

**Department of Transportation  
Federal Aviation Administration**

**SUPPORTING STATEMENT**

**Suspected Unapproved Parts Report, OMB Control No. 2120-0552**

**Part A. Justification**

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

49 USC, Section 44701 empowers the Administrator of the Federal Aviation Administration (FAA) to provide reasonable rules and regulations for minimum standards governing the design, materials, construction, and performance of aircraft, engines, and propellers as may be required to ensure safety in air transportation. Submission of the Suspected Unapproved Parts Report, FAA Form 8120-11, is necessary to ensure that only FAA approved parts are installed on type certificated aircraft, and that continued airworthiness is maintained.

**2. How, by whom, and for what purpose is the information used. 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 following items should all be address in this section.**

- 1. Whether responding to the collection is mandatory, voluntary, or required to obtain or retain a benefit.**
- 2. Describe the entities who must respond (e.g., class 1 railroads, operators of natural gas transmission lines, etc.).**
- 3. Whether the collection is reporting (indicate if a survey), recordkeeping, and/or disclosure.**
- 4. Indicate collection frequency (e.g., bi-annual, annual, monthly, weekly, as needed.)**
- 5. Describe the information that would be reported, maintained in records, or disclosed (e.g., information about a hazardous materials incident including location, type of hazardous material , extent of consequences, etc.).**
- 6. Describe who would receive the information – DOT, first responders, the general public, etc.**
- 7. Briefly describe the purpose of the collection.**
- 8. If a revision, briefly describe the revision in the Abstract and in question 15 of the Justification document.**

**Additionally, this write-up should indicate the actual use FAA has made of the information. This should not be general, but rather address the specific items of information being collected.**

The information collected on the FAA Form 8120-11 is reported voluntarily by manufacturers, repair stations, aircraft owner/operators, air carriers, and the general public who wish to report or disclose a suspected unapproved parts (SUP) to the FAA for review. The reported information is collected and correlated by the FAA, Aviation Safety Hotline Program Office, and used to determine if an unapproved part investigation is warranted. FAA employees and Department of Transportation (Office of Inspector General) receive information on these cases when assigned

for investigation. Since submittal is voluntary, the frequency for those wishing to report a SUP occurrence is on occasion.

When unapproved parts are confirmed that are likely to exist on other products or aircraft of the same or similar design or are being used in other facilities, the information is used as a basis for an aviation industry alert or notification. Alerts are used to inform industry of situations essential to the prevention of accidents, if the information had not been collected. The consequence to the aviation community would be the inability to determine whether or not unapproved parts are being offered for sale or use for installation on type-certificated products.

Procedures and processes relating to the SUP program and associated reports are found in FAA Order 8120.16A, Suspected Unapproved Parts Program, and AC 21-29, Detecting and Reporting Suspected Unapproved Parts. When unapproved parts are identified, the FAA notifies the public by published Field Notifications (FN), disseminated using Unapproved Parts Notifications (UPN), Aviation Maintenance Alerts, Airworthiness Directives (AD), entry into an issue of the Service Difficulty Reporting Summary, a Special Airworthiness Information Bulletin, a display on an Internet site, or direct mailing.

**3. Extent of automated information collection. 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.**

FAA Form 8120-11 may be returned to FAA 100% electronically, meeting the requirements of the Government Paperwork Elimination Act. The form is available electronically online through FAA Web Site: <https://www.faa.gov/aircraft/safety/programs/sups/>. The form can be completed electronically and submitted through email to the FAA Hotline, or the form can be faxed or mailed. Forms may be reproduced locally. The form is available to the public, and may be found on the internet.

**4. Efforts to identify duplication. 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.**

The information requested on FAA Form 8120-11 is not available from any other source. There is no duplication of reported information. However, if the public wishes to write out and submit data/information to the FAA without using the SUP Report, the FAA will accept and process.

**5. Efforts to minimize the burden on small businesses. If the collection of information impacts small businesses or other small entities (item 5 of OMB form 83-I), describe any methods used to minimize burden.**

Reporting of information is strictly voluntary. The information is requested from any individual or facility suspecting an unapproved part. Any burden is minimized by requesting only necessary information to allow the FAA to determine if an investigation is warranted.

6. Impact of less frequent collection of information. ***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.***

The collection of this information is conducted under the authority of the Administrator found in US code 49, Section 44701, and is determined by the FAA to be necessary in pursuance of aviation safety. Reports are submitted only when a suspected unapproved part is identified by an individual in the aviation community; therefore, notification frequency is on occasion. The consequences if this collection was to be limited to certain frequency or not allowed to be conducted would be that the FAA may not be notified of potentially bad parts. Without that knowledge the FAA would be impeded from investigating companies that provide suspected unapproved parts for commercial aircraft, which could in turn, affect the safety of commercial aviation around the world.

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

- ***Requiring respondents to report information to the agency more often than quarterly;***
- ***Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;***
- ***Requiring respondents to submit more than an original and two copies of any document;***
- ***Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;***
- ***In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;***
- ***Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;***
- ***That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or***
- ***Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.***
- ***If none of the above, put "There are no special circumstances."***

There are no special circumstances

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 February 19, 2019 (84 FR 4892), solicited public comment. No comments were received.

Discussions have been held with private industry as well as other government agencies such as the Department of Defense, Federal Bureau of Investigation, and U.S. Customs on these issues, and all comments and suggestions have been incorporated.

The FAA routinely meets with industry representatives on aviation safety issues.

***9. Payments or gifts to respondents. Explain any decision to provide a payment or gift to respondents, other than enumeration of contractors or grantees.***

No payment or gratuities are involved in this program.

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

Release of the initiator's identity, if confidentiality was requested, or any document which could reveal an initiator's identity is covered under the Freedom of Information Act's Sixth Exemption (5 USC 552(b) (6)). There is a block on the form for a reporter to make request for confidentiality and/or anonymity.

***11. Justification for collection of sensitive information: 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. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.***

There are no questions of a sensitive nature.

***12. Estimate of burden hours for information requested: Provide estimates of the hour burden of the collection of information. The statement should:***

- ***Indicate the number of respondents, frequency of responses, calculation for the individual burdens and for the total annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the***

**reasons for the variance. Generally, estimates should not include burden hour for customary and usual business practices**

The prior three years have increased each year by an average of 1.2%. The new estimate takes the number done in 2018 (143), and increases each year by 1.2% (171.6, 205.92, 247.104) with an average of 208.

This collection involves only one form, 8120-11 and the average time for completing the form is approximately 30 minutes.

The majority of participants in the aviation community have never submitted a SUP report, and some individuals have submitted multiple reports. The total number of forms submitted per reporter is dependent on how often the facility receives what it determines is a suspected unapproved part to be used in the repair of an aircraft or component. The base hour burden average is for Aircraft and Avionics Equipment Mechanics and Technicians, Assemblers and Fabricators, Aerospace Engineering and Operations Technicians, and Aerospace Products Sales Engineers at \$31.14/hour according to the Bureau of Labor.

The form submittal is completely voluntary, and most facilities submit few if any of the forms to the FAA on an annual basis. Some facilities have never submitted a SUP report, and others submit from 5 to 10 reports a year. The total number of forms submitted per reporter is dependent on how often the facility receives what it determines is a suspected unapproved part to be used in the repair of an aircraft or component.

Form	Annual Responses	Time per form		Hour Total annual burden	Labor cost per hour	Total Labor cost
8120-11	208	0.5	hour	104	\$62.28	\$6,477.12

Where labor cost came from	
People who fill out this form	their wage
<a href="https://www.bls.gov/ooh/installation-maintenance-and-repair/aircraft-and-avionics-equipment-mechanics-and-technicians.htm">Aircraft and Avionics Equipment Mechanics and Technicians at https://www.bls.gov/ooh/installation-maintenance-and-repair/aircraft-and-avionics-equipment-mechanics-and-technicians.htm</a>	\$ 29.45
<a href="https://www.bls.gov/ooh/production/assemblers-and-fabricators.htm">Assemblers and Fabricators at https://www.bls.gov/ooh/production/assemblers-and-fabricators.htm</a>	\$ 15.31
<a href="https://www.bls.gov/ooh/architecture-and-engineering/aerospace-engineering-and-operations-technicians.htm">Aerospace Engineering and Operations Technicians https://www.bls.gov/ooh/architecture-and-engineering/aerospace-engineering-and-operations-technicians.htm</a>	\$ 32.33
<a href="https://www.bls.gov/ooh/sales/sales-engineers.htm">Aerospace products sales engineer at https://www.bls.gov/ooh/sales/sales-engineers.htm</a>	\$ 47.46
Average of above wages	\$ 31.14
Benefits and Overhead (page 30 of below link)	\$ 31.14
<a href="https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf">https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf</a>	
<b>total labor cost per hour</b>	<b>\$ 62.28</b>

13. Estimate of total annual costs to respondents. **Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the costs of any hour burden shown in items 12 and 14).**

There are no material costs to the respondents.

14. Estimate of cost to the Federal government. *Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate costs, 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.*

*Agencies also may aggregate cost estimates from items 12, 13, and 14 in a single table.*

<b>COST TO FEDERAL GOVERNMENT</b>	
Forms Collected Per Year	208
Hours per form for processing	0.5 hours per employee
Number of employees for each form*	4
Total Hours	416
Estimated \$\$ per Hour (Aerospace Engineers)	\$101.13
Total Estimated Cost Annually	\$42,070.08

\* Each SUP report is analyzed at a minimum by one FAA Hotline employee, two SUP Focal Points at FAA Headquarters, and at least one FAA field representative prior to investigation assignment.

Labor cost information was obtained from [https://www.faa.gov/jobs/working\\_here/benefits/](https://www.faa.gov/jobs/working_here/benefits/) (under Pay->Core Compensation Plan (FV))

**Government labor cost**

Pay Band I	with locality pay of "Rest of the US"	\$ 74,228.00	\$ 115,042.00
	salary per hour	\$ 35.69	\$ 55.31
Pay Band J	with locality pay of "Rest of the US"	\$ 90,750.00	\$ 140,688.00
	salary per hour	\$ 43.63	\$ 67.64

average pay band I	\$ 45.50	
average pay band J	\$ 55.63	
average of I and J	\$ 50.57	
36.25% of average pay is benefits	\$ 18.33	
63.75% of average pay is overhead	\$ 32.24	
<b>Cost to government per hour</b>	<b>\$101.13</b>	

typical work days per year	260	
hrs per year	2080	
Benefits per M-08-13	36.25%	<a href="https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2008/m08-13.pdf">https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2008/m08-13.pdf</a>
Overhead is 100% minus benefits (100-36.25 = ___)	63.75%	<a href="https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf">https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf</a>

15. Explanation of program changes or adjustments. *Explain the reasons for any program changes or adjustments reported.*

Salary estimates have been updated to reflect current wage rates for the public respondents as

well as additional of benefits and overhead.

The amount of forms (number of responses) changed because the prior three years have increased each year by an average of 1.2%. The new estimate takes the number done in 2018 (143), and increases each year by 1.2% (171.6, 205.92, 247.104) with an average of 208.

The cost burden has been updated so that there is no additional cost. The previous listed was labor cost. It is removed so that it is correctly shown there is no cost to the respondent.

16. Publication of results of data collection. ***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.***

***If the report is not published, put "The feedback report information is not published."***

The feedback report information is not published.

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

We are seeking no such approval.

18. Exceptions to certification statement. ***Explain each exception to the certification statement identified in question 19, "Certification for Paperwork Reduction Act Submissions" (attached).***

***If there are no exceptions, put "There are no exceptions."***

There are no exceptions.