Supporting Statement A 2120-0045

Bird/Other Wildlife Strike Report

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

Since 1970, the Federal Aviation Administration (FAA) Administrator has had authority to issue airport-operating certificates to airports receiving certain air carriers and to establish minimum safety standards for the operation of those airports. This authority is currently found in Section 44706, Airport operating certificates, of Title 49, United States Code, Public Law 103-272, 109 Stat. 745 (July 5, 1994). The FAA has used this authority to issue requirements for the certification and operation of certain land airports. These requirements are contained in Title 14 Code of Federal Regulations, Part 139 (14 CFR 139), Certification of Airports, as amended.

An area of considerable concern involving aviation safety in the airport environment is the catastrophic damage that aircraft-wildlife collisions can cause. FAA Form 5200-7 (Bird/Other Wildlife Strike Report) is used by the aviation public to report technical and repair costs data on accidents/incidents resulting from collisions between aircraft and wildlife. Data collected on FAA Form 5200-7 is necessary to monitor compliance with 14 CFR 139.337 – Wildlife Hazard Management. Additionally, the FAA uses the data on how wildlife activities affecting aviation to improve present aircraft and engine airworthiness standards and to provide helpful guidance on wildlife mitigation.

The International Civil Aviation Organization (ICAO) has made it a standard for member states to establish procedures for recording and reporting bird strikes and forwarding those reports to ICAO for inclusion in the ICAO Bird Strike Information System (IBIS) database (Annex 14, to the Convention on International Civil Aviation, § 9.4.1.a and 9.4.2).

This collection 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.

The foundation to our understanding of wildlife hazards to aviation lies in the quantity and quality of strike data within the National Wildlife Strike Database (NWSD). The database extends from 1990 - 2020 and is a collaborative effort begun in 1995 between the FAA and the USDA. Although the quantity of strikes reported each year over three decades has grown significantly, the quality assurance provided by the USDA is the keystone allowing the NWSD to be invaluable throughout the aviation industry. Pilots, airports, and others involved in wildlife strikes report strike data voluntarily on an as needed basis.

The data collection is used by the FAA, USDA Wildlife Service, airports, engine and airframe manufacturers, ICAO and foreign countries to develop standards to address bird and other wildlife hazards to aircraft and injury to personnel and to develop wildlife habitat control methods on or adjacent to airports. Using wildlife strike reports, the FAA can determine the hazard level of species struck, track national trends, and provide a scientific foundation for regulatory guidance concerning mitigation of risks from wildlife strikes. Airports and wildlife biologists use the data to identify and mitigate hazardous species, to identify strike dynamics and attractants,

and to evaluate the effectiveness of their wildlife management programs. Engine and airframe manufacturers use the data to evaluate the effectiveness of aircraft components.

A wildlife strike report must include the incident date and time but can also include information about the airport, aircraft, aircraft operator, environmental conditions, damage, costs, effect on flight, wildlife involved, and incident reporter. Reporters can also attach photographs of damage and wildlife involved. The data elements collected help the FAA and partner organizations identify trends in wildlife strikes and their impact on U.S. aviation. Incident reporter contact information is collected for internal use only to contact reporters if more details about an incident are needed and to help identify potential duplicate reports.

The information collected is authenticated and stored electronically in the FAA National Wildlife Strike Database (https://wildlife.faa.gov/home). This database is accessible to international, national, state, and local governments and both public and private organizations and individuals for use in addressing the wildlife aircraft strike issue.

The FAA Wildlife Hazard Program, managed by the Office of Airports and the Airport Technology Research & Development Branch, will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with FAA standards for confidentiality, privacy, and electronic information. See response to Question 10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines.

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.

In accordance with the Government Paperwork Elimination Act, the FAA automated submission of the data in this collection in 2001. Since then, the percentage of reports filed electronically has increased from 0.4 percent in 2001 to 96 percent in 2018. Web submission is available at https://wildlife.faa.gov/home.

In addition, the FAA developed mobile application software to allow strike reporting from a smart phone. An extension to the mobile application software also placed a Quick Response (QR) Code for smart phones on the bottom of the 2011 "Report Wildlife Strikes" poster, which allows anyone to report a wildlife strike via the web or their personal data devices. As a result, electronic filings have dramatically increased every year.

We also continue to provide a fillable PDF at https://www.faa.gov/forms/ for those who prefer a more traditional format.

Results of the information collection, once reviewed and redacted to remove reporters' names and titles, are available online at https://wildlife.faa.gov/home and published in various wildlife reports, including Some Significant Wildlife Strikes to Civil Aircraft in the United States and Wildlife Strikes to Civil Aircraft in the United States.

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 information recorded and submitted under the Wildlife Aircraft Strike Hazard Reduction Program is unique to the purpose and not duplicated elsewhere. The FAA Wildlife Strike

Database is the authoritative U.S. source for this data. Data is shared with several other international, federal, and state agencies such as the International Civil Aviation Organization; the U.S. Department of Agriculture – Wildlife Services, U.S. Department of Defense–US Air Force, the U.S. Fish and Wildlife Service, Transport Canada, Central Science Laboratory, U.K., various state aviation authorities and state wildlife management authorities, as well as private industry to eliminate redundancy.

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

This information collection has been designed to minimize the burden on all respondents. Reporting is voluntary, and reporters can report as little or as much information as they are willing and capable of providing. Further, we have worked to provide several means of reporting to make the process as easy as possible for the maximum number of reporters.

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.

The collection is conducted as required when an incident occurs. Reduction in collection would degrade the statistical use of the data and therefore degrade safety.

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

There are no special circumstances.

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 November 25, 2019 (84 FR 64948) to solicit public comment. We received two comments, which we have included with the ICR. Neither comment requested any changes to the collection; instead, they offered support for its continuation.

The FAA consults with ICAO, the Bird Strike Committee–USA, Bird Strike Association–Canada, the World Birdstrike Association and 13 other international bird strike committees about the types and quantity of data required to maintain safety standards. In addition, the need for data is coordinated with the U. S. Department of Agriculture –Wildlife Services, US DoD (U.S. Air Force, and U.S. Navy), the U.S. Fish and Wildlife Service, various state aviation authorities and state wildlife management authorities, and local governments as well as both public and private organizations and individuals.

FAA form 150-5200-7, *Bird/Other Wildlife Strike Report*, is modeled on ICAO's *Bird Strike Reporting Form* and *Supplemental Bird Strike Reporting Form* and was coordinated with industry and government users.

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

The FAA does not provide payments or gifts to respondents.

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

The FAA offers 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 sensitive questions.

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

The average number of reports submitted to the FAA via the online and printed PDF versions of Form 5200-7 was approximately 11,475 annually in 2018, a slight increase over the 11,223 reports made via these methods when the collection was last renewed in 2017. Once the 1,492 reports from Federal Air Traffic Controllers, reported in item 14 below, are removed, the total reports by the public using Form 5200-7 falls to 10,031.

The amount of time to complete the requested information is estimated at 5 minutes. Because reporting is voluntary, there is no requirement for the person filing the report to provide all of the information requested in the form. Reporters are requested to provide only that information readily available to them.

10,031 X 5.0 minutes = 50,155 minutes = 836 hours (rounded)

The hourly cost to the respondents is estimated to be \$766,270.

This is based on the mean hourly wage of the three most common types of non-federal respondents: Airport Operations Specialists (67%), Pilots (15%), and Air Transportation Operators (5%). (Federal tower personal comprised 13% of respondents and are included in item 14 below.)

1. Airfield Operations Specialist¹ at \$27 (rounded), multiplied by 2 to account for benefits plus other overhead costs such as rent, utilities, and office equipment²: (\$27 x 2) X 7,688 = \$415,152

¹ Occupation 53-2022, BLS Occupational Employment Statistics for Transportation, 2018. See https://www.bls.gov/oes/current/oes532022.htm

² U.S. Department of Health and Human Services, Guidelines for Regulatory Impact Analysis, Table 4.2, Constructing Default Estimates of the Value of Time, 2016. See https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf.

- 2. Pilot³ at \$85 (rounded), multiplied by 2 to account for benefits plus other overhead costs such as rent, utilities, and office equipment⁴: (\$85 x 2) X 1,721 = \$292,570
- 3. Air Transport Operator⁵ at \$51 (rounded), multiplied by 2 to account for benefits plus other overhead costs such as rent, utilities, and office equipment⁶: $($51 \times 2) \times 574 = $58,548$

Summary (Annual numbers)	Reporting	Recordkeeping
IC 1 (electronic submission)		
# of Respondents	9,631	
# of Responses per respondent	1	
Time per Response	5 min.	
IC 2 (PDF form)		
# of Respondents	400	
# of Responses per respondent	1	
Time per Response	5 min.	

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

Approximately 400 print reports were received in 2018. Printed versions, available as a fillable PDF from the FAA website or in paper form at the end of FAA Advisory Circular 150/5200-32B, *Reporting Wildlife Aircraft Strikes*, and from the appropriate Airports District Offices (ADO), Flight Standards District Offices (FSDO), Flight Service Stations (FSS), or Airman's Information Manual (AIM), are pre-addressed to the FAA. As no postage is needed if the form is mailed in the United States, the estimated cost to mail the form is \$0.

³ Occupation 53-2011, BLS Occupational Employment Statistics for Transportation, 2018. See https://www.bls.gov/oes/current/oes532011.htm. BLS does not provide a mean hourly wage for this occupation. Wage provided above was calculated by dividing the mean annual wage by 2000 hours (50 weeks at 40 hours per week).

⁴ U.S. Department of Health and Human Services, Guidelines for Regulatory Impact Analysis, Table 4.2, Constructing Default Estimates of the Value of Time, 2016. See https://aspe.hhs.gov/system/files/pdf/242926/HHS RIAGuidance.pdf.

⁵ Occupation 53-2000, BLS Occupational Employment Statistics for Transportation, 2018. See https://www.bls.gov/oes/current/oes_nat.htm#53-0000. BLS does not provide a mean hourly wage for this occupation. Wage provided above was calculated by dividing the mean annual wage by 2000 hours (50 weeks at 40 hours per week).

⁶ U.S. Department of Health and Human Services, Guidelines for Regulatory Impact Analysis, Table 4.2, Constructing Default Estimates of the Value of Time, 2016. See https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf.

Bird strike identification using feathers, DNA, or other body parts or materials from birds involved in bird-aircraft strikes is provided free-of-charge to all U.S. airport operators, all U.S. aircraft owners/operators (regardless of where the strike happened), and to any foreign air carrier if the strike occurred at a U.S. airport. All specimens are mailed to the Smithsonian Institution's Feather Identification Laboratory (FIL). The Smithsonian received 4,682 civilian aviation bird strike identification packages in 2018. Packages of snarge and Form 5200-7 were shipped via regular mail at .55 cents postage for a total cost of \$2,575.

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 total estimated annualized cost to the Federal government is \$1,310,871, which includes personnel costs, contract costs, and prepaid mailing costs.

Personnel Costs

The average annual personnel cost of FAA staff involved in this collection is \$72,071.

- 2 Wildlife Biologists (0486, Wildlife Biology series) who spend an average of 100 hours annually working on this collection. These duties include reviewing 5200-7 forms, ensuring 5200-7 forms plus snarge samples are delivered to the Smithsonian FIL, contacting airports and other submitters to quality check data, running analyses on the NWSD, and writing and reviewing the annual strike report. The average hourly pay for wildlife biologists is \$41 (rounded), multiplied by 2 to account for benefits plus other overhead costs such as rent, utilities, and office equipment, for a fully-loaded hourly wage of \$82. The cost of the Wildlife Biologists participation in this collection is (100 hours x \$82) x 2 or \$16,400.
- Air Traffic Controllers (2152, Air Traffic Control series) are responsible for 13 percent of all reports to this collection (1,492 reports). The average hourly pay for air traffic controllers is \$ 59 (rounded), multiplied by 2 to account for benefits plus other overhead costs such as rent, utilities, and office equipment, for a fully-loaded hourly wage of \$118. The cost of Air Traffic Controller reporting annually is \$14,671.
 - o [1,492 reports x 5 minutes (burden per report)]/60 x \$118 = \$14,671 (rounded)
- One Airport Safety Specialist (1825, Aviation Safety series) who spends an average of 500 hours annually working on this collection. Duties assigned to this position include managing the Interagency Agreements between the FAA and the USDA, the Smithsonian FIL and GDIT as well as all duties connected to Form 5200-7 and the NWSD, managing web site modifications and issues, being the FAA POC for the NWSD and the web site and implementing new database systems for strike reporting. The average hourly pay for airport safety specialists is \$41 (rounded), multiplied by 2 to account for benefits plus other overhead costs such as rent, utilities, and office equipment, for a fully-loaded hourly wage of \$82. The cost of the Airport Safety Specialist's participation in this collection is (500 hours x \$82) or \$41,000.

Mailing Costs

The average annual cost of pre-paid postage (Business Reply Mail First Class) for print forms returned by U.S. First Class mail, based on 2018 data, is \$.55 cents first class mail + \$.85 per individual mailer. There is also a \$240 annual fee for the permit⁷. The total annual mailing costs equals $$240 + [400 \text{ (pre-paid mailers)} \times $1.40] = $800.$

Contract Costs

The average annual contract costs, based on 2018 data, is \$1,238,000.

Through an Interagency Agreement, the FAA has contracted with the U.S. Department of Agriculture - Wildlife Services, National Wildlife Research Center, to edit all strike reports (FAA Form 5200-7) sent to the FAA since 1990 to 1) ensure consistent, error-free data; 2) enter all edited strike reports since 1990 in the FAA National Wildlife Strike Database; 3) supplement FAA-reported strikes with additional, non-duplicated strike reports from other sources; 4) provide FAA with an updated computer file each quarter containing all edited strike reports; and 5) assist the FAA with the production of annual reports summarizing the results of the analyses. The annual cost of this contract is \$525,000.

The information collected is authenticated and stored electronically on the FAA National Wildlife Strike Database. On a controlled basis, this database is accessible to international, national, state, and local governments and both public and private organizations and individuals for use in addressing the wildlife aircraft strike issue. The General Dynamics Information Technology (GDIT) contract includes provisions for an Updated Graphical User Interface (GUI), a redesigned database that provides backend support for the website, and data centralization (the use of a single-point database and stored procedures internal to the database allows it to operate most efficiently when storing and retrieving data, which improves the performance for all users). The single-point database also ensures the highest level of data integrity is maintained. GDIT also provides identification of potential duplicate strikes as well as rapid data review and turn-around. The annual cost of this contract is \$400,000.

Through an Interagency Agreement between the FAA and the Smithsonian Institution, the Smithsonian provides identification of wildlife strike remains for any USA registered aircraft owner/operator, regardless of where the strike occurred, or to any air carrier, if the strike occurred at a USA airport. There is no charge to the respondent for this service. The annual cost of this contract is \$313,000.

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

In the previous submissions FAA counted responses from federally employed air traffic controllers among the general public responses. However this submission more correctly counts the number of responses submitted by federal Air Traffic Controllers and the associated burden, toward the Cost to Federal Government. This is not a change to the collection but a correction in the way we are reporting data submitted by this group of federal employees. We have also included the labor cost to the public of submitting wildlife remains for identification. The agency has separated collection activity into appropriate information collections; there have been no additional forms or applications added.

⁷ Business Reply Mail First Class Permit No. 12438, Washington D.C.

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 data is analyzed to:

- 1. identify trends in wildlife strike incidents;
- 2. identify airports with wildlife control problems;
- 3. evaluate the efficacy of airframe and engine manufacturer components;
- 4. monitor the effectiveness of wildlife strike control problems;
- 5. determine the economic cost of wildlife strikes;
- 6. determine the magnitude of safety issues;
- 7. and most importantly, determine the nature of the problems (e.g., wildlife species, aircraft and engine types, airports, seasonality) so that corrective actions can be taken.

Results of the information collection, once reviewed and redacted to remove reporters' names and titles, are available online at https://wildlife.faa.gov/home and published in annual wildlife reports, including Some Significant Wildlife Strikes to Civil Aircraft in the United States (last published in September 2019) and Wildlife Strikes to Civil Aircraft in the United States (last published in July 2019). The reports are available online at https://www.faa.gov/airports/airport_safety/wildlife/.

Because of the nature of the problem, there are no plans to discontinue collection, analysis, and publication of the data.

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 does not request an exemption from placing the expiration date on FAA Form 5200-7.

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

There are no exceptions.