**Supporting Statement A**

**Unmanned Aircraft Systems (UAS) BEYOND and Partnership for Safety Plan (PSP) Programs**

The purpose of the Unmanned Aircraft Systems (UAS) BEYOND and Partnership for Safety Plan (PSP) programs is for the Federal Aviation Administration (FAA) to work with state, local and tribal (SLT) governments (BEYOND) and private UAS operators (PSP) to work toward full, safe integration of UAS into the national airspace system (NAS). There are eight SLT governments in the BEYOND program and seven industry participants in the PSP program. The programs have multiple data collections that serve different purposes to help the FAA achieve the goals.

First, there are narrative reports that will provide qualitative, non-statistical data that will inform the FAA of operational trends, highlight successes and failures and their causes, and describe challenges and lessons learned. These narrative reports are meant to inform the FAA of progress being made, to identify where there are challenges or gaps in understanding, and to help the FAA make policy and resource decisions. The data will be supplied by the eight SLT governments in the BEYOND program, and the seven industry operators in the PSP program. The collection instruments include:

1. PSP Quarterly Reports
2. BEYOND Semi-Annual Reports
3. BEYOND Final Reports
4. PSP Final Reports
5. BEYOND Program Withdrawal Reports

Second, there are systems and operations data submissions which will provide both quantitative and qualitative information about the program participants’ aircraft, flights, corrective maintenance actions, off-nominal flight events, and UAS testing activities. The submissions are not statistical in nature but are designed to supply data that will help inform policy and standards related to UAS pilots flying their aircraft beyond their visual line of sight. The data will be supplied by the eight SLT governments in the BEYOND program, and the seven industry operators in the PSP program. The collection instruments include:

1. UAS Characteristics Reports
2. UAS Monthly Operational Flight Reports
3. UAS Maintenance Reports
4. UAS Flight Anomaly Reports
5. UAS Test Data Reports

Third, there are societal and economic data submissions that will provide qualitative and quantitative data regarding the potential societal and economic impacts of participant UAS operations. These are non-statistical reports that provide insight into the types of societal and economic benefits or detriments the participants’ UAS operations are having on their communities and their business operations compared to non-UAS (legacy) operations. These submissions will help to inform FAA policy and decision-making toward integrating different types of operations into the NAS, and to inform discussions with the public on the potential benefits of using UAS. The data will be supplied by the eight SLT governments in the BEYOND program, and the seven industry operators in the PSP program. The collection instruments include:

1. Legacy Societal and Economic Data Reports
2. UAS Societal and Economic Data Reports

Fourth, there is a community engagement component to the programs which includes two separate, but related, collections. One of these is the reports that will provide qualitative and quantitative data regarding the participants’ community outreach activities, including the types of activities, the targeted audiences, and the types and quantity of feedback received. The reports will include any raw data collected using questionnaires or surveys. These submissions are not statistical in nature, but will provide valuable information to the FAA that will inform community engagement best practices and lessons learned which can be shared with the public. The data will be supplied by the eight SLT governments in the BEYOND program, and the seven industry operators in the PSP program. The collection instruments include:

1. Community Engagement Reports

The other piece of the community engagement component is the Community Engagement Tool, which will include a potential burden on the general public. The Community Engagement Tool was developed by the FAA as an optional aid for program participants that includes general and operation-specific questions related to UAS operations. The BEYOND and PSP participants may choose to use any of the pertinent sample survey questions when developing their own questionnaires to survey the general public in their communities. The tool includes questions on general knowledge of UAS and sentiments toward potential benefits or drawbacks of UAS operations. The Community Engagement Tool is intended to help the program participants develop simple questionnaires with no intended utility other than gaining insight into the general public’s experience with, and opinions of, UAS operations. No statistical analysis or inference will be performed other than tabulation of responses. Results may be used to help develop lessons learned or best practices for other UAS stakeholders pertaining to community engagement activities.

1. Community Engagement Tool

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

## The purpose of the Unmanned Aircraft Systems (UAS) BEYOND and Partnership for Safety Plan (PSP) programs is for the Federal Aviation Administration (FAA) to work with state, local and tribal (SLT) governments (BEYOND) and private UAS operators (PSP) to work toward full, safe integration of UAS into the national airspace system (NAS). In order to fulfill this purpose, the FAA needs to collect operational data from the program participants to identify trends in the reliability of detect and avoid (DAA) systems, communication links, and navigation links. The operational flight data will also serve as an indicator of whether the flights beyond the pilots’ visual line of sight are safe, viable and/or scalable to broader geographic areas. The operational flight data, maintenance data, and anomaly data combined will identify potential hazards and the level of risk associated with those hazards.

## The memoranda of agreement (MOAs) with the BEYOND participants and the memoranda of understanding (MOUs) with the PSP participants will be entered into under the authority of 49 U.S.C. § 106(l) and (m), which authorizes agreements and other transactions on such terms and conditions as the FAA determines necessary. 49 U.S.C. § 106(l)(6) states, “The Administrator is authorized to enter into and perform such contracts, leases, cooperative agreements, or other transactions as may be necessary to carry out the functions of the Administrator and the Administration. The Administrator may enter into such contracts, leases, cooperative agreements, and other transactions with any Federal [agency](https://www.law.cornell.edu/definitions/uscode.php?width=840&height=800&iframe=true&def_id=49-USC-1419699195-997845645&term_occur=999&term_src=) (as such term is defined in [section 551(1) of title 5](https://www.law.cornell.edu/uscode/text/5/551#1)) or any instrumentality of the United States, any State, territory, or possession, or political subdivision thereof, any other governmental entity, or any person, firm, association, corporation, or educational institution, on such terms and conditions as the Administrator may consider appropriate.” 49 U.S.C. § 106(m) states, “With the consent of appropriate officials, the Administrator may, with or without reimbursement, use or accept the services, equipment, personnel, and facilities of any other Federal [agency](https://www.law.cornell.edu/definitions/uscode.php?width=840&height=800&iframe=true&def_id=49-USC-1419699195-997845645&term_occur=999&term_src=) (as such term is defined in [section 551(1) of title 5](https://www.law.cornell.edu/uscode/text/5/551#1)) and any other public or private entity. The Administrator may also cooperate with appropriate officials of other public and private agencies and instrumentalities concerning the use of services, equipment, personnel, and facilities. The head of each Federal [agency](https://www.law.cornell.edu/definitions/uscode.php?width=840&height=800&iframe=true&def_id=49-USC-1419699195-997845645&term_occur=999&term_src=title:49:subtitle:I:chapter:1:section:106) shall cooperate with the Administrator in making the services, equipment, personnel, and facilities of the Federal [agency](https://www.law.cornell.edu/definitions/uscode.php?width=840&height=800&iframe=true&def_id=49-USC-1419699195-997845645&term_occur=999&term_src=title:49:subtitle:I:chapter:1:section:106) available to the Administrator. The head of a Federal [agency](https://www.law.cornell.edu/definitions/uscode.php?width=840&height=800&iframe=true&def_id=49-USC-1419699195-997845645&term_occur=999&term_src=title:49:subtitle:I:chapter:1:section:106) is authorized, notwithstanding any other provision of law, to transfer to or to receive from the Administration, with or without reimbursement, supplies, personnel, services, and equipment other than administrative supplies or equipment.”

## Other FAA offices collect some of the operational flight data elements for different subgroups of the program participants and their partners. Those operating under a 49 U.S.C. §44807 exemption must send a monthly e-mail containing flight data to Mission Support Services (AJV). Those operating under 49 U.S.C. §40102(a) or 49 U.S.C. §40125 must either submit the flight data to the Certificate of Authorization (COA) Application Processing System (CAPS) or send an e-mail to AJV on a monthly basis. Those operating under certain 14 CFR Part 107 waivers deemed to be medium or high risk must send a monthly e-mail containing flight data and, in some cases, maintenance data to Flight Standards (AFS). Those operating under 14 CFR Part 135 must submit flight data to AFS on a monthly basis. The BEYOND and PSP programs will consolidate all of these separate data requirements into the UAS Monthly Operational Flight Reports. The programs will then provide output reports formatted to meet the needs of each of the FAA offices mentioned in this paragraph. The program participants and their partners will only need to submit the data once.

# 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 BEYOND and PSP programs require the participants to submit periodic narrative reports regarding their program status.

## The program participants will submit periodic narrative reports to provide information on their operations, accomplishments, lessons learned, challenges, future activities, community engagement activities, and societal and economic impacts of their operations. The periodic narrative reports are due quarterly (PSP) or semi-annually (BEYOND).

## PSP Quarterly Reports

## BEYOND Semi-Annual Reports

## The FAA program managers of the BEYOND and PSP programs will use this information to monitor progress toward the participants’ stated objectives in their concepts of operations and identify obstacles that need to be addressed for continued progress. The FAA program managers will also use these reports to gather, summarize, and share lessons learned with other program participants to enhance their projects.

## The BEYOND and PSP programs require the participants to submit one-time narrative reports at the conclusion of the MOA or MOU.

## Upon termination of the MOA or MOU, the BEYOND and PSP program participants are required to submit final reports covering their operations for the entire period of participation. The reports will include their project scopes, accomplishments, unexpected/unintended outcomes (positive or negative), their contributions to the objective of furthering UAS integration into the NAS, summaries of their community engagement activities, and reviews of the economic and societal benefits of their projects.

## BEYOND Final Reports

## PSP Final Reports

## The FAA program managers will use these reports to provide the participants’ perspectives in any final report written by the FAA. The narrative report submissions will also inform the FAA of operational trends, highlight successes and failures and their causes, and help the FAA make policy and resource decisions.

## The BEYOND program requires the submission of a one-time narrative report if a participant or partner withdraws from the program prior to the termination of the MOA.

## BEYOND Program Withdrawal Reports

## If a program participant or a participant’s partner withdraws from the BEYOND program prior to the termination of the MOA, the participant withdrawing or whose partner withdraws will submit a narrative report that details the reasons for leaving the BEYOND program and indicates whether they expect to overcome their challenges and consider returning at a future date.

## The FAA BEYOND program managers will use these reports to identify and address any agency hurdles to program participation. The FAA program managers will also use these reports to determine if there are lessons to be learned and applied to support the remaining participants’ successful continuation.

## The BEYOND and PSP programs require the program participants to submit operational data reports.

## UAS Characteristics Reports

## The participants will complete a one-time submission of the UAS Characteristics Reports for each of the aircraft in their fleets. When the BEYOND data analyst notes a new aircraft registration number in a UAS Monthly Operational Flight Report, the data analyst will use the registration number to obtain the aircraft manufacturer and model information from the aircraft registry. The analyst will then use the manufacturer and model information to populate as many of the specification fields on the report from the manufacturer’s website and other available sources. The analyst will then route the partially-completed form to the participant to complete.

## If the participant modifies an aircraft that results in the reported specifications to change, the participant will update the applicable UAS Characteristics Report.

## UAS Monthly Operational Flight Reports

## UAS Maintenance Data Reports

## The UAS Monthly Operational Flight Reports and the UAS Maintenance Data Reports will be required monthly. The participants will submit data about each operational, flight check, and training flight that they launched during the month. The participants will report all corrective (unscheduled) maintenance actions that they performed on their aircraft during the month.

## UAS Flight Anomaly Reports

## The participants will submit a UAS Flight Anomaly Report when there is an off-nominal event during a flight that does not meet the reporting criteria of an accident, incident, or occurrence but requires a mitigation strategy or the aircraft exceeds its operational boundaries.

## UAS Test Data Reports

## The purpose of these collections is to inform policy and decision-making related to enabling operations beyond the visual line of sight (BVLOS) and to fully integrate various UAS operation types (e.g., package delivery, infrastructure inspection, public safety, etc.) into the NAS. The data will be used by the UAS Integration Office (AUS) to liaise with relevant FAA offices:

## Office of Rulemaking (ARM) to inform rulemaking efforts,

## Aircraft Certification Office (AIR) to support decisions related to aircraft type certifications, and

## Flight Standards (AFS) and the Air Traffic Organization (ATO) to assist in the approval process for flight authorizations, certifications, waivers and exemptions and to ensure the ongoing safety of flights under the authorizations, certifications, waivers and exemptions.

1. The BEYOND and PSP programs require the program participants to submit societal and economic data reports on a semi-annual basis.

## Legacy Societal and Economic Data Reports

## UAS Societal and Economic Data Reports

These reports will include quantitative and qualitative information pertaining to the societal and economic benefits associated with the program participants’ UAS operations in comparison to similar operations using non-UAS (legacy) methods. Each participant is required to identify the societal and economic benefit data element(s) as well as the methodology used in quantifying each measurable benefit. The UAS Integration Office (AUS) will collaborate with the Office of Aviation Policy and Plans (APO) to analyze the aggregated results. The information will be used to inform FAA policy and decision-making toward integrating different types of operations into the NAS, and to inform discussions with the public on the benefits of using UAS.

1. The BEYOND and PSP programs also include a community engagement element, for which there are two collection instruments.

## Community Engagement Reports

## The BEYOND and PSP participants will submit the Community Engagement Reports in conjunction with their quarterly (PSP) and semi-annual (BEYOND) narrative reports. The Community Engagement Reports will include the type and number of community engagement activities undertaken during the reporting period, the targeted audiences, and the analysis of the outcome of the engagement such as community sentiment toward the UAS operations, lessons learned, and best practices developed. If the program participants choose to utilize questionnaires, they will send any collected information with their Community Engagement Reports. The UAS Integration Office (AUS) will use this information to determine how best to engage the public in discussions about the use of UAS in their communities, and to give insight into the public’s desire or resistance toward approvals of different types of operations in various communities. It will help the FAA develop information on community engagement best practices and lessons learned.

## As an optional aid for the BEYOND and PSP programs, AUS developed a Community Engagement Tool.

## Community Engagement Tool

## The tool contains a range of questions designed to gather information about the level of knowledge respondents have of UAS, and their sentiments regarding UAS use in their communities. The tool includes general questions and questions specific to particular operation types (package delivery, infrastructure inspection, and public safety). The BEYOND and PSP program participants may choose to incorporate none, some, or all of the questions listed in the Community Engagement Tool into their survey instruments. The program participants will disseminate the surveys that they develop using whatever means they feel are appropriate for their operations and communities. The respondents will be people from the general public.

## The Community Engagement Tool is intended to help the program participants develop simple questionnaires with no intended utility other than gaining insight on the opinions and experience of the general public on UAS operations. No statistical analysis or inference will be performed other than tabulation of responses. The objective is to gather general information about community sentiment to be shared within FAA and with external stakeholders, and to assist in the development of artifacts such as best practices and lessons learned documents. Those artifacts can then be shared with UAS stakeholders to help inform their community engagement activities.

## The proliferation of UAS in the NAS in recent years has been extraordinary and is unprecedented. Congress is focused on UAS matters, has recently legislated on the topic and is expected to do so again in the near future. The applications of both commercial and "hobbyist" UAS, or "drones", are numerous, as are the concerns and interests of the various stakeholders. The FAA is managing these new entrants through our activities to further UAS integration into the nation's airspace, which includes developing new regulations, engaging UAS stakeholders through the formation of the Drone Advisory Committee (DAC), and evaluating UAS detection technology in support of UAS mitigation interests within the safety and security purview of the U.S. Government. The Defense Department and other Federal agencies, including the Federal Communications Commission, are also actively engaged in UAS integration and management efforts.

## As these efforts continue to be front of mind for State, Local, and Federal Agencies, the FAA anticipates that aspects of the information collected as part of this effort will be disseminated to the public or used to support publicly-disseminated information through reports to Congress, the White House, or other agencies as appropriate. The UAS Integration Office (AUS) will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with FAA standards for confidentiality, privacy, and electronic information in accordance with 5 CFR Subpart C 930.301, Information Security Responsibilities for Employees who Manage or Use Federal Information Systems, and FAA information systems rules and procedures.

## The final purpose of collecting information in each area is to potentially compile final reports for the BEYOND and PSP programs including each of the aspects listed individually for each area. See the response to Question 10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines.

## No part of any of the data collections for the BEYOND or PSP programs will have questions regarding race or ethnicity.

# 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.

## All information collections will be submitted electronically to the FAA’s Aeronautical Data Exchange (ADX). Electronic collection instruments will also be provided within ADX for the BEYOND and PSP program participants to download and use in submitting their data.

## Because the collection instruments are dynamic and applicable only to the BEYOND and PSP program participants, they will not be available for public printing off the Internet.

The results of the information collections may be made available to the public over the Internet, but all confidential or proprietary information will be protected as required by law and in line with requirements in the Freedom of Information Act.

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

## To determine the operational data needed for the BEYOND and PSP programs’ success, the UAS Integration Office (AUS) established a data team with representatives from eight FAA programs. The team identified the specific data needs, who needs the data, what it will be used for, and whether the information has already been collected or is being collected.

* The AUS team will collect the aircraft manufacturer and model information from the DroneZone (OMB Control Number 2120-0765) for UAS weighing less than 55 pounds or AC Form 8050.1 (OMB Control Number 2120-0042) for UAS weighing more than 55 pounds.
* The AUS team will collect the UAS type, maximum takeoff weight, maximum airspeed, maximum altitude, and maximum flight time from the manufacturers’ websites. If the information is not on the manufacturers’ websites or if the UAS is custom, the AUS team will search for the information in the participants’ concept of operations (CONOPS) documents. If the information is in neither of these sources, the program participant will need to provide the information.

## Other FAA offices collect some of the operational flight data elements for different subgroups of the program participants. The participants operating under a 49 U.S.C. §44807 exemption must send a monthly e-mail containing flight data to Mission Support Services (AJV). The participants operating under 49 U.S.C. §40102(a) or 49 U.S.C. §40125 must either submit the flight data to the Certificate of Authorization (COA) Application Processing System (CAPS) or send an e-mail to AJV on a monthly basis. The participants operating under certain 14 CFR Part 107 waivers deemed to be medium or high risk must send a monthly e-mail containing flight data and, in some cases, maintenance data to Flight Standards (AFS). The participants operating under 14 CFR Part 135 must submit flight data to AFS on a monthly basis. The UAS Integration Office will consolidate all of these separate data requirements into the UAS Monthly Operational Flight Report. The UAS Integration Office will then provide output reports formatted to meet the needs of each of the FAA offices mentioned in this paragraph. The program participants will only need to submit the data once.

## The other data collections for the BEYOND and PSP programs are unique to these programs and are not collected through any other means.

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

## The narrative reports, along with the accompanying submissions pertaining to societal and economic data and community engagement data, were made infrequent in order to limit the burden on the program participants to provide those reports and data.

## To determine the operational data needed for the BEYOND and PSP programs’ success, the UAS Integration Office (AUS) established a data team with representatives from eight FAA programs. The team identified the specific data needs, who needs the data, what it will be used for, and whether the information has already been collected or is being collected. In addition, AUS accepted the Integration Pilot Program (an earlier state, local and tribal government partnership) participants’ voluntary offer to provide feedback on the operational data collection planning for BEYOND. As a result of these two collaborations, the AUS team made the forms as dynamic as possible to allow program participants to submit data such as date, time, and geographical coordinates in whatever format their systems use. The AUS team will standardize the data to its preferred format upon receipt of the data. Instead of using an online form to submit flight data one flight at a time, the AUS team developed an Excel form to enable the program participants to bulk upload all of the flight data at once. When information about a newly-registered UAS is needed, the AUS team will pre-populate the form with as much information as is available in other sources before asking the program participants to complete the form. When participants need to report an anomalous flight, they will use a dynamic form that limits the questions to the anomaly (or anomalies) that they select. Each of the program participants will determine their own methods for conducting the community engagement activities and collecting community feedback.

## In addition, all efforts will be made to ensure that the requested data is collected and submitted electronically, further reducing the time and burden of the compliance.

# 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 periodic narrative reports is necessary to obtain status updates from the BEYOND and PSP program participants to ensure that they are on track to achieve their project milestones. If the reports are less frequent, valuable time could be lost by the FAA not being aware of potential or actual roadblocks that need to be addressed.

## PSP Quarterly Reports

## BEYOND Semi-Annual Reports

## The program participants only submit one final report. If the final report is eliminated, the participants’ opportunities to provide their perspectives on their overall achievements and remaining challenges would be lost.

## BEYOND Final Reports

## PSP Final Reports

## The trigger to submit a program withdrawal report is a BEYOND participant deciding to leave the program. If this report is eliminated, the BEYOND team does not gain insight that can be applied to support the remaining participants’ successful continuation.

## BEYOND Program Withdrawal Reports

## The trigger to submit a UAS Characteristics Report is the acquisition of a new aircraft or the modification of an existing aircraft. If the specifications of the UAS are not known, it will be impossible to identify safety or performance trends based on UAS type (e.g., fixed wing, multi-rotor, etc.), weight, or configuration. If the UAS Characteristics Report is not updated when the UAS is modified, it will lead to inaccurate data analysis and result in decision-making based on false conclusions.

## UAS Characteristics Reports

## The frequency of the operational flight and maintenance reports is monthly. If the collection is less frequent, safety or performance issues that need to be addressed will go unidentified. In addition, the FAA activities to integrate UAS into the NAS are ongoing. If teams have to wait for data, it will slow their progress.

## UAS Monthly Operational Flight Reports

## UAS Maintenance Data Reports

## The trigger to submit a flight anomaly report is an off-nominal event that requires a mitigation or an event in which the aircraft exceeds its operational boundaries. If this report is eliminated, the FAA loses a valuable opportunity to identify safety concerns that should be addressed to ensure the continued safety of the NAS.

1. UAS Flight Anomaly Reports

## The test data reports are optional. The consequence of not receiving test data is that the FAA has a smaller volume of data on which to base UAS integration decisions.

1. UAS Test Data Reports

## The frequency of the societal and economic data reports and the community engagement reports is semi-annually (BEYOND) or quarterly (PSP) to coincide with the narrative reports due at these intervals. The frequency is set to inform ongoing UAS integration activities. If teams have to wait for information from this collection, it will slow their progress.

1. Legacy Societal and Economic Data Reports
2. UAS Societal and Economic Data Reports
3. Community Engagement Reports

## The community engagement tool is an optional aid provided to the program participants. The consequence of not providing this aid is that the program participants will develop their questionnaires without insight into what type of information is of interest to the FAA.

1. Community Engagement Tool

## In summary, the frequency of reporting chosen is meant to provide a balance between burdening the program participants and providing the FAA with needed data to inform its policy and decision-making. The UAS industry evolves quickly and there is impetus to integrate these operations into the NAS as quickly as possible.

# 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 the UAS Monthly Operational Flight Report and UAS Maintenance Report submissions is set at monthly in order to align with the reporting frequency in documents such as waivers and authorizations. This data is important to assess the safety of each participants’ flight operations, and provides important information about the durability and reliability of the aircraft.

## All other data collections will be conducted in a manner consistent with guidelines in 5 CFR 1320.5 (d)(2).

# 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.

The Federal Register Notice (FAA-2020-1051) received two public comments, neither of which was within the scope of this information collection.

Participants in the BEYOND and PSP programs are consulted throughout the process of developing their MOA or MOU with the FAA. These agreements describe the program data collections, requirements, and frequency of reporting in detail. The participants are given multiple opportunities to object to or suggest changes to any parts of the agreements that they feel will be an excess burden or if they will be unable to collect or report specific data elements.

In regards to the operational data, societal and economic data, and community engagement data, each went through extensive, months-long processes to gather input from internal FAA stakeholders and program participants regarding the data needs of FAA, concerns about collection burdens, the format and instructions of the collection instruments, how data would be used, and privacy concerns. Program participants also have ample opportunity during the programs to raise any concerns that may arise and work with the FAA to resolve them.

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

## There will be no payments or gifts to respondents.

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

## The MOAs and MOUs detail specific actions that the FAA and participants must take to protect proprietary, privileged or otherwise confidential information that may come into their possession as a result of the agreements.

## “The parties agree to protect from release information that is proprietary, privileged, or otherwise confidential to the extent permitted by law. The FAA will protect data and or information in its possession in accordance with requirements and procedures set forth under the Freedom of Information Act, 5 U.S.C. § 552, and any other applicable law, including but not limited to the Trade Secrets Act, 18 U.S.C. § 1905. Each party agrees to mark data as prescribed in Article 6, Section f, and other information as “proprietary” or “confidential,” in a manner that is immediately apparent. Each party shall maintain, and to the extent necessary reproduce, any and all restrictive markings set forth on, applied to, and/or associated with, the information provided by the other party.”

## Additionally, the FAA has taken the following steps to protect the information.

## Only authorized AUS staff have direct access to the program participants’ folders in the UAS Community on the Aeronautical Data Exchange (ADX).

## No raw data from ADX is shared internally within FAA, outside the AUS staff except that which is required in accordance with waivers, authorizations, or exemptions. With the exception just noted, only data that has been processed to omit records with data quality errors and remove the participants’ names is made available, upon request, to other FAA offices.

## All internal FAA data requests and analyses are routed through the Special Projects Deputy Director. All responses to the internal requests are marked with “Proprietary Information—Internal FAA Use Only.”

## The AUS team refers Freedom of Information Act (FOIA) requests from outside entities to the appropriate FOIA staff and the applicant. If information is a trade secret or confidential commercial/financial information, it will be treated as such. The FAA will protect what participants consider proprietary unless it determines that no legal basis exists for withholding the information. This applies to semi-annual or quarterly reports, data in ADX, and other shared data, even if not marked proprietary/confidential. The participants have two opportunities to protect data during a FOIA request response. The FAA will send the information to the participants for “submitter review” before releasing. At this point, the participants can notify the FAA of information that is to be withheld if any documents were not marked proprietary/confidential. If the FAA disagrees and still plans to release the information, the FAA will notify the participants at least ten days before releasing the information.

# 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 will be 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.**
* **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.**

## Total Burden

| **Report/ Form** | **Affected Public** | **Frequency** | **Number of Respondents** | **Total Number of Responses** | **Estimated Average Burden Per Response (hours)** | **Estimated Total Annual Burden (hours)** |
| --- | --- | --- | --- | --- | --- | --- |
| **Narrative Reports** |
| PSP Quarterly Reports | Business or other for-profit, PSP participants only | Quarterly | 7.00 | 28.00 | 80.00 | 2,240.00 |
| BEYOND Semi-Annual Reports | State, Local or Tribal Government, BEYOND participants only | Semi-Annually | 8.00 | 16.00 | 80.00 | 1,280.00 |
| PSP Final Reports | Business or other for-profit, PSP participants only | One-Time Submission | 7.00 | 2.33 | 40.00 | 93.20 |
| BEYOND Final Reports | State, Local or Tribal Government, BEYOND participants only | One-Time Submission | 8.00 | 2.67 | 40.00 | 106.80 |
| BEYOND Program Withdrawal Reports | State, Local or Tribal Government, BEYOND participants only | One-Time Submission | 8.00 | 2.67 | 40.00 | 106.80 |
| Narrative Reports Sub-Totals | 38.00 | 51.67 | 74.06 | 3826.80 |
| **Systems and Operations Data** |
| UAS Monthly Operational Flight Reports  | Business or other for-profit – PSP participants only, and State, Local or Tribal Government – BEYOND participants only | Monthly | 15.00 | 180.00 | 1.00 | 180.00 |
| UAS Maintenance Reports | Business or other for-profit – PSP participants only, and State, Local or Tribal Government – BEYOND participants only | Monthly | 15.00 | 180.00 | 1.00 | 180.00 |
| UAS Test Data Reports (optional) | Business or other for-profit – PSP participants only, and State, Local or Tribal Government – BEYOND participants only | Ad hoc | 15.00 | 15.00 | 0.08 | 1.25 |
| UAS Anomaly Reports | Business or other for-profit – PSP participants only, and State, Local or Tribal Government – BEYOND participants only | On Occasion – Assuming 10 annually per participant | 15.00 | 150.00 | 1.00 | 150.00 |
| UAS Aircraft Characteristics Submissions | Business or other for-profit – PSP participants only, and State, Local or Tribal Government – BEYOND participants only | On Occasion – for each New Aircraft – Assuming average 25 annual submissions | 15.00 | 375.00 | 0.20 | 75.00 |
| Systems and Operations Data Sub-Totals | 75.00 | 900.00 | 0.65 | 586.25 |
| **Societal and Economic Data** |
| Legacy Societal and Economic Data Reports (PSP participants) | Business or other for-profit – PSP participants only  | Quarterly | 7.00 | 28.00 | 1.00 | 28.00 |
| UAS Societal and Economic Data Reports (PSP participants) | Business or other for-profit – PSP participants only  | Quarterly | 7.00 | 28.00 | 1.00 | 28.00 |
| Legacy Societal and Economic Data Reports (BEYOND participants) | State, Local or Tribal Government – BEYOND participants only | Semi-Annually | 8.00 | 16.00 | 1.00 | 16.00 |
| UAS Societal and Economic Data Reports (BEYOND participants) | State, Local or Tribal Government – BEYOND participants only | Semi-Annually | 8.00 | 16.00 | 1.00 | 16.00 |
| Societal and Economic Data Sub-Totals | 30.00 | 88.00 | 1.00 | 88.00 |
| **Community Engagement** |
| Community Engagement Data Reports (PSP participants) | Business or other for-profit – PSP participants only  | Quarterly | 7.00 | 28.00 | 2.00 | 56.00 |
| Community Engagement Data Reports (BEYOND participants) | State, Local or Tribal Government – BEYOND participants only | Semi-Annually | 8.00 | 16.00 | 2.00 | 32.00 |
| Community Engagement Tool (optional) | Individuals or Households | On Occasion | 175,005.00 | 175,005.00 | 0.17 | 29,167.00 |
| Community Engagement Sub-Totals | 175,020.00 | 175,049.00 | 0.17 | 29,255.00 |
| **Totals** | **175,163.00** | **176,088.67** | **0.19** | **33,756.05** |

## NARRATIVE REPORTS

## PSP Quarterly Reports

The PSP has 7 participants, which is expected to remain fairly stable for the duration of the data collection as participants join and depart. We estimate for each PSP participant, it should take between 40 and 80 hours of work time divided amongst its employees to assess the data, develop the reports, and submit them to the FAA. For the calculation, 80 hours was used to ensure that the maximum burden was calculated. As these are quarterly submissions, each participant should submit 4 reports per year. This calculates to a maximum burden of 1,920 hours annually. Recordkeeping was not calculated as the reported data should be collected by the participants as a normal course of business.

The respondents will be employees of the PSP industry partners, likely to be in roles similar to a Management Analyst[[1]](#footnote-2) or Project Management Specialist[[2]](#footnote-3) role, whose average salaries are $45.94 and $38.57/hour respectively. Assuming the higher cost brings the total maximum cost burden for this data collection to $102,905.60.

7 respondents x 4 responses per respondent = 28 responses

28 responses x 80 hours = 2,240 hours

2,240 hours x $45.94 per hour = $102,905.60

|  |  |  |
| --- | --- | --- |
|  Summary (Annual numbers) | **Reporting** | **Recordkeeping** |
| **# of Respondents** | 7 |  |
| **# of Responses per respondent** | 4 |  |
| **Time per Response** | 80 hours |  |
| **Total # of responses** | 28 |  |
| **Total burden (hours)** | 2,240 |  |

## BEYOND Semi-Annual Reports

BEYOND has 8 participants, which is expected to remain the same throughout the program, if not decrease. We estimate for each participant, it should take between 40 and 80 hours of work time divided amongst its employees to assess the various types of data, develop the reports or forms, and submit the data to the FAA. For the calculation, 80 hours was used to ensure that the maximum burden was calculated. As these are semi-annual submissions, each participant should submit 2 reports per year. This calculates to a maximum burden of 1,280 hours annually. Recordkeeping was not calculated as the reported data should be collected by the participants as a normal course of business. The respondents will be employees of the BEYOND Lead Participants, made up of State, Local and Tribal government entities, and are likely to be in roles similar to a Management Analyst1 or Project Management Specialist2 role, whose average salaries are $45.94 and $38.57/hour respectively. Assuming the higher cost brings the total maximum cost burden for this data collection to $58,803.20.

8 respondents x 2 responses per respondent = 16 responses

16 responses x 80 hours = 1,280 hours

1,280 hours x $45.94 per hour = $58,803.20

|  |  |  |
| --- | --- | --- |
|  Summary (Annual numbers) | **Reporting** | **Recordkeeping** |
| **# of Respondents** | 8 |  |
| **# of Responses per respondent** | 2 |  |
| **Time per Response** | 80 hours |  |
| **Total # of responses** | 16 |  |
| **Total burden (hours)** | 1,280 |  |

## BEYOND Final Reports

BEYOND has 8 participants, which is expected to remain the same throughout the program, if not decrease. We estimate for each participant, it should take no more than 40 hours of work time divided amongst its employees to develop the reports, and submit them to the FAA. For the calculation, 40 hours was used to ensure that the maximum burden was calculated. As this is a one-time submission, at the end of the program, each participant should submit maximum one report total, annualized at 1/3 report per participant. This calculates to a maximum burden of 106.80 hours annually. Recordkeeping was not calculated as the reported data should be collected by the participants as a normal course of business. The respondents will be employees of the BEYOND Lead Participants and are likely to be in roles similar to a Management Analyst[[3]](#footnote-4) or Project Management Specialist[[4]](#footnote-5) role, whose average salaries are $45.94 and $38.57/hour respectively. Assuming the higher cost brings the total maximum cost burden for this data collection to $4,906.39.

8 respondents x 1/3 responses per respondent = 2.67 responses

2.67 responses x 40 hours = 106.80 hours

106.80 hours x $45.94 per hour = $4,906.39

|  |  |  |
| --- | --- | --- |
|  Summary (Annual numbers) | **Reporting** | **Recordkeeping** |
| **# of Respondents** | 8 |  |
| **# of Responses per respondent** | 1/3 |  |
| **Time per Response** | 40 hours |  |
| **Total # of responses** | 2.67 |  |
| **Total burden (hours)** | 106.80 |  |

## PSP Final Reports

The PSP has 7 industry partner participants, which is expected to remain fairly stable for the duration of the data collection as participants join and depart. We estimate for each participant, it should take no more than 40 hours of work time divided amongst its employees to develop the reports, and submit them to the FAA. For the calculation, 40 hours was used to ensure that the maximum burden was calculated. As this is a one-time submission, at the end of the program, each participant should submit maximum one report total, annualized at 1/3 report per participant. This calculates to a maximum burden of 93.33 hours annually. Recordkeeping was not calculated as the reported data should be collected by the participants as a normal course of business. The respondents will be employees of the PSP industry partners and are likely to be in roles similar to a Management Analyst[[5]](#footnote-6) or Project Management Specialist[[6]](#footnote-7) role, whose average salaries are $45.94 and $38.57/hour respectively. Assuming the higher cost brings the total maximum cost burden for this data collection to $4,287.73.

7 respondents x 1/3 responses per respondent = 2.33 responses

2.33 responses x 40 hours = 93.33 hours

93.33 hours x $45.94 per hour = $4,287.73

|  |  |  |
| --- | --- | --- |
|  Summary (Annual numbers) | **Reporting** | **Recordkeeping** |
| **# of Respondents** | 7 |  |
| **# of Responses per respondent** | 1/3 |  |
| **Time per Response** | 40 hours |  |
| **Total # of responses** | 2.33 |  |
| **Total burden (hours)** | 93.33 |  |

## BEYOND Program Withdrawal Reports

BEYOND has 8 participants, which is expected to remain the same throughout the program, if not decrease. For BEYOND we expect that most participants will never complete the form. However, we will assume one report per participant, annualized at 1/3 report per year. We estimate for each participant, it should take no more than 40 hours of work time divided amongst its employees to develop the reports, and submit them to the FAA. For the calculation, 40 hours was used to ensure that the maximum burden was calculated. This calculates to a maximum burden of 106.8 hours annually. Recordkeeping was not calculated as the reported data should be collected by the participants as a normal course of business. The respondents will be employees of the BEYOND Lead Participants and are likely to be in roles similar to a Management Analyst7 or Project Management Specialist8 role, whose average salaries are $45.94 and $38.57/hour respectively. Assuming the higher cost brings the total maximum cost burden for this data collection to $4,906.39.

8 respondents x 1/3 responses per respondent = 2.67 responses

2.67 responses x 40 hours = 106.8 hours

106.8 hours x $45.94 per hour = $4,906.39

|  |  |  |
| --- | --- | --- |
|  Summary (Annual numbers) | **Reporting** | **Recordkeeping** |
| **# of Respondents** | 8 |  |
| **# of Responses per respondent** | 1/3 |  |
| **Time per Response** | 40 hours |  |
| **Total # of responses** | 2.67 |  |
| **Total burden (hours)** | 106.8 |  |

## OPERATIONAL DATA REPORTS

## Unmanned Aircraft System (UAS) Characteristics Reports

PSP and BEYOND participants will complete these reports, so there will be 15 participants combined. The number of responses per respondent depends on the number of aircraft in the fleet. In the Integration Pilot Program (IPP) (a former, similar program), the fleet size ranged from 2 to 151, with the average fleet size being 25. Because the FAA will pre-populate the form with data from available sources before routing it to the participants to complete, the participants will only need to complete 14 fields with UAS specifications that they should have readily available. Therefore, it should take less than 30 seconds to answer each question. Upload times typically take from 3 to 5 minutes. The maximum burden is 12 minutes per UAS. Recordkeeping was not calculated as the reported data should be collected by the participants as a normal course of business. The respondents will be employees of the PSP industry partners and the BEYOND Lead Participants and are likely to be in roles similar to a Management Analyst[[7]](#footnote-8) or Project Management Specialist[[8]](#footnote-9) role, whose average salaries are $45.94 and $38.57/hour respectively. Assuming the higher cost brings the total maximum cost burden for this data collection to $3,445.50.

It is important to note that the bulk of the burden will fall on the first year when each participant first reports their entire fleet. In subsequent years, respondents will only need to report on additional UAS that they acquire so the burden will vary from 0 to an unknown quantity based on the participants’ individual programs. However, the FAA expects the respondents to add fewer UAS in subsequent years than they report in the first year. Due to the uncertainty regarding the number of additional aircraft to report, we will assume the burden will remain the same each year in order to ensure calculation of the maximum burden.

15 respondents x 25 responses per respondent = 375 responses

375 responses x 0.2 hours = 75 hours

75 hours x $45.94 per hour = $3,445.50

|  |  |  |
| --- | --- | --- |
|   Summary (Annual numbers) | **Reporting** | **Recordkeeping** |
| **# of Respondents** | 15 |  |
| **# of Responses per respondent** | 25 |  |
| **Time per Response** | 12 minutes |  |
| **Total # of responses** | 375 |  |
| **Total burden (hours)** | 75 |  |

## Unmanned Aircraft System (UAS) Monthly Operational Flight Reports

PSP and BEYOND participants will submit these reports, so there will be 15 participants combined. It typically takes between 30 and 50 minutes to complete operational flight data reports using the electronic system. Upload times typically take from 3 to 5 minutes. In order to ensure we calculate the maximum burden, we used 1 hour each for the flight reports. As the data is submitted on a monthly basis, each participant will submit flight data 12 times annually at maximum. This calculates to a maximum burden of 180 hours annually. Recordkeeping was not calculated as the reported data should be collected by the participants as a normal course of business. The respondents will be employees of the PSP industry partners and the BEYOND Lead Participants and are likely to be in roles similar to a Management Analyst[[9]](#footnote-10) or Project Management Specialist[[10]](#footnote-11) role, whose average salaries are $45.94 and $38.57/hour respectively. Assuming the higher cost brings the total maximum cost burden for this data collection to $8,269.20.

15 respondents x 12 responses per respondent = 180 responses

180 responses x 1 hour = 180 hours

180 hours x $45.94 per hour = $8,269.20

|  |  |  |
| --- | --- | --- |
|  Summary (Annual numbers) | **Reporting** | **Recordkeeping** |
| **# of Respondents** | 15 |  |
| **# of Responses per respondent** | 12 |  |
| **Time per Response** | 1 hour |  |
| **Total # of responses** | 180 |  |
| **Total burden (hours)** | 180 |  |

## Unmanned Aircraft System (UAS) Maintenance Reports

PSP and BEYOND participants will complete these reports, so there will be 15 participants combined. It typically takes between 30 and 50 minutes to complete the maintenance reports using the electronic system. Upload times typically take from 3 to 5 minutes. Therefore, in order to ensure we calculate the maximum burden, we used 1 hour each for the maintenance reports. As the data is submitted on a monthly basis, each participant will submit maintenance data 12 times annually at maximum. This calculates to a maximum burden of 180 hours annually. Recordkeeping was not calculated as the reported data should be collected by the participants as a normal course of business. The respondents will be employees of the PSP industry partners and the BEYOND Lead Participants and are likely to be in roles similar to a Management Analyst[[11]](#footnote-12) or Project Management Specialist[[12]](#footnote-13) role, whose average salaries are $45.94 and $38.57/hour respectively. Assuming the higher cost brings the total maximum cost burden for this data collection to $8,269.20.

15 respondents x 12 responses per respondent = 180 responses

180 responses x 1 hour = 180 hours

180 hours x $45.94 per hour = $8,269.20

|  |  |  |
| --- | --- | --- |
|  Summary (Annual numbers) | **Reporting** | **Recordkeeping** |
| **# of Respondents** | 15 |  |
| **# of Responses per respondent** | 12 |  |
| **Time per Response** | 1 hour |  |
| **Total # of responses** | 180 |  |

## Unmanned Aircraft System (UAS) Flight Anomaly Reports

PSP and BEYOND participants could complete these reports, so there will be up to 15 participants combined. The number of responses per respondent depends on the number of anomalies that occur each year. During two years of the Integration Pilot Program (IPP) (a former, similar program), 44 anomaly reports total were submitted by the 9 participants. That averages to be two responses per respondent annually. Because the PSP and BEYOND programs will require more types of anomalies to be reported than in the IPP, and to ensure calculation of the maximum burden, we estimated the annual number of responses per respondent will increase to 10 per year. The time per response depends on the type of anomaly that occurred and the impact of the anomaly. At a minimum, the respondent would be required to answer 8 questions. For an anomaly involving multiple system failures, the respondent would be required to answer up to 25 questions. Each question should take 1-2 minutes to answer. Using the maximum burden of 25 questions and 2 minutes per question, it should take 50 minutes to complete the form. Upload times typically take from 3 to 5 minutes. Therefore, to ensure we calculated the maximum burden, we used 1 hour. Recordkeeping was not calculated as the reported data should be collected by the participants as a normal course of business. The respondents will be employees of the BEYOND Lead Participants and PSP industry partners and are likely to be in roles similar to a Management Analyst[[13]](#footnote-14) or Project Management Specialist[[14]](#footnote-15) role, whose average salaries are $45.94 and $38.57/hour respectively. Assuming the higher cost brings the total maximum cost burden for this data collection to $6,891.00.

15 respondents x 10 responses per respondent = 150 responses

150 responses x 1 hour = 150 hours

150 hours x $45.94 per hour = $6,891.00

|  |  |  |
| --- | --- | --- |
|  Summary (Annual numbers) | **Reporting** | **Recordkeeping** |
| **# of Respondents** | 15 |  |
| **# of Responses per respondent** | 10 |  |
| **Time per Response** | 1 hour |  |
| **Total # of responses** | 150 |  |
| **Total burden (hours)** | 150 |  |

## UAS Test Data Reports

PSP and BEYOND participants could complete these reports, so there will be up to 15 participants combined. The UAS Test Data Reports are optional and ad hoc. The participants work through their test plans at their own pace. They will also collect their test data in a number of different ways. To minimize the reporting burden, the FAA will accept the test data in its native file format. The participants will need only attach a cover sheet with basic summary information that will take less than a minute to populate. Upload times typically take from 3 to 5 minutes. Therefore, we used 5 minutes as the maximum burden. This calculates to a maximum burden of 1.25 hours annually. Recordkeeping was not calculated as the reported data should be collected by the participants as a normal course of business. The respondents will be employees of the PSP industry partners and the BEYOND Lead Participants and are likely to be in roles similar to a Management Analyst[[15]](#footnote-16) or Project Management Specialist[[16]](#footnote-17) role, whose average salaries are $45.94 and $38.57/hour respectively. Assuming the higher cost brings the total maximum cost burden for this data collection to $57.43.

15 respondents x 1 response per respondent = 15 responses

15 responses x 0.0833 hours = 1.25 hours

1.25 hours x $45.94 per hour = $57.43

|  |  |  |
| --- | --- | --- |
|  Summary (Annual numbers) | **Reporting** | **Recordkeeping** |
| **# of Respondents** | 15 |  |
| **# of Responses per respondent** | 1 |  |
| **Time per Response** | 5 minutes |  |
| **Total # of responses** | 15 |  |
| **Total burden (hours)** | 1.25 |  |

## SOCIETAL AND ECONOMIC DATA

## Legacy Societal and Economic Data Reports

PSP and BEYOND participants will complete these reports, so there will be 15 participants combined. It is not expected to take more than 1 hour per submission to complete the report as it is based on information pre-planned to collect and report about the participants’ operations. The reports will be submitted in conjunction with the participants’ quarterly (PSP) or semi-annual (BEYOND) reports, which means PSP participants will submit 4 per year and BEYOND participants will submit 2 per year. Recordkeeping was not calculated as the reported data should be collected by the participants as a normal course of business. The respondents will be employees of the PSP industry partners and the BEYOND Lead Participants and are likely to be in roles similar to a Management Analyst15 or Project Management Specialist16 role, whose average salaries are $45.94 and $38.57/hour respectively. Assuming the higher cost brings the total maximum annual cost burden for this data collection for PSP participants to $2,572.64, for BEYOND participants to $1,470.08, and combined to $4,042.72.

PSP Participant Burden:

7 respondents x 4 responses per respondent = 28 responses

28 responses x 1 hour = 28 hours

28 hours x $45.94 per hour = $1,286.32

|  |  |  |
| --- | --- | --- |
| Summary (Annual numbers) | **Reporting** | **Recordkeeping** |
| **# of Respondents** | 7 |  |
| **# of Responses per respondent** | 4 |  |
| **Time per Response** | 1 hour |  |
| **Total # of responses** | 28 |  |
| **Total burden (hours)** | 28 |  |

BEYOND Participant Burden:

8 respondents x 2 responses per respondent = 16 responses

16 responses x 1 hour = 16 hours

16 hours x $45.94 per hour = $735.04

|  |  |  |
| --- | --- | --- |
| Summary (Annual numbers) | **Reporting** | **Recordkeeping** |
| **# of Respondents** | 8 |  |
| **# of Responses per respondent** | 2 |  |
| **Time per Response** | 1 hour |  |
| **Total # of responses** | 16 |  |
| **Total burden (hours)** | 16 |  |

Total burden for PSP and BEYOND program participants for Legacy Societal and Economic Data reporting:

 $1,286.32 (PSP) + $735.04 (BEYOND) = $2,021.36

## UAS Societal and Economic Data Reports

PSP and BEYOND participants will complete these reports, so there will be 15 participants combined. It is not expected to take more than 1 hour per submission to complete the report as it is based on information pre-planned to collect and report about the participants’ operations. The reports will be submitted in conjunction with the participants’ quarterly (PSP) or semi-annual (BEYOND) reports, which means PSP participants will submit 4 per year and BEYOND participants will submit 2 per year. Recordkeeping was not calculated as the reported data should be collected by the participants as a normal course of business. The respondents will be employees of the PSP industry partners and the BEYOND Lead Participants and are likely to be in roles similar to a Management Analyst[[17]](#footnote-18) or Project Management Specialist[[18]](#footnote-19) role, whose average salaries are $45.94 and $38.57/hour respectively. Assuming the higher cost brings the total maximum annual cost burden for this data collection for PSP participants to $2,572.64, for BEYOND participants to $1,470.08, and combined to $4,042.72.

PSP Participant Burden:

7 respondents x 4 responses per respondent = 28 responses

28 responses x 1 hour = 28 hours

28 hours x $45.94 per hour = $1,286.32

|  |  |  |
| --- | --- | --- |
| Summary (Annual numbers) | **Reporting** | **Recordkeeping** |
| **# of Respondents** | 7 |  |
| **# of Responses per respondent** | 4 |  |
| **Time per Response** | 1 hour |  |
| **Total # of responses** | 28 |  |
| **Total burden (hours)** | 28 |  |

BEYOND Participant Burden:

8 respondents x 2 responses per respondent = 16 responses

16 responses x 1 hour = 16 hours

16 hours x $45.94 per hour = $735.04

|  |  |  |
| --- | --- | --- |
| Summary (Annual numbers) | **Reporting** | **Recordkeeping** |
| **# of Respondents** | 8 |  |
| **# of Responses per respondent** | 2 |  |
| **Time per Response** | 1 hour |  |
| **Total # of responses** | 16 |  |
| **Total burden (hours)** | 16 |  |

Total burden for PSP and BEYOND program participants for UAS Societal and Economic Data reporting:

 $1,286.32 (PSP) + $735.04 (BEYOND) = $2,021.36

## COMMUNITY ENGAGEMENT

## Community Engagement Reports

PSP and BEYOND participants will complete these reports, so there will be 15 participants combined. It is not expected to take more than 2 hours per submission to complete the report as it is based on information pre-planned to collect and report about the participants’ operations. The reports will be submitted in conjunction with the participants’ quarterly (PSP) or semi-annual (BEYOND) reports, which means PSP participants will submit 4 per year and BEYOND participants will submit 2 per year. Recordkeeping was not calculated as the reported data should be collected by the participants as a normal course of business. The respondents will be employees of the PSP industry partners and the BEYOND Lead Participants and are likely to be in roles similar to a Management Analyst[[19]](#footnote-20) or Project Management Specialist[[20]](#footnote-21) role, whose average salaries are $45.94 and $38.57/hour respectively. Assuming the higher cost brings the total maximum annual cost burden for this data collection for PSP participants to $2,572.64, for BEYOND participants to $1,470.08, and combined to $4,042.72.

PSP Participant Burden:

7 respondents x 4 responses per respondent = 28 responses

28 responses x 2 hours = 56 hours

56 hours x $45.94 per hour = $2,572.64

|  |  |  |
| --- | --- | --- |
| Summary (Annual numbers) | **Reporting** | **Recordkeeping** |
| **# of Respondents** | 7 |  |
| **# of Responses per respondent** | 4 |  |
| **Time per Response** | 2 hours |  |
| **Total # of responses** | 28 |  |
| **Total burden (hours)** | 56 |  |

BEYOND Participant Burden:

8 respondents x 2 responses per respondent = 16 responses

16 responses x 2 hours = 32 hours

32 hours x $45.94 per hour = $1,470.08

|  |  |  |
| --- | --- | --- |
| Summary (Annual numbers) | **Reporting** | **Recordkeeping** |
| **# of Respondents** | 8 |  |
| **# of Responses per respondent** | 2 |  |
| **Time per Response** | 2 hours |  |
| **Total # of responses** | 16 |  |
| **Total burden (hours)** | 32 |  |

Total burden on PSP and BEYOND program participants for Community Engagement Data reporting:

 $2,572.64 (PSP) + $1,470.08 (BEYOND) = $4,042.72

## Community Engagement Tool

Use of questions from the Community Engagement Tool is completely optional for all BEYOND and PSP program participants. However, community outreach is a key component of both programs. Assuming that all participants choose to employ Community Engagement Tool questions with the public, we then must consider their intended audiences.

Each of the state, local and tribal government participants in the BEYOND program have submitted community engagement plans related to the concepts of operation for themselves and their industry partners. Those plans show that most public engagement will be targeted to local populations or stakeholders directly affected by the operations, meaning use of Community Engagement Tool questions will be relatively limited for now as operations have been limited in number and scope, and increase yearly as operational concepts are proven and expanded to new areas and from more rural areas to suburban and urban areas over time. Most outreach will be in the form of small events such as town halls or communications directly with local neighborhoods. We estimate that on average, the questions will reach no more than 5,000 people per year per participant the first year, and perhaps double each year thereafter. That would bring the total to 35,000 members of the public potentially asked to answer the survey per participant over the course of three years, annualized to 11,667 per participant per year. We will assume a 100% response rate to determine the maximum burden on the public. There are eight participants in the BEYOND program and seven in the PSP program, which would bring the total respondents to 175,005 per year.

To determine the time opportunity costs associated with members of the public answering the Community Engagement Tool questions we utilized the DOT’s recommended hourly value of travel time savings. This value for personal time is estimated to be $13.60/hour.[[21]](#footnote-22)

The Community Engagement Tool includes 29 questions, some general in nature and others specific to operation types. Participants that use questions from the tool will likely only use the general questions and those specific to their operation type. However, if we assume each participant uses all of the questions, the survey should take no more than 10 minutes per respondent.[[22]](#footnote-23)

175,005 respondents x 1 response per respondent = 175,005 responses

175,005 responses x .167 hours = 29,226 hours

29,226 hours x $13.60 per hour = $397,473.60

|  |  |  |
| --- | --- | --- |
| Summary (Annual numbers) | **Reporting** | **Recordkeeping** |
| **# of Respondents** | 175,005 |  |
| **# of Responses per respondent** | 1 |  |
| **Time per Response** | 10 minutes |  |
| **Total # of responses** | 175,005 |  |
| **Total burden (hours)** | 29,226 |  |

## Total Cost

The total cost of the BEYOND and PSP data collections for the respondents is estimated to be $608,300.68 based upon the assumptions cited.

|  |  |
| --- | --- |
| **Data Collection** | **Cost** |
| 1. PSP Quarterly Reports
 | $102,905.60 |
| 1. BEYOND Semi-Annual Reports
 | $58,803.20 |
| 1. BEYOND Final Reports
 | $4,906.39 |
| 1. PSP Final Reports
 | $4,287.73 |
| 1. BEYOND Program Withdrawal Reports
 | $4,906.39 |
| 1. UAS Characteristics Reports
 | $3,445.50 |
| 1. UAS Monthly Operational Flight Reports
 | $8,269.20 |
| 1. UAS Maintenance Reports
 | $8,269.20 |
| 1. UAS Flight Anomaly Reports
 | $6,891.00 |
| (10) UAS Test Data Reports | $57.43 |
| (11) Legacy Societal and Economic Data Reports | $2,021.36 |
| (12) UAS Societal and Economic Data Reports | $2,021.36 |
| (13) Community Engagement Reports | $4,042.72 |
| (14) Community Engagement Tool | $397,473.60 |
| **TOTAL** | **$608,300.68** |

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

The costs to the BEYOND and PSP participants to store the data and submit it to the FAA would be virtually $0. The information will be housed on systems the participants already own, and uploaded using software and internet services for which they already pay and use for their own purposes. The FAA has provided the Aeronautical Data Exchange (ADX) system to house the forms and templates to be completed, and to act as the data repository for the participants in order to relieve any potential burden.

Members of the general public who choose to answer the community engagement tool questions would also incur no costs to do so.

# 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.

The UAS Integration Office (AUS) staffs a number of federal and contract employees responsible for review, analysis, and interpretation of information collected in these data collections. This work is expected to consume, at most, 10% of annual work time for the following staff: nine project managers, with an average expected salary no more than $168,820 per year[[23]](#footnote-24), two federal support staff with an average expected salary no more than $113,677 per year[[24]](#footnote-25), and eight contractor analysts, with an average expected salary no more than $95,560 per year[[25]](#footnote-26). There will also be one Federal data project manager, with an average expected salary no more than $168,820 per year[[26]](#footnote-27), who will spend approximately 50% of his or her time reviewing, analyzing, interpreting, developing reports and other data-related tasks related to the operational data, UAS characteristics data, and UAS flight anomaly data.

9 federal project managers x $168,820 per year = $1,519,380 (10% = $151,938)

2 federal support staff x $113,677 per year = $227,354 (10% = $22,735)

8 contract project support analysts x $95,560 per year = $764,480 (10% = $76,448)

1 federal data project manager x $168,820 per year = $168,820 (50% = $84,410)

This comes to a maximum total of $335,531 per year.

The operational data also requires secured storage, which is expected to cost $2,500 total, annualized to $833.33 and development and licensing which is expected to cost $6,400 per year. This comes to a total of 7,233.33 per year.

Project managers, federal support staff and contractor analysts may be required to travel in order to meet with the BEYOND and PSP participants to discuss their operations, future plans, and data submissions. We estimate that each employee will travel once or twice per year, so average that to 1.5 trips per staff member per year. At an average cost of $2,000 per trip multiplied by 16 staff members that will cost approximately $48,000 per year. As the trips will not primarily be for the purpose of discussing data collection requirements and submissions, we will assume that only half the cost will be related to the data collection elements of the BEYOND and PSP programs, which calculates to $24,000 per year.

In total, the BEYOND and PSP data collections are expected to cost the Federal Government $366,764.33 per year.

The estimated costs to the Federal Government are as follows:

**Direct Labor Costs**

Project Managers: $151,938

Federal support staff: $22,735

Contractor analysts: $76,448

Data project manager: $84,410

Total Direct Labor: $335,531

**Other Direct Costs**

Data Secured Storage: $833.33

Development and Licensing: $6,400

Travel and Related Costs: $24,000

Other Direct Cost Total: $31,233.33

**Total Cost: $366,764.33**

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

## This is a new collection.

# 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.

## The results of this collection of information will not be published.

# 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 to not display the expiration date for the OMB approval.

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

## No exceptions.

1. Salary information taken from the U.S. Bureau of Labor Statistics, May 2019 National Occupational Employment and Wage Estimates United States at <https://www.bls.gov/oes/2019/may/oes131111.htm> [↑](#footnote-ref-2)
2. Salary information taken from the U.S. Bureau of Labor Statistics, May 2019 National Occupational Employment and Wage Estimates United States at <https://www.bls.gov/oes/2019/may/oes131198.htm> [↑](#footnote-ref-3)
3. Salary information taken from the U.S. Bureau of Labor Statistics, May 2019 National Occupational Employment and Wage Estimates United States at <https://www.bls.gov/oes/2019/may/oes131111.htm> [↑](#footnote-ref-4)
4. Salary information taken from the U.S. Bureau of Labor Statistics, May 2019 National Occupational Employment and Wage Estimates United States at <https://www.bls.gov/oes/2019/may/oes131198.htm> [↑](#footnote-ref-5)
5. Salary information taken from the U.S. Bureau of Labor Statistics, May 2019 National Occupational Employment and Wage Estimates United States at <https://www.bls.gov/oes/2019/may/oes131111.htm> [↑](#footnote-ref-6)
6. Salary information taken from the U.S. Bureau of Labor Statistics, May 2019 National Occupational Employment and Wage Estimates United States at <https://www.bls.gov/oes/2019/may/oes131198.htm> [↑](#footnote-ref-7)
7. Salary information taken from the U.S. Bureau of Labor Statistics, May 2019 National Occupational Employment and Wage Estimates United States at <https://www.bls.gov/oes/2019/may/oes131111.htm> [↑](#footnote-ref-8)
8. Salary information taken from the U.S. Bureau of Labor Statistics, May 2019 National Occupational Employment and Wage Estimates United States at <https://www.bls.gov/oes/2019/may/oes131198.htm> [↑](#footnote-ref-9)
9. Salary information taken from the U.S. Bureau of Labor Statistics, May 2019 National Occupational Employment and Wage Estimates United States at <https://www.bls.gov/oes/2019/may/oes131111.htm> [↑](#footnote-ref-10)
10. Salary information taken from the U.S. Bureau of Labor Statistics, May 2019 National Occupational Employment and Wage Estimates United States at <https://www.bls.gov/oes/2019/may/oes131198.htm> [↑](#footnote-ref-11)
11. Salary information taken from the U.S. Bureau of Labor Statistics, May 2019 National Occupational Employment and Wage Estimates United States at <https://www.bls.gov/oes/2019/may/oes131111.htm> [↑](#footnote-ref-12)
12. Salary information taken from the U.S. Bureau of Labor Statistics, May 2019 National Occupational Employment and Wage Estimates United States at <https://www.bls.gov/oes/2019/may/oes131198.htm> [↑](#footnote-ref-13)
13. Salary information taken from the U.S. Bureau of Labor Statistics, May 2019 National Occupational Employment and Wage Estimates United States at <https://www.bls.gov/oes/2019/may/oes131111.htm> [↑](#footnote-ref-14)
14. Salary information taken from the U.S. Bureau of Labor Statistics, May 2019 National Occupational Employment and Wage Estimates United States at <https://www.bls.gov/oes/2019/may/oes131198.htm> [↑](#footnote-ref-15)
15. Salary information taken from the U.S. Bureau of Labor Statistics, May 2019 National Occupational Employment and Wage Estimates United States at <https://www.bls.gov/oes/2019/may/oes131111.htm> [↑](#footnote-ref-16)
16. Salary information taken from the U.S. Bureau of Labor Statistics, May 2019 National Occupational Employment and Wage Estimates United States at <https://www.bls.gov/oes/2019/may/oes131198.htm> [↑](#footnote-ref-17)
17. Salary information taken from the U.S. Bureau of Labor Statistics, May 2019 National Occupational Employment and Wage Estimates United States at <https://www.bls.gov/oes/2019/may/oes131111.htm> [↑](#footnote-ref-18)
18. Salary information taken from the U.S. Bureau of Labor Statistics, May 2019 National Occupational Employment and Wage Estimates United States at <https://www.bls.gov/oes/2019/may/oes131198.htm> [↑](#footnote-ref-19)
19. Salary information taken from the U.S. Bureau of Labor Statistics, May 2019 National Occupational Employment and Wage Estimates United States at <https://www.bls.gov/oes/2019/may/oes131111.htm> [↑](#footnote-ref-20)
20. Salary information taken from the U.S. Bureau of Labor Statistics, May 2019 National Occupational Employment and Wage Estimates United States at <https://www.bls.gov/oes/2019/may/oes131198.htm> [↑](#footnote-ref-21)
21. <https://www.faa.gov/regulations_policies/policy_guidance/benefit_cost/media/econ-value-section-1-tx-time.pdf> [↑](#footnote-ref-22)
22. [How long should a survey be? What is the ideal survey length? | SurveyMonkey](https://www.surveymonkey.com/curiosity/survey_completion_times/) <https://surveytown.com/keeping-your-survey-to-a-reasonable-length/> [↑](#footnote-ref-23)
23. Salary based on the maximum salary for an FAA J-Band employee using the 2021 pay levels and the Washington, DC locality. <https://my.faa.gov/employee_services/pay_perf/pay.html.html#plansTables> [↑](#footnote-ref-24)
24. Salary based on the maximum salary for an FAA H-Band employee using the 2021 pay levels and the Washington, DC locality. <https://my.faa.gov/employee_services/pay_perf/pay.html.html#plansTables> [↑](#footnote-ref-25)
25. Salary information taken from the U.S. Bureau of Labor Statistics, May 2019 National Occupational Employment and Wage Estimates United States at <https://www.bls.gov/oes/2019/may/oes131111.htm>. Salary based on Management Analyst annual mean wage. [↑](#footnote-ref-26)
26. Salary based on the maximum salary for an FAA J-Band employee using the 2021 pay levels and the Washington, DC locality. <https://my.faa.gov/employee_services/pay_perf/pay.html.html#plansTables> [↑](#footnote-ref-27)