

940 Supporting Statement A
PROCEDURES for NON-FEDERAL NAVIGATION FACILITIES
2120-0014

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

Title 14 CFR Part 171 sets forth minimum requirements for the approval and operation of non-Federal aerial navigation aids (NavAids) that facilitate instrument flight rules (IFR) and air traffic control procedures. Part 171's requirements address requests for IFR procedures, minimum requirements for approval, performance requirements, and installation requirements. The regulation also addresses maintenance and operations requirements, including "reports," which are forms that must be submitted by the non-Federal sponsor who owns those NavAids, to the FAA.

The Program is responsible for the oversight of the operation and maintenance of facilities used by the flying public not owned by the Federal government. Without oversight, there is no way to ensure that non-Federal sponsors ("non-Federal sponsors" refers to entities such as state and local governments, businesses, and private citizens) are procuring FAA approved facilities or to ensure that those facilities are operating safely. This collection provides the FAA with the necessary data on non-Federally owned facilities to maintain safety in the NAS.

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 forms referenced below are information-reporting and record-keeping documents. They must be used by anyone that wants to operate a non-Federally owned facility in the National Airspace System (NAS). Furthermore, the non-Federally employed technicians who maintain those facilities must complete the forms, and submit them to their assigned FAA Inspector, for record-retention purposes.

What follows is a further elaboration on the forms' purpose:

- First, documenting the initial parameters during commissioning is necessary to establish a baseline, for reference during future inspections. (Form 6000-8)
- Second, in order to capture an accurate history of the facility's performance over time, it's necessary to use on-site logs that record events such as routine maintenance, repairs, and the facility's occasional removal from service. (Form 6030-1)

- Third, capturing an accurate history of the facility's performance is further accomplished by recording the facility's parameters during each periodic inspection.
 - o By "parameters," we mean the facility's numerical or other measurable factors, such as the extent to which a sensor is operating within tolerance. Taken together, these parameters comprise a data set that defines the facility/system as a whole, and sets the conditions of its operation. (Form 6000-10)

In short, this collection provides the FAA with data necessary to ensure that non-Federally owned facilities supporting the NAS are being operated and maintained safely.

As for information privacy, there is no plan to publicly disseminate the collected information, nor use it to support publicly disseminated information. The information collected is for internal FAA use only, and not public consumption. The FAA's Non-Federal Program will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with FAA standards for confidentiality, privacy, electronic information and document retention guidance. (See response to Question 10 of this Supporting Statement for more information on confidentiality and privacy.) In summary, the information collection is designed to yield data that meet all applicable information quality guidelines.

Technical Reference Data Record (TRDR), FAA Form 6000-10. (Called Record of Meter Readings and Adjustments, Form FAA-198, in 14 CFR Part 171.) TRDRs contain the facility's parameters, including equipment adjustments and all meter readings, and the sponsor must fill it out at the end of commissioning the facility. The sponsor must retain this information on-site. During each periodic inspection, review of this document verifies that the facility remains within initial tolerance.

Technical Performance Record (TPR), FAA Form 6000-8. (Called Radio Equipment Operation Records, Form 418, in 14 CFR Part 171.) TPRs contain a record of system parameters recorded in each scheduled routine maintenance visit to the facility. The sponsor or the sponsor's representatives must keep the original of each record at the facility and send a copy of the form to the FAA. This form provides proof and/or validation that the facility's parameters are within tolerance during each periodic inspection.

Facility Maintenance Logs, FAA Form 6030-1. (Called Facility Maintenance Log, Form 406C, in 14 CFR Part 171.) Facility Maintenance Logs are a permanent record of all the activities required to maintain a non-Federal facility. Logging is necessary in accordance with FAA policy. The entries must include all malfunctions encountered, if any, information on adjustments, equipment failures, causes, and corrective action taken. In addition, the entries must include any periodic maintenance required to operate the facility, and issuance of any facility NOTAMs. The FAA must receive copies

of the logs. Generally, completion and close out of logs are at the end of each month. However, if maintenance or a scheduled outage carries over into the next month, the relevant log must be closed out at the conclusion of that maintenance or outage. In the case of an unscheduled outage that lasts longer than 60 seconds, the log must be terminated in time to ensure that the FAA will receive a copy of the log within 20 days of the outage's occurrence. This form documents a complete history of the operation and maintenance of the facility for the facility's life cycle until decommissioning.

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.

All Forms 6000-8, 6000-10 and 6030-1 are available as fillable electronic documents, to facilitate greater ease of use. Respondents may also print it, and make hand-written entries.

All three forms are publicly available on the FAA's website:

6000-10:

<https://www.faa.gov/forms/index.cfm/go/document.information/documentID/214994>

6000-8: <https://www.faa.gov/forms/index.cfm/go/document.information/documentID/184228>

6030-1:

<https://www.faa.gov/forms/index.cfm/go/document.information/documentID/185470>

Results of the information collection are not available to the public.

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.

These forms track ongoing maintenance tasks, to ensure that the facility is operating safely. No two NavAids are alike, given variables such as siting location. Consequently, each NavAid requires its own forms. The collection of this data is not a duplication of any other collection; the Non-Federal Program is the only Federal program with direct inspection oversight of these facilities.

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

Non-Federally employed maintenance technicians are, in some cases, sole proprietors or employees of small businesses. However, the forms are a boon rather than a burden.

This is because much of the technicians' job entails creating maintenance records that reflect his or her work. (Creating such records is a requirement of 14 CFR Part 171.) Nonetheless, the FAA has created the forms to make meeting the requirement easier and designed them to minimize the amount of time and effort needed to provide the information.

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.

Non-Federal NavAids allow pilots to fly in almost any weather, day or night. In other words, they facilitate a safe and efficient National Airspace System. Combined with Federally owned NavAids, these systems facilitate a robust contribution to the United States' economy, via commercial aviation. (E.g., the transport of passengers and freight.) Similarly, these systems also facilitate our national defense, via deployment of tactical aircraft, and cargo aircraft that transport troops, vehicles, equipment, and other supplies.

Not conducting the collection of information would violate the requirements of Part 171. More importantly, it would also eliminate oversight of the maintenance practices that keep our skies safe. Similarly, collecting information less frequently would increase the risk of improper maintenance and operation going unnoticed.

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.*

Only the first two bullets are applicable: “requiring respondents to report information to the agency more often than quarterly” and “requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it”.

Logging is required at each maintenance visit and reporting varies depending on the situation. For example, if there is an outage, reporting must take place immediately. Depending on the issue, this could require reporting more than quarterly and even submitting documents within 30 days of inspection. It is not common, but is possible. Generally, submissions occur annually, unless the non-Federal sponsor prefers to submit more frequently.

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 27, 2018 (83 FR 43724) solicited public comment. No comments were received.

FAA personnel have, at a minimum, annual contact with non-Federally employed maintenance technicians and sponsors for each of the 2,600 non-Federally owned facility. None of these stakeholders provided any comments, criticisms, or suggestions with respect to these forms.

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

No payment or gifts are 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.

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 statement should:

- **Indicate the number of respondents, frequency of response, 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 hours for customary and usual business practices. * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under item 13.**

Although this submission may be a revision to an approved collection, and thus describes only the new or changed requirements in Question 2, this answer should state the total new burden hours and how much this figure is increased/decreased from the previous burden (if any) for the requirement. **NOTE: You are NOT required to stick to the estimated numbers in the Federal Register Notice for this collection.**

- a. The statement must provide the number of respondents expected annually, the frequency of their responses, the total number of responses expected, the average response time per respondent, and the total annual response time (in hours) for the collection. Response time includes not only the time necessary to complete the form or answer the questions, but also the time needed to gather the information (unless it was already being gathered for other purposes), to have it reviewed by lawyers or accountants, etc. Explain how you arrived at these estimates.
- b. Remember that figures should be annualized. For example, if a permit will be valid for three years, and you expect 300 respondents the first year and none the second and third years, use the average of 100 respondents. If the burden per response is

expected to vary widely, show the expected range of responses and explain the variance.

c. If the collection will involve more than one form or other means of information collection, provide burden estimates for each form.

d. Provide estimates of annualized labor cost to respondents for the hour burden for the collection, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for the collecting the information should not be included here (see Item 14 below).

Respondents: Approximately 2,600 non-Federal navigational facilities — no more than 2,600 respondents.

Frequency: Collection frequency varies depending on the form and situation. Form 6000-10 is filled out once during a facility's lifetime, when it is commissioned into service. It is the initial commissioning documentation that verifies a facility's operating parameters. Non-Federal Program policy requires updating this form only in the event of extreme circumstances that permanently alter the facility's operating parameters. In contrast, forms 6000-8 and 6030-1 are filled out at each maintenance visit (typically once every month, 12 times per year), and on an as-needed basis – such as in the case of rare, unforeseen events that require an extra maintenance visit.

Our information-collection calculations are based on the frequency with which non-Federal technicians *fill out the forms*, rather than the frequency with which they submit the forms to their FAA Inspectors.

During an FAA Inspector's regular visits (usually every 12 months), (s)he would collect the hardcopy forms. However, the option to submit these forms electronically is also available to technicians. The Non-Federal Program leaves it to the Inspectors and technicians to decide between themselves which method is most convenient. If the technician will be submitting hardcopies, the Inspector will collect them every 12 months. But if the technician wishes to submit electronically, (s)he may submit more frequently.

Estimated Average Reporting Burden: 13.72 hours annual amount per respondent, in the case of newly commissioned facilities, and 12.0 hours annual amount per respondent in the case of facilities that were commissioned in previous years. The calculation of time is not based on when the forms are submitted, but rather the number of maintenance visits a non-Federal technician is expected to make in a year.

- Form 6000-10 1.72 hours per response
- Form 6000-8 30 minutes per response
- Form 6030-1 30 minutes per response

Estimated Total Annual Burden: Cumulative - Approximately 31,234 hours per year.

Cumulative (2,600 sites x 12.0 hours) + (20 facilities x 1.72) = 31,234 hours

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|---|---------------------|-----------------------------------|
| • | Form 6000-10 | 20 x 1.72 hours = 34 |
| • | Form 6000-8 | 2,600 x 6.0 hours = 15,600 |
| • | Form 6030-1 | 2,600 x 6.0 hours = 15,600 |

The “20 facilities” figure used to compute the hours for Form 6000-10 is based on the average number of facilities that were commissioned during FY 2016, FY 2017, and FY2018. This data was collected from the Non-Federal Program’s annual reports.

- (FY16: 32 facilities) + (FY17: 12 facilities) + (FY18: 15 facilities) = 59 facilities.
- 59 facilities ÷ 3 fiscal years = 19.667 facilities per fiscal year.

There are approximately 2,600 non-Federally owned NavAids, each of which requires its own maintenance records. Therefore, we consider each NavAid to be a “respondent,” for the purposes of this document.

The frequency of submission is occasionally, although forms are updated at every maintenance visit, and the average annual burden per respondent is 13.72 hours in the case of newly commissioned facilities, and 12.0 hours in the case of facilities commissioned in previous years. This addresses all three forms (6000-10, 6000-8 & 6030-1) and the basis is historical Non-Federal Program data, occasionally and informally revalidated through verbal questioning by Non-Federal Program inspectors. (I.e., the inspector asks the technician, “How much time would you estimate it takes you to complete the paperwork each month?”) If an inspector feels that the paperwork burden has, for some reason, noticeably increased, (s)he will report back to program leadership.

The estimated annualized cost to respondents for the hour burdens for collections of information is \$1,911,881.19. According to the Bureau of Labor Statistics “Occupational Outlook Handbook,” the annual 2017 median wage for an Electrical and Electronics Engineering Technician was \$63,660. Therefore, the “fully loaded” wage rate is \$127,320. Calculated as follows:

\$127,320 ÷ 52 weeks = \$2,448.46 per week
\$2,448.46 ÷ 40 hours = \$61.21 per hour
\$61.21 x 31,234 hours = \$1,911,881.19 per years

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 other than those listed in question 12.

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.

The estimated annual costs to the FAA to collect this information is \$862,815, using an annual, “fully loaded” salary of \$230,084. This salary is based on the maximum salary, as of January 7, 2018, of an I Band Technical position with locality pay for the “Rest of the United States.”

Each of the 2,600 sites is usually inspected once every 12 months. On average, Inspectors spend 3 hours per site, collecting, analyzing, and reporting on the data. That amounts to approximately 7,800 hours annually. (2,600 sites x 3 hours.)

Facility visits include ensuring proper paperwork is readily accessible; logs are filled out in the approved standardized manner; the facility is operating within parameters, the technician has proper verification credentials; and is maintaining the facility according to FAA standards. At the end of the inspection, the Inspector collects the logs, and later reviews them, after returning to the office. The “3 hours” includes the amount of time necessary to review logs.

We are unable to provide data on travel costs. FAA Inspectors conduct inspections within their assigned territories. “Typical travel” usually involves time spent driving to local facilities. Facilities that are not local may require overnight travel, which could (but not always) include airfare. Also, access to some facilities requires rental of special equipment, such as snow cats, helicopters, etc.

$$\begin{aligned} \$230,084 \div 52 \text{ weeks} &= \$4,424.69 \text{ per week} \\ \$4,424.69 \div 40 \text{ hours} &= \$110.62 \text{ per hour} \\ \$110.62 \times 7,800 \text{ hours} &= \$862,815 \text{ per year} \end{aligned}$$

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

There has been no change in the requirement; however the burden has been adjusted. A separate form (6000-10) is used at the commissioning of the facility to ensure this data is recognized as the baseline operating parameters. (This form was previously called the 6030-17.) The other two forms 6030-1 & 6000-8 (previously listed as 6790-3

and 6790-4) were previously used; they are required at each maintenance visit. Previous information collections listed forms 6790-3 and 6790-4, which are performance records for specific types of navigation aids (E.g., the VHF Omni-Directional Range.) However, these forms were either listed in error, or because data-collection procedures were different in the past. Today, a single performance record (6000-8) is used for nearly all of the navigation aids that the Non-Federal Program regulates. As a result, there is no longer any need to use 6790-3 and 6790-4. Regardless, the data being collected remains the same.

The Non-Federal Program is not responsible for the forms used and had no input in changes to the Form numbers and/or the names of the forms. These forms are not solely for the use of the Non-Federal Program.

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 Non-Federal Program does not publish the collection results.

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 this approval.

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

There are no exceptions.