

Department of Transportation
Federal Aviation Administration

SUPPORTING STATEMENT
Mitsubishi MU-2B Series Airplane Training Requirements
2120-0725

Part A. Justification

1. Circumstances that make collection of information necessary.

In response to the increasing number of accidents and incidents involving the Mitsubishi MU-2B series airplane, the Federal Aviation Administration (FAA) began a safety evaluation of the MU-2B in July of 2005. As a result of this safety evaluation, the FAA issued Special Federal Aviation Regulation No. 108—Mitsubishi MU-2B Series Special Training, Experience, and Operating Requirements on February 6, 2008. This Special Federal Aviation Regulation (SFAR) established a standardized pilot training program. The collection of information is necessary to document participation, completion, and compliance with the pilot training program for the MU-2B under subpart N of part 91 which replaced SFAR No. 108.

The FAA published subpart N of part 91 as a final rule; request for comment, on September 7, 2016, in order to address the inaccuracies of SFAR No. 108. SFAR No. 108 contained inaccurate training profiles which are misaligned with current FAA flight training policy. The FAA removed the SFAR and its more prescriptive requirements and replaced them with a performance-based standard in subpart N of part 91. The detailed ground and flight training requirements in SFAR No. 108 have been updated and moved to guidance material and SFAR No. 108 was removed from the Code of Federal Regulations (CFR) on November 7, 2017. As a result of this rulemaking action, operators, training providers, and safety officials have timely access to accurate training material.

The FAA's authority to issue rules on aviation safety is found in Title 49 of the United States Code. Subtitle I, Section 106, describes the authority of the FAA Administrator to issue, rescind, and revise the rules. This rulemaking was promulgated under the authority described in Subtitle VII, Aviation Programs, Part A, Air Commerce and Safety, Subpart III, Safety, Section 44701, General Requirements. Under that section, the FAA is charged with prescribing regulations setting the minimum standards for practices, methods, and procedures necessary for safety in air commerce. Procedures routinely used by the FAA are the recording of training received,

requiring a logbook endorsement from a training provider, or requiring operators to submit a training program to the FAA for approval.

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

2. How, by whom, and for what purpose is the information used.

The collection of information is used to ensure compliance with subpart N of part 91. The information will also create written documentation establishing a base month for an annual training requirement. In addition, a recommended MU-2B training program has been published by the FAA as Appendix A to Advisory Circular 91-89. The recommended training program is an acceptable means of compliance with subpart N of part 91. Part 91 training providers are required to submit a proposed MU-2B training program to their local jurisdictional Flight Standards District Office (FSDO) for approval, which includes curriculum and syllabus. The information will be used by the FAA to ensure compliance with subpart N of part 91 and promote safety in air commerce. This information collection is mandatory for those entities and persons that wish to operate MU-2 aircraft. The collection consists of recordkeeping and reporting. It is mandatory for training providers to submit their training programs to the FAA every two years and for pilots to obtain logbook endorsements every year.

3. Extent of automated information collection.

In accordance with the Government Paperwork Elimination Act (GPEA), the FAA encourages the use of automation and electronic media for the gathering, storage, presentation, review, and transmission of all requests, records, reports, tests, or statements required by this final rule with the provision 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.

The FAA does not require that a copy of the logbook endorsement or course completion certification be submitted to the FAA. The FAA routinely requires that pilots log or receive endorsements that document the pilot's completion of required training or compliance with applicable rules. These records can be kept 100% electronically.

The submission of training manuals to the FSDO is accomplished electronically (via PDF and email). Due to the lack of standardization among respondents, this is more efficient than an electronic portal. All responses (100%) are submitted electronically.

4. Efforts to identify duplication.

There is no duplicate requirement that would provide the FAA this information. The information necessary is available from the particular operator only, and is not available from any other source.

5. Efforts to minimize the burden on small businesses.

The FAA believes that the collection of information will not impact a substantial number of small businesses or other small entities; however, the material published in conjunction with subpart N of part 91 is informative and explanatory with regards to the requirements, and an application for approval of an MU-2B training program. A part 91 training provider will be guided through the administrative requirements by the local FAA principal operations inspector assigned to that operator and, if necessary, by representatives of the Washington headquarters staff. Therefore, no additional methods to minimize burden are necessary.

6. Impact of less frequent collection of information.

The FAA sees the collection of this information as a necessary means to verify compliance with subpart N of part 91. If the collection is not conducted, or is conducted less frequently, the FAA anticipates that the compliance rate will be lower, accidents and incidents will continue, and the DOT strategic goal of improving transportation safety will be compromised.

7. Special circumstances.

There are no special circumstances.

8. Compliance with 5 CFR 1320.8:

A Federal Register Notice published on June 27, 2019 (84 FR 30787) solicited public comment. No comments were received.

9. Payments or gifts to respondents.

Payments or gifts are not provided to respondents.

10. Assurance of confidentiality:

Assurance of confidentiality is not provided to respondents.

11. Justification for collection of sensitive information:

There are no questions of a sensitive nature.

12. Estimate of burden hours for information requested:

For the final phase check and the logbook endorsement, a qualified flight instructor who meets the requirements of subpart N of part 91 must complete the training course final phase check at the successful completion of each training course and the logbook endorsement for each pilot. The FAA estimates there are approximately 400 pilots¹ in the United States who fly the MU-2B airplanes and are required to complete the training per year.

The FAA estimates that it will take a pilot 5 minutes to obtain certification of the final phase check, and 5 minutes per pilot to obtain the logbook endorsement.

Logbook endorsements: **5 minutes** per pilot per year x 400 pilots = 33.3 hours per year

Training course final phase check: **5 minutes** per pilot per year x 400 pilots = 33.3 hours per year

Total annual burden: 400 pilots performing 2 tasks of 5 minute each = 66.6 hours

Logbook Endorsement

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents		400	
# of Responses per respondent		1	
Time per Response		5 min	
Total # of responses		400	
Total burden (hours)		33.3 hrs	

Training Course Final Check

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents		400	
# of Responses per respondent		1	
Time per Response		5 min	

¹ The FAA has obtained this number through ongoing communication with Mitsubishi, the manufacturer of the aircraft.

Total # of responses		400	
Total burden (hours)		33.3 hrs	

For the submission of the training programs, the FAA estimates there are approximately 20 part 91 training providers that will train part 91 operators. These instructors will be required to provide information in accordance with the final rule. Training providers are required to submit the training program every two years. Based on four hours for part 91 training providers to submit their training program, the program will impose 80 hours of reporting burden every two years, or 40 per year.

20 training providers / 2 years = 10 providers responding per year
 10 providers × 4 hours = 40 hours annually

Provide Training Information to FAA

Summary (Annual numbers)	Reportin g	Recordkeeping	Disclosure
# of Respondents	10		
# of Responses per respondent	1		
Time per Response	4hrs		
Total # of responses	10		
Total burden (hours)	40		

TOTAL

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	10	400	
# of Responses per respondent	1	2	
Time per Response	4 hours	5 mins	
Total # of responses	10	800	

Total burden (hours)	40	67	
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The FAA is using the following hourly wages, which include all fringe and overhead benefits:

Pilot wage:	$\$44.28^2 * 1.484^3 = \mathbf{\$65.71}$
Instructor wage:	$\$34.69^4 * 1.484 = \mathbf{\$51.48}$

Pilots and Training Providers	Number of Respondents	Burden Per Respondent	Number of Responses	Hours per Year	Cost Burden per Year
Phase check and Logbook endorsement (pilot)	400 pilots	5 minutes/year	$400 * 2 = 800$	$67 \text{ hours} * \$65.71$	$\$4,402$
Training provider tasks (pilot related)	20 flight instructors	4 hours/2 years	$10 / \text{year}$	$40 \text{ hours} * \$51.48$	$\$2,059$
	420		810	107 hours	\$6,461

13. Estimate of total annual costs to respondents.

There are no start-up or material costs related to this collection.

14. Estimate of cost to the Federal government.

We estimate that 20 proposed MU-2B training programs will be submitted by part 91 training providers and it will take 4 hours for an FAA employee (Aviation Safety Inspector) to review and accept the application every two years. The FAA employs Aviation Safety Inspectors (ASI), GS-1825-13/Step 5, to examine the training programs related to this collection. The fully burdened hourly wage rates for these employees are:

- ASI: $(\$100,530 / 2,080 \text{ hours per year} = \$48.33/\text{hour}) * 2.0 = \mathbf{\96.66^5}

² Pilot wage is derived from the Bureau of Labor Statistics, Nonscheduled Air Transportation, NAICS 481200, and is assumed to be representative of pilot and representative occupations.

http://www.bls.gov/oes/current/naics4_481200.htm

³ The FAA uses a fringe multiplier of 31.4 percent (<https://www.bls.gov/news.release/ecec.nr0.htm>), plus an estimated 17 percent for overhead costs such as rent, equipment and utilities (<https://www.regulations.gov/document?D=EPA-HQ-OPPT-2014-0650-0005>) for a total of 48.4 percent.

⁴ CFI and DPE wage is derived from the Bureau of Labor Statistics, NAICS 481200, Nonscheduled Air Transportation, 25-0000, Education, Training and Library Occupations.

https://www.bls.gov/oes/current/naics4_481200.htm#25-0000

20 proposed training programs x 4 hours to review x **\$99.66** FSDO hourly wage = \$2,654 per two years = **\$7,973**

Per year: \$7,973/2 = \$3,986

15. Explanation of program changes or adjustments.

The number of aircraft and pilots is lower than in the last submission, due to attrition. The hourly burden is correspondingly lower. Moreover, in the previous submission, the number of training provider responses was over-counted; this has been corrected.

The title of this collection has changed from “SFAR- Mitsubishi MU-2B Series Airplane Special Training, Experience, and Operating Procedures” to “Mitsubishi MU-2B Series Airplane Training Requirements”, in order to remove reference to SFAR, which was removed in 2016, and to more accurately reflect the components of the collection.

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

16. Publication of results of data collection.

There is no plan for tabulation or publication.

17. Approval for not displaying the expiration date of OMB approval.

Approval is not being sought for not displaying the expiration date.

18. Exceptions to certification statement.

There are no exceptions. The agency certifies compliance with all provisions of the Paperwork Reduction Act.

⁵ OPM 2019 General Schedule Pay Tables, Rest of U.S. Locality. <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/19Tables/html/RUS.aspx>.

Source: U.S. Department of Health and Human Services, “Guidelines for Regulatory Impact Analysis” (2016), https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf. On page 30, HHS states, “As an interim default, while HHS conducts more research, analysts should assume overhead costs (including benefits) are equal to 100 percent of pretax wages....” To isolate the overhead rate, the FAA subtracted the benefits rate of 69 percent from the recommended rate of 100 percent.