

Supporting Statement A

Certification: Mechanics, Repairman, Parachute Riggers

Summary of Change:

This revision requests approval of a new information collection instrument, new FAA Form 8610-3, Airman Certificate and/or Rating Application – Repairman. The information collected on this new form, was previously collected on FAA Form 8610-2.

Addition of the new form has resulted in reformatting of information on FAA Form 8610-2, now specific only to mechanics and parachute riggers.

Additionally, FAA Form 8610-1 has been reformatted for better user functionality.

See Question 15 for a summary of additional changes forming the basis of estimates within this IC.

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

Title 49, United States Code, Sections **44702** and **44703**, empower the Administrator of the Federal Aviation Administration to issue airman certification and to specify the terms, conditions, and limitations, and to authorize the regulations that prescribe the reporting requirement discussed in this supporting statement.

Title 14, Code of Federal Regulations, **part 65** (14 CFR part 65) prescribes, among other things, rules governing the issuance of certificates and associated rating for mechanic, repairman, and parachute riggers certificates, and issuance and renewal of mechanic certificate inspection authorizations:

Subpart A – General,

65.11, Application and issue.

65.19, Retesting after Failure.

Subpart D – Mechanics, § 65.75 through § 65.95

Mechanics – § 65.75 - § 65.89

Inspection Authorization – § 65.91 through § 65.95

Subpart E – Repairmen, § 65.101 through § 65.107

Repairmen (Air Carrier and Repair Station) – § 65.101 through § 65.103

Experimental Aircraft Builder Repairman – § 65.104 through § 65.105

Light Sport Repairman – § 65.107

Subpart F – Parachute Riggers

This collection of information supports the Department of Transportation's strategic goal for *Safety: Reduce Transportation-Related Fatalities and Serious Injuries Across the Transportation System*.

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

Responding to this collection is required in order to obtain and/or retain a benefit.

14 CFR § 65.11 requires that applications for a certificate or rating under this part be made on a form and in a manner prescribed by the FAA Administrator. The instruments (forms) described below are submitted by the applicant, to the FAA, by way of the local Flight Standards Office. The forms included in this collection are:

- **FAA Form 8610-1**, Mechanic's Application for Inspection Authorization
- **FAA Form 8610-2**, Airman Certificate and/or Rating Application – Mechanic and Parachute Rigger
- **FAA Form 8610-3**, Airman Certificate and/or Rating Application – Repairman¹

Use of the Information Collected

The information collected on the forms is, and has been, used by the FAA to determine eligibility for a mechanic, repairman, or parachute rigger certificate and/or rating, or a mechanic certificate inspection authorization. Application and certification is necessary to ensure qualifications of the applicant.

Mechanics (Part 65, Subpart D) – Reporting requirement.

Applicants for a mechanic certificate or added rating are required to submit, *FAA Form 8610-2, Airman Certificate and/or Rating Application – Mechanics and Parachute Riggers* to the FAA.

- FAA Form 8610-2 is attached.
 - o Refer to the attachment “**Part 65 Forms-Details of IC**”, for a summary of the information requested on the form, and the FAA business need for the information.
- Submission of the form is done on an as-needed basis, when an applicant is making original application for a mechanic certificate, or is requesting an added rating or other change to a previously issued mechanic certificate.
 - o Examples of other changes include name, gender, and nationality changes, etc. which must be submitted to the FAA on FAA form 8610-2.
- Respondents are either individuals who have civil/military experience in maintaining aircraft, or are students who have graduated from an Aviation Maintenance Technician School certificated by the FAA under 14 CFR part 147.

Parachute Riggers (Part 65, Subpart F) – Reporting and Recordkeeping requirements.

Reporting Requirement - Applicants for a parachute rigger certificate or added rating are required to submit *FAA Form 8610-2, Airman Certificate and/or Rating Application – Mechanics and Parachute Riggers*, to the FAA.

- FAA Form 8610-2 is attached.
 - o Refer to the attachment “**Part 65 Forms-Details of IC**”, for a summary of the information requested on the form, and the FAA business need for the information.

¹ This collection is requesting approval of a new form to collect repairman applicant information previously collected on FAA Form 8610-2.

- Submission of the form is done on an as-needed basis, when an applicant is making original application for a parachute rigger certificate, or is requesting an added rating or other change to a previously issued parachute rigger certificate.
 - Examples of other changes include name, gender, and nationality changes, etc. which must be submitted to the FAA on FAA form 8610-2.
- Respondents are individuals who have civil/military experience in maintaining and packing parachutes.

Recordkeeping requirement - Certificated parachute riggers must also keep records, as required by §65.131. This is a mandatory requirement of the certificate holder.

- A record is maintained by the parachute rigger that describes the parachute being packed, maintained, or altered. The record must include a description of the work done to the parachute, and the date and place where the work was performed.
- The records must be kept for at least 2 years after the date each was made.
- Parachute riggers must also attach a record to each parachute packed, to include the date and place of the packing, any defects found, and the riggers name and certificate number.

Section 65.19, Retesting after Failure – Reporting Requirement

Mechanic and parachute rigger applicants must pass FAA knowledge and practical tests, with a minimum passing grade of 70%, to be eligible for certificate issuance.

- Applicants may retest 30 days after failing a test.
- If an applicant desires to test prior to 30 days from the test failure, they must present a signed statement from an airman holding the certificate and rating sought by the applicant, certifying that the airman has given the applicant additional instruction in each of the subjects failed, and that the airman considers the applicant ready for retesting.

Inspection Authorization (§ 65.91 through § 65.95) – Reporting requirement.

Individuals who hold, and have held, a FAA mechanic certificate for at least 3 years and meet other additional requirements, are eligible to apply for an Inspection Authorization (IA). Applicants for an IA are required to submit *FAA form 8610-1, Mechanic's Application for Inspection Authorization* to the FAA.

- FAA Form 8610-1 is attached. This is a reporting requirement.
 - Refer to the attachment "**Part 65 Forms-Details of IC**", for a summary of the information requested on the form, and the FAA business need for the information.
- Initial submission of the form is done on an as-needed basis, when an applicant is making original application for an inspection authorization (IA).
- The authorization must be renewed every 2 years (§65.93(a)). In March of each odd year (e.g. March 2021), current holders of an IA must make application for renewal using FAA Form 8610-1.
- Respondents are individuals who hold and have held a FAA mechanic certificate for at least 3 years.

Repairmen (Subpart E) – Reporting requirements.

Applicants for a repairman certificate or added rating are required to submit *FAA Form 8610-3, Airman Certificate and/or Rating Application – Repairman*, to the FAA.

- FAA Form 8610-3 is attached.
 - o Refer to the attachment “**Part 65 Forms-Details of IC**”, for a summary of the information requested on the form, and the FAA business need for the information.
- Submission of the form is done on an as-needed basis, when an applicant is making original application for a repairman certificate, or is requesting an added rating or other change to a previously issued repairman certificate.
 - o Examples of other changes include name, gender, and nationality changes, etc. which must be submitted to the FAA on FAA form 8610-3.
- There are 3 types of repairman certificates available:
 - o 65.101 Repairmen are employed by an FAA certificated Air Carrier or Repair Station.
 - Respondents are individuals with training or experience in conducting specific maintenance tasks on behalf of the air carrier or repair station.
 - o 65.104 Repairmen are builders of an experimental aircraft.
 - Respondents are typically owners of the experimental aircraft for which they were the primary builder.
 - o 65.107 Repairman maintain light-sport aircraft. There are two ratings available: Inspection Rating and Maintenance Rating.
 - Respondents for the Inspection Rating are aircraft owners. The respondent must attend a 16 hour training course acceptable to the FAA and may only exercise the privileges of the rating on the specific light-sport aircraft owned by the certificate holder.
 - Respondents for the Maintenance Rating are individuals who will perform maintenance and inspection on other owners light-sport aircraft. The respondent must complete a training course acceptable to the FAA, on maintaining the particular class of light-sport aircraft for which they intend to exercise the privileges of the rating. Training courses must provide the following minimum hours:

Class of Light-Sport Aircraft	Minimum Hours of Instruction
Airplane	120
Weight-shift Control aircraft	104
Powered Parachute	104
Lighter than Air	80
Glider	80

Respondents submit FAA forms in this collection to local FAA Flight Standards offices, for review by the FAA, to determine the applicants eligibility. If all eligibility requirements are met, the FAA issues a temporary certificate to the applicant. All applications, including a copy of the temporary airman certificate, are sent to the FAA’s Foundational Business, Airmen Certification Branch.

The Airmen Certification Branch issues and mails a permanent airman certificate to the airman.

- The Airman Certification Branch maintains the information and safeguard it from improper access, modification, and destruction, consistent with FAA standards for confidentiality, privacy, and electronic information.
- Some information is available to the public via a database accesses through www.faa.gov (https://www.faa.gov/licenses_certificates/airmen_certification/). The database provides limited information to include the airman's name, address, and any certificates and ratings issued by the FAA.
- The maintaining and dissemination of the data is described in DOT/FAA System of Records Notice (**SORN**) **847, Aviation Records on Individuals** (attached).

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.

In response to the Government Paperwork Elimination Act (GPEA), all forms are available in electronic format and can be downloaded off the FAA's website, here:

<https://www.faa.gov/forms/>

The forms must be signed by the applicant and reviewed and processed by an Aviation Safety Inspector (ASI) at a Flight Standards District Office (FSDO).

Once the revised forms in this collection are approved by OMB, the FAA will begin it incorporation of these forms into IACRA.

- The FAA has an electronic data collection system called the Integrated Airman Certification and Rating Application (IACRA). IACRA is a secure web-based application that uses online validation and digital signatures to complete the airman certification documents. IACRA interfaces with multiple FAA databases such as knowledge testing and airman records for data validation and verification. It automatically ensures that applicants meet regulatory and policy requirements.
- IACRA improves the airman certification process by checking for data errors that cause rejected applications. The certification processing time is reduced since the applicant, and inspector/examiner can complete the airman application online and can submit the completed application electronically using digital signatures. OMB has used IACRA as an example of FAA's compliance with the Government Paperwork Elimination Act.
- Once the revised forms in this collection are approved by OMB, the FAA will begin it incorporation of these forms into IACRA. The IACRA website will reference this IC once forms are incorporated. The website can be found here: <https://iacra.faa.gov/IACRA/Default.aspx>

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

We have reviewed other FAA public use reports and find no duplication. We know of no other entity collecting similar information for certification of mechanics, repairman, or parachute riggers, or for issuing or renewing inspection authorizations. The information collected is only available from the applicants applying for an airman certificate, rating, or inspection authorization, under 14 CFR part 65. No similar information is available without the applicants providing it.

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

This information collection does not involve small businesses. It involves only individuals who are required to complete an application form in order to obtain or retain a benefit.

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.

If the collection of this information were not conducted, the FAA would not be able to determine applicant eligibility and qualifications for issuance of a certificate, rating, or inspection authorization. Without this determination, the appropriate certification or inspection authorization could not be issued.

If parachute records were not required to be kept by parachute riggers, the user of the parachute could not determine the parachutes airworthiness prior to using the parachutes. This could result in an unairworthy and/or unsafe parachute being unintentionally used.

7. Explain any special circumstances.

There are no special circumstances.

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission.

A 60 day notice was published in the *Federal Register* on August 19, 2020,(85 FR 51144). No comments were received.

A 30 day notice was published in the *Federal Register* on December 18, 2020 (85 FR 82570).

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

No payment or gifts are to be provided to the respondents

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

The information provided by the applicant on FAA Forms 8610-1 and 8610-2, and 8610-3 becomes part of the airman's record and is contained in the Privacy Act system of records DOT/FAA 847, Aviation Records on Individuals (SORN 847).

The use of that information is subject to the provisions of the Privacy Act and the Privacy Act systems of records, DOT/FAA 847 (SORN 847).

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.

Burden Summary

The total annual number of respondents to this collection is approximately 35,127 mechanic, parachute rigger, and repairmen applicants and certificate holders, totaling approximately **266,657** responses (28,657 reporting responses + 238,000 recordkeeping responses).

The total annual time burden of this collection is approximately **39, 920** hours. (20,167 reporting hours + 19,754 recordkeeping hours)

The total estimated reporting burden under part 65 as described in this IC includes 28,657 respondents, 28,657 responses, and **20,167** hours annually, with an estimated cost of **\$972,373**.²

The total estimated recordkeeping burden under part 65 as described in this IC includes 6,800 respondents, 238,000 responses, and **19,754** hours annually, with an estimated cost of **\$839,348**.²

Reporting Burden								
	IA Initial 65.91	IA Renew 65.93	Mechanic Subpart D	Parachute Rigger Subpart F	Repairman Subpart E	Retesting After Failure 65.19	Light Sport Repairmen Training 65.107	Totals
Instrument	FAA Form 8610-1		FAA Form 8610-2		FAA Form 8610-3			
# of Respondents (annually)	1855	10826	11000	360	3280	1136	200	28,657
Responses per respondent	1	1	1	1	1	1	1	--
Total # of Responses	1855	10826	11000	360	3280	1136	200	28,657
	12681		11360					
Time per Response (hours)	.33	.33	.33	.33	.33	.167	55	--
Hour Burden (hours)	612	3573	3630	119	1083	190	10960	20,167
	4185		3749					
Cost Burden (\$)	\$270,100		\$244,392		\$46,017	\$12,262	\$399,601	\$972,373

Recordkeeping Burden	
Parachute Rigger – Records 65.131	
# of Respondents (annually)	6800
Responses per respondent	35
Total # of Responses	238,000
Time per Response (hours)	.083
Hour Burden (hours)	19,754

² See question 15 for an explanation of differences from 2017 IC renewal.

Cost Burden (\$)	\$839,348
-------------------------	------------------

Reporting Burden

Form 8610-1, Mechanic's Application for Inspection Authorization

Annually approximately 1855³ applications are made for a new issuance inspection authorization. Annually approximately 10826⁴ holders of an inspection authorization renew their authorization.

The FAA estimates an average of 20 minutes (.33 hours) is spent by each respondent completing the applications form.

Form 8610-1, Application for Inspection Authorization	# of Respondents (annually)	Responses per respondent (annually)	Time per response (hours)	Hour Burden	Cost/hour (\$/hour)	Cost burden (\$)
New IA applicants	1855	1	0.33 hours (20 minutes)	612	64.54	39,498
IA Renewals 21652/2 ⁵	10826	1	0.33 hours (20 minutes)	3573	64.54	230,601
Totals	12,681	1	55	4185	--	270,100

Form 8610-2, Airman Certificate and/or Rating Application - Mechanic and Parachute Rigger

Annually approximately 11360⁶ individuals make application for an airmen (mechanic and parachute rigger) certificate, added rating, or other change, and spend an average time of 20 minutes (.33 hours) completing the application form.

Form 8610-2, Application for Mechanic and Parachute Rigger	# of Respondents (annually)	Responses per respondent (annually)	Time per response (hours)	Hour Burden	Cost/hour (\$/hour)	Cost burden (\$)
Mechanic Applicants	11000	1	0.33 hours (20 minutes)	3630	64.54	234,280

³ Respondent data source was obtained from a query of the FAA NPTRS Database for 2019 IA original issuances.

⁴ Respondent data source was an FAA Airman Records branch query of the number of March 2019 IA Renewals received by the FAA airman records office.

⁵ Inspection authorization renewals are required biennially. Therefore, the total number of IA renewals was divided by 2 to determine an estimated annual respondents.

⁶ Respondent data source for mechanic and parachute rigger applicants was the FAA's 2019 Active Civil Airmen Statistics, Table 16, https://www.faa.gov/data_research/aviation_data_statistics/civil_airmen_statistics/

			minutes)			
Parachute Rigger Applicants	360	1	0.33 hours (20 minutes)	119	42.49	5,056
Totals	11360	1	.33	3749	--	244,392

Form 8610-3, Airman Certificate and/or Rating Application – Repairman

Annually, approximately 3280 individuals make application for a repairman certificate or added rating, and spend an average time of 20 minutes (.33 hours) completing the application form.

- o The FAA estimates 2650⁷ §65.101 repairman applicants annually.
- o The FAA estimates 430⁸ § 65.104 amateur-built repairman applicants annually.
- o The FAA estimates 200⁶ §65.107 light-sport repairman applicants annually.

Form 8610-3, Application for Repairman Certificate	# of Respondents (annually)	Responses per respondent (annually)	Time per response (hours)	Hour Burden (hours)	Cost/hour (\$/hour)	Cost burden (\$)
Repairman -65.101	2650	1	0.33 (20 minutes)	875	42.49	37,179
Amateur Built Repairman - 65.104	430	1	0.33 (20 minutes)	142	42.49	6,034
Light Sport Repairmen - 65.107	200	1	0.33 (20 minutes)	66	42.49	2,804
Total	3280	1	0.33	1083		\$46,017

Section 65.19, Retesting after failure

Of the 11360 mechanic and parachute rigger applicants, the FAA estimates that approximately 10% of applicants fail a mechanic certification test and retest within 30 days, thereby needing a statement of retraining. Respondents spend an estimated 10 minutes in obtaining a statement of retraining.

Retesting after Failure 65.19	# of Respondents (annually)	Responses per respondent (annually)	Time per response (hours)	Hour Burden (hours)	Cost/hour (\$/hour)	Cost burden (\$)
Annual retests within 30 days	1136	1	0.167 (10 minutes)	190	64.54	\$12,263

Section 65.107 – Light-sport repairman training

⁷ Respondent data source for this renewal was the FAA's 2019 Active Civil Airmen Statistics, Table 16, https://www.faa.gov/data_research/aviation_data_statistics/civil_airmen_statistics/

⁸ Respondent data source was an FAA Airman Records branch query of the number of 2019 §65.104 amateur-built repairman applications received by the FAA airman records office.

The FAA receives approximately 200 light-sport repairman applications annually, with the below estimated dispersal among light-sport ratings and classes.

As discussed in question 2, repairman applicants have different training hour requirements depending on the class of light-sport aircraft being requested on the certificate.

Class of Light-Sport Aircraft	Minimum Hours of Instruction
Airplane	120
Weight-shift Control aircraft	104
Powered Parachute	104
Lighter than Air	80
Glider	80

Of the 200 light-sport repairman applicants annually, the FAA annual estimates for each class are 60 airplane, 5 weight-shift, 5 powered parachute, 2 lighter-than-air, and 8 glider.

Light Sport Repairmen Training 65.107		# of Respondents (annually)	Responses per respondent (annually)	Time per response (hours)	Hour Burden	Cost/hour (\$/hour)	Cost burden (\$)
Inspection Rating		120	1	16	1920	36.46	70,003
Maintenance Rating	Airplane Class	60	1	120	7200	36.46	262,512
	Weight Shift Class	5	1	104	520	36.46	18,959
	Powered Parachute class	5	1	104	520	36.46	18,959
	Lighter than Air Class	2	1	80	160	36.46	5,834
	Glider Class	8	1	80	640	36.46	23,334
Total		200	1	55*	10960	--	\$399,601

*Average response time based on the hour burden of all training divided by the # of respondents.

Record Keeping Burden

The FAA estimates that 6800⁹ parachute rigger certificate holders each make 35 recordkeeping entries per year and spend 5 minutes making each entry.

Parachute Rigger Records – § 65.131	# of Respondents (annually)	Responses per respondent (annually)	Time per response (hours)	Hour Burden	Cost/hour (\$/hour)	Cost burden (\$)

⁹ Respondent data source for parachute rigger certificate holders was the FAA's 2019 Active Civil Airmen Statistics, Table 1, https://www.faa.gov/data_research/aviation_data_statistics/civil_airmen_statistics/

Records	6800	35	0.083 (5 minutes)	19,754	\$42.49	\$839,348
---------	------	----	----------------------	---------------	---------	------------------

Labor Cost Analysis

The labor cost estimates used wage rates for aircraft mechanics and other installation, maintenance and repair workers, to determine a cost burden. For all wages, the FAA multiplied the hourly wage by 2 to account for a fringe benefit rate of 31%¹⁰ and an overhead rate of 69%¹¹.

Aircraft Mechanics and holders of an Inspection Authorization

The wage rate of **\$32.27** per hour came from the Department of Labor, Bureau of Labor Statistics (BLS), May 2019, Aircraft Mechanics and Service Technicians #49-3011.¹² This wage rate is used for initial mechanic applicants, as well as added rating and other change applications. Applicants for an Inspection authorization must hold a mechanic certificate.

Mechanics			
Hourly wage	31% Fringe Benefit	69% Overhead	Total
\$32.27	\$10.00	\$22.27	\$64.54

Parachute Rigger and Repairmen.

The wage rate of **\$21.06** per hour came from the Department of Labor, Bureau of Labor Statistics (BLS), May 2019, Installation, Maintenance, and Repair Workers, All Other, #49-9099.¹³

Parachute Riggers and Repairmen			
Hourly wage	31% Fringe Benefit	69% Overhead	Total
\$21.06	\$6.53	\$14.90	\$42.49

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

There are no additional startup costs not already covered in question 12.

14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational

¹⁰ An employee fringe benefit of 31% is added (for benefits such as health benefits, vacation, sick time, etc.), based on the Civilian Workers wages, as reported in BLS release, Employer Costs for Employee Compensation-June 2019.

Source: U.S. DOL/BLS: <https://www.bls.gov/news.release/ecec.nr0.htm>

¹¹ Source: U.S. Department of Health and Human Services, "Guidelines for Regulatory Impact Analysis" (2016), https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf. On page 30, HHS states, "As an interim default, while HHS conducts more research, analysts should assume overhead costs (including benefits) are equal to 100 percent of pretax wages...." To isolate the overhead rate, the Department subtracted the benefits rate of 69 percent from the recommended rate of 100 percent.

¹² U.S. DOL/BLS: <https://www.bls.gov/oes/current/oes493011.htm>

¹³ U.S. DOL/BLS: <https://www.bls.gov/oes/current/oes499099.htm>

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 FAA estimates the total additional agency burden per year is **20,688** hours, at an estimated cost of **\$2,181,963**.

Costs to the Federal government are incurred in reviewing the applications for mechanics, parachute riggers, and repairmen. The reviews are typically done by qualified Aviation Safety Inspectors.

Agency Burden						
	IA Initial 65.91	IA Renew 65.93	Mechanic Subpart D	Parachute Rigger Subpart F	Repairman Subpart E	Totals
Instrument	FAA Form 8610-1		FAA Form 8610-2		FAA Form 8610-3	
# of Respondents (annually)	1855	10826	11000	360	3280	28,327
Responses per respondent	1	1	1	1	1	--
Total # of Responses	1855	10826	11000	360	3280	28,327
Time per Response (hours)	.75	.75	.75	.75	.75	--
Hour Burden (hours)	1391	8119	8250	270	2460	20,688
	9438		8520			
Cost Burden (\$)	995,425		927,081		259,456	2,181,963

Agency Labor Cost Analysis

The FAA estimates the fully burdened FAA aviation safety inspector (ASI) rate at \$105.47. We obtained the salary base rate for this position from the 2020 Core Compensation Plan Pay Bands, effective January 5, 2020.¹⁴ For this position, we add a benefit overhead of 36.25%¹⁵.

15. Explain the reasons for any program changes or adjustments.

FAA Form 8610-3, is a new form in this collection, specific to repairman applicants under 14 CFR part 65, Subpart E.

- This is not a request to collect new information, only to separate repairman information collection from mechanics and parachute riggers.
- Separating these collections will benefit the applicants, as the forms will be more specific to applicant type.
- Separation also allows additional room on the forms, which provides for larger font and formatting to enable a better user experience, including attaching instructions to the applicant on form completion for the specific certificate being requested.
- Refer to the attachment "**Part 65 Forms-Details of IC**", for a summary of the information requested on the form, and changes made to the form.

¹⁴ https://employees.faa.gov/org/staffoffices/ahr/program_policies/policy_guidance/hr_policies/hrpm/comp/comp_ref/paybands/

¹⁵ <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2008/m08-13.pdf>

FAA Form 8610-2 has been reformatted to only include information specific to mechanic and parachute rigger applicants, due to the addition of the new repairman application form.

- Refer to the attachment “**Part 65 Forms-Details of IC**”, for a summary of the information requested on the form, and changes made to the form.

FAA Form 8610-1 has been reformatted for better user functionality when making application for, or renewal of, an inspection authorization.

- Refer to the attachment “**Part 65 Forms-Details of IC**”, for a summary of the information requested on the form, and changes made to the form.

ICR Summary of Burden – Differences from 2017 Renewal

This table summarizes the change of burden in this ICR from the 2017 collection renewal. The additional tables provide detailed data on reporting and recordkeeping burden differences.

	Respondents	Responses	Hour Burden	Cost Burden
2017	64,291	376,241	44,841	\$770,711
2020	35,457	266,327	39,920	\$1,811,721
Difference	-28,824	-109,584	-4,921	\$1,041,010

Reporting burden estimated in this IC includes less respondents, and slightly more hour burden. However the increase in wage rate estimates has increased the cost burden considerably, as follows:

	Respondents	Hour Burden	Cost Burden
2017	55,116	18,188	\$317,610
2020	28,657	20,167	\$972,373
Difference	-26,459	1,979	\$654,763

See tables below for an explanation and specific differences on 2017 vs 2020 estimate differences.

Inspection Authorization - FAA Form 8610-1

Although the number of respondents went down by only 68, the wage rate estimate increases by \$46/hour, resulting in a cost burden increase of approximately \$190,167.

FAA Form 8610-1					
IC	Respondents	Time	Hours	Cost	Cost Burden
2017	12,749	.33 hours	4,207	\$19	\$79,933

2020	12,681	0.33	4,185	\$64.54	\$270,100
Difference	-68		-22	\$46	\$190,167

Mechanics, Parachute Riggers and Repairmen - FAA Form 8610-2 and 8610-3

Note: In the 2020 IC, this burden is split between two collection instruments, the -2 and -3 forms listed above, while the 2017 IC only uses FAA form 8610-2.

Although the number of respondents went down by 27,727, and resulting hours burden was reduced by 13,981 hours, the wage rate estimates increased by \$25.49/ hour for parachute riggers and repairmen, and by \$48/hour for mechanics, resulting in cost the cost burden \$290,409 higher, than the previous collection.

FAA Form 8610-2 Mechanics and Riggers & Repairmen					
IC	Respondents	Time	Hours	Cost	Cost Burden
2017	42,367	0.33	13,981	\$17	\$237,677
2020	14640	0.33	4832	\$65	\$244,392
				\$42.49	\$46,017
Difference	-27,727		-13,981	\$25.49- \$48	\$52,732

Retesting after Failure

The burden associated with mechanic and parachute rigger retests, within 30 days of a test failure, was inadvertently omitted from the previous IC resulting in an additional 1136 respondents, 190 hours, and \$12,263 in cost burden.

Retesting after Failure 65.19					
IC	Respondents	Time	Hours	Cost	Cost burden
2017	0	0	0	0	0
2020	1136	10 minutes	190	64.54	\$12,262

Light-Sport Repairmen Training

The burden associated with light sport repairman training was inadvertently omitted.

Light Sport Repairmen Training 65.107					
IC	Respondents	Average Time	Hours	Cost burden	Respondents
2017	0	0	0	0	0
2020	200	55*	10960	--	\$399,601

Recordkeeping burden estimated in this IC includes less respondents, resulting in less hour burden. However the increase in estimated wage rates results in an increase in cost burden, as follows:

Parachute Rigger Records – § 65.131

IC	Respondents	Responses per	Responses	Time	Hour	Cost/hour	Cost burden
2017	9175	35	321,125	0.083 (5 minutes)	26,653	\$17	\$453,101
2020	6800	35	238,000	0.083 (5 minutes)	19,754	\$42.49	\$839,348
Difference	-2,375	-	-83,125	-	-6,899	\$25.49	386,247

Agency burden estimated in this IC includes less respondents, however the estimated time for FAA review of applications has been increased for accuracy of actual time spent reviewing applications, and the inspector estimated wage rate has increased, resulting in a higher cost burden to the agency than previously reported, as follows:

Agency Burden - Difference from 2017 IC Renewal					
IC	Respondents	Time	Hours	Cost	Cost Burden
2017	55116	0.33	18,18 8	\$38.46	\$699,510
2020	28,372	0.75	21,27 9	\$105.4 7	\$2,181,963
Difference	-26,744	0.42	3,091	\$67.01	\$1,482,453

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 to publish this information for statistical or other purposes at this time.

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

We are not seeking approval to not display the expiration date.

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

There are no exceptions.