

Paperwork Reduction Act Burden Statement

A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a currently valid OMB Control Number. The OMB Control Number for this information collection is 2120-0697. Public reporting for this collection of information is estimated to be approximately 30 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. All responses to this collection of information are required to obtain or retain a benefit in accordance with 14 CFR Part 49. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, Federal Aviation Administration, 10101 Hillwood Parkway, Fort Worth, TX 76177-1524.

Supporting Statement A
FAA Entry Point Filing Form – International Registry

The following items were updated for the following reasons:

2. Added a little more information.
3. Included the future use of CARES.
7. Responded to better address the question.
- 12 & 14. Figures were updated to use FY20 data.

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

On August 9, 2004, the President signed the Cape Town Treaty Implementation Act of 2004 (hereinafter referred to as Cape Town Treaty or Treaty), Public Law 108-297, which requires conforming changes to the regulations concerning registration and deregistration of aircraft. The Convention on International Interest in Mobile Equipment, as modified by the Protocol to the Convention on International Interests in Mobile Equipment on Matters Specific to Aircraft Equipment, provides for the creation of the International Registry.

14 CFR 49.61 designates the FAA Civil Aviation Registry (Registry) as the entry point for authorizing the transmission of information affecting an interest in certain types of eligible U.S. registered aircraft, helicopters and aircraft engines to the International Registry. The information collected is necessary to obtain an authorization code for transmission of interests to the International Registry. The International Registry is an electronic registry system that works in tandem with the current system operated by the Registry for the United States.

To transmit interests to the International Registry, interested parties must file a completed FAA Entry Point Filing Form – International Registry, AC Form 8050-135, with the Registry. Upon receipt of the

completed form, the Registry verifies the accuracy of the submitted data and issues a unique authorization code. The submitter then uses that authorization code to enter their interest into the International Registry.

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.

The purpose of this collection is to obtain an authorization code for transmission of information to the International Registry. Responding to this collection is mandatory in order to obtain a code however, submitting the information to the International Registry is voluntary or done as needed. Respondents are typically financial or leasing institutions but could be individuals or companies. The Registry scans the form and keeps an image in the administrative files and enters the party name(s), collateral description(s), and the authorization code into the existing database system for recordkeeping. Interested parties may access the information to determine if an authorization code was issued. Interested parties may request a copy of the completed AC Form 8050-135 by submitting a written request identifying the authorization code.

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.

Currently, this form is available for download via the FAA Forms website at https://www.faa.gov/licenses_certificates/aircraft_certification/aircraft_registry/aircraft_regn_forms/. The completed form must be hand delivered or mailed to the FAA Registry when recordable related documents representing the transaction must be included. The related documents must meet the recording requirements of 14 CFR Part 49. Prospective interests (the 8050-135 form alone), however, may be submitted by fax or as an attachment in an email at 9-avs-ar-electronic-submittals@faa.gov. The issuance of the authorization code is a manual process. Upon submission of the form, Registry personnel review it for completeness and acceptability to issue the authorization code, pass it through a printer that imprints the unique authorization code, make a copy of the form to keep in our office, and return the original form to the respondent. Because the Registry is required to issue a unique code, we maintain control of these numbers. The data is input into the Aircraft Registration database to allow for search capabilities. The AC Form 8050-135 is scanned and the image stored in an electronic administrative file. These images are retrievable by entering the authorization code in the database and accessing the imaging system software.

In the future, the Civil Aviation Registry Electronic Services (CARES) is intended to streamline the way International forms are submitted via online access to users wishing to submit information directly over the internet in a digital format. In instances where CARES will initiate a request from the user, an email notification will be sent directly to the user with a unique authorization code. (The unique authorization code will associate an email notification with the user response.) The specific details on how this solution will be developed is evolving at this time, and will be implemented in a later phase of CARES development.

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.

The Registry is the exclusive U.S. entry point for transmissions to the International Registry. There is no duplication of records or recordkeeping.

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

We have reduced the respondent burden to a minimum. The procedures and information needed to obtain an authorization code are the same for all respondents.

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.

The frequency of the collection is determined by the respondent. Without this collection respondents would not be able to record their interest in certain types of mobile equipment on the International Register.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- *requiring respondents to report information to the agency more often than quarterly;*
- *requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;*
- *requiring respondents to submit more than an original and two copies of any document; requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;*
- *in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;*
- *requiring the use of a statistical data classification that has not been reviewed and approved by OMB;*
- *that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or*
- *requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.*

The frequency of this information collection is determined by the respondent. The collection is based on the need to record an interest in certain types of mobile equipment, which usually doesn't occur more than once yearly, possibly less frequently. The Registry collects the party name, address, and telephone number, a description of the affected mobile equipment, the type of interest and the submitter's information if different from the interested party, on the AC Form 8050-135. Respondents are only

required to submit one copy of the form but may retain a copy for their records. There is no pledge of confidentiality.

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 data elements to be recorded, disclosed, or reported.

A Federal Register Notice published on January 28, 2021 (86 FR 7453), solicited public comments. There was one comment that does not appear to apply to this notice. The comment was from “Anonymous” and stated “IT IS THE JOB THAT NO ONE UNDERSTANDS? IT IS THE AIRPORT CERTIFICATION CLERK? IT IS LIKE THE ADMINISTRATIVE CLERK OF A BUSINESS?” The FAA has no response to this comment.

Throughout the drafting of the changes to 14 CFR Parts 47 and 49, the changes to 49 U.S.C. Chapter 441, and the creation of the AC Form 8050-135, the Registry, working with the Aeronautical Center Counsel, consulted interested persons outside the agency and obtained their views on the collection of data and the data elements to be recorded, disclosed, or reported. An interested group of attorneys and lawyers, the U.S. State Department, and a representative of the Export-Import Bank to name a few, were key to making these changes. The FAA has not solicited or received public comments on this collection since the collection began.

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

No payments or gifts were provided.

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

The Registry does not assure confidentiality.

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

No information of a sensitive nature is requested nor required to obtain an authorization code.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the**

hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices. * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.

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

The estimated annualized cost to respondents is \$178,566.60. There were 14,360 filings during FY20. The time per response is 0.5 hours. A Paralegal mean hourly wage of \$24.87 was used to estimate the annualized cost.

Most companies that file these types of security agreements are law firms and financial institutions. A technical level person (paralegal or legal assistant) usually completes the form and submits it to the Registry. The public cost burden is based upon the mean hourly wage for a paralegal derived from the Bureau of Labor Statistics, U.S. Department of Labor, *Occupational Outlook Handbook*, Paralegals and Legal Assistants, at <https://www.bls.gov/ooh/legal/paralegals-and-legal-assistants.htm>.

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	14,360		
# of Responses per respondent	1		
Time per Response	0.5		
Total # of responses	14,360		
Total burden (hours)	7,180		

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

There are no additional costs.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The estimated annualized cost burden for the Federal Government is \$187,092.77. The Registry staffs its Cashier's section with full-time employees who, with part of their time, support the Registry's responsibility as the portal to the International Registry both in issuing the code and QA processing of completed work packets. In addition, a very small amount of the Cashier's section supervisor's time is required for this function. Contractors perform the preparation, indexing and scan functions. Copier, printer, and computer equipment are required for performing the process. We use a five-year life cycle for equipment in calculating the annualized equipment cost for the government. The copier requires an annual maintenance contract/agreement. Copier paper and printer ribbon are the only additional supplies the Registry anticipates requiring to support this function. The Registry mainframe computer usage is costed at \$2.29 per unit. This figure is based on calculations used in the development and submission of user fees. A unit is loosely defined as a transaction between the Registry and the mainframe. Each time the Registry communicates with the mainframe a transaction occurs. There were 14,360 filings for FY20 and only the indexing and QA functions will require accessing the computer network mainframe.

	Driving Item Count		Qty per Item	Unit		Rate	Cost	Annual Cost
Personnel								\$61,602.56
Cashier Supervisor	6	Actions	0.250	Hrs	@	\$43.86	\$65.79	
Legal Assistant IR	14,360	Form Packets	0.083	Hrs	@	\$26.51	\$31,596.74	
Legal Assistant QA	14,360	Form Packets	0.083	Hrs	@	\$25.12	\$29,940.03	
Contract Personnel Time Required								\$51,832.70
Prep	14,360	Form Packets	0.020	Hrs	@	\$26.14	\$7,507.41	
Index	14,360	Form Packets	0.083	Hrs	@	\$26.14	\$31,155.74	
Scan	14,360	Form Packets	0.015	Hrs	@	\$20.38	\$4,389.85	
Store	14,360	Form Packets	0.015	Hrs	@	\$20.38	\$4,389.85	
Dispose	14,360	Form Packets	0.015	Hrs	@	\$20.38	\$4,389.85	
Supplies								\$6,322.71
Portfolio Folders	14,360	Form Packets	1.000	Each	@	\$0.3836	\$5,508.50	
Blue Paper	14,360	Form Packets	1.000	Sheet	@	\$0.0324	\$465.26	
White Paper	14,360	Form Packets	3.000	Sheets	@	\$0.0081	\$348.95	
Computer Time								\$65,768.80
Index	14,360	Form Packets	1.000	Unit	@	\$2.29	\$32,884.40	
QA	14,360	Form Packets	1.000	Unit	@	\$2.29	\$32,884.40	
Equipment and Maintenance								\$1,566.00
Copier Purchase & Maintenance \$7500/5 yrs				Used for IR 100%			\$750.00	
Gov't Computer \$1200/5 yrs							\$240.00	
Printer \$2882/5 yrs							\$576.00	
							Total Annual Cost	\$187,092.77

15. Explain reasons for any program changes or adjustments.

The burden is based on respondent submissions which can fluctuate up or down from year to year. The last submission was an estimated number.

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.

No publication is planned for this information.

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.

The Registry is not seeking approval to not display the expiration date for OMB approval.

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

There are no exceptions.