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

While there may not be a specific regulatory/statutory requirement to collect PIREPs. Several Federal Regulations, Handbooks and Advisory Circulars contain section on submission, collection, coding and dissemination of PIREPs, including:

## 14 CFR § 135.67 Reporting potentially hazardous meteorological conditions and irregularities of ground facilities or navigation aids.

Whenever a pilot encounters a potentially hazardous meteorological condition or an irregularity in a ground facility or navigation aid in flight, the knowledge of which the pilot considers essential to the safety of other flights, the pilot shall notify an appropriate ground radio station as soon as practicable.

## Federal Meteorological Handbook No. 12 (FMH-12), United States Meteorological Codes and Coding Practices.

Chapter 1, contains the instructions for encoding PIREPs for transmission.

### Federal Aviation Administration Order JO 7110.10AA, Flight Services

8-2-3. RESPONSIBILITY

**a**. FSS specialists must actively solicit PIREPs in conjunction with preflight and inflight communications with pilots and assure timely dissemination of the PIREP information.

# Federal Aviation Administration Aeronautical Information Manual Paragraph 7-1-20. Pilot Weather Reports (PIREPs)

- **a.** FAA air traffic facilities are required to solicit PIREPs.
- **b.** Pilots are urged to cooperate and promptly volunteer reports of these conditions and other atmospheric data such as: cloud bases, tops and layers; flight visibility; precipitation; visibility restrictions such as haze, smoke and dust; wind at altitude; and temperature aloft.

The PIREP information collected is used by the National Weather Service (NWS) forecasters to confirm that their forecasts of Turbulence and Icing as well as other weather products are correct. The National Transportation Safety Board (NTSB) special investigation report: Improving Pilot Weather Report Submission states:

A PIREP can be one of the most critical sources of data for a forecaster when determining whether to issue an advisory product. Forecasters have noted that even a single PIREP can influence the decision to issue (or discontinue) a hazardous weather advisory or amend its geographic area. PIREPs also provide information that improves automated products such as the Graphical Turbulence Guidance (GTG), the Current Icing Product (CIP), and the Forecast Icing Product (FIP) (FAA 2014d). Such improvements in the quality of forecasts and advisories allow for more accurate identification of areas conducive to airframe icing and turbulence and help pilots avoid such hazards.

To better achieve safety improvements, it is important to increase both the quantity and quality of PIREP submissions. Although pilots value using PIREPs in their strategic and

tactical flight planning, relatively few routinely provide PIREPs themselves. The Aircraft Owners and Pilots Association's (AOPA) review of results from its 2016 survey (to which about 700 primarily GA pilots responded) found that 83% of pilots who responded to the survey viewed PIREPs as either extremely or very important to aviation safety across the NAS.

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.

Pilot reporting of weather conditions, including turbulence, commonly referred to as Pilot Weather Reports (PIREPs), has been standard procedure during most of the Twentieth century. By the late 1940s, the International Civil Aviation Organization (ICAO) had developed standards which included aircraft-based weather observations by pilots and subsequent government distribution. In the USA, commercial airlines developed their own collection and distribution methods. This was in response to Federal Aviation Administration (FAA) requirements that pilots should report hazardous weather, and airlines should have ability to monitor the progress of every flight.

Pilot Weather Reports (PIREPs) are voluntary reports from pilots describing weather conditions observed while flying. PIREPs are an important source of weather information in the National Airspace System (NAS). In some instances PIREPs are the only way for forecasters to confirm the forecasted conditions are occurring.

Complete, accurate, and timely weather information from PIREPs is an essential element of flight safety for all aircraft operations in the NAS. This information is used by pilots to avoid inadvertent encounters with hazardous weather and preventing weather-related accidents.

Pilots most commonly submit PIREPs verbally via radio to a flight service station (FSS). Pilots also have technology options to transmit a PIREP in text format, through either aircraft or webbased tools and/or portable electronic devices.

The PIREP Form, FAA Form 7110-2, is a tool to assist ATC personnel and pilots to report the conditions encountered in the proper format. It is essential that the weather conditions in a PIREP be reported be in the correct format to ensure the timely dissemination and availability to the users of the NAS. The PIREP format includes aircraft type, location, altitude; time conditions were observed; and a description of observed weather conditions.

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.

Pilots report the information verbally. A government employee or contractor enters the information into the NAS.

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.

There is no duplication.

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

The collection of the information does not involve small business or other entities.

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.

Once a PIREP has been properly disseminated and is available to the NAS, end users include other pilots, company flight-handling personnel (such as dispatchers and flight coordinators), ATC personnel, National Weather Service (NWS) meteorologists, and weather researchers. For each of these user groups, the real-time information provided by PIREPs directly supports flight safety functions:

- Pilots and other company personnel use PIREPs during both strategic and tactical route planning to avoid weather hazards.
- ATC personnel use PIREPs when organizing the safe and expeditious flow of air traffic in their area of jurisdiction. ATC personnel can (and, under some weather conditions, are required to) solicit PIREPs and disseminate the information.
- NWS meteorologists use PIREPs to verify or amend aviation forecast and advisory products. Weather researchers also use PIREPs to improve the accuracy of global forecast models and turbulence and icing weather products.
- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

When certain weather conditions are present or forecast, pilots are requested to submit PIREPs. However, the submission of a PIREP by a pilot is voluntary.

- requiring respondents to report information to the agency more often than quarterly; N/A (voluntary)
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; N/A (voluntary)
- requiring respondents to submit more than an original and two copies of any document; requiring respondents to retain records, other than health, medical,

government contract, grant-in-aid, or tax records, for more than three years; **N/A** (voluntary)

- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study; Collection of Pilot Report Information (PIREP) is not a survey.
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB; Pilot Report Information (PIREP) is not statistical data.
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or N/A (voluntary)
- requiring respondents to submit proprietary trade secrets, or other confidential
  information unless the agency can demonstrate that it has instituted procedures
  to protect the information's confidentiality to the extent permitted by law.; N/A
  submission of a PIREP is voluntary)

Explain the need for any inconsistencies in your collection. There are no inconsistencies, see answer to question 6.

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A Federal Register Notice published on October 1, 2019 (84 FR 52157), solicited public comment. There were 2 comments received. Both affirmed the importance of PIREPs to Aviation Safety. The 30 day Federal Register Notice was published on December 6, 2019 (84 FR 66963). No comments were submitted. <a href="https://www.regulations.gov/docketBrowser?rpp=25&so=DESC&sb=commentDueDate&po=0&dct=N&D=FAA-2019-0772">https://www.regulations.gov/docketBrowser?rpp=25&so=DESC&sb=commentDueDate&po=0&dct=N&D=FAA-2019-0772</a>

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

No payments or gifts are made to individuals who submit PIREP information.

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

PII is not part of a PIREP. PII is not required or requested to submit a PIREP. Only the weather information reported by the pilot included in a PIREP. If the form is used, once the weather information is entered into the NAS, the form is discarded.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

There are no questions of a sensitive nature.

- 12. Provide estimates of the hour burden of the collection of information. The statement should:
  - Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices. \* If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.

Submission of a PIREP is voluntary. There were more than 54,000 PIREPs submitted from January through September 2019. The average time to submit a PIREP is approximately 2 minutes.

Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under item 13.

### FAA Form 7110-2 Pilot Weather Report (PIREP)

5	12 months	PIREPs per year 72,000	
7		72,000	
8			
9			
	average salary of airline and		
	commercial pilots per BLS CY 2019 -		
.0	\$121,430		
.1			
.2	annual salary	\$121,430.00	
.3	monthly	\$10,119.17	
.4	Daily salary (20 days per month)	\$505.96	
.5	average hours a day 10/pay per hour	\$50.60	
.6			
.7	pay per minute 51/60 minutes	\$0.84	
8.			
9	2 minutes per submission	\$1.68	
0			
1	annual burden 72,000 x1.68	\$120,960.00	
2			

Summary (Annual numbers)	Reporting	Recordkeepin g	Disclosure
# of Respondents	18,000		
# of Responses			
per respondent	4		
Time per			
Response	2 minutes		
Total # of			
responses	72,000		
Total burden			
(hours)	2,400		

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 costs to the respondents or record keepers. The use of this form does not create any new procedures or modify existing ones.

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 expenses (such as equipment, overhead,

printing, and support staff), and any other expense that would not have been incurred without this collection of information.

Include here a description of the method used to estimate costs to the Federal government, which should show the quantification of hours, operational expenses (such as equipment, overhead, printing, and staff support), and any other expense which would not have been incurred without this collection of information. Even if there will be no costs beyond the normal labor costs for staff, please provide average staff hourly rate x estimated hours per year.

- Costs should be sourced and cited
- Costs should include base wage, fringe, and overhead (each sourced/cited)
- Calculations should be shown

Printing out the PIREP Form is not required. Use of the form does not create an additional cost to the Federal Government.

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

As mentioned in response to question 2, Pilots have been reporting inflight weather conditions thought-out the 20<sup>th</sup> century. Both the FAA and ICAO have developed and upgraded the standards of collection, reporting and dissemination of the PIREPs.

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.

Information collected will not be published in a journal, on a website or a news source. However:

Once a PIREP has been properly disseminated and is available to the NAS, end users include other pilots, company flight-handling personnel (such as dispatchers and flight coordinators), ATC personnel, National Weather Service (NWS) meteorologists, and weather researchers. For each of these user groups, the real-time information provided by PIREPs directly supports flight safety functions:

- Pilots and other company personnel use PIREPs during both strategic and tactical route planning to avoid weather hazards.
- ATC personnel use PIREPs when organizing the safe and expeditious flow of air traffic in their area of jurisdiction. ATC personnel can (and, under some weather conditions, are required to) solicit PIREPs and disseminate the information.

### FAA Form 7110-2 Pilot Weather Report (PIREP)

- NWS meteorologists use PIREPs to verify or amend aviation forecast and advisory products. Weather researchers also use PIREPs to improve the accuracy of global forecast models and turbulence and icing weather products.
- 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.

Not seeking approval.

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

Not seeking exceptions.