

Supporting Statement A

Certification of Repair Stations, Part 145 of Title 14, CFR

OMB 2120-0682

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

This Information Collection is submitted to the Office of Management and Budget (OMB) to request renewal of an existing Information Collection currently authorized under Information Collection 2120-0682, Certification of Repair Stations, Part 145 of Title 14, CFR, which includes FAA Form 8310-3 Application for Repair Station Certificate and/or Rating. The request will allow the Federal Aviation Administration (FAA) to leverage a means of collecting and processing requests to obtain or make changes to an existing Air Agency Certificate (certificated repair station) pursuant to 14 CFR Part 145.

Title 49, United States Code, Section 44701, General Requirements (formerly the Federal Aviation Act of 1958, Section 601) authorizes the Secretary of Transportation to provide for reasonable rules and regulations necessary for minimum safety, and section 44707, Examining and Rating Air Agencies. Title 14, CFR Part 145 prescribes the requirements for issuance of repair station certificates and associated ratings to maintenance and alteration organizations.

Rulemaking was promulgated under the authority described in Title 49, subtitle VII, part A, subpart III, section 44701, General Requirements, and section 44707, Examining and Rating Air Agencies. Under section 44701, the FAA may prescribe regulations and standards in the interest of safety for inspecting, servicing, and overhauling aircraft, aircraft engines, propellers, and appliances. The FAA may also prescribe equipment and facilities for, and the timing and manner of, inspecting, servicing, and overhauling these items. Under section 44707, the FAA may examine and rate repair stations that repair, alter, and maintain aircraft, aircraft engines, propellers, and appliances, on the adequacy and suitability of the equipment, facilities, and materials for, and methods of, repair and overhaul, and the competency of the individuals doing the work or giving instruction in the work.

Part 145 of Title 14, Code of Federal Regulations (CFR) prescribes the requirements for the issuance of repair station certificates and associated ratings to maintenance and alteration organizations (Docket Number FAA-19999-5836, 66 FR 41117, Aug. 6, 2001, as amended). 14 CFR part 145 states that a repair station application must be made in a format acceptable to the FAA. In order to remain consistent and provide ease of application, the FAA developed and made available to the public FAA Form 8310-3, Application for Repair Station Certificate and/or Rating. The form contains information

that will identify the repair station and its ratings and limitations, which are necessary to ensure that the repair station meets the minimum acceptable standards to hold the certificate. The form captures information from the applicant such as; official name of the repair station, location where business is conducted, official mailing address, any doing business as name, changes in ratings, or if initial certification, ratings sought, changes in location or housing and facilities, change in name or ownership, or any other purpose for which the applicant requests, including a request for approval to contract maintenance functions to outside entities.

The FAA Form 8310-3, Application for Repair Station Certificate and/or Rating is made available to the applicant/respondent via www.faa.gov, email, in person, or by mail. The applicant may submit the FAA Form 8310-3 to the FAA through email, in person, by mail.

Once the applicant has become certified as an Air Agency (repair station), the certificate holder may submit request changes to their certificate by either email, in person, or by mail. The certificate holder will also have the availability to request changes to their certificate by accessing the external portal to an FAA IT system solution. The respondents will establish a single account on the web portal where they will be able to conduct multiple activities, including submission of the FAA Form 8310-3 for changes to their existing certificate.

The web portal is not a duplication of certification activities; it is an alternate method the applicant may use to communicate directly with the FAA.

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.

Respondents are individuals or corporations who are seeking to obtain an FAA certificated repair station under 14 CFR part 145. Per the regulatory requirements of § 145.5, no person may operate as a certificated repair station without, or in violation of, a repair station certificate, ratings, or operations specifications issued under this part. Subpart B Certification of part 145, specifically § 145.51(a), states that an application for a repair station certificate and rating must be made in a format acceptable to the FAA. Which provides the requirement of the applicant/respondent to submit an application to obtain certification.

The FAA Form 8310-3 is the application made available to the applicant and collects minimal information such as, applicant's name, location where the business will be conducted, the official mailing address of the repair station, any doing business as names (DBA), reasons for submission which include, original application for certificate and rating, changes in ratings, changes in location or housing and facilities, change in name or ownership. The submission of the form is how the FAA receives information

from the applicant to begin certification activities or make changes to an existing certificate.

The FAA reviews and analyzes the information it collects from the applicant/respondents to determine the scope and complexity of intended operations.

The FAA reviews the information collected on the FAA Form 8310-3 to assist the applicant in obtaining repair station certification. As the blocks indicate, they are axiomatic, basic and ease of burden in completing. The FAA will use this information to establish the repair station certification and will retain this form and the information contained therein in the FAA office that issued the certificate for as long as the certificate is active and/or a time-period specified by the Agency's Records Management Order 1350.14B, mandated by the Federal Records Act of 1950, as amended. The applicant is not required to retain a copy of the form. The FAA does not provide or disseminate to other persons or entities the information contained on the form.

The collection of this information is required to obtain or retain the benefit of holding an Air Agency Certificate and Operations Specifications, commonly referred to as holding an FAA repair station certificate.

Persons who wish to obtain or make changes to a repair station certificate are required to submit the FAA Form 8310-3 to the FAA for review and determination of capability to obtain or make changes to the certificate.

There are no reporting or recordkeeping requirement for the applicant. The applicant is not required by regulation to retain a copy of the application.

Information is collected on occasion. One time for initial certification and when or if an existing certificated repair station request changes to their certificate.

The FAA retains a copy of the application in the FAA office that issued the certificate for as long as the certificate is active and/or a time-period specified by the Agency's Records Management Order 1350.14B, mandated by the Federal Records Act of 1950, as amended.

The FAA does not provide or disseminate the information collected to other persons or entities.

The purpose of collecting information contained on the FAA Form 8310-3 is for the applicant and the FAA to determine the scope and complexity of intended repair station operations and to ensure compliance with federal regulations as well as maintain the FAA's mission to ensure aviation safety.

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 FAA Form 8310-3 is the application submitted by the applicant/respondent that identifies the intended operations of the repair station. The form is made available to the applicant via www.faa.gov, email, in person, by mail and through the use of the FAA's IT solution systems external portal, commonly referred to as the Safety Assurance System (SAS). If the applicant chooses to utilize the SAS to submit the form, the applicant requests access to the system and then is given a confidential secure access key to enter the external portal. The SAS is automated. The submission of the application is automated, but the review of each application submitted requires FAA review and response. The SAS makes the application process less burdensome and more efficient for respondents.

The applicant is provided any of the above methods for submitting the application. Information collected is not and will not be made available to the public via internet or any other 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.

The FAA is the only government entity that collects or requests information from the respondents relating to repair station certification activities.

The FAA retains a copy of the application in the FAA office that issued the certificate for as long as the certificate is active and/or a time-period specified by the Agency's Records Management Order 1350.14B, mandated by the Federal Records Act of 1950, as amended.

Certification and FAA oversight activities are managed within the SAS for time-periods set by the programs parameters for consistency in performing risk analysis and oversight of certificated entities. The information is not located in any other Federal data repository nor accessible to other government systems. Nor is there any duplication of information collected.

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

The required information is limited to the minimum information needed for the FAA to accept the application and issue the repair station certificate. No exception is provided to any respondent, including small businesses, from providing the required information as it is essential to ensuring all repair stations meet the same acceptable level of safety. The FAA does not have any alternative method to offer to small businesses to minimize burden associated with submitting the required information.

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 information collected is necessary to ensure that each repair station certificate holder conducts repair station business in compliance with federal regulations, ensuring aviation safety. Without the information required by the applicant, the FAA would be unable to certify and issue a repair station certificate. The information collected through the FAA Form 8310-3 is submitted for initial certification and whenever the certificate holder requests to make a change to their existing certificate. There is no requirement for the applicant or certificate holder to submit the application any other time than what is stated in the aforementioned.

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

There are no special circumstances for this information collection.

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 March 20, 2020 (85 FR 18326) 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.

No gifts or payments are provided to respondents.

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

There is no assurance of confidentiality provided to respondents.

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.

Respondents who wish to obtain an air agency certificate to conduct business as an FAA certified repair station are required to submit the FAA Form 8310-3 form. The applicant is required to submit this form only once for initial certification. If the certificated repair station owner wishes to make changes to the certificate, such as, a change in ratings, he/she will be required to submit an FAA Form 8310-3 to make those changes.

As of December 31, 2019, the FAA has certificated 4,020 repair stations in the United States to work on United States (N-Registered) aircraft, and component parts thereof. The FAA has classified repair stations into size categories¹ using the criterion of number of employees and identified 2,091 small (1-10 employees), 1,753 medium (11-199 employees), and large (over 199 employees) repair stations, representing 52 percent, 44 percent and 4 percent of the total number of 4,020 certificated repair stations as of the end of 2019.

For FY2019, the FAA received a total number of 129 FAA Form 8310-3 Application for Repair Station Certificate and/or Ratings. From existing repair stations (65) and new applicants (64). Using the above calculated percentages for size categories of repair stations, the FAA estimates that each year 67 small, 57 medium and 5 large repair stations would be submitting the Form 8310-3.

As shown in Table 1, the FAA estimates that the small repair stations would require 2.25 hours of general manager/owner time (including 15 minutes to fill out the Form 8310-3), 3 hours of first-line supervisor/quality manager time, and 1 hour of clerk time to prepare and complete an application (average total number of 6.25 hours for small stations). A medium-sized repair station would require 4.25 hours (including 15 minutes to fill out the Form 8310-3), 4 hours of first-line supervisor/quality manager time, and 1 hour of clerk time (average total number of 9.25 hours for a medium-sized repair station). Finally, large repair stations would require 8.25 hours of general manager/owner time (including 15 minutes to fill out the Form 8310-3), 8 hours of first-line supervisor/quality manager time, and 2 hours of clerk time (average total number of 18.25 hours for a large repair station).

Table 1: Number and Types of Repair Station Employee Hours to Prepare and Submit Form 8310-3

¹ The costs to comply with preparing the information for the Form 8310-3 would generally increase with repair station size and the number of employees is the best basis to distinguish among repair station sizes. Also, mechanic and technician wage rates are positively correlated with repair station size. Larger repair stations tend to more highly technical and complex work (e.g. repairing and maintaining turbojet and turboprop engines, landing gears, etc.) than do smaller repair stations.

Repair Station Size	Number of Hours by Labor Category			
Number of Employees	General Manager/Owner	First-Line Supervisor	Clerk	Total Hours
1-99	2.25	3	1	6.25
100-199	4.25	4	1	9.25
>199	8.25	8	2	18.25

As shown in Table 2, the FAA estimates 418.75 annual burden hours for 67 small repair stations, 527.25 annual burden hours for 57 medium-sized repair stations, and 91.25 annual burden hours for 5 large repair stations. Therefore, the total annual number of burden hours for all repair stations is estimated at 1,037.25 hours.

Table 2: Annual Total Burden Hours

Size Category	Number of Repair Stations by Size Category	Number of Burden Hours	Total Burden Hours
Small (1-10)	67	6.25	418.75
Medium (11-199)	57	9.25	527.25
Large (>199)	5	18.25	91.25
Total	129		1,037.25

Using the above burden hours for each repair station category and corresponding fully loaded wage rates from Bureau of Labor Statistics for each labor category, the FAA estimated the total annual cost burden to 129 respondents to be \$439,027 as shown in Table 4 below.

Table 3 displays the average annual compliance cost by repair station size. Fully loaded wage rates for each labor category (General Manager/Owner², First-Line Supervisor³ and Clerk⁴) are estimated by multiplying with 1.299⁵ the 25%, 50% and 75% percentile wage estimates for small, medium and large repair stations, respectively.

² <https://www.bls.gov/oes/2017/may/oes111021.htm>

³ <https://www.bls.gov/oes/2018/may/oes491011.htm>

Table 3: Numbers and Types of Repair Station Employee Hours and Compliance Costs to Prepare and Submit Form 8310-3

Repair Station Size	Number of Hours and Fully Loaded Wage Rate by Labor Category							
Number of Employees	General Manager/Owner	Wage Rate	First-Line Supervisor	Wage Rate	Clerk	Wage Rate	Total Hours	Compliance Cost Per Repair Station
1-99	2.25	40.96	3	32.11	1	15.07	6.25	\$204
100-199	4.25	62.70	4	41.31	1	18.81	9.25	\$451
>199	8.25	97.79	8	52.44	2	23.82	18.25	\$1,274

Using the above compliance cost per repair station estimates (\$204 for small, \$451 for medium-sized, and \$1,274 for large repair station), the FAA calculated the annual total cost for 129 respondents as shown in Table 4 below: \$85,239 for 67 small repair stations, \$237,541 for 57 medium-sized repair stations and \$116,246 large repair stations, for a total of \$439,027.

Table 4: Total Annual Compliance Cost of Submitting Form 8310-3

Size Category	Number of Repair Stations by Size Category	Number of Burden Hours	Total Burden Hours	Compliance Cost Per Repair Station	Total Compliance Cost
Small (1-10)	67	6.25	418.75	\$204	\$85,239
Medium (11-199)	57	9.25	527.25	\$451	\$237,541
Large (>199)	5	18.25	91.25	\$1,274	\$116,246
Total	129		1,037.		\$439,027

⁴ <https://www.bls.gov/oes/2017/may/oes434071.htm>

⁵ <https://www.bls.gov/news.release/ecec.nr0.htm> Employer Costs for Employee Compensation (ECEC) provides the load factor of 29.9%. Last accessed on March 31, 2020.

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

There are no additional material costs.

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.

This cost is determined based on FAA aviation safety inspector's (ASI) time to review and process FAA Form 8310-3 applications, issuance of certificate or changes to the existing certificated repair station. The typical inspector is a FG-13, having a hourly wage of \$69.00⁶. This is not an annualized cost. This is a one-time cost for initial certification and subsequent changes to an existing certificate.

FAA	ASI (# of personnel)	Hours	Wage Rate	Total Cost (ASI x Hours x Wage Rate)
Reviewing application	2	2	\$69	\$276.00
Conducting inspection	2	8	\$69	\$1,104.00
Issuing certificate	2	2	\$69	\$276.00
Filing and entering information into database	2	1	\$69	\$138.00
Total Cost				\$1,794.00

The total cost for an initial repair station certification is calculated by \$69.00 per hour, per 13 hours of time for each inspector, multiplied by 2 inspectors equals \$1,794.00.

The total cost to the federal government for changes to an existing certificate can be reduced to one inspector reviewing application, inspecting facility, issuing revised or amended certificate, and filing the certificate. That cost is estimated at \$689.00 per each change requested by the existing certificated repair station.

FAA	ASI (# of	Hours	Wage	Total Cost
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⁶ Multiplying with the previously used 29.9% load factor obtained from BLS ECEC publication to account for all benefits of a private industry worker to the 53-6051 (Transportation Inspectors) OES series at the Federal Executive Branch mean wage rate of \$53.06 (https://www.bls.gov/oes/current/naics4_999100.htm), we estimated \$68.92 per hour, rounded to \$69 per hour for the aviation safety inspector. This USA Jobs announcement for a recent FAA vacancy shows the FG-13 pay scale which is comparable to BLS information: <https://www.usajobs.gov/GetJob/ViewDetails/539025500>. Accessed on January 29, 2020.

	personnel)		Rate	(ASI x Hours x Wage Rate)
Reviewing application	1	2	\$69	\$106.00
Conducting inspection	1	8	\$69	\$424.00
Issuing certificate	1	2	\$69	\$106.00
Filing and entering information into database	1	1	\$69	\$53.00
Total Cost				\$897.00

		\$116,610.
\$1,794.00	65	00
		\$57,408.0
\$897.00	64	0
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		\$174,018.
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15. Explain the reasons for any program changes or adjustments.

Information collection 2120-0682 was approved on October 5, 2015. At that time, there were approximately 4,625 certificated repair stations. The submission was adjusted from previous collections to incorporate the new regulatory requirement for all existing and new repair stations to submit a training program for FAA approval. Therefore, the burden calculations reflected were exorbitant.

As of December 31, 2019, there are 4,020 certificated repair stations in the United States. For fiscal year (FY) 2019, the FAA received a total number of 129 FAA Form 8310-3 applications. Out of the 129 total received, 64 were submitted for new certification and 65 were submitted from existing repair station owners.

The changes in calculated burdens as noted in paragraphs 12, 13, and 14 capture the number of FAA Form 8310-3 Application for Repair Station Certificate and/or Rating received in 2019. In addition, the amount of time and cost associated with time it takes a new applicant or an existing certificate holder to review, enter the required information and submit the form to the FAA. Burden calculations are also included for the FAA inspector to receive and process the forms.

The FAA has identified an inaccuracy in how burden calculations are determined associated with repair station certification and subsequent changes to an existing repair station certificate. The actual total certification activities were not previously presented in past OMB approvals for this collection. The detailed certification activities are not

presented and calculated in this collection. However, once the FAA properly assesses an entire repair station certification burden, the FAA will publish a new notice to the Federal Register capturing the entire certification burden calculation.

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 FAA does not plan to publish any data related to part 145 repair station certification activities covered by this collection.

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 is not seeking approval to not display the expiration date for this information collection.

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

There are no exceptions to the certification statement for this information collection.