

SUPPORTING STATEMENT A  
DEALER'S AIRCRAFT REGISTRATION CERTIFICATE APPLICATION  
OMB 2120-0024

**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 nation's vital security interest in support of national strategies by ensuring that the national transportation system is secure.

Public Law 103-272 states that all aircraft must be registered before being flown. It sets forth registration eligibility requirements and provides for application for registration as well as suspension and/or revocation of registration.

14 CFR Part 47 Subpart C describes procedures for obtaining and using a dealer's aircraft registration certificate and prescribes procedures that implement Public Law 103-272 which provides for the issuance of a dealer's aircraft registration certificate and for their use in connection with aircraft eligible for registration by persons engaged in manufacturing, distributing or selling aircraft. Dealer's certificates enable such persons to fly aircraft immediately without having to go through the paperwork and expense of applying for and securing a permanent Aircraft Registration Certificate.

**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the use the agency has made of the information received from the current collection.**

The collection of this information is mandatory in order to obtain a Dealer's Aircraft Registration Certificate. The Aircraft Registry collects the minimum amount of information necessary (i.e. name, mailing/business address, phone number, signature, title, date, type of business, and type of registration). The information collected on the Dealer's Aircraft Registration Certificate Application, AC Form 8050-5, is for any individual or company engaged in manufacturing, distributing, or selling aircraft and wants to fly those aircraft with a dealer's registration certificate instead of obtaining a certificate of aircraft registration. The information collected is maintained in a database for recordkeeping purposes. A conveyance examiner in the FAA Aircraft Registry reviews the application to ensure it is complete and properly filled out. If the application is correct, the Aircraft Registry issues the number of dealer's certificates requested and mails them to the dealer. Certificates are valid for one year, therefore, a dealer must reapply each year. As with all information collected by the Aircraft Registry this information is available to the public upon request.

**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. Registry personnel still have to print and electronically scan the documents 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 the purpose described in Item 2 above.**

There is only one Aircraft Registry. No other agency is collecting this information or issuing dealer's certificates.

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

The requirements for obtaining a dealer's certificate are the same for all applicants. We have kept the burden to a minimum for everyone.

**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.**

Dealer's certificates permit short-term operation of an aircraft by a method, which is less restrictive and less time-consuming than obtaining a permanent aircraft registration certificate. Without this information collection, there would be no basis for issuance of a dealer's aircraft registration certificate.

**7. Explain any 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.**

Anyone applying for a dealer certificate mails the original application to the Aircraft Registry. A dealer's certificate is good for one year from issuance; therefore, the information is collected on an annual basis unless the certificate is not renewed. No proprietary or confidential information is collected.

**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 April 23, 2020 (85 FR 22783) solicited public comment. We received one comment. The commenter asked if the FAA would consider extending the validity period of the Dealer's Certificate to 3 years to align with normal aircraft registrations. FAA regulations only allow a dealer's certificate to be valid for one year and changing the regulation is outside the scope of this notice. The commenter also stated the FAA should consider raising its fees, which is also outside the scope of this notice.

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

There is no payment or gift to respondents.

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

Information collected is public information. There is no promise 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 questions of a sensitive nature.

**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 hour burden information is based on statistical information collected each fiscal year. The information in this statement is from FY19. In FY19, 3,670 applications for dealer's certificates were filed. Each dealer should spend approximately 30 minutes (.5 hours) completing the application for a total hour burden of 1,835 hours.

Summary (Annual numbers)	Reporting	Recordkeepin g	Disclosure
# of Respondents	3,670		
# of Responses per respondent	1		
Time per Response	.5 hours		

<b>Total # of responses</b>	3,670		
<b>Total burden (hours)</b>	1,835		

Based upon the U.S. Bureau of Labor Statistics Occupational Handbook the estimated median wage for a Manufacturing Sales Representative is \$44.70 per hour.<sup>1</sup> Using BLS's Employer Costs for Employee Compensation memo released September 17, 2019,<sup>2</sup> the FAA calculated the mean hourly wage, plus benefits, for these managers to be \$65.16 (\$44.70 + \$20.46). The total estimated annual cost burden to the respondents is 1,835 X \$65.16 for a total annual cost of about \$119,569.

There are no additional overhead costs that would be incurred on this collection.

**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 to the respondent.

**14. Provide estimates of annualized cost 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 Registry uses the average hourly rate of a Legal Instruments Examiner and different levels of Contract Clerks used at each stage of processing to determine the wage rate.

The Office of Management and Budget (OMB) guidance for civilian federal employees determined that the full fringe benefit cost factor is 36.25%.<sup>3</sup> Using OMB's guidance, the FAA calculated the mean hourly wage, plus benefits, for a:

- Government Legal Instruments Examiner to be \$42.57 (\$27.14 + \$15.43),
- Contract Clerk (Print/File/Mail/Scan) wage rate to be \$31.97 (\$20.38 + 11.59), and
- Contract Clerk (Prep/Index) wage rate to be \$41.00 (\$26.14 + 14.86).

Gvt Legal Instruments Examiner wage rate	.35 hr	@ \$42.57 per hr	\$14.90
Contract Clerk (Mail) wage rate	.05 hr	@ \$31.97 per hr	\$1.60
Contract Clerk (Prep) wage rate	.05 hr	@ \$41.00 per hr	\$2.05

<sup>1</sup> <https://www.bls.gov/oes/current/oes414011.htm>

<sup>2</sup> <https://www.bls.gov/news.release/pdf/ecec.pdf> released September 17, 2019

<sup>3</sup> <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2008/m08-13.pdf>

Contract Clerk (Index) wage rate	.05 hr	@ \$41.00 per hr	\$2.05
Contract Clerk (Scan) wage rate	.05 hr	@ \$31.97 per hr	\$1.60
Total Per Unit			\$22.20

The total annualized cost for processing 3,670 (FY19) Dealers Aircraft Registration Certificate Applications, AC Form 8050-5, at \$22.20 per unit is \$81,474.

**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. The increase in the reporting burden is due to an increase in the number of respondents requesting dealer certificates for FY-2019 over the FY data used for the previous renewal submission. The adjustment to the number of responses and time burden reflects an increase in elective activity by the public, not a change in a government requirement. The decrease in the annual cost burden is due to the past submission incorrectly capturing labor costs as material costs and this submission corrects that oversight.

**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.**

There are no plans for tabulation or publication of the information collected.

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

There is no reason not to display.

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

There are no exceptions.