

**Supporting Statement A**  
**Reduction of Fuel Tank Flammability on Transport Category Airplanes**  
**OMB Control Number 2120-0710**

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

The collection requires design approval holders (DAH) to conduct a flammability analysis and develop means to reduce the flammability of certain high flammability fuel tanks on large turbine-powered transport category airplanes manufactured by Boeing and Airbus. Manufacturers of auxiliary fuel tanks are also required to conduct a flammability assessment as well as develop design changes if their supplemental type certificate auxiliary fuel tank adversely impacts the performance of any flammability means installed by Boeing or Airbus. In addition, this collection requires operators of the affected airplanes put into service after 1992 with high flammability exposure fuel tanks, to incorporate fuel tank flammability reduction means.

DAH who provide a flammability reduction means on transport category airplanes are required to provide a report to the FAA that contains reliability data for the flammability reduction means (FRM). The FAA is extending the semi-annual reporting requirement. Continued reporting is necessary because the safety of the fleet depends upon the reliability of the FRM and if the reliability does not meet that predicted at the time the system is certified, airworthiness directives may be needed. Note, there is no specific reporting requirement for operators because the data would be obtained through normal business agreements between the operators and the manufacturers. Operators and the manufacturers already have agreements to gather data, such as warranty claims and engine and airplane reliability submitted to the DAH for extended twin operations.

This collection of information supports the Department of Transportation's strategic goal of safety.

**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.**

Design approval holders voluntarily use the flammability analysis documentation to demonstrate to their FAA Oversight Office that they are compliant with regulations by submitting semi-annual reports detailing component failures discovered during scheduled or unscheduled maintenance. The FAA safety oversight offices will use the collected data to determine if mandatory action should be initiated to correct any unsafe conditions resulting from poor reliability of the flammability reduction means (FRM) and the resulting increased flammability of the fuel tanks on transport category airplanes. High flammability fuel tanks are susceptible to catastrophic fuel tank explosions. Maintaining fuel tank FRM reliability results in the safety level intended by the adopted regulatory requirements for installation of FRM

**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.**

Design approval holders (DAH) receive reliability data from operators through electronic means. The FAA accepts electronic submissions of the required reports from the DAH. 100% may be submitted electronically. In addition, the FAA has issued approvals of FRM components manufactured by suppliers of parts to airlines. Since these parts are used in the FRM the FAA also requires reliability reporting from these suppliers as a condition of the approvals. These reports make up a small portion of the overall reliability reporting and the reports have been collected through electronic means.

**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 unique documents are developed by design approval holders to comply with this collection. There is no evidence of duplication as this information is not currently available elsewhere.

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

This collection will not involve small business or 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.**

If the collection was not conducted or was conducted less frequently, then it would be impossible for the FAA to monitor compliance with the reliability requirements of the rule and possibly mandate safety improvements if the system reliability drops below that required by the regulation.

**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.*

Explain the need for any inconsistencies in your collection.

None.

**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 18, 2019 (84 FR 49174), 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.**

Not applicable.

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

Respondents are not given 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 collection results in an annual recordkeeping and reporting burden of approximately 1,800 hours. This burden is based on five (5) design approval holders and four (4) parts suppliers (parts manufacturer approval holders) submitting 18 total reports per year requiring an average of 100 hours to complete each report.

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
<b># of Respondents</b>	9	0	0
<b># of Responses per respondent</b>	2	0	0
<b>Time per Response</b>	100	0	0
<b>Total # of responses</b>	18	0	0
<b>Total burden (hours)</b>	1,800	0	0

The total annual cost burden is \$142,434.00. The FAA multiplied the fully-burdened wage rate for aerospace engineers of \$79.13 by the annual burden of 1,800 hours.

	<b>Median</b>	<b>Benefits</b>	<b>Fully-</b>
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	hourly wage	factor	burdened wage rate
Aerospace Engineers	\$55.39	1.429	\$79.13

Notes: 1. Median hourly wages are from the BLS May 2018 National Occupational Employment & Wage Estimates United States, [www.bls.gov/oes/current/oes.nat.htm](http://www.bls.gov/oes/current/oes.nat.htm)

2. The benefits factor is from the BLS News Release, March 19, 2019, Employer Costs for Employee Compensation--December 2018, p. 2, Table A, Private industry column.

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

No other cost than labor as indicated 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.**

There are no additional costs incurred by the government for this collection. The design approval holders routinely submit information to the FAA; review of the information is part of the FAA's existing oversight responsibilities.

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

The FAA has received reports of premature failure of components on some airplane models resulting in the need to continue the reporting requirement. However, the number of reporting-burden hours has decreased since the previous submission. The previous reporting burden was based on 5 design approval holders submitting 40 total reports per year requiring an average of 100 hours to complete each report. There are currently five design approval holders and four parts manufacturer approval holders that are subject to the reporting requirements. The necessary reporting intervals are twice per year and are based on reliability data submitted from the initial introduction to service of the FRM. The current burden is based on 9 approval holders submitting 18 total reports per year, requiring an average of 100 hours to complete each report. The use and acceptance of electronic reports is now 100 percent.

**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.**

Not applicable. The FAA will not publish the information collected.

**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.**

Approval to not display the expiration date is not requested.

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

There are no exceptions.