

## Supporting Statement A

### Helicopter Air Ambulance, Commercial Helicopter, and Part 91 Helicopter Operations

OMB#: 2120-0756

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

The FAA's authority to issue rules on aviation safety is found in Title 49 of the United States Code. This rulemaking is promulgated under the authority described in 49 U.S.C. 44701(a)(4), which requires the Administrator to promulgate regulations in the interest of safety for the maximum hours or periods of service of airmen and other employees of air carriers, and 49 U.S.C. 44701(a)(5), which requires the Administrator to promulgate regulations and minimum standards for other practices, methods, and procedures necessary for safety in air commerce and national security.

Some sections of this final rule are already covered by OMB-approved package 2120-0039 titled Part 135 – Operating Requirements: Commuter and on-demand operations and rules governing persons on board such aircraft. The existing part 135 rules require certain manuals for operations and training. This new collection adds some requirements for those same manuals. Each reference to manuals is addressed in the appropriate section below.

This information collection supports the Department of Transportation's strategic goal of safety. Specifically, the goal is to promote the public health and safety by working toward the elimination of transportation-related deaths, injuries, and property. Future reports of these same sections will be reported in 2120-0039 for part 135.

#### **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.**

These requirements in part 135 are addressed specifically to helicopter air ambulances, often referred to as emergency medical services (EMS), and to on-demand operations including overwater operations. The National Transportation Safety Board recommended several changes following accident investigations. The FAA aims to improve the safety record of helicopter air ambulances through better oversight of their operations. The FAA will use the information it collects and reviews to ensure compliance and adherence with regulations and, if necessary, to take enforcement action on violators of the regulations.

Section 44731 of the Modernization and Reform Act of 2012 required the FAA to collect from part 135 certificate holder providing helicopter air ambulance services a report

containing the number of helicopters that the certificate holder uses to provide helicopter air ambulance services, the base locations of the helicopters, the number of flights and hours flown by registration number while providing helicopter air ambulance services, the number of flight requests for a helicopter providing air ambulance services that were accepted or declined by the certificate holder and the type of each such flight request (such as scene response, inter-facility transport, organ transport, or ferry or repositioning flight), the number of accidents, if any, involving helicopters operated by the certificate holder while providing air ambulance services and a description of the accidents, the number of flights and hours flown under instrument flight rules by helicopters operated by the certificate holder while providing air ambulance services, the time of day of each flight flown by helicopters operated by the certificate holder while providing air ambulance services, and the number of incidents, if any, in which a helicopter was not directly dispatched and arrived to transport patients but was not utilized for patient transport.

Section 314(d) of the FAA Reauthorization Act of 2018 amended these reporting requirements for the report to contain the number of helicopters that the certificate holder uses to provide helicopter air ambulance services and the base locations of the helicopters, the number of hours flown by the helicopters operated by the certificate holder, the number of patients transported and the number of patient transport requests for a helicopter providing air ambulance services that were accepted or declined by the certificate holder and the type of each such flight request (such as scene response, inter-facility transport or organ transport), the number of accidents, if any, involving helicopters operated by the certificate holder while providing air ambulance services and a description of the accidents, the number of hours flown under instrument flight rules by helicopters operated by the certificate holder, the number of hours flown at night by helicopters operated by the certificate holder, the number of incidents, if any, in which a helicopter was not directly dispatched and arrived to transport patients but was not utilized for patient transport.

Essentially, this relieved the requirement for reporting of flight time by individual aircraft and by time of day and now only requires the reporting of the total flight hours, in aggregate, flown by the certificate holder and the number of hours flown at night. The amendment added the requirement to report the number of patients flown by the certificate holder.

The requirement for reporting is placed upon the certificate holders via Operations Specification paragraph A021, Air Ambulance Operations—Helicopter. A reporting template is provided to the certificate holders by the FAA Part 135 Commuter and On-demand Operations Branch, AFS-250.

The data collected is to provide a report to the Committee on Transportation and Infrastructure of the House of Representatives and the Committee on Commerce, Science, and Transportation of the Senate as required by §44731. It is also being collected to ensure that the database required and the report required will best inform efforts to improve the safety of helicopter air ambulance operations.

**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.**

The FAA encourages electronic transmission and most certificate holders readily use electronic transmission to communicate with the FAA. However, electronic transmission is optional and there are some certificate holders that still do not use it for their own reasons.

The form provided to the certificate holders by the FAA is in Excel format and is easily submitted as an email attachment. The email address for submission is provided on the form.

Operations Specifications (the documents that give the operators their authority) are completely automated via the FAA online web-tool, WebOPSS. Many operators currently use and access WebOPSS on a daily basis to manage their operations and authorizations. Still, the few operators that do not participate in automation may let their FAA principal inspectors know what they need and the inspectors will generate the appropriate approvals and give the operator printed copies. All the data is available at FAA Headquarters in Washington, D.C. in the WebOPSS electronic database.

**4. 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.**

We reviewed the supporting statements for information collection, FAA regulatory parts 121, 135, and 136. We found no duplication and do not know of any other agency collecting the same information.

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

The collection of information does not have a significant impact on a substantial number of 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.**

Without this collection, helicopter air ambulance pilots would be able to use designated local flying areas without demonstrating their familiarity and detailed knowledge of the hazards and high altitude terrain in local flying areas in order to use the lower minimums every year. Therefore, pilots would be able to use the local flying area weather

minimums without having to pass an examination given by the certificate holder within the 12 months prior to using the local flying area minimums (§135.609). Additionally, pilots would not have to document the highest obstacle along the planned route of flight (§135.615).

Without this collection, the certificate holder performing helicopter air ambulance operations would not have to have an FAA-approved pre-flight risk-analysis program and their pilots would not have to complete a worksheet prior to the first leg of each helicopter air ambulance operation. (§135.617)

Without this collection, operations control specialists would not complete safety duties to include review of the pilot's worksheet required in §135.617 or complete training and testing. (§135.619)

Without this collection, medical personnel would not require training or briefings. (§135.621)

In addition, the FAA would not have access to training records or sections of manuals that this rule requires.

**7. 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 secrets, 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.*

There are no special circumstances that require these collections to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5 (d)(2).

**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 September 17, 2019 (84 FR 48989) solicited public comment. No comments were received.

**9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.**

No payments or gifts will be provided to respondents.

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

There is no assurance of confidentiality provided to respondents.

**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.**

There are no questions of a sensitive nature.

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

The average hourly rate for Helicopter Chief Pilots is \$40.66 per hour.<sup>1</sup> A 31.4 percent multiplier was then applied to account for fringe benefits which brings the salary to \$53.43 per hour.<sup>2</sup> To account for overhead, a multiplier of 17 percent was applied.<sup>3</sup> The total salary with fringe and overhead is \$63 per hour (rounded to the nearest dollar). The average hourly rate of a Helicopter Pilot is \$32.45 per hour.<sup>4</sup> A 31.4 percent multiplier was then applied to account for fringe benefits which brings the salary to \$42.64.<sup>5</sup> To account for overhead, a multiplier of 17 percent was applied.<sup>6</sup> The total salary with fringe and overhead is \$50 per hour (rounded to the nearest dollar). The average hourly rate of a typist (clerical) is approximately \$18.25 per hour, based on a typist (clerical) earning FG-5, Step 5 (Kansas City Locality Pay).<sup>7</sup> Kansas City locality pay was utilized as it is a mid-point, cost wise, for locality pay. A 31.4 percent multiplier was then applied to account for fringe benefits which brings the salary to \$23.98 per hour.<sup>8</sup> To account for overhead, a multiplier of 17 percent was applied.<sup>9</sup> The total salary with fringe and overhead is \$27 (rounded to the nearest dollar).

- Drug and Alcohol Testing (§§ 120.5, 120.15)  
Operations control specialists would be subject to certificate holders' drug and alcohol testing programs. The FAA believes that, because certificate holders currently administer and maintain records for drug and alcohol testing for other employees (approved under OMB Control Number 2120-0535), the cost for a clerical person to maintain the records would be negligible.
- Radio altimeters for rotorcraft operations (§135.160)  
This section will only require a collection of information from certificate holders that request a deviation under its provisions. Under the previous collection 107 deviations were granted to operators. We do not have any active requests for deviation and currently everyone is in compliance with the rule. However in the future, it is possible that an eligible rotorcraft operator will apply for the deviation. We estimate that we may receive 1 deviation request per year that we must

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<sup>1</sup> [https://www.payscale.com/research/US/Job=Chief\\_Helicopter\\_Pilot/Salary](https://www.payscale.com/research/US/Job=Chief_Helicopter_Pilot/Salary)

<sup>2</sup> <https://www.bls.gov/news.release/ecec.nr0.htm>

<sup>3</sup> Source: Cody Rice, U.S. Environmental Protection Agency, "Wage Rates for Economic Analyses of the Toxics Release Inventory Program" (June 10, 2002),

<https://www.regulations.gov/document?D=EPA-HQ-OPPT-2014-0650-0005>.

<sup>4</sup> [https://www.payscale.com/research/US/Job=Helicopter\\_Pilot/Salary](https://www.payscale.com/research/US/Job=Helicopter_Pilot/Salary)

<sup>5</sup> <https://www.bls.gov/news.release/ecec.nr0.htm>

<sup>6</sup> Source: Cody Rice, U.S. Environmental Protection Agency, "Wage Rates for Economic Analyses of the Toxics Release Inventory Program" (June 10, 2002) ),

<https://www.regulations.gov/document?D=EPA-HQ-OPPT-2014-0650-0005>.

<sup>7</sup> <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2018/general-schedule/>

<sup>8</sup> <https://www.bls.gov/news.release/ecec.nr0.htm>

<sup>9</sup> Source: Cody Rice, U.S. Environmental Protection Agency, "Wage Rates for Economic Analyses of the Toxics Release Inventory Program" (June 10, 2002),

<https://www.regulations.gov/document?D=EPA-HQ-OPPT-2014-0650-0005>.

process for approval or rejection. The total yearly cost for this requirement is 1 hour and \$63.

#### **Radio Altimeters**

| Application for On Demand Helicopters | Time for Deviation | Total Hours | Wage for Chief Pilot | Total Cost |
|---------------------------------------|--------------------|-------------|----------------------|------------|
| 1                                     | 1 hr               | 1           | \$63                 | \$63       |
|                                       |                    |             |                      |            |
|                                       |                    |             |                      |            |

| Summary (Annual numbers)             | Reporting | Recordkeeping | Disclosure |
|--------------------------------------|-----------|---------------|------------|
| <b># of Respondents</b>              | 1         |               |            |
| <b># of Responses per respondent</b> | 1         |               |            |
| <b>Time per Response</b>             | 1.0 Hour  |               |            |
| <b>Total # of responses</b>          | 1         |               |            |
| <b>Total burden (hours)</b>          | 1         |               |            |

- VFR ceiling and visibility requirements for class G airspace. (§135.609) Each certificate holder may designate local flying areas (50 nautical miles in any direction from a designated location). Each certificate holder could designate more than one local flying area but no certificate holder is required to designate any local flying areas. A pilot employed by a certificate holder using local flying areas must pass an examination given by the certificate holder within the 12 calendar months prior to using the local flying area. This is a one time collection that was captured in the last revision of this information collection. Today, there are 63 HAA operators who have complied with this requirement. This requirement would apply for a new entrant. Therefore, this calculation will be based on one new entrant per year.

#### **Local Flying Area**

| Air Ambulance Operators | Hours to Develop Local Flying Area | Total Hours | Wage for Chief Pilot | Total Cost |
|-------------------------|------------------------------------|-------------|----------------------|------------|
|                         |                                    |             |                      |            |
| 1                       | 2                                  | 2           | \$63                 | \$126      |

| Summary (Annual numbers)      | Reporting | Recordkeeping | Disclosure |
|-------------------------------|-----------|---------------|------------|
| # of Respondents              | 1         |               |            |
| # of Responses per respondent | 1         |               |            |
| Time per Response             | 2.0 Hours |               |            |
| Total # of responses          | 1         |               |            |
| Total burden (hours)          | 2         |               |            |

- VFR flight planning (§135.615)

This section requires the pilot in command to document the highest obstacle along the planned route of flight. Changes to the planned flight that occur while the helicopter is on the ground at an intermediate stop require evaluation of the new route. VFR flight planning procedures must be added to the certificate holder's operations manual if not already there.

Each pilot would spend 5 minutes prior to each air ambulance operation and a change would occur 5% of the time taking another 5 minutes. We estimate 367 operations per helicopter per year. 95% of the operations will take 5 minutes and 5% will take 10 minutes.

#### VFR Flight Planning

| Year         | Helicopters | Operations Per Year | Hours of Flight Planning | Total Hours   | Pilot Wage | Cost               |
|--------------|-------------|---------------------|--------------------------|---------------|------------|--------------------|
|              |             |                     |                          |               |            |                    |
| 1            | 1,230       | 324                 | 0.08                     | 31,881        | \$50       | \$1,594,050        |
| 2            | 1,230       | 324                 | 0.08                     | 31,881        | \$50       | \$1,594,050        |
| 3            | 1,230       | 324                 | 0.08                     | 31,881        | \$50       | \$1,594,050        |
| <b>TOTAL</b> |             |                     |                          | <b>95,643</b> |            | <b>\$4,782,150</b> |

| Summary<br>(Annual numbers)              | Reporting       | Recordkeepin<br>g | Disclosure |
|--|-----------------|-------------------|------------|
| <b># of Respondents</b>                  | 1,230           |                   |            |
| <b># of Responses<br/>per respondent</b> | 324             |                   |            |
| <b>Time per<br/>Response</b>             | 0.08 Hour       |                   |            |
| <b>Total # of<br/>responses</b>          | 398,520         |                   |            |
| <b>Total burden<br/>(hours)</b>          | 31,881<br>Hours |                   |            |

- Pre-flight risk analysis (§135.617)

This section requires each certificate holder performing helicopter air ambulance operations to implement an FAA-approved pre-flight risk-analysis program documented in its existing operations manual. This section lists the areas that must be covered in the manual. The certificate holder must develop a pre-flight risk analysis worksheet that covers at least the same listed areas. The pilot in command must complete the worksheet prior to the first leg of each helicopter air ambulance operation, sign it and specify the date and time it was completed. The certificate holder must retain each completed worksheet for at least 90 days. This is a one-time collection that was captured in the last revision of this information collection. Today, there are 63 HAA operators who have complied with this requirement. This requirement would apply for a new entrant. Therefore, this calculation will be based on one new entrant per year. We estimate a chief pilot would take 30 hours to develop the program and to document it in the operations manual. A clerk would take 30 hours to edit, copy, and distribute the changes to the manual.

#### Develop Pre-flight Risk Analysis Program

| Year         | Air Ambulance Operator | Hours to Develop Risk Analysis | Hour-Chief Pilot | Hours-Clerical | Total Hours | Wage for Chief Pilot | Wage for Clerical | Total Cost     |
|--------------|------------------------|--------------------------------|------------------|----------------|-------------|----------------------|-------------------|----------------|
| 1            | 1                      | 60                             | 30               | 30             | 60          | \$50                 | \$27              | \$2,310        |
| 2            | 1                      | 60                             | 30               | 30             | 60          | \$50                 | \$27              | \$2,310        |
| 3            | 1                      | 60                             | 30               | 30             | 60          | \$50                 | \$27              | \$2,310        |
| <b>TOTAL</b> | <b>3</b>               | <b>180</b>                     | <b>90</b>        | <b>90</b>      | <b>180</b>  |                      |                   | <b>\$6,930</b> |

| Summary (Annual numbers)             | Reporting  | Recordkeeping | Disclosure |
|--------------------------------------|------------|---------------|------------|
| <b># of Respondents</b>              | 1          |               |            |
| <b># of Responses per respondent</b> | 1          |               |            |
| <b>Time per Response</b>             | 60.0 Hours |               |            |
| <b>Total # of responses</b>          | 1          |               |            |
| <b>Total burden (hours)</b>          | 60 Hours   |               |            |

The pilot would perform the risk analysis taking 10 minutes per operation. We estimate 324 helicopter operations per year.

**Perform Risk Analysis**

| <b>Year</b>  | <b>Helicopters</b> | <b>Operations Per Year</b> | <b>Hours Per Risk Analysis</b> | <b>Total Hours</b> | <b>Wage for Pilot</b> | <b>Total Cost</b>   |
|--------------|--------------------|----------------------------|--------------------------------|--------------------|-----------------------|---------------------|
| 1            | 1,230              | 324                        | 0.17                           | 67,748             | \$50                  | \$3,387,420         |
| 2            | 1,230              | 324                        | 0.17                           | 67,748             | \$50                  | \$3,387,420         |
| 3            | 1,230              | 324                        | 0.17                           | 67,748             | \$50                  | \$3,387,420         |
| <b>TOTAL</b> |                    |                            |                                | <b>203,244</b>     |                       | <b>\$10,162,260</b> |

| <b>Summary<br/>(Annual numbers)</b>  | <b>Reporting</b> | <b>Recordkeeping</b> | <b>Disclosure</b> |
|--------------------------------------|------------------|----------------------|-------------------|
| <b># of Respondents</b>              |                  | 1,230                |                   |
| <b># of Responses per respondent</b> |                  | 324                  |                   |
| <b>Time per Response</b>             |                  | .17 Hours            |                   |
| <b>Total # of responses</b>          |                  | 398,520              |                   |
| <b>Total burden (hours)</b>          |                  | 67,748 Hours         |                   |

- Operations control centers (135.619)

This section requires certificate holders authorized to conduct helicopter air ambulance operations, with 10 or more helicopter air ambulances, to have an operations control center staffed by operations control specialists (OCS). Those specialists would communicate with pilots, advise pilots of weather conditions, and provide flight-following services. They would also participate in the pre-flight risk analysis completed by the pilot in command (§135.617); acknowledging it and specifying the date and time it was completed, and that according to their professional judgment, the flight can be conducted safely. The certificate holder must have an FAA-approved OCS initial and recurrent (every 12 months) training program and conduct an FAA-approved knowledge and practical test. The certificate holder must retain a training record for each specialist for the duration of that individual's employment and for 90 days thereafter. The certificate holder must document the duties and responsibilities of the OCS in their operations manual and the OCS training program in its training manual. The information would not likely already be contained in the existing manuals since this is a new

position although some already voluntarily use employees with different titles but some similar duties. Compliance for this section was 2 years after the effective date of the final rule. This a one-time collection that was captured in the last revision of this information collection. Today, there are 63 HAA operators who have complied with this requirement. This requirement would apply for a new entrant. Therefore, this calculation will be based on one new entrant per year. The OCS would take 5 minutes per operation to finish review of the pilot's worksheet.

#### Pilot's Worksheets

| Year         | Helicopters | Ops Per Year | Hours Per Pilot Worksheet | Total Hours   | Wage for Pilot | Cost               |
|--------------|-------------|--------------|---------------------------|---------------|----------------|--------------------|
| 1            | 1,230       | 324          | 0.08                      | 31,881        | \$50           | \$1,594,080        |
| 2            | 1,230       | 324          | 0.08                      | 31,881        | \$50           | \$1,594,080        |
| 3            | 1,230       | 324          | 0.08                      | 31,881        | \$50           | \$1,594,080        |
| <b>TOTAL</b> |             |              |                           | <b>95,643</b> |                | <b>\$4,782,240</b> |

| Summary<br>(Annual numbers)          | Reporting | Recordkeeping | Disclosure |
|--------------------------------------|-----------|---------------|------------|
| <b># of Respondents</b>              |           | 1,230         |            |
| <b># of Responses per respondent</b> |           | 324           |            |
| <b>Time per Response</b>             |           | 0.08 Hours    |            |
| <b>Total # of responses</b>          |           | 398,520       |            |
| <b>Total burden (hours)</b>          |           | 31,881 Hours  |            |

There are currently 13 operators with 10 or more air ambulance helicopters that have already complied with this requirement. There is currently one operator that is going through certification that needs to develop an OCS training/operations manual. It is estimated that no more than one operator would apply for certification per year. The chief pilot would take 60 hours to develop the OCS training/operations manual. The typist/clerical would need 30 hours to edit, make copies, and distribute the revisions to the manuals. We estimate 2 operators would only need to make a small amendment to their existing manuals because they have a similar program currently in place. For these operators, the chief pilot

would take 1 hour to revise the manual and the clerk would need 1 hours to edit, make copies, and distribute the revisions to the manuals.

#### Develop OCS Training

| Year         | Operators Developing New Plan | Hours Chief Pilot | Hours Clerical | Total Hours      | Wage for Chief Pilot | Wage for Clerical | Total Cost      |
|--------------|-------------------------------|-------------------|----------------|------------------|----------------------|-------------------|-----------------|
| 1            | 1                             | 60                | 30             | 90               | \$3,000              | \$810             | \$3,810         |
| 2            | 1                             | 60                | 30             | 90               | \$3,000              | \$810             | \$3,810         |
| 3            | 1                             | 60                | 30             | 90               | \$3,000              | \$810             | \$3,810         |
| <b>Total</b> |                               |                   |                | <b>270 Hours</b> |                      |                   | <b>\$11,430</b> |

| Summary (Annual numbers)      | Reporting | Recordkeeping | Disclosure |
|-------------------------------|-----------|---------------|------------|
| # of Respondents              | 1         |               |            |
| # of Responses per respondent | 1         |               |            |
| Time per Response             | 90.0 Hour |               |            |
| Total # of responses          | 1         |               |            |
| Total burden (hours)          | 90 Hours  |               |            |

#### Amendment to Existing Manual

| Year         | Operators Revising Manual | Hours Chief Pilot | Hours Clerical | Total Hours | Wage for Chief Pilot | Wage for Clerical | Total Cost   |
|--------------|---------------------------|-------------------|----------------|-------------|----------------------|-------------------|--------------|
| 1            | 2                         | 1                 | 1              | 4           | \$100                | \$54              | \$154        |
| 2            | 2                         | 1                 | 1              | 4           | \$100                | \$54              | \$154        |
| 3            | 2                         | 1                 | 1              | 4           | \$100                | \$54              | \$154        |
| <b>Total</b> |                           |                   |                | <b>12</b>   |                      |                   | <b>\$462</b> |

|  |  |  |  |              |  |  |  |
|--|--|--|--|--------------|--|--|--|
|  |  |  |  | <b>Hours</b> |  |  |  |
|--|--|--|--|--------------|--|--|--|

| <b>Summary<br/>(Annual numbers)</b>      | <b>Reporting</b> | <b>Recordkeepin<br/>g</b> | <b>Disclosure</b> |
|--|------------------|---------------------------|-------------------|
| <b># of Respondents</b>                  | 2                |                           |                   |
| <b># of Responses<br/>per respondent</b> | 1                |                           |                   |
| <b>Time per<br/>Response</b>             | 2.0 Hours        |                           |                   |
| <b>Total # of<br/>responses</b>          | 2                |                           |                   |
| <b>Total burden<br/>(hours)</b>          | 4 Hours          |                           |                   |

Total cost for development/amendment of a manual is 282 hours and \$11,892.

The OCS would require training every 12 months with a test at the end. A record of the training including the test must be retained. The clerk would maintain the training records of the OCS's spending 5 minutes on each record documenting that training and the test was completed on a certain date.

#### Training Records for Operators without OCCs

| <b>Year</b>  | <b>OCS</b> | <b>Hours Per<br/>OCS<br/>Record</b> | <b>Total<br/>Hours</b> | <b>Wage</b> | <b>Cost</b>  |
|--------------|------------|-------------------------------------|------------------------|-------------|--------------|
|              |            |                                     |                        |             |              |
| 1            | 130        | 0.08                                | 10                     | \$27        | \$270        |
| 2            | 130        | 0.08                                | 10                     | \$27        | \$270        |
| 3            | 130        | 0.08                                | 10                     | \$27        | \$270        |
|              |            |                                     |                        |             |              |
| <b>Total</b> |            |                                     | <b>30 Hours</b>        |             | <b>\$810</b> |

| <b>Summary<br/>(Annual numbers)</b>      | <b>Reporting</b> | <b>Recordkeepin<br/>g</b> | <b>Disclosure</b> |
|--|------------------|---------------------------|-------------------|
| <b># of Respondents</b>                  |                  | 130                       |                   |
| <b># of Responses<br/>per respondent</b> |                  | 1                         |                   |
| <b>Time per<br/>Response</b>             |                  | 0.08 Hours                |                   |

|                             |  |          |  |
|-----------------------------|--|----------|--|
| <b>Total # of responses</b> |  | 130      |  |
| <b>Total burden (hours)</b> |  | 10 Hours |  |

Certificate holders with operations control centers are required to retain operations control specialist training records.

#### Training Records for Operators with OCCs

| Year         | OCS | Hours per OCS Record | Total Hours     | Wage | Cost           |
|--------------|-----|----------------------|-----------------|------|----------------|
| 1            | 400 | 0.08                 | 32              | \$27 | \$864          |
| 2            | 400 | 0.08                 | 32              | \$27 | \$864          |
| 3            | 400 | 0.08                 | 32              | \$27 | \$864          |
| <b>Total</b> |     |                      | <b>96 Hours</b> |      | <b>\$2,592</b> |

| Summary (Annual numbers)             | Reporting | Recordkeepin g | Disclosure |
|--------------------------------------|-----------|----------------|------------|
| <b># of Respondents</b>              |           | 400            |            |
| <b># of Responses per respondent</b> |           | 1              |            |
| <b>Time per Response</b>             |           | 0.08 Hours     |            |
| <b>Total # of responses</b>          |           | 400            |            |
| <b>Total burden (hours)</b>          |           | 32 Hours       |            |

- Training of medical personnel (§135.621)

This section indicates that medical personnel may either be trained each 24 calendar months or receive a briefing prior to each air ambulance operation. The certificate holder would retain a record of each medical personnel trained for 24 calendar months. The certificate holder conducting helicopter air ambulance operations would need to add training of medical personnel to the existing training manual. Medical personnel may or may not be employees of the certificate holder. If they are not an employee they are still trained by the certificate holder. We estimate that 50% of certificate holders will develop and conduct training and 50% will brief medical personnel prior to each operation. For development of a training program, this was a one-time collection that was captured in the last revision of this information collection. Today, there are 63 HAA operators who have complied with this requirement. This requirement would apply for a new entrant. Therefore, this

calculation will be based on one new entrant per year. We estimate 10 hours by the chief pilot to develop the training and 10 hours by the clerk to edit, make copies, and distribute the training. After training is conducted, the clerk will spend 5 minutes per training record documenting the date training was completed. Development of the training is a one-time event. The training records must be updated every 24 calendar months.

#### Develop Medical Personnel Training

| Year         | Air Ambulance Operators | Hours for CP to Develop Training | Wage for Chief Pilot | Hours for Clerical to Develop Training | Wage for Clerical | Total Hours | Total Cost     |
|--------------|-------------------------|----------------------------------|----------------------|--|-------------------|-------------|----------------|
| 1            | 1                       | 10                               | \$50                 | 10                                     | \$27              | 20          | \$770          |
| 2            | 1                       | 10                               | \$50                 | 10                                     | \$27              | 20          | \$770          |
| 3            | 1                       | 10                               | \$50                 | 10                                     | \$27              | 20          | \$770          |
| <b>Total</b> |                         |                                  |                      |  |                   | <b>60</b>   | <b>\$2,310</b> |

| Summary (Annual numbers)      | Reporting  | Recordkeeping | Disclosure |
|-------------------------------|------------|---------------|------------|
| # of Respondents              | 1          |               |            |
| # of Responses per respondent | 1          |               |            |
| Time per Response             | 20.0 Hours |               |            |
| Total # of responses          | 1          |               |            |
| Total burden (hours)          | 20.0 Hours |               |            |

#### Recordkeeping for Medical Personnel Training

| Year         | Training Data to be Maintained | Hours for Data Input              | Wage for Clerical | Total Hours | Total Cost      |
|--------------|--------------------------------|-----------------------------------|-------------------|-------------|-----------------|
| 1            | 5,858                          | 0.08                              | \$27              | 469         | \$12,663        |
| 2            | No Data                        | Input due to 24 Month Requirement |                   |             |                 |
| 3            | 5,858                          | 0.08                              | \$27              | 469         | \$12,663        |
| <b>Total</b> |                                |                                   |                   | <b>938</b>  | <b>\$25,326</b> |

| Summary<br>(Annual numbers)              | Reporting | Recordkeepin<br>g | Disclosure |
|--|-----------|-------------------|------------|
| <b># of Respondents</b>                  |           | 5,858             |            |
| <b># of Responses<br/>per respondent</b> |           | 1                 |            |
| <b>Time per<br/>Response</b>             |           | 0.08 Hours        |            |
| <b>Total # of<br/>responses</b>          |           | 5,858             |            |
| <b>Total burden<br/>(hours)</b>          |           | 469 Hours         |            |

- Requirements of FAA Reauthorization Bill of 2018 – Report to Congress.

Congress is mandating that operators complete a Helicopter Air Ambulance Data Report that will be submitted to congress on an annual basis. Operators have estimated that it may take between 2 and 24 hours (depending on their fleet size) to complete the reporting to the FAA so the information can be given to Congress. This reporting will be completed and submitted electronically. For the purposes of this report, an average of 7 hours will be used for each operator to complete the report. The salary will be based on the clerical wage rate sourced above.

| Year         | Number<br>of HAA<br>Operator<br>s | Hours<br>for Data<br>Input | Wage for<br>Clerical | Total<br>Hours | Total<br>Cost |
|--------------|-----------------------------------|----------------------------|----------------------|----------------|---------------|
| 1            | 63                                | 7                          | \$27                 | 441            | \$11,907      |
| 2            | 63                                | 7                          | \$27                 | 441            | \$11,907      |
| 3            | 63                                | 7                          | \$27                 | 441            | \$11,907      |
| <b>TOTAL</b> |                                   |                            |                      | 1,323          | \$35,721      |

| Summary<br>(Annual numbers) | Reporting | Recordkeepin<br>g | Disclosure |
|-----------------------------|-----------|-------------------|------------|
| <b># of Respondents</b>     | 63        |                   |            |

|                                      |           |  |  |
|--------------------------------------|-----------|--|--|
| <b># of Responses per respondent</b> | 1         |  |  |
| <b>Time per Response</b>             | 7 Hours   |  |  |
| <b>Total # of responses</b>          | 63        |  |  |
| <b>Total burden (hours)</b>          | 441 Hours |  |  |

#### **Summary of all Burden Hours and Costs**

|    |   | <b>Section</b> | <b>Total Annual Burden Hours</b> | <b>Total Annual Cost</b> |
|----|---|----------------|----------------------------------|--------------------------|
| 1  | Radio Altimeters                                      | 135.160        | 1                                | \$63                     |
| 2  | Local Flying Area                                     | 135.609        | 2                                | \$126                    |
| 3  | VFR Flight Planning                                   | 135.615        | 31,881                           | \$1,594,080              |
| 4  | Develop Pre-flight Risk Analysis Program              | 135.617        | 60                               | \$2,310                  |
| 5  | Perform Risk Analysis                                 | 135.617        | 67,748                           | \$3,387,420              |
| 6  | Pilots Worksheet                                      | 135.617        | 31,881                           | \$1,594,080              |
| 7  | Develop OCS Training/Amendment to Existing Manual     | 135.619        | 94                               | \$3,964                  |
| 8  | Training Records for Operators without OCCs           | 135.619        | 10                               | \$270                    |
| 9  | Training Records for Operators with OCCs              | 135.619        | 32                               | \$864                    |
| 10 | Develop Medical Personnel Training                    | 135.621        | 20                               | \$770                    |
| 11 | Recordkeeping for Medical Personnel Training          | 135.621        | 469                              | \$12,663                 |
| 12 | Reauthorization 2018 Congressional Report Requirement |                | 441                              | \$11,907                 |
|    |   |                |                                  |                          |
|    | <b>Total Cost of this Information Collection</b>      |                | <b>132,639 Hours</b>             | <b>\$6,608,517</b>       |

**13. Provide an estimate for 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 #12 above.

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

This figure is the estimated cost for the government to approve and monitor FOQA programs. Typically inspectors at the GS-13 level would inspect and approve these programs. Generally, these inspectors are GS-13 (GS-13, Step 5 hourly wage, Kansas City Locality Pay) for an average wage of \$47.66 per hour<sup>10</sup> with 31.4%<sup>11</sup> fringe benefits cost for a total of \$62.76 per hour. With overhead added<sup>12</sup>, the total salary is 70.86 per hour.

#### Radio Altimeters

| Application for On Demand Helicopters | Application for Air Tour Operators | Time for Review of Ops Specs | Total Hours | Wage for Inspector at HQ | Total Cost |
|---------------------------------------|------------------------------------|------------------------------|-------------|--------------------------|------------|
| 1                                     | 1                                  | 1 hr                         | 2           | \$71                     | \$142      |

A certificate holder would designate a local flying area and send their request to the FAA field office. An FAA inspector would review and send the certificate holder approval or edits. We estimate one hour of FAA review at the above GS-13 pay rate.

#### Local Flying Area

| Air Ambulance Operators | Hours to Review Request | Total Hours | Wage for Inspector | Total Cost |
|-------------------------|-------------------------|-------------|--------------------|------------|
| 1                       | 1                       | 1           | \$71               | \$71       |

Each certificate holder would develop a revision to their existing operations manual on how they will perform pre-flight risk analysis. The revision would be sent to the FAA district office for review. An FAA inspector would review.

<sup>10</sup> [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/GS\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/GS_h.pdf)

<sup>11</sup> Bureau of Labor Statistics, Employer Costs for Employee Compensation – September 2018, USDL-18-1941, Released December 14, 2018

<sup>12</sup> Source: Cody Rice, U.S. Environmental Protection Agency, "Wage Rates for Economic Analyses of the Toxics Release Inventory Program" (June 10, 2002), <https://www.regulations.gov/document?D=EPA-HQ-OPPT-2014-0650-0005>.

### Review Pre-flight Risk Analysis Program

| Year         | Air Ambulance Operator | Hours to Review | Total Hours | Wage for Inspector | Total Cost   |
|--------------|------------------------|-----------------|-------------|--------------------|--------------|
| 1            | 1                      | 1               | 1           | \$71               | \$71         |
| 2            | 1                      | 1               | 1           | \$71               | \$71         |
| 3            | 1                      | 1               | 1           | \$71               | \$71         |
| <b>TOTAL</b> |                        | <b>3</b>        |             |                    | <b>\$213</b> |

Each impacted certificate holder would develop/revise their training manual and send it to the FAA field office.

### Review New OCS Training

| Year         | Operators Developing New Plan | Hours for Review | Total Hours    | Wage for Inspector | Total Cost   |
|--------------|-------------------------------|------------------|----------------|--------------------|--------------|
| 1            | 1                             | 1                | 1              | \$71               | \$71         |
| 2            | 1                             | 1                | 1              | \$71               | \$71         |
| 3            | 1                             | 1                | 1              | \$71               | \$71         |
| <b>Total</b> |                               |                  | <b>3 Hours</b> |                    | <b>\$213</b> |

### Review Amendment to Existing Manual

| Year         | Operators Revising Manual | Hours for Review | Total Hours    | Wage for Inspector | Total Cost   |
|--------------|---------------------------|------------------|----------------|--------------------|--------------|
| 1            | 2                         | 1                | 2              | \$71               | \$142        |
| 2            | 2                         | 1                | 2              | \$71               | \$142        |
| 3            | 2                         | 1                | 2              | \$71               | \$142        |
| <b>Total</b> |                           |                  | <b>6 Hours</b> |                    | <b>\$426</b> |

Each certificate holder would develop a revision to their existing training manual for medical personnel and submit it to the FAA field office where an inspector would review it.

### Review Medical Personnel Training

| Year | Air | Hours | Wage for | Total | Total |
|------|-----|-------|----------|-------|-------|
|      |     |       |          |       |       |

|              | Ambulance Operators | for Review | Inspector | Hours          | Cost         |
|--------------|---------------------|------------|-----------|----------------|--------------|
| 1            | 1                   | 1          | \$71      | 1              | \$71         |
| 2            | 1                   | 1          | \$71      | 1              | \$71         |
| 3            | 1                   | 1          | \$71      | 1              | \$71         |
| <b>Total</b> |                     |            |           | <b>3 Hours</b> | <b>\$213</b> |

#### Summary of all annual Burden Hours and Costs

|   |  | Section | Total Burden Hours | Total Cost   |
|---|--|---------|--------------------|--------------|
| 1 | Radio Altimeters                                 | 135.160 | 2                  | \$142        |
| 2 | Local Flying Area                                | 135.609 | 1                  | \$71         |
| 3 | Review Pre-Flight Analysis                       | 135.617 | 1                  | \$71         |
| 4 | Review OCS Training/Amendment to Existing Manual | 135.619 | 3                  | \$213        |
| 5 | Review Development of Medical Personal Training  | 135.621 | 1                  | \$71         |
|   |  |         |                    |              |
|   | <b>Total</b>                                     |         | <b>8 Hours</b>     | <b>\$568</b> |

#### **15. Explain the reasons for any program changes or adjustments.**

The burden has been updated and revised. For many of the rules, they were one time requirements. Each existing operator has already complied with the requirements. Therefore the burden now reflects new entrants only.

Existing form 2170-0761 has been revised due to requirements of the FAA Reauthorization Act of 2018. This information collection is including the revised form. Section 314(d) of the FAA Reauthorization Act of 2018 amended these reporting requirements for the report to contain the number of helicopters that the certificate holder uses to provide helicopter air ambulance services and the base locations of the helicopters, the number of hours flown by the helicopters operated by the certificate holder, the number of patients transported and the number of patient transport requests for a helicopter providing air ambulance services that were accepted or declined by the certificate holder and the type of each such flight request (such as scene response, inter-facility transport or organ transport), the number of accidents, if any, involving helicopters operated by the certificate holder while providing air ambulance services and a description of the accidents, the number of hours flown under instrument flight

rules by helicopters operated by the certificate holder, the number of hours flown at night by helicopters operated by the certificate holder, the number of incidents, if any, in which a helicopter was not directly dispatched and arrived to transport patients but was not utilized for patient transport.

**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.**

There is no publication plan.

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

The FAA is not seeking approval to not display the expiration date.

**18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."**

There are no exceptions in Item 19, OMB Form 83-I.