

Supporting Statement A

Air Taxi and Commercial Operator Airport Activity Survey (FAA Form 1800-31)

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

This survey is restricted to on demand operations that are subject to the passenger transportation tax to report their annual passenger enplanement numbers. Operators that conduct less than five round trips between two points may voluntarily report revenue enplanements on FAA Form 1800-31. This charter data is not collected by the U.S. Department of Transportation, Bureau of Transportation Statistics (BTS) or any other federal agency or source.

This annual survey is the only source of revenue passengers transported by charter and nonscheduled operators (air taxis) under title 14 Code of Federal Regulations, part 135. The collection involves on-demand operators voluntarily providing the number of revenue passengers that boarded their aircraft annually by airport. FAA and contractor staff review the responses (either paper or electronic) to ensure that the operator submitting data is valid and the response is complete. Valid submissions are incorporated into an FAA database that also contains enplanement data collected by BTS from certificated, commuters, and foreign air carriers. Enplanement data are consolidated into a report for each airport that lists each air carrier and their annual enplanements. This is used to determine whether an airport is eligible for Airport Improvement Program funds and calculates primary airport sponsor apportionment as specified by title 49 United States Code (U.S.C.), section 47114.

Passengers traveling on air taxis would be overlooked entirely if this passenger survey were not conducted. As a result, FAA would not be fairly allocating Airport Improvement Program (AIP) passenger entitlement funds to airports. This would affect smaller airports, usually in rural areas, because they struggle to meet the 2,500 and 10,000-passenger enplanement thresholds to qualify for designation as commercial service and primary. On average, we receive responses from approximately 100 operators reporting 1.1 million passengers.

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.

The Office of Airports uses the enplanement data submitted to categorize and determine funding for airports, many of which are small airports in rural areas. The data collected through this survey is very important to these airports because small charter operators are not required to report passengers to BTS on Form 41, T-100. Without this voluntary survey, many airports would not be able to reach the passenger thresholds necessary to qualify for AIP passenger entitlement funds.

Although the information collected is not disseminated directly to the public, results may be used in scientific, management, technical or general informational publications.

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.

For the last two decades, the FAA Airports Organization has had a contractor send out printed forms including postage paid return envelopes, received and review the responses, and entered the data into the FAA database, known as SOAR (System of Airports Reporting). FAA personnel oversaw the process and were the point of contact for the respondents. The form was also available online ([FAA Form 1800-31](#)) and an operator could print the form and submit the completed form to the FAA. The operator could also email the signed and scanned form to the FAA.

The FAA will begin accepting data electronically in 2020. The FAA Airports Organization is actively working to meet the OMB terms of clearance to allow electronic submission, including the use of e-signature. This new process will be in place for the submission of calendar year 2019 data that will begin in February 2020. Third party e-signature software will be in place by December 30, 2019 for use in voluntary submission of FAA Form 1800-31 data. We will continue to accept hard copies for those operators unable or unwilling to submit data electronically.

The enplanement data collected through FAA 1800-31 (which does not contain personal identifying information) reside in the FAA's SOAR database. A Privacy Threshold Assessment was adjudicated for SOAR in 2018. A Privacy Impact Assessment is underway for SOAR and will include the FAA Form 1800-31 electronic submission using third party e-signature software. It will be submitted for adjudication by DOT by December 30, 2019.

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.

The survey is restricted to on demand operations that are not reporting to BTS. The Office of Airports coordinates with state transportation organizations, within the FAA, and with the U.S. Department of Transportation (DOT) to ensure there is no duplication of data collection.

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

This voluntary annual survey is distributed to approximately 190 small on-demand operators annually. Operators are requested to provide the total number of revenue passengers that boarded their aircraft at each U.S. airports in the previous year. The data requested is the minimum amount of data needed.

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.

If this data were not collected annually, then approximately 1.1 million passengers would not be included in the annual data. Approximately 320 airports would lose AIP entitlement funding and 25 airports would not qualify for passenger entitlements (\$1 million each) without the data collected on this form.

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.*

The special circumstances outlined in the seven bullets listed above are not applicable to FAA Form 1800-31.

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 August 16, 2019 (84 FR 162), solicited public comment. No comments were received.

As part of the annual survey process, about five percent of the charter operators contact the FAA with specific questions related to their operations. During these discussions, the respondents have not provided any criticism or suggestions on the form, instructions or burden and cost.

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

There is not payments or gifts for information submissions.

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

The Office of Airports does not assure confidentiality to respondents. We do not release the

total enplanements by operator to the public. However, the total passengers reported by an operator are provided to each airport.

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.

This survey does not solicit information that is sensitive or private.

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

Approximately 190 operators receive a copy of the form each year. The FAA receives approximately 100 responses per year. The average response time per respondent is 90 minutes, based on estimates provided by operators in conversations with the FAA.

Summary (Annual numbers)	Reporting
# of Respondents	190
# of Responses per respondent	1
Time per Response	1.5
Total # of responses	100
Total burden (hours)	150

The total estimated annual burden is 150 hours with an annual cost of \$7,473. This was developed using the base hourly rate (wages/salaries) from the U.S. Bureau of Labor Statistics (BLS) issued in March 2019 for employee compensation of \$24.91¹. The base hourly rate was multiplied by two to account for fringe benefits and overhead² resulting in a fully loaded hourly wage of \$49.82. The fully loaded hourly wage (\$49.82) was then multiplied by the total burden hours (150) for an estimated annual cost of \$7,473.

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.

There is no additional cost to the respondents.

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.

¹ U.S. Bureau of Labor Statistics, March 19, 2019. Employer costs for employee compensation averaged \$36.32 per hour worked in December 2018. Wages and salaries averaged \$24.91 per hour worked and accounted for 68.6 percent of the costs, while benefit costs averaged \$11.41 and accounted for the remaining 31.4 percent (see Table 1). <https://www.bls.gov/news.release/ecec.toc.htm>

² U.S. Department of Health & Human Services, Guidelines for Regulatory Impact Analysis, issued on January 13, 2017. <https://aspe.hhs.gov/pdf-report/guidelines-regulatory-impact-analysis>

Below is an annual estimate of the costs to the Federal government for the collection of the data. It includes the actual cost of postage and printing along with the labor and benefit costs for the FAA and contractor employees. These costs may be slightly reduced in the future as the electronic submission is utilized.

Using the 2019 midpoint of a J band salary of an FAA employee in Washington, DC (with locality pay), a \$63 per hour base rate was selected. The hourly base rate was multiplied by two to account for fringe benefits and overhead³ resulting in a fully loaded hourly wage of \$126.

The FAA used the hourly wage for Professional and Business Services identified by the BLS⁴ of \$29.25. The base hourly rate was then multiplied by two to account for fringe benefits and overhead⁵ resulting in a fully loaded hourly wage of \$58.40.

Annual Cost to the Federal Government

\$ 220 in postage (including the self-addressed stamped return envelope)
\$ 450 in printing costs (survey package)
\$ 7,560 in FAA compensation for oversight (60 hours x \$126/hr)
\$10,512 in contractor compensation costs (180 hours x \$58.40/hr)
\$18,742 total cost

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

There are no changes in reporting requirements. However, beginning in February 2020, operators will be able to electronically sign and submit their data to the FAA therefore reducing the burden on the air carrier. The reduction in burden will allow the air carrier to submit the form electronically and will no longer need to print, scan and submit the form.

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.

The results of the survey are not published. The data collected through this survey is included in the total number of enplanements, by airport, which are available on the FAA web page.

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.

We are not seeking this approval.

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

³ U.S. Department of Health & Human Services, Guidelines for Regulatory Impact Analysis, issued on January 13, 2017. <https://aspe.hhs.gov/pdf-report/guidelines-regulatory-impact-analysis>

⁴ Source: Bureau of Labor Statistics, December 2018. Table 6. <https://www.bls.gov/news.release/ecec.t06.htm>

⁵ U.S. Department of Health & Human Services, Guidelines for Regulatory Impact Analysis, issued on January 13, 2017. <https://aspe.hhs.gov/pdf-report/guidelines-regulatory-impact-analysis>

We are not seeking any exceptions.