

**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.

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.

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.

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

Manual Record Entry Activity	Hourly Burdened Rate	135		121		125		Air Tour		91K		PAO	
		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

*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 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 These sums are later averaged over the three years.

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

(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

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).

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.

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.

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.

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.

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- (2) Number of pilots times cost per pilot per previous table. Estimates may not total due to rounding.

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

- (3) Estimates based on pilot numbers from FAA databases and FAA forecast.
- (4) Number of pilots times cost per pilot per previous table. Estimates may not total due to rounding.

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

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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.

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.

Manual Entry - Present and Future

Type of Operations	Hours	Cost	Respondents
Part 121	219	\$17,824	8
	10,		1
Part 135	710	\$871,614	,817
Part 125	506	\$30,318	52
			1
Air Tours	790	\$64,634	,091
Part 91K	332	\$27,021	3
	2,		
PAO	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 cost³ (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 The discussion of the supplemental cost follows the tables.

³ The base cost is the cost to type the data into PRD once it has been collected.

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				

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.

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	1,7594	4,530	168			\$367,713
2006	1,744	7,389	478	168			\$363,437
2007	1,744	7,358	470	168			\$362,784
2008	1,744	8,196	685	168			\$380,291
2009	1,744	8,112	664	168			\$378,542
2010	1,744	7,815	587	168	339	87	\$379,423
2011	1,744	7,646	544	168	336	87	\$375,828
2012	1,744	7,554	520	168	334	86	\$373,854
2013	1,744	7,288	452	168	329	85	\$368,202
2014	1,744	7,236	438	168	328	84	\$367,087

2015	1,744	17,145	4,415	168	326	84	\$365,144
2016	1,744	7,016	4,382	168	324	83	\$362,406
2017	1,744	7,284	4,451	168	329	85	\$368,121
2018	1,744	7,555	4,521	168	334	86	\$373,889
2019	1,744	7,751	4,571	168	338	87	\$378,068
2020	1,744	7,845	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 burden⁵ 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	Responders
Part 121	8,645	\$701,789	2,705	\$55,074	11,350	\$756,863	
Part 125	1,041	\$84,463	242	\$5,936	1,283	\$90,399	
Part 135 (2)	73,245	\$5,944,857	23,606	\$7,563,071	96,851	\$13,507,928	9
Part 91K	4,511	\$366,184	1,215	\$25,746	5,726	\$391,930	
Total	87,442	\$7,097,293	27,768	\$7,649,827	115,210	\$14,747,120	9
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.

⁵An additional 40 minutes, including 10 minutes of a human resources manager and 30 minutes of a training and development manager or .667 hours.

§ 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	Airman	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	
										3	
Total Hours including hours to gather records										1,831	

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

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.

⁶ 2016 locality wage adjusted for the Washington, Maryland, Virginia area, and a fringe benefit rate of 36.25%

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.