

Supporting Statement A
OMB 2120-0042
Aircraft Registration

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

This information collection supports the Department of Transportation's strategic goals on safety and security. Maintaining proper registration of aircraft is fundamental to ensure compliance with operations/airworthiness safety requirements in order to promote the public health and safety by working toward the elimination of transportation-related deaths, injuries, and property damage. Proper registration of aircraft is necessary to advance the nations vital security interest in support of national strategies by ensuring that the national transportation system is secure.

The registration system provides identification of all civil aircraft in the United States. The registration record also provides evidence of ownership which may be used in court if there is an ownership controversy. The form of registration certificate and the basic rules concerning aircraft identification marks are prescribed by Annex 7 to the Convention of International Civil Aviation, which the United States has signed, and which has the force of law. Public Law 103-272 states that all aircraft must be registered before they may be flown. It sets forth registration eligibility requirements, provides for application for registration as well as suspension and/or revocation of registration, and recordation of conveyances, leases, and security instruments.

14 CFR Parts 47 and 49 prescribe procedures that implement Public Law 103-272. DOT/FAA – 801; Aviation Registration Records, System of Records Notice (SORN) prescribes policies and practices for storing, retrieving, accessing, retaining, and disposing of records in the registration 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.

This collection is mandatory for any person or entity wishing to register an aircraft. The information is collected and used by the FAA Aircraft Registration Branch (Aircraft Registry) to: 1) maintain documentation of aircraft ownership; 2) register aircraft and issue a registration certificate and; 3) record conveyances affecting an interest in aircraft. Bi-annual reporting of U.S. Flight Hours is also collected from corporations not U.S. citizens to monitor compliance with 14 CFR 47.9.

Evidence of ownership information is collected utilizing the: 1) AC Form 8050-2, Aircraft Bill of Sale; 2) AC Form 8050-88, Affidavit of Ownership for Amateur-Built and Other Non-Type Certificated Aircraft; 3) AC Form 8050-88A, Affidavit of Ownership for Light-Sport Aircraft and; 4) AC Form 8050-4, Certificate of Repossession of Encumbered Aircraft. These forms, though their use is not required, are available to use as evidence

of ownership to accompany the AC Form 8050-1, Aircraft Registration Application, which must be used for the initial registration when ownership of an aircraft transfers from one entity to another. The AC Form 8050-1B Registration Renewal Application is used for the stated purpose (renewal) every three years following notification to the aircraft owner that their aircraft's registration is eligible for renewal. If the registration expires, the owner must use the AC Form 8050-1 to apply for reinstatement and may not operate the aircraft until the reinstated registration is accomplished. The AC Form 8050-98, Aircraft Security Agreement may be used by secured parties to record any financial encumbrances against an aircraft and eligible engines, propellers, and spare part locations.

The AC Form 8050-117, Flight Hours for Corporations Not U. S. Citizens, is used as bi-annual notification and is then returned with report data from corporations not U.S. citizens for compliance with 14 CFR 47.9 which requires that at least 60% of the aircraft's flight hours be in U.S. airspace.

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.

The current official file for the Aircraft Registry is an electronic based record system. This applies to maintenance of the records and does not affect the collection of information, which must come from each individual aircraft owner or secured party. We are currently accepting any digitally signed documents through an electronic submission email portal. The documents still have to be printed and electronically scanned into a work packet for examination.

The Aircraft Registry is making great strides towards a fully automated online aircraft registration and recordation system. The new system will allow aircraft registrants and security holders to create an account associated with an aircraft record. This will allow them to fill in their information electronically and upload any forms or supporting information right from their computer. The new system will allow access to other entities depending on the role they play and the information needed. The Aircraft Registry is currently in the Request for Information (RFI) stage in order to choose a vendor for development. The projected implementation is by the end of 2021.

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.

There is only one Aircraft Registry. There is no duplication of records or record-keeping.

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

We have reduced the burden on all respondents to the minimum amount necessary to register an aircraft and/or record a security interest. The procedures and information required are the same for all respondents.

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.

As identified in 14 CFR Parts 47 and 49, collection occurs when: an aircraft changes ownership; registered owner's address changes; or a security interest is granted. Collection of flight hour data for each aircraft owned by corporations that are not U.S. citizens occurs every 6 months. Non-compliance with public law is a consequence of not collecting the information.

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.*

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 60-day Federal Register Notice published on January 15, 2020 (85 FR 2481) soliciting public comments. There was one comment submitted by Aircraft Owners and Pilots Association (AOPA). AOPA made five recommendations. The recommendations are listed below as well as the FAA's comments.

- I. The FAA should consolidate and streamline access to form guidance and ancillary forms.** I reviewed the comment and I don't know if it's reasonable for us to not agree to make the internet resources more straightforward.
- II. The FAA should not limit access to online re-registration code to a single postal mailing.** The registration renewal security code is issued by the FAA Aircraft Registry on the initial renewal notice. The security code is a randomly generated code shown on the first notice. All three notices sent by the FAA are computer generated and due to system limitations cannot be modified to regenerate the security code on each notice. If for any reason the registrant needs the code they can contact the Registry by phone or email to obtain it. We will update our guidance to ensure that it accurately reflects this. AOPA suggests the FAA email the code to the owner. The FAA Aircraft Registry does not collect emails.
- III. The FAA Bill of Sale, AC Form 8050-2, collects more information than necessary and should warn users that a Durable Power of Attorney that is valid at the state level might be rejected by FAA.** AOPA specifically states the portion of the bill of sale which allows the owner to show a sales price is not necessary since it is not required. That option is available to the owner if they choose to fill it out as some state laws require this information. It is there as a convenience to give the owner a space to put the purchase price if needed. The owner may choose to leave this portion of the bill of sale blank. The FAA does not require that portion to be completed. AOPA also mentions the need for more information on the bill of sale that applies to the use of a Power of Attorney when someone is signing the bill of sale on behalf of the owner. The information aid that is currently on the FAA website has the information needed to assist with this. AOPA suggests the FAA use emails instead of letters to request further information from aircraft owners. The FAA Aircraft Registry does not collect emails.
- IV. The FAA is doing a good job collecting flight hours information from "Corporations not U.S. Citizens".** AOPA suggest the FAA use emails to send out the fillable form and allow the owner to respond in the same manner. The FAA Aircraft Registry does not collect emails.

- V. The FAA should refrain from revising subject documents during the comment period.** Before the FRN was published, the FAA was in the process of adding numbers to the blocks on the AC Form 8050-1 form to aid FAA Examiners when an application needed to be returned. The numbering does not affect the information being collected or completed by the applicant.

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

No payments or gifts were provided.

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

We do not assure confidentiality as all information collected is public information.

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.

No information of a sensitive nature is requested nor required to register an aircraft.

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.**

The AC Form 8050-1 and AC Form 8050-1B are the only required forms to be used by respondents. The public may report a transfer of ownership via any viable instrument. Lenders may report their interest in an aircraft via their own security agreement. Non-

US citizen corporations may report their US/Non-US flight hours with the AC Form 8050-117 or by other means such as a written statement, as long as the information is reported according to regulations.

However, on the assumption that the public makes full use of the forms the Aircraft Registry provides for the required purposes, and based on workload statistics from FY 2019, the table below provides estimates of the annual number of responses received for each of the reporting and recording requirements set forth in 14 CFR Parts 47 and 49.

When calculating the number of respondents, the Aircraft Registry considers a number of the responses to be re-filed documents rejected for correction. The Aircraft Registry rejected 93,760 documents in FY-19. Therefore, the number of respondents reported is calculated as 267,830 responses minus 93,760 rejections, which equals approximately 174,070 respondents.

Form/Document Group	Responses	Average Time in Hours	Total Hours
Evidence of Ownership Documents AC Form 8050-2 AC Form 8050-4 AC Form 8050-88 AC Form 8050-88A	86,103	0.5	43,052
Application for Registration AC Form 8050-1	74,443	0.5	37,222
Application for Renewal (Electronic) AC Form 8050-1B	55,919	0.5	27,960
Application for Renewal (Paper) AC Form 8050-1B	20,053	0.5	10,026
Security Agreement AC Form 8050-98	29,952	0.75	22,464
Flight Hour Report AC Form 8050-117	1360	0.5	680
			141,404

Evidence of Ownership Documents (-2, -4, -88 & -88A)

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	86,103		
# of Responses per respondent	1		
Time per Response	0.5		

Total # of responses	86,103		
Total burden (hours)	43,052		

Application for Registration (-1)

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	74,443		
# of Responses per respondent	1		
Time per Response	0.5		
Total # of responses	74,443		
Total burden (hours)	37,222		

Application for Renewal (-1B electronic)

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	55,919		
# of Responses per respondent	1		
Time per Response	0.5		
Total # of responses	55,919		
Total burden (hours)	27,960		

Application for Renewal (-1B paper)

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	20,053		
# of Responses per respondent	1		
Time per Response	0.5		
Total # of responses	20,053		

Total burden (hours)	10,026		
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Security Agreement (-98)

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	29,952		
# of Responses per respondent	1		
Time per Response	0.75		
Total # of responses	29,952		
Total burden (hours)	22,464		

Flight Hour Report (-117)

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	1360		
# of Responses per respondent	1		
Time per Response	0.5		
Total # of responses	1360		
Total burden (hours)	680		

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

Entities that submit documents/forms to the Registry come from a very broad spectrum. The range is a scale from a rural owner of a powered parachute to a corporate attorney with a Forbes company that owns a multi-million dollar Hawker. As a result, we have used a title search clerk/legal assistant wage of \$25 per hour x 141,404 hours' time (indicated above) for completing necessary forms for compliance with regulations for our calculation. We estimate the annual total preparation costs to the respondents to be \$3,535,100.

Additional costs for postage are shown in the table below in accordance with the following.

- Evidence of Ownership may be mailed alone as evidenced by the larger quantity indicated by the table entry in question.
- Initial submittal of the Application for Registration must always be accompanied by an Evidence of Ownership document.
- Security Agreements normally accompany a Bill of Sale (Evidence of Ownership) and typically significantly increases weight/cost.
- The Flight Hours Report is mailed alone and not filed with the other documents.

Packet Type	Responses	Cost	Total
Ownership, Application & Security Agreement	29,952	\$1.64	\$49,121.28
Ownership & Application	56,151	\$0.55	\$30,883.05
Ownership Only	11,660	\$0.55	\$6,413.00
Renewal Application	20,053	\$0.55	\$11,029.15
Flight Hours Report	1,360	\$0.55	\$748.00
		Total	\$98,194.48

The total annual cost burden to all respondents is estimated at \$3,633,294.48.

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.

Operational expenses, such as equipment, overhead, printing, computer, maintenance, and support staff and any other expense that would not have been accrued without this collection of information are not included in any cost estimates for this collection. Agencies also may aggregate cost estimates from items 12, 13, and 14 in a single table.

Based on workload statistics from FY 2019, the chart below shows a breakout of processing time in hours for both Legal Instruments Examiner (\$27.14 per hour) and contractor (\$20.38 per hour), and related mailing costs (@ \$.55) for distribution of some of the forms in this collection. All forms, except the -117, are available in electronic format online, but must be printed and submitted via USPS or other courier.

Form/Document Group		Evidence of Ownership Documents	Application for Registration	Application for Renewal (Electronic)	Application for Renewal (Paper)	Security Agreement	Flight Hours Report
Counts	Mailed Out	0	0	0	0	0	1,707
	Incoming	86,103	74,443	55,919	20,053	29,952	1,360
Time	Fed	43,052	37,222	0	5,013	14,976	570

in Hours	Contractor	28,701	24,814	0	6684	9,984	12
Cost In \$	Fed	\$1,168,431	\$1,010,205	\$0	\$136,052	\$406,449	\$15,470
	Contractor	\$584,926	\$505,709	\$0	\$136,220	\$203,474	\$245
	Mail	\$0	\$0	\$0	\$0	\$0	\$0
	Total	\$1,753,357	\$1,515,914	\$0	\$272,272	\$609,923	\$15,715
						Total	\$4,167,181

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

The burden is based on customer submissions which fluctuates up or down from year to year. FY19 saw an increase in ownership, application and security agreement packets and ownership and application packets. There was a decrease in ownership alone packets. Renewal application submissions increased due to the number of registrations increasing. Flight hour reports decreased due to less non-citizen corporations registering aircraft and de-registering or transferring aircraft already registered.

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.

No publication is planned for this information.

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.

There are no issues with displaying the expiration date for OMB approval.

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

There are no exceptions.