**Department of Transportation**

**Federal Aviation Administration**

**SUPPORTING STATEMENT**

**Pilot Records Database**

**2120-0607**

INTRODUCTION

This information collection is submitted to the Office of Management and Budget (OMB) to request a three-year approval clearance for the information collection entitled Pilot Records Database

**Part A. Justification**

**1. Circumstances that make collection of information necessary.**

a. Title 49 United States Code (49 U.S.C.) § 44703(h): Records of Employment of Pilot Applicants, which was established by the Pilot Records Improvement Act of 1996 (PRIA), mandates that air carriers who have been issued a part 119 air carrier certificate and are authorized to conduct operations under Title 14 of the Code of Federal Regulations (14 CFR) part 121 or part 135 as well as part 125 and 135 operators, request and receive FAA records, air carrier and other operator records, and the National Driver Register records before allowing an individual to begin service as a pilot. Additionally, fractional ownerships operating in accordance with subpart K of part 91 are required to complete a pilot safety background check before allowing an individual to begin service as a pilot (reference § 91.1051). Furthermore, air tour operators operating in accordance with § 91.147 are required to obtain an individual’s previous drug and/or alcohol testing records before allowing an individual to begin service as a pilot. All requestors are heretofore referred to as “air carriers.”

b. Title 49 U.S.C. § 44703(h)(8) also requires the Administrator to promulgate standard forms for use by the air carrier in order to: request the records; inform the individual who is the subject of the request; obtain the individual’s written consent; and, inform the individual of the individual right of that individual to receive a copy of any records furnished in response to the request. A summary of the PRIA form numbers, titles, and purpose is provided in Table 1.

Section 203 of the Airline Safety and Federal Aviation Administration Extension Act of 2010 (Pub. L. 111-216, 124 Stat. 2348) (the Act), codified at 49 United States Code 44703(i) requires the FAA to establish an electronic pilot records database. The Act requires air carriers to access the database and evaluate any relevant records maintained therein pertaining to an individual before allowing that individual to begin service as a pilot. In addition, the database must be populated with records maintained by the FAA as well as records maintained by air carriers and other employers of pilots. At a minimum, air carriers and operators employing pilots must report “records that are generated by the air carrier or other person after [August 1, 2010]” as well as “records that the air carrier or other person [was] maintaining, on [August 1, 2010],” pursuant to §44703(h)(4). In order to meet this mandate, the FAA developed a phased approach to implementing the PRD. The FAA records portion of the database was made available via a beta release in December 2017.

The FAA Extension, Safety, and Security Act of 2016 (Public Law 114-190), Section 2101 required the FAA to establish the Pilot Records Database no later than April 30, 2017. Therefore, a subsequent phase of PRD was expedited and deployed in late 2017 which included several enhancements and permitted proxies to access the application on behalf of an air carrier or other operator. The final phase of PRD, the air carrier and other operator portion of the database, can only be completed after the FAA publishes a final rule. A notice of proposed rulemaking (NPRM) was published on March 30, 2020, and a final rule is expected to publish in January of 2021. The final rule will provide requirements for the FAA and air carriers and other operators to phase-out PRIA.

The PRD automated the PRIA process and provided an air carrier or other operator with immediate access to a consenting pilot’s FAA records. An air carrier or other operator would receive the following information that an individual had viewed and provided the FAA an electronic consent to release:

* previous employers that the individual served as a pilot;
* current airman certificates, associated ratings, and any limitations to the certificate or ratings;
* date and certificate grade sought for any failed attempt to pass a practical test required to obtain a certificate or type rating under part 61 of Title 14, Code of Federal Regulations (since August 2010);
* current medical certificate including its class and any limitations;
* closed enforcement information; and
* accident and/or incident.

A hiring air carrier is still required to obtain records from current and/or previous employers, as well as the National Drivers Register using the consent to release records form provided by the PRD until the transition period is complete. Specifically, for three years and 90 days from publication of the final rule, both PRIA and the PRD will concurrently be in effect. During this period, employers will be uploading airman records into the PRD. While the transition is occurring, some airman records will be available in the PRD and others will not. To ensure a hiring air carrier or other operator has access to all relevant airman records, the hiring air carrier or other operator must review all records available in the PRD as well as request all relevant records from previous employers as required by PRIA. After the transition period, all historical records from previous employers will be entered into the PRD, and hiring air carriers and other operators will have access to all relevant records via the PRD.

**2. How, by whom, and for what purpose is the information used.**

An air carrier would continue to utilize the PRIA forms during the three years and 90 days allowed for transition to the PRD, and after then would use the PRD to request and receive applicable records of all applicants for the position of pilot with their company. FAA’s externally facing applications require access control through MyAccess. Members of the public will authenticate via an externally-facing registration web page; MyAccess. Pilots may grant consent for hiring air carriers to review records using the appropriate form if they are unable to grant consent electronically via the PRD. Air carriers “may use such records only to assess the qualification of the individual in deciding whether or not to hire the individual as a pilot.” (49 U.S.C. § 44703(i)(9). All users of the PRD must have an account in MyAccess which includes an identity verification procedure.

**3. Extent of automated information collection.**

Air carriers may upload records to the PRD using both a manual process as well as an automated process. This allows each air carrier to decide which method of information collection is appropriate considering their specific needs. The automated process can utilize an XML data feed directly from the air carrier’s record-keeping system which can improve efficiency and reduce data-entry errors.

The FAA records portion of the database was deployed in beta release December 2017. A subsequent phase of PRD was expedited and deployed prior to April 30, 2018 which included several enhancements and permitted proxies to access the application on behalf of an air carrier. The final phase of PRD, the air carrier and other operator portion of the database, can only be completed after the FAA publishes a final rule. A notice of proposed rulemaking (NPRM) published on March 30, 2020, and a final rule is expected to publish in January of 2021. The final rule will provide requirements for the FAA and air carriers to phase-out PRIA.

**4. Efforts to identify duplication.**

The collection of certain pilot records is within the purview of the FAA. Title 49, United States Code, 44703(h) requires the FAA to establish standard forms for use by the air carrier in order to: request the records; inform the individual who is the subject of the request; obtain the individual’s written consent; and, inform the individual of the individual right of that individual to receive a copy of any records furnished in response to the request. Additionally, Title 49, United States Code, 44703(i) requires the FAA to establish an electronic Pilot Records Database and phase-out PRIA. No other Federal agency has similar requirements, thus there is no duplication.

**5. Efforts to minimize the burden on small businesses.**

This proposed rule would affect substantial numbers of small entities operating under 91K, parts 121 and 135, air tour operators, entities conducting public aircraft operations, and corporate flight departments. There are dozens of small part 121 carriers and a couple of thousand small part 135 carriers and operators. All part 125 operators are small. Air tour operators are typically small. These operators may involve a couple of pilots flying less than five passengers per air tour. We expect that all fractional ownerships are large with revenues exceeding $16.5 million. We also estimate that entities flying public use aircraft are associated with large governmental jurisdictions. We assume that any corporation that could afford a corporate flight department would have in excess of $16.5 million in revenues and is therefore a large entity. Alternatives to minimize the burden on small businesses were addressed and rejected in the RIA.

**6. Impact of less frequent collection of information.**

Implementation of the information collection process, as facilitated by the PRIA forms, is statutorily mandated, as is the creation and implementation of the PRD. Failure to collect and use the information less frequently could have a significant impact on air safety. Consequently, several NTSB recommendations related to air carrier accidents were issued to the FAA to facilitate the sharing of pilot records among air carriers and other operators. This information collection responds to those NTSB recommendations.

**7. Special circumstances**

Title 49 U.S.C. § 44703(i)(5) requires the Administrator to maintain pilot records described in 49 U.S.C. § 44704(i)(2) for the life of the pilot.

Additionally, 49 United States Code 44703(i) requires the FAA to establish an electronic pilot records database containing “records that are generated by the air carrier or other person after [August 1, 2010]” as well as “records that the air carrier or other person [was] maintaining, on [August 1, 2010],” pursuant to §44703(h)(4). In order to meet this mandate, air carriers and operators are currently maintaining pilot records dating from August 1, 2005 until the the records have been entered into the PRD.

**8. Compliance with 5 CFR 1320.8.**

An NPRM titled Pilot Records Database was published in the Federal Register on March 30, 2020 (85 FR 17660). The rule requested comment on this proposed information collection and allowed 90 days for public comment.

**9. Payments or gifts to respondents.**

No gifts or payments are provided for the reporting of records through PRIA or in the PRD.

**10. Assurance of confidentiality.**

Title 49 U.S.C. § 44703(i)(9) provides that an air carrier may use such records only to assess the qualifications of the individual in deciding whether or not to hire the individual as a pilot. The air carrier is directed to take such actions as may be necessary to protect the privacy of the pilot and the confidentiality of the records. This holds true with the one exception of FAA inspectors who, during the course of their normal duties for the FAA, cannot be denied access to relevant records of any air carrier for the purpose of surveillance or inspection.

In addition, 49 U.S.C. § 44703(i)(11) states that the FAA shall prescribe such regulations as may be necessary to protect and secure the personal privacy of any individual whose records are accessed in the PRD. The FAA must also prescribe regulations that will protect the confidentiality of those records. Further, the FAA is charged with precluding the further dissemination of records in the PRD by the person who accessed the records.

The FAA conducted a privacy threshold assessment for the system in November 2016. It is available at dot.gov/privacy.

**11. Justification for collection of sensitive information.**

Section 203(b)(2) of the FAA Extension Act of 2010 requires the FAA to establish an electronic records database containing records from the FAA and records maintained by air carriers and other operators that employ pilots. The PRD would contain sensitive information whose loss, misuse, or unauthorized access could affect the privacy of application users or affect the conduct of Federal government programs.

With this threat in mind, the FAA will adhere to National Institute of Standards and Technology (NIST) Federal Information Security Management Act (FISMA) 800.53 Security and Privacy Controls for Federal Information Systems and Organizations to secure information contained in PRD. The FAA has also conducted a Privacy Impact Assessment for the PRD, which is available at dot.gov/privacy.

**12. Estimate of burden hours for information requested.**

**Subpart A—General**

# § 111.15 Application for database access

Registering Users – In order to get to access the PRD, users would have to go through a registration process with the FAA. The table below indicates the number of users expected to apply for access to the PRD, the estimated time it would take each user to register, the hourly rate of the persons registering and the estimated hour burden for all users to register.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
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| **Initial Burden for Users to Apply/Register for Access to the PRD**   |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | | **Users Expected to Apply for Access to the PRD to Comply with PRD** | **Respondents** | **Hourly Rate (\*)** | **Time to Register** | **Total cost to Register PRD Users** | **Hours for Users to Register** | | Responsible persons | 5,033 | $84.74 | 0.50 | $213,248 | 2,517 | | Pilots | 175,860 | $44.66 | 0.33 | $2,591,790 | 58,034 | | Authorized Individuals | 10,066 | $84.74 | 0.50 | $426,496 | 5,033 | | Proxies | 1,904 | $84.74 | 0.50 | $80,672 | 952 | | **Total** | **192,863** |  |  | **$3,312,207** | **66,536** | |
| \*See the Regulatory Evaluation available in the docket for details on the hourly rates and costs. |

**Subpart B – Accessing and Evaluating Records**

§ 111.240 Verification of motor vehicle driving records.

Air carriers and participating operators must be able to provide supporting documentation to the Administrator upon request that a search of the NDR was conducted, and that documentation must be kept for five years. The FAA considers this burden de minimis.

**Subpart C—Reporting of Records by Air Carriers and Operators**

§ 111.205 General, (a) Each air carrier and operator must report the information required by this subpart for an individual employed as a pilot beginning on the PRD date of hire for that individual.

Each air carrier and other operator would report to the PRD all records required by this subpart for each individual employed as a pilot in the form and manner prescribed by the Administrator.

The FAA is proposing in subpart C of part 111 to require all part 119 certificate holders, 91K fractional ownership operators, persons authorized to conduct air tour operations in accordance with 14 CFR 91.147, persons operating a corporate flight department, entities conducting public aircraft operations, and trustees in bankruptcy to enter relevant data on individuals employed as pilots into the PRD. Relevant data includes: training, qualification and proficiency records; final disciplinary action records; records concerning separation of employment; drug and alcohol testing records; and verification of motor vehicle driving record search and evaluation.

The FAA has determined that there would be no new information collection associated with the proposed requirement. However, industry would be required to report data that they already collect to the PRD. We estimate that burden here.

The rule would require that one year after publication present and future records be reported to the PRD. Present and future records are all records going forward.

As previously discussed, there would be two methods for reporting data to PRD. The first method would be to transmit data electronically using an automated utility such as XML, so it can be read by both the user and the PRD. The second method would be through direct manual data entry, using the same pre-established data field forms for each record type. The FAA estimated how many air carriers and operators would report data directly from their own electronic databases. The FAA also determined how many air carriers and operators would enter data manually to the PRD, and on how many pilots they would enter data. The following discussion summarizes the estimates of the burden and the cost of reporting records to the PRD.

**Electronic Reporting of Records to the PRD**

Air carriers and operators would incur a one-time burden to transfer pilot records electronically from their databases to the PRD. The burden includes the time required for air carriers and operators to develop an encoding program to transfer records from their electronic databases via an automated utility to appropriate fields within the PRD. They could also incur an annual burden to monitor, trouble-shoot and modify the transfer of data to the PRD.

Industry sources representative of small, medium and large carriers provided the number of hours along with the cost per hour to develop an encoding program. A representative fractional ownership provided an estimated total cost to develop the program. As the fractional ownership did not provide hours or hourly wage rates, the FAA estimated these for the fractional ownership. To do this we averaged the wage rates received from the other operators and divided the fractional ownership total cost by this wage rate. Further, a mid-size carrier estimated an additional annual updating cost of $1,500 for monitoring, trouble-shooting and modifying, which we applied to mid-size carriers.

The tables below indicate the number of respondents (in other words, number of air carriers or operators), estimated hours, hourly rate and the cost of electronic reporting, for electronic reporting of present and future records, both one-time burden and annual updating burden and for electronic reporting of historical records.

**One-Time Burden of Electronic Reporting of Present and Future Records**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Operator Type** | **Respondents** | **Hours** | **Hourly Rate\*** | **One-Time Cost of Electronic Reporting\*** |
| Small 121 | 51 | 20 | $120 | $122,400 |
| Mid-size 121 | 13 | 35 | $75 | $34,125 |
| Large 121 | 4 | 400 | $89 | $142,400 |
| **Total 121** | **68** | **455** |  | **$298,925** |
| Small 135 | 234 | 20 | $120 | $561,600 |
| Mid-size 135 | 2 | 35 | $75 | $5,250 |
| **Total 135** | **236** | **55** |  | **$566,850** |
| Small part 125 | 18 | 20 | $120 | $43,200 |
| **Total 125** | **18** | **20** |  | **$43,200** |
| Part 91K | 4 | 1,897 | $95 | $720,800 |
| **Total 91K** | **4** | **1,897** |  | **$720,800** |
| Small Corporate Flight Dept. | 1,413 | 20 | $120 | $3,391,200 |
| **Total Corporate Flight Dept.** | **1,413** | **20** |  | **$3,391,200** |
| **Total One-Time Burden** | **1,739** | **2,447** |  | **$5,020,975** |

\*Industry sources representative of small, medium and large carriers provided us with the number of hours along with the cost per hour. See the Regulatory Evaluation available in the docket for more details.

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| **Annual Cost of Electronic Reporting Present and Future Records** | | | | |
| **Operator Type** | **Respondents** | **Hours\*** | **Hourly Rate\*** | **Annual Cost of Electronic Reporting** |
| Mid-size 121 | 13 | 20 | $75 | $19,500 |
| Mid-size 135 | 2 | 20 | $75 | $3,000 |
| **Total Annual Burden** | 15 | 40 |  | $22,500 |
| \*Based on information from a mid-size carrier, the additional annual cost per mid-size respondent is $1,500 (=20 hours x $75 hourly rate). See the Regulatory Evaluation available in the docket for more details. | | | | |

**Manual Reporting of Present and Future Data**

To estimate the burden of reporting records manually to the PRD, the FAA first estimated the amount of time that it would take to report pilot records for each of the operator types. The total amount of time per pilot per year for each operating type to manually enter the records to PRD is indicated in the table below (in row labelled “Amount of time per pilot per year”). Included in the table is the time for each of the recording events, an estimate of the cost per event and the total cost per pilot per year. These data are used in the calculations of manual reporting costs and time burden by affected operating part.

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| **Time and Cost per Pilot by Affected Operating Part—Manual Reporting** |

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| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  |  | **135** | | **121** | | **125** | | **Air Tour** | | **91K** | | **PAO** | |
| **Manual Record Entry Activity** | **Hourly Burdened Rate** | **Time in Minutes** | **Cost** | **Time in Minutes** | **Cost** | **Time in Minutes** | **Cost** | **Time in Minutes** | **Cost** | **Time in Minutes** | **Cost** | **Time in Minutes** | **Cost** |
| Setting up current pilots in PRD for the first time | $84.74 | 3 | $4.24 | 3 | $4.24 | 3 | $4.24 | 3 | $4.24 | 3 | $4.24 | 3 | $4.24 |
| Training/checking events - per year | $81.19 | 10.8 | $14.61 | 10.4 | $14.07 | 13.6 | $18.39 | 4 | $5.41 | 10.8 | $14.61 | 13.6 | $18.39 |
| Ground training - per year | $81.19 | 4 | $5.41 | 4 | $5.41 | 4 | $5.41 | 0 | $0.00 | 4 | $5.41 | 4 | $5.41 |
| Initial train/check (one time event for new pilots) | $81.19 | 0.648 | $0.88 | 0.648 | $0.88 | 0.54 | $0.73 | 0.108 | $0.15 | 0.864 | $1.17 | 0.54 | $0.73 |
| Amount of time per pilot per year | Initial | 18.45 |  | 18.05 |  | 21.14 |  | 7.11 |  | 18.66 |  | 21.14 |  |
| Recurring | 15.45 |  | 15.05 |  | 18.14 |  | 4.11 |  | 15.66 |  | 18.14 |  |
| Total cost per pilot per year | First Year |  | $25.14 |  | $24.60 |  | $28.77 |  | $9.80 |  | $25.43 |  | $28.77 |
| Subsequent Years |  | $20.90 |  | $20.36 |  | $24.53 |  | $5.56 |  | $21.19 |  | $24.53 |

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| \*Time and cost estimates may not sum to totals due to rounding. See the Regulatory Evaluation in the docket for more details. |

The FAA estimated the number of air carriers and operators (in other words, the number of respondents) who would report data manually to the PRD and the number of pilots working for them. The FAA calculates the hours required for data entry by multiplying the time it takes to enter records per pilot per year by the number of pilots. For example, to enter data manually for a part 121 pilot in year 1 it would take 18.05 minutes/60 minutes times the estimated number of pilots (271) or 82 hours.

Costs are calculated by multiplying the number of pilots by the cost per pilot per year. For example, the cost of manually entering data in year 1 for pilots working in part 121 is pilots x $24.60 or $6,667.[[1]](#footnote-1) The burden to enter present and future records manually to PRD is presented for each operating type for years 1 through 3 of the information collection in the tables below.[[2]](#footnote-2) These sums are later averaged over the three years.

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| **Part 121 Manual Entry** | | | | | | |
|  | | | | | | |
| Year | Number of respondents - Part 121 Air Carriers | Pilots | Hours for data entry | Costs |
| 1 | 8 | 271 | 82 | $6,667 |
| 2 | 8 | 273 | 68 | $5,558 |
| 3 | 8 | 275 | 69 | $5,599 |
| **Total** |  |  | **219** | **$17,824** |

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| (1) Estimates based on pilot numbers from FAA databases and FAA forecast.  (2) Number of pilots times cost per pilot per previous table. Estimates may not total due to rounding.  **Part 125 Manual Entry**   |  |  |  |  |  | | --- | --- | --- | --- | --- | |  | Part 125 Manual Entry - Operators not approved for Electronic | | | | | Year | Number of respondents - Part 125 Operators | Pilots | Hours for data entry | Costs | | 1 | 52 | 528 | 186 | $11,162 | | 2 | 52 | 528 | 160 | $9,578 | | 3 | 52 | 528 | 160 | $9,578 | | **Total** |  |  | **506** | **$30,318** | |
| (1) Estimates based on pilot numbers from FAA databases and FAA forecast.  (2) Number of pilots times cost per pilot per previous table. Estimates may not total due to rounding. |

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| **Part 135 Manual Entry**   |  |  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | --- | --- | |  | Part 135 Manual Entry - Operators not approved for Electronic | | | | | | | | Year | Number of respondents - 135 Air Carriers | Pilots | Hours for data entry | Number of respondents - 135 Operators | Pilots Working for 135 Operators | Hours for data entry | Costs | | 1 | 1,649 | 12,627 | 3,883 | 168 | 342 | 105 | $326,041 | | 2 | 1,649 | 12,684 | 3,266 | 168 | 344 | 89 | $272,285 | | 3 | 1,649 | 12,731 | 3,278 | 168 | 345 | 89 | $273,288 | | **Total** |  |  | **10,427** |  |  | **283** | **$871,614** | |

1. Estimates based on pilot numbers from FAA databases and FAA forecast.
2. Number of pilots times cost per pilot per previous table. Estimates may not total due to rounding.

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| **Air Tour Operators Manual Entry**   |  |  |  |  |  | | --- | --- | --- | --- | --- | |  | Air Tours Manual Entry - Operators not approved for Electronic | | | | | Year | Number of Respondents - Air tour Operators | Pilots | Hours for data entry | Costs | | 1 | 1,091 | 3,088 | 366 | $30,262 | | 2 | 1,091 | 3,091 | 212 | $17,186 | | 3 | 1,091 | 3,091 | 212 | $17,186 | | **Total** |  |  | **790** | **$64,634** | |
| 1. Estimates based on pilot numbers from FAA databases and FAA forecast. 2. Number of pilots times cost per pilot per previous table. Estimates may not total due to rounding. |

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| **Part 91K Manual Entry**   |  |  |  |  |  | | --- | --- | --- | --- | --- | | Year | Number of Respondents -91K | Pilots (1) | Hours for data entry | Costs | | 1 | 3 | 398 | 124 | $10,127 | | 2 | 3 | 399 | 104 | $8,447 | | 3 | 3 | 399 | 104 | $8,447 | | **Total** |  |  | **332** | **$27,021** | |
| 1. Estimates based on pilot numbers from FAA databases and FAA forecast. 2. Number of pilots times cost per pilot per previous table. Estimates may not total due to rounding. |

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| **Public Aircraft Operations Manual Entry**   |  |  |  |  |  | | --- | --- | --- | --- | --- | | Year | Number of Respondents - PAO | Pilots | Hours | Costs | | 1 | 323 | 2,821 | 994 | $81,159 | | 2 | 323 | 2,824 | 854 | $69,266 | | 3 | 323 | 2,824 | 854 | $69,266 | | **Total** |  |  | **2,702** | **$219,691** | |
| 1. Estimates based on pilot numbers from FAA databases and FAA forecast 2. Number of pilots times cost per pilot per previous table. Estimates may not total due to rounding. |

A summary of the burden for present and future pilot records that we expect would be manually entered to the PRD is presented in the next table. The average annual hour burden is 5,086 and the average annual cost burden is $410,367 for manual entry into the PRD of present and future records.

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| **Manual Entry - Present and Future**   |  |  |  |  | | --- | --- | --- | --- | | **Type of Operations** | **Hours** | **Cost** | **Respondents** | | **Part 121** | 219 | $17,824 | 8 | | **Part 135** | 10,710 | $871,614 | 1,817 | | **Part 125** | 506 | $30,318 | 52 | | **Air Tours** | 790 | $64,634 | 1,091 | | **Part 91K** | 332 | $27,021 | 3 | | **PAO** | 2,702 | $219,691 | 323 | | **Total** | **15,259** | **$1,231,102** | **3,294** | | **Average/year** | **5,086** | **$410,367** | **1,098** | |

**111.265 Historical Record Reporting**

The rule requires that two years after publication historical records be reported to the PRD. Parts 121 and 135 air carriers would report historical records they have maintained back to August 1, 2005 through initial proposed compliance date. Parts 125 and 135 operators and 91K fractional ownerships would report historical records they have maintained back to August 1, 2010 through initial proposed compliance date. Those operators with approved electronic databases would transfer data electronically. The table below summarizes the number of respondents hours/respondent, hourly rate and the one-time cost of electronic reporting.

**Electronic Data Transfer of Historical Records**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **One-Time Burden of Electronic Reporting Historical Records** | | | | |
| **Size Groupings** | **Respondents** | **Hours/ Respondent** | **Hourly Rate** | **One-Time Cost of Electronic Reporting** |
| Small 121 | 51 | 20 | $120 | $122,400 |
| Mid-size 121 | 13 | 70 | $75 | $68,250 |
| Large 121 | 4 | 400 | $89 | $142,400 |
| **Total part 121 (1)** | **68** | **490** |  | **$333,050** |
| Small 135 | 226 | 20 | $120 | $542,400 |
| Mid-size 135 | 2 | 70 | $75 | $10,500 |
| **Total part 135 (1)** | **228** | **90** |  | **$552,900** |
| Small part 125 | 18 | 20 | $120 | $43,200 |
| **Total part 125** | **18** | **20** |  | **$43,200** |
| Part 91K | 4 | 385 | $95 | $146,300 |
| **Total Part 91K** | **4** | **385** |  | **$146,300** |
| **Total Burden** | **318** | **985** |  | **$1,075,450** |
| (1) Includes carriers certificated under both parts 121 and part 135. | | | | |

**Manual Reporting**

The FAA estimated the burden to report historical records to PRD, back to August 1, 2005 for part 121 and part 135 air carriers, and back to August 1, 2010 for parts 125 and 135 operators and part 91K fractional ownerships.The FAA first estimated the number of pilots who worked for affected operators and carriers that would manually report historical records. The FAA then estimated a base cost burden to report these records by multiplying the base cost[[3]](#footnote-3) (per pilot per year) by the number of pilots with historical records over the years 2005 through 2018 (that would be manually reported to PRD). Then the FAA added a supplement to represent the additional cost that would be required to report historical records, which would be more difficult to retrieve and transpose to the PRD.

The burden using the base cost for reporting historical records to the PRD is summarized in the tables below for each of the operating types that would have to report historical records for years 2005 through 2020.[[4]](#footnote-4) The discussion of the supplemental cost follows the tables.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Part 121 Manual Entry Historical** | | | | | | |
|  | Part 121 Manual Entry - Operators not approved for Electronic | | | |
| Year | Number of respondents - Part 121 Air Carriers | Part 121 Pilots | Hours for data entry | Costs |
| 2005 | 18 | 2,027 | 508 | $41,270 |
| 2006 | 18 | 2,026 | 508 | $41,249 |
| 2007 | 18 | 2,055 | 515 | $41,840 |
| 2008 | 18 | 2,096 | 526 | $42,675 |
| 2009 | 18 | 2,064 | 518 | $42,023 |
| 2010 | 18 | 2,030 | 509 | $41,331 |
| 2011 | 18 | 2,035 | 510 | $41,433 |
| 2012 | 18 | 2,078 | 521 | $42,308 |
| 2013 | 18 | 2,139 | 537 | $43,550 |
| 2014 | 18 | 2,183 | 548 | $44,446 |
| 2015 | 18 | 2,209 | 554 | $44,975 |
| 2016 | 18 | 2,254 | 565 | $45,891 |
| 2017 | 18 | 2,281 | 572 | $46,441 |
| 2018 | 18 | 2,315 | 581 | $47,133 |
| 2019 | 18 | 2,331 | 585 | $47,459 |
| 2020 | 18 | 2,346 | 588 | $47,765 |
| **Total** |  | **34,469** | **8,645** | **$701,789** |
| **Part 125 Manual Entry**   |  |  |  |  |  | | --- | --- | --- | --- | --- | | Year | Number of respondents | Part 125 Pilots | Part 125 Hours | Costs | | 2005 |  |  |  |  | | 2006 |  |  |  |  | | 2007 |  |  |  |  | | 2008 |  |  |  |  | | 2009 |  |  |  |  | | 2010 | 33 | 363 | 110 | $8,902 | | 2011 | 33 | 355 | 107 | $8,709 | | 2012 | 33 | 342 | 103 | $8,381 | | 2013 | 33 | 317 | 96 | $7,780 | | 2014 | 33 | 306 | 93 | $7,505 | | 2015 | 33 | 297 | 90 | $7,285 | | 2016 | 33 | 282 | 85 | $6,928 | | 2017 | 33 | 288 | 87 | $7,067 | | 2018 | 33 | 294 | 89 | $7,202 | | 2019 | 33 | 299 | 90 | $7,338 | | 2020 | 33 | 300 | 91 | $7,366 | | **Total** |  | **3,443** | **1,041** | **$84,463** | | | | | | | | |

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Part 135 Manual Entry**   |  |  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | --- | --- | | Year | Number of respondents - 135 Air Carriers | Pilots working for part 135 Carriers | Hours for data entry | Number of respondents - 135 Operators | Pilots Working for 135 Operators | Hours for data entry | Total Costs Part 135 | | 2005 | 1,744 | 17,594 | 4,530 | 168 |  |  | $367,713 | | 2006 | 1,744 | 17,389 | 4,478 | 168 |  |  | $363,437 | | 2007 | 1,744 | 17,358 | 4,470 | 168 |  |  | $362,784 | | 2008 | 1,744 | 18,196 | 4,685 | 168 |  |  | $380,291 | | 2009 | 1,744 | 18,112 | 4,664 | 168 |  |  | $378,542 | | 2010 | 1,744 | 17,815 | 4,587 | 168 | 339 | 87 | $379,423 | | 2011 | 1,744 | 17,646 | 4,544 | 168 | 336 | 87 | $375,828 | | 2012 | 1,744 | 17,554 | 4,520 | 168 | 334 | 86 | $373,854 | | 2013 | 1,744 | 17,288 | 4,452 | 168 | 329 | 85 | $368,202 | | 2014 | 1,744 | 17,236 | 4,438 | 168 | 328 | 84 | $367,087 | | 2015 | 1,744 | 17,145 | 4,415 | 168 | 326 | 84 | $365,144 | | 2016 | 1,744 | 17,016 | 4,382 | 168 | 324 | 83 | $362,406 | | 2017 | 1,744 | 17,284 | 4,451 | 168 | 329 | 85 | $368,121 | | 2018 | 1,744 | 17,555 | 4,521 | 168 | 334 | 86 | $373,889 | | 2019 | 1,744 | 17,751 | 4,571 | 168 | 338 | 87 | $378,068 | | 2020 | 1,744 | 17,845 | 4,595 | 168 | 340 | 88 | $380,068 | | **Total** |  | **280,786** | **72,303** |  | **3,657** | **942** | **$5,944,857** | | |
| **91k Manual Entry**   |  |  |  |  |  | | --- | --- | --- | --- | --- | | Year | Number of respondents | Pilots | Hours | Costs | | 2005 |  |  |  |  | | 2006 |  |  |  |  | | 2007 |  |  |  |  | | 2008 |  |  |  |  | | 2009 |  |  |  |  | | 2010 | 5 | 1,823 | 476 | $38,629 | | 2011 | 5 | 1,781 | 465 | $37,739 | | 2012 | 5 | 1,716 | 448 | $36,362 | | 2013 | 5 | 1,595 | 416 | $33,798 | | 2014 | 5 | 1,538 | 401 | $32,590 | | 2015 | 5 | 1,491 | 389 | $31,594 | | 2016 | 5 | 1,416 | 370 | $30,005 | | 2017 | 5 | 1,447 | 378 | $30,662 | | 2018 | 5 | 1,472 | 384 | $31,192 | | 2019 | 5 | 1,498 | 391 | $31,743 | | 2020 | 5 | 1,504 | 393 | $31,870 | | **Total** |  | **17,281** | **4,511** | **$366,184** | |

The FAA adds a supplemental burden to the base cost burden of reporting historical records, by adding an additional 30 minutes of a training and development manager and an additional 10 minutes of a human resources manager to estimated pilot records kept in 2005 and 2010. The following table summarizes the supplemental cost.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Manual Entry Supplemental Cost for Historical Records**   |  |  |  |  | | --- | --- | --- | --- | |  | Training & Development Manager | Human Resources Manager | Total Added Cost | | Time in hours | 30 | 10 |  | | Wage Rate | $81.19 | $84.74 |  | | Total Extra Cost per Pilot | $40.60 | $14.12 | $54.72 | |

The following table summarizes the base hours and base cost burden for reporting historical records and the supplemental cost burden to represent the additional cost of locating and transposing historical records to the PRD. To derive supplemental hours the FAA multiplied the supplemental time burden[[5]](#footnote-5) described earlier by estimated pilots with records being reported manually in 2005 and 2010. To derive supplemental costs, the FAA multiplied the additional supplemental cost per pilot by the estimated pilots with records being reported manually in 2005 and 2010.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Manual Entry – Historical Base and Supplemental Burden and Costs**   |  |  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | --- | --- | |  | **Base Hours** | **Base Cost** | **Supplemental Hours (1)** | **Supplemental Costs** | **Total Hours** | **Total Cost** | **Respondents** | | **Part 121** | 8,645 | $701,789 | 2,705 | $55,074 | 11,350 | $756,863 | 18 | | **Part 125** | 1,041 | $84,463 | 242 | $5,936 | 1,283 | $90,399 | 33 | | **Part 135 (2)** | 73,245 | $5,944,857 | 23,606 | $7,563,071 | 96,851 | $13,507,928 | 1,912 | | **Part 91K** | 4,511 | $366,184 | 1,215 | $25,746 | 5,726 | $391,930 | 5 | | **Total** | 87,442 | $7,097,293 | 27,768 | $7,649,827 | 115,210 | $14,747,120 | 1,968 | | **Average/year (2)** |  |  |  |  | 57,605 | $7,373,560 |  | | |
| (1) An additional 40 minutes per pilot record was added to the time estimated to enter pilot records kept in 2005 and 2010. |

**§ 111.425 Discontinued compliance with Pilot Records Improvement Act**

The PRIA would be discontinued two years and 90 days after the effective date of the proposed Pilot Records Database. Accordingly, there would be a reduced paperwork burden due to the fact that pilots, carriers and operators would no longer have to complete FAA forms to request PRIA records. The table below indicates the annual number of FAA forms completed by airmen, hiring and previous employers during the hiring process. This burden would be eliminated because air carriers and pilots would no longer have to complete and mail (or fax) forms in order for air carriers to request pilot records and for pilots to allow records to be released. Hours saved are estimated by multiplying the time required to complete each form by each entity times the number of forms completed annually. Cost savings are estimated by multiplying the time required to complete the form by the wage rate for each entity completing times the number of forms completed annually. Three different entities would have to complete form 8060-12 while only two different entities would have to complete the other three forms. We expect the same entities would complete each form for one PRIA request. In other words one airman, and one hiring entity would each complete Form 8060-10, Form 8060-11, and Form 8060-11A and in addition one previous employer would complete Form 8060-12 per PRIA request. So as not to double count or under count we take the number of respondents to be the three respondents (airman, hiring entity and previous employer) completing 24,120 forms (Form 8060-12) or 3 times 24,120. If we multiplied the number of entities completing each form by the number of forms and added the results for all the forms, we would be double counting respondents, as it is likely the same person would complete all the forms. If we chose one of the forms only requiring two entities to complete to estimate number of respondents, we would be underestimating respondents.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Cost Savings for Discontinued Compliance with Pilot Records Improvement Act**   |  |  |  |  |  |  |  |  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | | **FAA Form** | **Number of Forms Completed Annually** | **Airman** | **HRM - Hiring Entity** | **HRM - Previous Employer** | **Air- man** | **HRM** | **Airman** | **HRM** | **Total** | **Hours** | | **Respondents** | | | 8060-10 | 17,586 | 10 | 10 | N/A | $44.66 | $84.74 | $130,898 | $248,373 | $379,271 | 5,862 | | 17,586 | | | 8060-11 | 28,138 | 7 | 7 | N/A | $146,606 | $278,178 | $424,784 | 6,565 | | 28,138 | | | 8060-11A | 28,138 | 10 | 10 | N/A | $209,438 | $397,397 | $606,834 | 9,379 | | 28,138 | | | 8060-12 | 28,138 | 6 | 6 | 17 | $125,663 | $914,012 | $1,039,675 | 5,628 | | 28,138 | | |  |  |  | | | Total | | **$612,605** | **$1,837,960** | **$2,450,565** | **27,434** | | **101,999** | | | Hours to gather records. | | | | | | | | | | | **4,397** | |  | |  | | | | | | Total Hours including hours to gather records | | | | | **31,831** | |  | |

The table below summarizes the total paperwork burden in terms of hours, cost and respondents.

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Total Paperwork Burden** | | **Year 1** | | **Year 2** | | **Year 3** | | **Total** | |
|  | **Respondents** | **Hours** | **Cost** | **Hours** | **Cost** | **Hours** | **Cost** | **Hours** | **Cost** |
| **§ 111.15 Application for database access one-time costs averaged per year - Annual Registration burden** | 69,761 | 14,305 | $979,621 | 5,803 | $259,162 | 5,803 | $259,162 | 25,911 | $1,497,945 |
|  |  |  |  |  |  |  |  |  |  |
| **111.205 General (a) (Reporting Present and Future Records)** |  |  |  |  |  |  |  |  |  |
| **Electronic Data Transfer** |  |  |  |  |  |  |  |  |  |
| Present and Future one-time costs | 1,739 | 2,447 | $5,020,975 |  |  |  |  | 2,447 | $5,020,975 |
| Present and Future annual costs | 15 | 40 | $22,500 | 40 | $22,500 | 40 | $22,500 | 120 | $67,500 |
| **Manual Data Entry** |  |  |  |  |  |  |  |  |  |
| Present and Future annual costs | 1,744 | 5,740 | $465,418 | 4,753 | $382,320 | 4,766 | $1,231,102 | 15,259 | $2,078,840 |
|  |  |  |  |  |  |  |  |  |  |
| **111.265 Historical Record Reporting** |  |  |  |  |  |  |  |  |  |
| **Electronic** |  |  |  |  |  |  |  |  |  |
| Historical one-time costs | 318 | 985 | $1,075,450 |  |  |  |  | 985 | $1,075,450 |
| **Manual Data Entry** |  |  |  |  |  |  |  |  |  |
| Historical per year | 1,968 | 57,605 | $7,373,560 | 57,605 | $7,373,560 |  |  | 115,210 | $14,747,120 |
| **Total Burden** | **75,545** | **81,122** | **$14,937,524** | **68,201** | **$8,037,542** | **10,609** | **$1,512,764** | **159,932** | **$24,487,830** |
| **Total Savings - Discontinuation of PRIA** | **101,999** | **31,831** | **$4,648,815** | **31,831** | **$4,648,815** | **31,831** | **$4,648,815** | **95,493** | **$13,946,444** |
| **Net Burden/Costs** |  | **49,291** | **$10,288,709** | **36,370** | **$3,388,727** | **(21,222)** | **($3,136,051)** | **64,439** | **$10,541,386** |

The FAA estimates the total industry net burden is **49,291** hours in year one, **36,370**hours in year two and **64,439** hours in year 3. The industry estimates the total net cost is $10.3 million in year one, $3.4 million in year two and $3.1 million in year three.

**13. Estimate of total annual costs to respondents.**

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

**14. Estimate of cost to the Federal government.**

The following table summarizes the FAA burden and cost of the PRD. The FAA uses an hourly wage rate for a grade 14 step 5 position of $80.56 to estimate costs.[[6]](#footnote-6)

|  |  |  |
| --- | --- | --- |
| **FAA Burden to Develop and Operate PRD** | | |
| **Year** | **Operations and Maintenance Costs** | **Hours** |
| 1 | $2,471,000 | 30,671 |
| 2 | $2,384,690 | 29,600 |
| 3 | $2,335,606 | 28,990 |
| **Total** | **$7,191,296** | **$89,261** |
| **Average** | **$2,397,099** | **$29,754** |
| \*See the Regulatory Evaluation available in the docket for details on the hourly rates and costs. | | |

**15. Explanation of program changes or adjustments.**

The PRD will be replacing the previous hard-copy PRIA process for request and use of records pertaining to individuals seeking employment as pilots. Once in hand, pilot records will be used, as under PRIA, to assess the qualifications of an individual for service as a pilot.

**16. Publication of results of data collection.**

Results of this data collection will not be published for public consumption.

**17. Approval for not displaying the expiration date of OMB approval.**

The FAA is not seeking approval not to display the date of expiration of this information collection.

**18. Exceptions to certification statement.**

There are no exceptions.

1. This is the first year cost—subsequent years do not include the cost of entering or “setting up” pilots in the database for the first time except for new pilots (that occur on an annual basis). [↑](#footnote-ref-1)
2. The FAA estimates the change in burden and cost for these amendments over three years to align with the three-year approval and renewal cycle for most information collections. The FAA based pilot estimates on internal databases and the FAA forecast. [↑](#footnote-ref-2)
3. The base cost is the cost to type the data into PRD once it has been collected. [↑](#footnote-ref-3)
4. The end date depends on the publication date of the final rule. At the time of writing and for the purposes this analysis, the FAA assumed the final rule would be published in 2019. The FAA will adjust the estimates of historical records as necessary after the publication of the proposed rule and the end of the comment period. [↑](#footnote-ref-4)
5. An additional 40 minutes, including 10 minutes of a human resources manager and 30 minutes of a training and development manager or .667 hours. [↑](#footnote-ref-5)
6. 2016 locality wage adjusted for the Washington, Maryland, Virginia area, and a fringe benefit rate of 36.25% [↑](#footnote-ref-6)