

Supporting Statement A
Representatives of the Administrator, 14 CFR part 183

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

Title 49, United States Code, **Section 44702** states that the Secretary of Transportation may, subject to such regulations as he may prescribe, delegate to any properly qualified private person, the examination and testing necessary for the issuance of certificates under Title VI of the Federal Aviation Act.

Title 14, Code of Federal Regulations, **part 183** (14 CFR part 183), Representatives of the Administrator, implements the provisions of section 314 of the Federal Aviation Act. 14 CFR part 183 (part 183) describes the requirements for delegating to any properly qualified private person, the examination and testing necessary for the issuance of airmen certificates.

In addition to the regulatory basis, the purpose of this information collection is to make designated examiners readily available to the public, especially in those areas where the Federal Aviation Administration (FAA) inspector resources are limited. The information collected is used for internal FAA use, to determine the eligibility and qualifications of interested candidates and to appoint designated representatives of the Administrator from a pool of qualified applicants.

This collection of information supports the Department of Transportation's strategic goal for *Safety: Reduce Transportation-Related Fatalities and Serious Injuries Across the Transportation System*.

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.

Response to this collection of information is required to obtain a benefit, specifically, to obtain a FAA designation as a representative of the Administrator. Designee applicants come from private industry. They are experts in the aviation and medical communities who are familiar with the regulations and certification requirements necessary to issue an FAA certificate. Only highly experienced aviation professionals are expected to respond to the collection. The collection is for reporting of an individual's eligibility and qualifications and occurs on an as needed basis for initial applicants. However, if an individual is not selected as a designee, their application must be updated whenever information changes (as needed) and at least every 12 calendar months (annually), if the individual wishes to continue to be considered for a designation.

The collection of information is for the purpose of obtaining essential information concerning the applicant's professional and personal qualifications. The FAA uses the information provided to screen and select designees who will act as representatives of the FAA Administrator in performing various certification and examination functions under Title VI of Federal Aviation Act.

The collection of information involves respondents requesting to be delegated for one or more designee type, as follows:

Aviation Medical Examiner, § 183.12.

Aviation Medical Examiners (AME) are licensed physicians who issue medical certificates to people involved in the operations of aircraft. They serve the Federal Aviation Administration (FAA) and the flying community by medically certifying pilots.

Designated Engineering Representative, § 183.29.

Designated Engineering Representatives (DER) are responsible for finding that engineering data complies with the appropriate airworthiness standards.

Designated Manufacturing Inspection Representatives, § 183.31.

A Designated Manufacturing Inspection Representative (DMIR) conducts conformity inspections during the manufacturing process. DMIRs also issue certificates such as airworthiness certificates for aircraft, export certificates for aircraft and parts, and special flight permits. DMIR must also be employed by a Production Approval Holder (PAH) or a PAH's approved supplier.

Designated Airworthiness Representative - Manufacturing, § 183.33.

Designated Airworthiness Representative - Manufacturing (DAR-F), are individuals who perform examination, inspection, and testing services necessary to the issuance of airworthiness certificates. These designees perform mostly the same functions as DMIRs but work as individual consultants.

Designated Airworthiness Representative - Maintenance, § 183.33.

Designated Airworthiness Representative - Maintenance (DAR-T), are individuals who perform examination, inspection, and testing services necessary to the issuance of airworthiness certificates.

Pilot Examiners, § 183.23. Pilot Examiners (DPE) individuals who test and certificate applicants for a pilot certificate under part 61. DPEs fall into one or more subgroups below:

- Designated Pilot Examiner (DPE) (Air Carrier)
- Designated Pilot Examiner (DPE) (General Aviation)
- Specialty Aircraft Examiner (SAE)
- Administrative Pilot Examiner (Admin-PE)

Designated Mechanic Examiner, § 183.25.

Designated Mechanic Examiner (DME) are technical personnel examiners who test and certificate applicants for a mechanic certificate issued under 14 CR part 65.

Designated Parachute Rigger Examiner, § 183.25.

Designated Parachute Rigger Examiner (DPRE) are technical personnel examiners who test and certificate applicants for a parachute rigger certificate under 14 CFR part 65.

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 in this collection are available in a fillable .pdf format on the FAA website at <https://www.faa.gov/forms/>. The forms are available electronically but must be printed for submission to the FAA.

The FAA has partially implemented the Designee Management System (DMS), a web-based application which, once fully implemented, will replace all paper forms currently used to collect designee applicant information from the public.

- Once DMS is fully implemented, all previously approved paper forms referenced within this information collection will no longer be needed as DMS will support a fully electronic submission process. A revised IC will be submitted to request approval to cancel the paper forms and exclusively use the electronic DMS process.
- DMS is a web-based tool designed to standardize the management of designees. The FAA's Designee Management Policy establishes the process and procedures for

managing all aspects of designee administration including registration, application, selection, appointment, orientation, training, oversight, suspension and termination.

- The description within this IC regarding DMS is limited to information collected for the purposes of registration, application, selection, and appointment, since these purposes involve collection of information from the public, i.e. designee applicants. There are other aspects of DMS which are used to manage individuals who have been appointed as representatives of the FAA Administrator and who are conducting work on behalf of the FAA Administrator. These other aspects are not included in this collection as they do not apply to the public and constitute actions that the designee performs while doing work on behalf of the FAA Administrator.
- The DMS tool is available to interested candidates at a publicly accessible Universal Resource Locator (url). Users must register for access to DMS prior to having the ability to submit requested application information.
- Applicants will be required to have access to a computer with internet access to the DMS webpage located at the following url: <https://designee.faa.gov/#/login>. Additionally, applicants must have a valid email address in order to initially and continually access DMS.
- DMS will provide the Paperwork Reduction Act Statement on the login page. The Privacy Act Statement is provided to applicants within the application's signature page, where the applicant applies their electronic signature using their established DMS password.

DMS collects the following general information on individuals applying for a designation:

- User Registration
 - o First Name, Last Name
 - o Email
 - o Username, Password
- Application/Selection/Appointment
 - o Designee "Yes/No" questions on knowledge, certifications held, work experience, and training.
 - o First Name, Middle Name, Last Name, Suffix
 - o Date of Birth
 - o Gender
 - o Country of Citizenship
 - o Contact Phone, Email, Personal Address, Mailing Address
 - o Eligibility/Background "Yes/No" questions. Questions determining applicant eligibility based on FAA established Designee Policy for each designee type.
 - o Requested Designation Function Codes
 - o Resume/Supplemental Information listing the applicant's FAA certificates held and relevant work experience based on requested designation function codes.

The decision to use DMS for fully electronic submissions is based on benefits to the FAA, applicants, and designees. Benefits to applicants include a new simplified application process which will result in a better user experience, allowing the application process to be completed quickly, with a logical series of steps.

For designee applicants, none of the results of the information collection are made available to the public, either over the internet or by other means. The information collected from applicants is for internal FAA use, only for determining eligibility and qualifications of potential designated representatives of the FAA Administrator.

Once appointed, the contact information for each designated representative is posted to the internet (www.faa.gov) to allow the public to contact the designee to perform various work functions on behalf of the FAA.

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 find no duplication relating to information requested for designee applicants. The information collected as described in this submission are not duplicative since they request information from designee applicants with varied technical/professional backgrounds and areas of responsibility. We know of no other agency collecting this information.

IC 2120-0690 notes burden to 183. All burden related to designee applicants, including designees applicants who could be authorized to conduct work relating to light-sport aircraft and airmen, are included in this IC 2120-0033.

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

The collection of information involves individuals only.

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.

Collection frequency is on an as-needed basis; the information is initially collected only when an applicant wishes to apply for a designee position. Applicant information is required to be updated whenever the information changes and at least every 12 months. If this frequency were diminished, applicant information may not be current and valid, thus resulting in inaccurate data used for selection of designees.

If the collection were not conducted, FAA would not have the information needed to determine if applicants are qualified to be representatives of the FAA Administrator. Therefore, the FAA would not be able to support public demand for certifications services, and the aviation public and industry would be adversely impacted economically.

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

This collection of information is conducted in a manner consistent with 5 CFR section 1320.5 (d) (2) (i) (viii).

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 60 day notice was published in the *Federal Register* on November 7, 2019,(84 FR 60136). No comments were received.

A 30 day notice was published in the *Federal Register* on January 3, 2020,(85 FR 6012).The 30 day notice corrected an error in the original notice describing only one FAA form within the collection. The collection includes DMS and two FAA forms for collecting the applicant information for the various designee types.

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

Respondents do not receive any payments or gifts in return for submitting the requested information described in this collection.

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

Respondents have not been given any 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 sensitive questions within the DMS application process. Questions asked are only used for determining the eligibility and qualifications of designee applicants.

12. Provide estimates of the hour burden of the collection of information. The statement should:

Burden Summary

The total burden for 2143 respondents, taking 1.5 hours per response is 5949 hours and \$569,508 annually.

- The information is collected using DMS for most designee types.
- FAA Form 8110-14, Statement of Qualifications, is used to collect information for DER applicants.
- FAA Form 8710-6, Examiner Designation and Qualification Record, is used to collect information for Air Carrier DPE applicants.

Total Burden Summary Table:

Designee Type	AME	DMIR/ DAR-F	DAR-T	DME/ DPRE	General Aviation DPE/SAE/Admin-PE	Air Carrier DPE	DER	Totals
Instrument	DMS					Form 8710-6	Form 8110-14	
# of Respondents (annually)	238	58	83	96	798	550	320	2143
Responses per respondent	2	2	2	2	2	2	1	n/a
Total # of Responses	476	116	166	192	1596	1100	320	3966
Time per Response (hours)	1.5	1.5	1.5	1.5	1.5	1.5	1.5	n/a
Hour Burden	714	174	249	288	2394	1,650	480	5949
Cost/ Hour (\$)	203.64	62.72	62.72	41.40	82.00	82.00	112.60	n/a
Cost Burden (\$)	145,399	10,913	15,617	11,923	196,308	135,300	54,048	569,508

Compared to the previous burden, hour burden has decreased from 7,098 hours to 5949 hours.

The information collection burden under 14 CFR part 183 includes the time necessary for a respondent to gather the information needed for the application and complete the application process.

- The # of Respondents (annually) includes both new applicants, and those applicants who are updating their application with current information, until the time when they are selected and appointed as a representative of the FAA Administrator.

- The responses per respondent averages 2 responses annually to account for initial application and then for providing any updated information related to the application over the course of 12 months.
- The time per response is an average of the time required for an applicant to initially apply and the time it takes to update the application with any new information subsequent to the initial application.

Labor Cost Analysis

The burden of this ICR falls on various aviation professionals, to include doctors, engineers, pilots, and mechanics. Accordingly, the labor cost estimates vary greatly depending on the applicants profession related to the designation sought.

For all wages, the FAA multiplied the hourly wage by 2 to account for a fringe benefit rate of 31%¹ and an overhead rate of 69%².

AME Applicant Labor Cost:

With respect to these applicants, the FAA believes that doctors will perform most of the reporting requirements. The wage rate of **\$101.82** per hour came from the Department of Labor, Bureau of Labor Statistics (BLS), May 2018, Family and General Practitioners #29-1062.³

AME Applicants			
Hourly wage	31% Fringe Benefit	69% Overhead	Total
\$101.82	\$31.97	\$69.85	\$203.64

DER Applicant Labor Cost:

With respect to these applicants, the FAA believes that highly experienced aerospace engineers will perform most of the reporting requirements. The wage rate of **\$56.30** per hour came from the Department of Labor, Bureau of Labor Statistics (BLS), May 2018, Aerospace Engineers #17-2011.⁴

DER Applicants			
Hourly wage	31% Fringe Benefit	69% Overhead	Total
\$56.30	\$18.00	\$38.30	\$112.60

DPE, SAE, and Admin-PE Applicant Labor Cost:

With respect to these applicants, the FAA believes that highly experienced general aviation pilots will perform most of the reporting requirements. An average salary was estimated based on the pilot in command/second in command average salaries resulting in an estimation of **\$41.00** per hour.

DPE, SAE, and Admin-PE Applicants			
Hourly wage	31% Fringe Benefit	69% Overhead	Total
\$41.00	\$12.87	\$28.13	\$82.00

Note: Data received for pilot salaries was from a Pilot Compensation Survey done published in the June 2018 issue of Professional Pilot Magazine. The Pilot salaries below are the

¹ An employee fringe benefit of 31% is added (for benefits such as health benefits, vacation, sick time, etc.), based on the Civilian Workers wages, as reported in BLS release, Employer Costs for Employee Compensation-June 2019.

Source: U.S. DOL/BLS: <https://www.bls.gov/news.release/ecec.nr0.htm>

² Source: U.S. Department of Health and Human Services, "Guidelines for Regulatory Impact Analysis" (2016), https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf. On page 30, HHS states, "As an interim default, while HHS conducts more research, analysts should assume overhead costs (including benefits) are equal to 100 percent of pretax wages...." To isolate the overhead rate, the Department subtracted the benefits rate of 69 percent from the recommended rate of 100 percent.

³ Source: U.S. DOL/BLS: <https://www.bls.gov/oes/current/oes291062.htm>

⁴ Source: U.S. DOL/BLS: <https://www.bls.gov/oes/current/oes172011.htm>

averages of First Officer and Captain pay across varying aircraft. The salary survey provided numbers based on types of turbojet airplanes, rotorcraft, turboprops, fractional ownership operations, but did not consider lower salaries of pilots for single engine or multiengine reciprocating powered airplanes that make up a large segment of the industry (4000 reciprocating powered airplanes). An average salary was estimated based on the pilot-in-command/second-in-command turboprop, turbojet, fractional ownership, and helicopter average salaries and an estimate of airplane pilot salaries resulting in an estimate of \$41.00 per hour.

DMIR, DAR-F, DAR-T, and DME Applicant Labor Cost:

With respect to these applicants, the FAA believes that aircraft mechanics will perform most of the reporting requirements. The wage rate of **\$31.36** per hour came from the Department of Labor, Bureau of Labor Statistics (BLS), May 2018, Aircraft Mechanics and Service Technicians #49-3011.⁵

DMIR, DAR-F, DAR-T, and DME Applicants			
Hourly wage	31% Fringe Benefit	69% Overhead	Total
\$31.36	\$9.85	\$21.51	\$62.72

DPRE Applicant Labor Cost:

With respect to these applicants, the FAA believes that individuals currently employed as parachute riggers will perform most of the reporting requirements. The wage rate of **\$20.70** per hour came from the Department of Labor, Bureau of Labor Statistics (BLS), May 2018, Installation, Maintenance, and Repair Workers, All Other, #49-9099.⁶

DPRE Applicants			
Hourly wage	31% Fringe Benefit	69% Overhead	Total
\$20.70	\$6.50	\$14.20	\$41.40

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

No additional costs have been identified for respondents to this information collection.

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 FAA estimates that the total estimated annual cost to the Federal Government is **\$71,960**.

The fully burdened FAA aviation safety inspector (ASI) rate of \$48.90 was obtained from the 2018 General Schedule Salary Table⁷ as published by the U. S. Office of Personnel Management. The fully burdened salary used for calculating costs savings is the base hourly salary of \$48.90 for a GS 13 Step 5, which is the mid-range salary for this position multiplied by the FAA fringe benefit salary multiplier⁸ of 1.3625 to yield the fully burdened rate of **\$66.63**.

⁵ U.S. DOL/BLS: <https://www.bls.gov/oes/current/oes493011.htm>

⁶ U.S. DOL/BLS: <https://www.bls.gov/oes/current/oes499099.htm>

⁷ <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/19Tables/html/RUS.aspx>

⁸ <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2008/m08-13.pdf>

Once an FAA office determines a need for a designee, an ASI will review the application information provided in DMS. Applicants are interviewed to further determine their eligibility and qualifications to be appointed a designated representative of the FAA Administrator.

- The FAA estimates that approximately **20** individuals are appointed as designees (includes all types) each year. For each designee appointed, it is estimated that an average of 2 other applicants had their information reviewed to determine eligibility and qualifications; therefore the number of applications reviewed, on average, is **3** applicants for each designee appointment.
- **20** Designee appointments x **3** applicants per appointment = **60** information reviews.
- It is estimated that an ASI spends **3** hours evaluating each applicant's information to determine eligibility for appointment of a particular designation.

60 Reviews x **3** hours of ASI time x **\$66.63**/hour = **\$ 71,960.00**

This burden estimate has changed (lowered) from the previous burden due to a change in FAA internal processes for appointing and renewing designees.

- Previously, the National Examiner Board reviewed each application. Now, applications are only reviewed at the local Flight Standards office level when the office determines a need for a new designee.
- Time spent reviewing applications by the local office has increased since there is no longer National Examiner Board review.
- Renewals are no longer a burden to the FAA. Renewals of designations are no longer required, and therefore are no longer a burden for designees to maintain their designation, or for FAA to review.

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

1. Time burden has decreased from previous burden due to the following:
 - Designee renewals are no longer conducted. Renewals of designations are not required by regulation and therefore the FAA no longer specifies renewal timeframes and criteria. Renewal burden is no longer included in this ICR.
Note: Current data for the number of designee applicants (respondents) has increased significantly from the last report. This increase in applicants cancelled out some of the time burden that was removed as a result of no time spent doing renewals.
2. The cost burden has increased from the previous reported burden due to the following:
 - The wages used to estimate cost burden have been updated to reflect a more accurate estimate of wages for all expected respondents.
 - Current data for the number of designee applicants (respondents) has increased significantly from the last report.
3. The estimated annual cost to the Federal Government has increased due to the following:
 - Updated data has been used for a more accurate estimate of current ASI wages and time spent in reviewing applicant information.
 - Previously, the National Examiner Board (NEB) reviewed each application. Now, applications are only reviewed when a local FAA office determines a need for a designee, and application reviews are done by that office. Therefore, less applications are reviewed each year, but time spent reviewing applications by the appropriate FAA office has increased slightly.

4. The Designee Management System (DMS) is introduced as a new web-based information collection tool being created to replace the paper forms currently used to collect information for certain types of designee applicants.
- DMS has replaced the use of the previously approved paper forms:
 - o FAA Form 8110-28, Application and Statement of Qualification (DME/DPRE/DAR-T)
 - o FAA Form 8710-10, National Examiner Board Designated Pilot Examiner Candidate Application.
 - The following paper forms are still used within this collection until such time as these designee types are included in DMS:
 - o FAA Form 8110-14, Statement of Qualification. Used for DER applicants.
 - o FAA Form 8710-6, Examiner Designation and Qualification Record. Used for Air Carrier DPE applicants.
- Note:** A revision of this ICR will be submitted for OMB approval PRIOR to the remaining designee types being incorporated into DMS and the paper forms being removed from the collection.

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 are no plans to publish this information for statistical or other purposes.

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.

FAA is not seeking such approval.

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

No exception to the certification statement of OMB Form 83-I is requested.