

**INFORMATION COLLECTION SUPPORTING STATEMENT**  
**Revision of a Currently Approved Collection for**  
**Safe Disposition of Life-Limited Aircraft Parts**  
**2120-0665**

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information. (Annotate the CFR parts/sections affected).**

The FAA has found life-limited parts that exceeded their operating limitations installed on aircraft through accident investigations, Suspected Unapproved Parts reports and routine surveillance activities. Although such installation of life-limited parts violates existing FAA regulations, concerns have arisen regarding the disposition of these life-limited parts when they have reached their life limits.

Concerns over the use of life-limited aircraft parts led Congress to pass a law requiring the safe disposition of these parts. The Wendell H. Ford Investment and Reform Act for the 21st Century (Public Law 106-181), added section 44725 to Title 49, United States Code.

49 U.S.C. §40113. Administrative section (a) General Authority; empowers the Administrator of the Federal Aviation Administration to issue such regulations as he/she shall deem necessary to carry out the provisions of the Act.

49 U.S.C. §44725. Life-Limited Aircraft Parts; was enacted as part of the Wendell H. Ford Investment and Reform Act for the 21st Century (Public Law 106-181) over concerns with the use of life-limited aircraft parts that led Congress to pass a law requiring the safe disposition of these parts.

This data collection applies to maintenance providers authorized to perform maintenance, preventive maintenance, rebuilding, and alterations in accordance with 14 CFR Part 43.3. This section includes certificated mechanics, certificated repairman; pilots certificated under 14 CFR Part 61, repair stations, air carriers certificated under 14 CFR Parts 121 and 135 with approved maintenance programs and manufacturers performing inspections or alterations for operators conducting operations in accordance with 14 CFR Parts 91 and 125.

The type design of an aircraft, aircraft engine, or propeller includes the Instructions for Continued Airworthiness (ICA), which includes the Airworthiness Limitations that describe life limits for parts installed on the product. See, for instance, 14 CFR 21.3(c) and 21.50.

In order for an aviation product to comply with its type design, the life-limited parts installed on it must fall within the acceptable ranges described in the Airworthiness Limitations section of the Instructions for Continued Airworthiness. For this reason, installation of a life-limited part after the mandatory replacement time has been reached would be a violation of the maintenance regulations. Section 43.13(b) requires that maintenance work be completed so that the product worked on “will be at least equal to its original or properly altered condition. The product is not at least equal to its original or properly altered condition if a life-limited part has reached or exceeded its life limit. Existing regulations require that specific markings be placed on all life-limited parts at the time of manufacture. This includes permanently marking the part with a part number (or equivalent) and a serial number (or equivalent). See 14 CFR 45.14. Persons who install parts must have adequate information to determine a part's current life status. In particular, documentation problems may mislead an installer concerning the life remaining for a life-limited part. This rule further provides for the data needs of subsequent installers to ensure they know the life remaining on a part and prevent the part being used beyond its life limit. Existing regulations provide for records on life-limited parts that are installed on aircraft. The regulations require that each owner or operator under § 91.417(a)(2)(ii) and each certificate holder under § 121.380(a)(2)(iii) or § 135.439(a)(2)(ii), maintain records showing “the current status of life-limited parts of each airframe, engine, propeller, rotor, and appliance.” These regulations do not govern the disposition of the part when it is removed from the aircraft. If the part is intended to be reinstalled, however, a record of the life status of the part will be needed at the time of reinstallation to show that the part is within its life limit and to create the required record under §§ 91.417(a)(2)(ii), 121.380(a)(2)(iii), or 135.439(a)(2)(ii), as applicable. Therefore, when a life-limited part is removed from an aircraft and that part is intended to be reinstalled in an aircraft, industry practice is to make a record of the part's current status at the time of removal. Repair stations, air carriers, and fixed base operators (FBO's) have systems in place to keep accurate records of such parts to ensure that they can reinstall the parts and have the required records to show that the part is airworthy. If the part is not intended to be reinstalled, however, under existing regulations and practice there is no record required or routinely made when a part is removed from an aircraft. The part may be at the end of its life limit and not eligible for installation. Or, the part may not have reached the end of its life limit, but is so close that reinstallation would not be practicable. In these cases industry practices vary. For instance, the part might be put in a bin and later sold as scrap metal, it might be used as a training aid, or it might be mutilated.

These regulations ensure positive control and safe disposition of all life-limited parts until they are mutilated or destroyed, after having reached their mandatory operating life limits, by preventing them from being accidentally installed. This regulation requires that records be maintained showing the

current status of the part regardless of time remaining, if any. This collection of information supports the Department of Transportation's strategic goal on safety.

This renewal of the OMB control action requires the continued information collection.

**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 mandates a recordkeeping system to be maintained that will aid aircraft operators in determining the status of the life-limited parts, so those that have reached their life limit will not be inadvertently installed. This collection affects owners, operators, repairman and service providers for aviation/aircraft airframes, engine, propellers, and appliances. Persons performing the removal or installation of the parts and operators of the aircraft must keep a record. This collection requires recordkeeping of parts removed or installed on type certificated products or deterrence of installation on type certificated products.

**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, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

This collection permits the use of electronic recordkeeping for tracking of documents. In compliance with the Government Paperwork Elimination Act (GPEA), electronic recordkeeping is available and is presently utilized by most aircraft operators and repair facilities. The electronic recordkeeping burden makes up 70% of the burden associated with this collection.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose(s) described in Item 2 above.**

This information collection is not a duplication of other reporting. No other Federal Agency requires this recordkeeping procedure.

- 5. If the collection of information has a significant impact on a substantial number of small businesses or other small entities (Item 5 of the Paperwork Reduction Act submission form), describe the methods used to minimize burden.**

This collection has had minimal impact on small entities. This is due to the fact that most operators had an acceptable recordkeeping system in place that met the requirements of the new rule for keeping records of time remaining on life-limited parts. The additional part marking requirement, when used, has had only minimal impact of small businesses.

- 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 regulation requires that the current status of life-limited parts be maintained to prevent installation after reaching or exceeding their authorized life limit. Without this information life-limited parts that have exceeded their operating limitations may be installed on aircraft resulting in accidents.

- 7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5(d)(2).**

There are no special circumstances.

- 8. Describe efforts to consult 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. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d) soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

A notice requesting public comment was published in the Federal Register on March 13, 2020 with the citation: 85 FR 14721. No comments were received.

- 9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

We do not provide any payments or gifts.

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

No assurance of confidentiality is necessary.

**11. Provide additional justification for any questions of sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.**

There are no sensitive questions in this collection of information.

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

The cost estimate assumes that **about 8,000 maintenance providers** would perform almost all of the activities subject to this data collection. Previous estimates were assumed to require an additional **half-hour** at \$54 per hour by an aircraft maintenance technician, whereas this action is not substantiated as the basis for the recordkeeping collection. The mandated recordkeeping actions estimates to include overhead and fringe costs were consistent with average of \$54 per hour

At a fully burdened industry overhead rate of: \$54.00

The annual labor cost to the respondents is: \$5,400,000

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
<b># of Respondents</b>		8000	
<b># of Responses per respondent</b>		12.5	
<b>Time per Response</b>		.5 hour	
<b>Total # of responses</b>		100,000	
<b>Total burden (hours)</b>		50,000	

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

There are no additional costs not already included in question 12.

**14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, and other expenses that would not have been incurred without this collection of information.**

There is no annual cost to the Federal Government to analyze and process the information. The parts marking burden requirement is for industry operators.

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

There are no program changes at this time. In previous collections estimates were assumed to require an additional **half-hour** at \$54 per hour by a aircraft maintenance technician, whereas this action was not substantiated since the basis for the collection is recordkeeping action. These actions are not reportable to the Federal Government, but are mandated to be managed internally by the aircraft operator. However, salary costs have remained consistent. Previous depictions listed costs for respondents whereas there are no respondents as described, the collection is for mandated recordkeeping actions. Previous depictions also described a third party disclosure, this was removed since it is determined to be a duplicated effort.

**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 collections of information results are to be published.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

No request for seeking approval not to display expiration date for OMB.

**Explain each exception to the certification statement.**

No exceptions.