remote pilot certification. Currently, part 107 requires remote pilots to take an initial knowledge test as well as another test once every two years to maintain a current remote pilot certificate. See 14 CFR §§ 107.61 and 107.65. The proposed rule would convert the subsequent knowledge testing requirement to a training requirement. In addition, the rule proposes to update its testing and training materials to harmonize initial testing and subsequent training, and to add new information about night operations.

#### Justification:

**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, Section 44703 specifically empowers the Secretary of Transportation to issue airman certificates to properly qualified persons. This clearance request covers the burden imposed on airmen directly responsible for the control of aircraft. Each certificate issued specifies the capacity in which the holder is authorized to serve as an airman in connection with the operation of an aircraft.

Subpart C of title 14 Code of Federal Regulations part 107 (14 CFR part 107), Small Unmanned Aircraft Systems, provides requirements for applicants to obtain a remote pilot certificate, and establishes procedures for applicants to apply for such certificates. Part 107 also refers to a provision in 14 CFR part 61, as applicants who already hold a certificate under 14 CFR part 61 might be eligible to obtain a remote pilot certificate by completing an initial training course in a manner acceptable to the Administrator.

This collection follows the strategic goal of safety addressed in 49 United States Code section 44807, which authorizes the Secretary of Transportation to use a risk-based approach in determining which types of unmanned aircraft operations require a certificate under § 44703.

**2. Indicate how, by whom, how frequently, and for what purpose the information is to be used.**

Persons applying for a remote pilot certificate with a small UAS rating under part 107 must submit information using the FAA Form 8710-13, Remote Pilot Certificate and/or Rating Application. For applicants who do not hold a pilot certificate under part 61, the Remote Pilot Certificate and/or Rating Application is submitted along with a documentation demonstrating that the applicant passed an aeronautical knowledge test. For applicants who hold a pilot certificate under part 61 and meet the flight review requirements of § 61.56, the Remote Pilot Certificate and/or Rating Application is submitted with evidence of completion of the training course.

**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 or information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection.**

The FAA has an electronic data collection system called the Integrated Airman Certification and Rating Application (IACRA). IACRA is a secure web-based application that uses online validation and digital signatures to complete the airman certification documents. IACRA interfaces with multiple FAA databases such as knowledge testing and airman records for data validation and verification. It automatically ensures that applicants meet regulatory and policy requirements.

IACRA improves the airman certification process by checking for data errors that cause rejected applications. The certification processing time is reduced since the applicant, recommending instructor (if required), and inspector/examiner can complete the airman application online and can submit the completed application electronically using digital signatures. OMB has used IACRA as an example of FAA's compliance with the Government Paperwork Elimination Act.

**4. Describe efforts to identify duplication.**

We have reviewed other FAA public-use reports and find no duplication. Also, we know of no other agency collecting information from pilots and flight instructors prescribing the terms, conditions, and limitations of their operating certificates. This information is required under 14 CFR Part 61 or Part 107.

**5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.**

Reporting and record keeping requirements of Part 61 and Part 107 of the Federal Aviation Regulations pertain to individual applicants for a pilot certificate and not to business organizations.

**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.**

Any applicant who seeks to obtain a remote pilot certificate under Part 107 must submit an application to enable compliance of the DOT and FAA with 49 U.S.C. 44703, 44807 and 44611. The DOT and FAA must also collect the information that Transportation Security Administration requires for compliance with 49 U.S.C. 44903(j)(2)(D)(i). If the FAA did not collect the information from remote pilot applicants to enable compliance with these provisions, the FAA would not be able to conduct the oversight that sections 44703, 44807, and 44611 require.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with guidelines.**

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2)(i)-(viii).

**8. 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.**

The Department of Transportation (DOT) submits updates to this Supporting Statement to the Office of Management and Budget (OMB) in preparation for requesting an approval for information collections related to the proposed rule titled "Operations of Small Unmanned Aircraft Over People." The publication of the proposed rule is available at 84 Fed. Reg. 3856.

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

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

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

The information collected will become part of the Privacy Act system of records DOT/FAA 847, General Aviation Records on Individuals and afforded the protection offered under the Privacy Act and that particular system.

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

The Remote Pilot Certificate and/or Rating Application requires the applicant to respond to questions concerning a conviction under Federal or State statutes pertaining to narcotic drugs, marijuana, and/or stimulant drugs or substances. This information is necessary to determine whether the applicant is in compliance with appropriate 14 CFR part 61 or 14 CFR part 107 certification requirements.

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

**Annual Number of Responses**

The total number of annual responses for the part 107 airman certification program is estimated to be **42,000 annually**.<sup>1</sup>

Reporting Responses:

Section 107.61: sUAS = 42,000

**Total Responses            42,000**

**Annual Number of Respondents**

The total number of applicants for a remote pilot certificate with a small UAS rating is estimated to be **42,000 annually**.

For Part 107 we estimate that an average of 42,000 forms are submitted annually that require an average preparation time of 0.25 hours to complete. Because Part 107 applicants come from a broad range of occupations, we use NAICS 5419 titled Other Professional, Scientific, and Technical Services.<sup>2</sup> This results in mean hourly wage of \$26.00,<sup>3</sup> and including benefits a total employer compensation of \$37.14.<sup>4</sup>

**42,000 8710-13 Applications x 0.25 hours x \$37.14 per hour = \$389,970**

**13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.**

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

<sup>1</sup> Source: Internal FAA Document titled UAS Report Card dated March 1, 2019.

<sup>2</sup> Source: <https://www.bls.gov/iag/tgs/iag54.htm>

<sup>3</sup> Source: [https://www.bls.gov/oes/current/naics4\\_541900.htm](https://www.bls.gov/oes/current/naics4_541900.htm). Occupation Code 00-0000.

<sup>4</sup> Source: <https://www.bls.gov/news.release/eccec.nr0.htm>. United States Department of Labor, Bureau of Labor Statistics, March 2019 Economic News Release Titled Employer Costs for Employee Compensation.

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

Estimated annual cost to the Federal Government is **\$1,059,183**. This cost is determined by estimating the time required for FAA personnel to review and process FAA 8710-13 Remote Pilot Certificate and/or Rating Application forms. We estimate that 42,000 forms are submitted for these certificates and ratings at an average file processing time by a clerical worker of 30 minutes each. For this ICR the FAA is estimating that this work would be performed by Level 2 Clerical Support, at an annual salary of \$41,354.<sup>5</sup> For federal salaries, the FAA uses a cost factor of 36.25 percent to account for benefits and overhead, resulting in an hourly rate of \$31.19.<sup>6</sup>

**For Part 107 we estimate that an average of 42,000 forms are submitted annually which cost \$31.19 per hour to process.**

**42,000** 8710-13 Applications x **(\$31.19)\*0.5 hours** = **\$654,990**

**Total: \$654,990**

**15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of the OMB Form 83-1.**

This is a new collection.

**16. For collections of information whose results will be published, outline plans for tabulation, and publication.**

There are no plans to publish this information for statistical or other purposes.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

No such approval is being sought.

**18. Explain each exception to the certification statement identified in item “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-1.**

There are no exceptions to the certification statement.

---

<sup>5</sup> Source: [https://employees.faa.gov/org/staffoffices/ahr/program\\_policies/policy\\_guidance/hr\\_policies/hrpm/comp/comp\\_ref/paybands/](https://employees.faa.gov/org/staffoffices/ahr/program_policies/policy_guidance/hr_policies/hrpm/comp/comp_ref/paybands/). Clerical Support, Level 2. Average Salary of \$41,354. (“Rest of U.S.” Locality Index)

<sup>6</sup> Source: <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2008/m08-13.pdf>