

**SUPPORTING STATEMENT
FLIGHT PLANS
(Domestic - FAA Form 7233-1, and International - FAA Form 7233-4)
OMB #2120-0026**

A. Justification

1. Explain the circumstances that make the collection of information necessary.

The Federal Aviation Administration (FAA) is authorized and directed by Title 49, United States Code, paragraph 40103.(b), to prescribe air traffic rules and regulations governing the flight of aircraft for the protection and identification of aircraft and property and persons on the ground. Title 14, CFR, Part 91, Subchapter F, prescribes flight rules governing the operation of aircraft within the United States. These rules govern the operation of aircraft (other than moored balloons, kites, unmanned rockets and unmanned free balloons) within the United States and for flights across international borders. Paragraphs 91.153 and 91.169, address flight plan information requirements. Paragraph 91.173 states requirements for when an instrument flight rules (IFR) flight plan must be filed. International Standards Rules of the Air, Annex 2 to the Convention on International Civil Aviation paragraph 3.3 states requirements for filing international flight plans. In addition, a Washington, District of Columbia (DC) Special Flight Rules Area (SFRA) was implemented requiring pilots operating within a certain radius of Washington, DC to follow special security flight rules. The SFRA also includes three (3) general aviation airports in Maryland (College Park, Clinton/Washington Executive/Hyde Field, and Friendly/Potomac Airfield) where pilots are required to file a flight plan regardless of whether they are flying under visual flight rules (VFR) or IFR. This collection of information supports the Department of Homeland Security and the Department of Defense in addition to the normal flight plan purposes described in item 2 below.

2. Indicate how, by whom, and for what purpose the information is to be used.

FAA Form 7233-1, Flight Plan: This collection is mandatory. The entities that must respond are as follows: air traffic controllers, search and rescue (SAR) personnel, flight standards inspectors, accident investigators, military, law enforcement, and the Department of Homeland Security. This collection is for reporting. This collection will be as needed and continuous. Domestic flight plan information is used to govern the flight of aircraft for the protection and identification of aircraft and property and persons on the ground. The information is used by air traffic controllers, search and rescue (SAR) personnel, flight standards inspectors, accident investigators, military, law enforcement, and the Department of Homeland Security.

FAA Form 7233-4, International Flight Plan: International flight plan information is used for the same purposes as domestic flight plans; in addition it is used by Customs and international controllers.

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.

Almost 100 percent of flight plans are filed electronically. However, as a courtesy to the aviation public, flight plans may be submitted in paper form. Flight plans may be filed in the following ways:

- Air carrier and air taxi operations, and certain corporate aviation departments, have been granted authority to electronically file flight plans directly with the FAA. The majority of air carrier and air taxi flights are processed in this manner.

- Air carrier and air taxi operators may submit prestored flight plan information on scheduled flights to Air Route Traffic Control Centers (ARTCC) to be entered electronically at the appropriate times.
- Pilots may call 1-800-WX-BRIEF (992-7433) and file flight plans with a flight service station specialist who enters the information directly into a computer system that automatically transmits the information to the appropriate air traffic facility. Pilots calling certain flight service stations have the option of using a voice recorder to store the information that will later be entered by a specialist.
- Using Internet access, pilots may file flight plans electronically through Direct User Access Terminal System (DUATS) vendors, at no cost to the users. The two vendors allow pilots to store flight data so that minimal additional information is required when filing a flight plan.
- Private and corporate pilots who fly the same aircraft and routes at regular times may prestore flight plans with flight service stations. The flight plans will then be entered automatically into the air traffic system at the appropriate time.
- Pilots who visit a flight service station in person may choose to file a flight plan by using a paper form. The data will then be entered into a computer and filed electronically. The pilot will often keep the paper copy for his/her record.

4. Describe efforts to identify duplication.

Due to the nature of flight plan data, there is negligible duplication of information. Air traffic computers automatically identify duplicate flight plans.

5. If the collection of information impacts small businesses.

The information required for flight plans is the minimum necessary to provide the requested air traffic services and does not represent a burden for small businesses. The multiple options for filing flight plans described above provide convenient methods of filing for any system user.

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.

Accuracy of flight plan information is essential to flight safety and efficient use of the air traffic system. Aircraft cannot operate in an IFR environment, in restricted airspace or fly across borders without a flight plan. Without flight plans, search and rescue efforts would be hampered in the event of an accident. The user determines the frequency of collection of information by requesting air traffic services.

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

Collection of flight plan information is consistent with 5 CFR 1320.5(d)(2)(i)-(viii).

8. 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.

A 60-Day Notice for Public Comment was published in the Federal Register on April 22, 2020 (85 FR 22510). No comments were received.

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

No payment or gift was made to respondents.

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

It is FAA policy to make factual information available to persons properly and directly concerned except information held confidential for good cause, i.e., a pilot’s address and telephone number.

This data is used by FAA for search and rescue or accident-related operational responsibilities. All flight plan data is routinely destroyed after 15 days except for data retained due to an accident, incident or regulatory investigation.

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 questions of a sensitive nature are asked.

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

Statistics are not kept on the total number of flight plans filed into the National Airspace System (NAS). Statistics are only kept on the number of flight plans filed through FAA or contract flight service stations and are not maintained separately for domestic and international flight plan forms, nor is there a distinction made among methods of filing flight plans, as stated in number 3 above.

Although there is no tally on the number of flight plans filed through venues other than a flight service station, tallies are kept of the number of instrument departures. Since there must be a flight plan filed for any instrument flight, this number most nearly reflects the total number of instrument flight plans filed. (IFR flight plans are sometimes filed but not activated, in which case they would not be counted using IFR departures.)

In order to provide a more accurate accounting of the number of flight plans filed, the number of VFR flight plans filed and tallied by a flight service station is added to the number of IFR departures.

Flight Plans

Total IFR Departures	16,223,810
Total VFR Flight Plans	<u>1,023,016</u>
Total Flight Plans Filed	17,246,826

	RESPONDENT
# OF RESPONDENTS	17,246,826
# OF RESPONSE PER RESPONDENTS	1
TIME PER RESPONSE	1 minute
TOTAL # OF RESPONSES	17,246,826
TOTAL BURDEN	287,447

There is a wide range of time required to file a flight plan. Flight plans that are prestored, for instance, require only the initial recording of information and are then put in the system multiple times from the initial information. Flight plans filed by an individual through a flight service station, on average, take 2.5 minutes. Averaging repetitive electronic filing with person-to-person filing gives a one minute rough order of magnitude (ROME) estimate of the length of time that it takes to file a flight plan. The reporting burden on the public, based on an average of one minute per flight plan multiplied by 17,246,826 flight plans, equals 287,447 hours of public reporting hours.

Just as there is a wide range of time required to file flight plans, there is a wide range in cost. Cost per flight plan is lower for those using prestored flight plans than for those filed by an individual pilot. The average annual salary of a private pilot is \$111,800, according to Money.com. Dividing the private pilot's average salary by 26, 2 week pay periods, the 2 week gross pay is \$4,300. We then divide the biweekly pay by 80 hours per pay period. The average hourly rate is \$53.75. For the purpose of this justification, we are using an estimate of \$53.75 per hour for each respondent. Based on that estimate, the cost to respondents is figured as follows. We multiplied the hourly wage rate by 2 to account for a fringe benefits rate of 69 percent and an overhead rate of 31 percent.(Source: U.S. Department of Health and Human Services, "Guidelines for Regulatory Impact Analysis" (2016), https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf.)

In order to include the benefits and overhead, the hourly is multiplied by 2 (\$53.75 x 2=\$107.5).

Summary:

287,447 hours

\$107.5 x 287,447 public reporting hours = \$30,900,552.50

13. Provide an estimate of the total annual cost burden to respondents or record keepers 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.

To estimate the personnel cost of filing flight plans, we have used a percentage of the total salaries (pay and benefits) paid to the personnel in Air Route Traffic Control Centers, Airport Traffic Control Towers, and Flight Service Stations. While controllers in a flight service station spend a greater percentage of time filing flight plans than do controllers in a Center or Tower, their income is less and their numbers are fewer. Controllers in a Center or Tower receive most flight plans electronically from other sources and are only occasionally involved in the initial filing of a flight plan. The salary information below was obtained from the transportation.gov website, Federal Aviation Administration FY2020 President's Budget Submission

ARTCC/ATCT controllers:

FY20 salaries (pay and benefits) \$2,217,050,000

FSS controllers:

FY20 salaries (pay and benefits) \$36,450,000

Estimated percentage of time spent on filing flight plans:

ARTCC/ATCT controllers: 0.1%
 FSS controllers: 25.0%

Cost:
 ARTCC/ATCT controllers: 0.1% x \$2,217,050,000 =\$22,170,500
 FSS controllers: 25.0% x \$ 36,450,470 =\$ 9,112,617.5
 Total personnel cost: \$31,283,117.5

15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of the OMB Form 83-1.

There have been no changes to the hourly burden since the previous submission. The wage costs for the public have been updated to reflect current rates.

16. For collections of information whose results will be published, outline plans for tabulation, and publication.

The collection of this data is solely to provide a service to the users of the NAS and is not used for statistical, analytical, or publication purposes.

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.

The FAA is not requesting this exception.

18. Explain each exception to the certification statement identified in item 19, "Certification for Paperwork Reduction Act Submission," of OMB Form 83-1.

There are no exceptions.