

## Supporting Statement A

### Organization Designation Authorization-Part 183, Subpart D. OMB 2120-0704

#### **This renewable information collection has the following changes:**

Revision to the information on reporting and recordkeeping requirements in paragraph (#2).

Addressed stakeholder communication (#8)

Corrected math errors in summary of burden hours and costs (#12)

Corrected math error in estimation for 183.63 (#12)

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

The purpose of Title 49, U.S.C. Subtitle VII - Aviation Programs, is to provide for a safe, secure, and efficient aviation system that contributes to national security and encourages civil aviation.

49 U.S.C. Section 40113(a) empowers the Secretary of Transportation (or the Administrator of the Federal Aviation Administration) to issue such regulations as he/she shall deem necessary to carry out the provisions of the Act.

49 U.S.C. Section 44701 empowers the Administrator of the Federal Aviation Administration to prescribe reasonable rules and regulations, or minimum standards necessary for safety in air commerce.

49 U.S.C. Section 44702(a) empowers the Administrator of the Federal Aviation Administration to issue and amend type certificates, and supplemental type certificates for aircraft, aircraft engines, propellers, and appliances. The section specifies that applications shall be as the Secretary prescribes as to form, content, retention, and manner served.

49 U.S.C. Section 44702(d) empowers the Administrator of the Federal Aviation Administration to delegate to any properly qualified private person functions related to the examination, inspection, and testing necessary to the issuance of certificates.

Subpart D to part 183 establishes the Organization Designation Authorization. This rule allows the Federal Aviation Administration to appoint organizations as representatives of the Administrator. As authorized, these organizations perform certification functions on behalf of the FAA. These functions may include approving data, issuing various kinds of aircraft and organization certificates, and any other functions the Administrator may deem necessary. Application, reporting, and recordkeeping requirements are contained in the rule.

This information collection supports the Department of Transportation's strategic goal on safety. This safety goal is accomplished by promoting public health and safety by working toward the elimination of transportation-related deaths, injuries, and property damage.

**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.**

Organizations who wish to begin or continue performing certification functions on behalf of the FAA are mandated to submit information to the Federal Aviation Administration (FAA) on occasion. The FAA reviews submitted application forms to determine whether the applicant meets the qualification requirements necessary to be authorized as a representative of the Administrator.

Organizations submit Procedures manuals for approval by the FAA to ensure the organizations utilize the correct processes when performing functions on behalf of the FAA. The management of such activity is provided for in 49 USC 44702(d).

Reporting and recordkeeping requirements include identification of functions sought, experience applicable to the authorization sought, procedures manual submission, and procedures manual changes. These requirements are necessary to manage the various approvals issued by the organization. The reporting and recordkeeping requirements are necessary to document approvals issued and must be maintained in order to address future safety issues which may arise.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.**

In compliance with the Government Paperwork Elimination Act (GPEA), applications and notifications may be submitted 100% electronically at the discretion of the authorization holder. Electronic storage arrangements are acceptable, provided the applicant has an FAA-approved agreement addressing the storage means. The form may be obtained from [www.faa.gov/documentlibrary/](http://www.faa.gov/documentlibrary/).

**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.**

This information collection is not a duplication of other reporting.

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

The information required is the minimum needed to appoint and manage the activities of organizations authorized as a representative of the Administrator. The collection is necessary to ensure the safety of the aircraft transportation system.

**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.**

This collection is required to ensure the future safety of products on which delegated organizations perform functions. Failure to collect the information would impact the FAA's ability to respond to and correct aviation safety deficiencies.

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

This information collection is consistent with the guidelines in Title 5 CFR 1320.5(d)(2)(i)-(viii).

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

A Federal Register Notice published on (December 27, 2021), the Federal Register citation, 86 FR 73408-73409. Solicited public comment. No comments were received as of yet. No additional stakeholder communications were received during the comment period.

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

We do not provide any payments or gifts.

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

We do not assure confidentiality other than that provided for proprietary business 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 are no sensitive questions in this collection of information.

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

The estimated reporting (Aerospace Engineers) burden imposed by the collection is 288 hours.

The estimated recordkeeping (Material Recording Clerks) burden imposed by the collection is 5517 hours.

We estimate that this collection imposes an annual public reporting burden of \$240,566.00.

The estimated Aerospace Engineers, based on 288 hours at \$161.00 per hour is \$46,368.00.

The estimated recordkeeping costs are \$194,198.40 based on 5517 hours at \$35.20 per hour for Material Recording Clerks.

Reporting - Aerospace Engineers	
	<a href="https://www.bls.gov/ooh/architecture-and-engineering/aerospace-engineers.htm">https://www.bls.gov/ooh/architecture-and-engineering/aerospace-engineers.htm</a>
\$ 54.34	wage and salary per above - (All workers, goods producing industries - Management, Professional, and related 67.5%)
	<a href="https://www.bls.gov/news.release/ecec.t09.htm">https://www.bls.gov/news.release/ecec.t09.htm</a>
\$ 26.16	Benefits per above professional group 32.5%
	<a href="https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf">https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf</a>
	Overhead cost is 100% - benefits which would be 67.5%

Aerospace Engineers Calculations	
80.50	54.34 is 67.5% of 80.50
26.16	32.5% of 80.50 is 26.16 benefits
54.34	67.5% of 80.50 is 54.34 overhead
<b>161.00</b>	<b>TOTAL COST TO EMPLOYER</b>

Recordkeeping - Material Recording Clerks	
	<a href="https://www.bls.gov/ooh/office-and-administrative-support/material-recording-clerks.htm">https://www.bls.gov/ooh/office-and-administrative-support/material-recording-clerks.htm</a>
\$ 13.27	wage and salary per above - (Occupational group - service 71.2%)
	<a href="https://www.bls.gov/news.release/ecec.t05.htm">https://www.bls.gov/news.release/ecec.t05.htm</a>
\$ 4.33	Benefits per above Occupational group - service 24.6%
	Overhead cost is 100% - benefits which would be 71.2%

Material Recording Clerks Calculations	
17.60	13.27 is 75.4% of 17.60
4.33	24.6% of 17.60 is 4.33
13.27	75.4% of 17.60 is 13.27
<b>35.20</b>	<b>TOTAL COST TO EMPLOYER</b>

Collection Instrument Reporting	# of Respondents	Burden Hours Per Respondent	Total Burden Hours (A*B)	Mean Hourly Rate Plus Benefits	Annual Cost
	A	B	C	D	(C*D)
183.43	4	65	260	\$161.00	\$41,860
183.45	8	1	8	\$161.00	\$1,288
183.55	8	2	16	\$161.00	\$2,576
183.57	4	1	4	\$161.00	\$644
	<b>24</b>	<b>69</b>	<b>288</b>		<b>\$46,368</b>
183.63: Safety	4	48	192	\$35.50	\$6,816
Corrective Items	3	30	90	\$35.20	\$3,168
Notification of Errors	5	1	5	\$35.20	\$176
	<b>12</b>	<b>79</b>	<b>287</b>		<b>\$10,160</b>
<b>Total:</b>	<b>36</b>	<b>148</b>	<b>575</b>		<b>\$56,528</b>

	<b>Collection Instrument Recordkeeping</b>	<b># of Respondents A</b>	<b>Burden Hours Per Responses</b>	<b>Total Burden Hours (A*B)</b>	<b>Mean Hourly Rate Plus Benefits</b>	<b>Annual Cost</b>
		<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>(C*D)</b>
183.61	Authorized holders	10	200	2,000	\$35.20	\$70,400
	Significant Holders	20	100	2,000	\$35.20	\$70,400
	Limited Holders	60	20	1,200	\$35.20	\$42,240
	<b>Total:</b>	<b>90</b>	<b>320</b>	<b>5,200</b>		<b>\$183,040</b>
	<b>Hours</b>	126	468	5,775		<b>\$239,568</b>

A section-by-section breakdown of the proposed rule follows, showing frequency of response, burden and how the burden has been established (based on the previous three years).

The Organization Designation Authorization rule imposes the following burdens:

Section 183.43: Application. The applicant for an authorization must submit an application and proposed procedures manual to the FAA.

Estimated number of annual applications	4
Estimated reporting burden hours per application	5 hours
Estimated reporting burden for procedures manual	60 hours
Estimated annual reporting burden	260 hours

Section 183.45: Issuance of Organization Designation Authorizations. An authorization holder must apply to and obtain approval for any changes to the authorized functions or limitations.

Estimated application for changes	8
Estimated preparation time	1 hours
Estimated annual reporting burden	8 hours

Section 183.55: Limitations. An authorization holder may not perform an authorized function if there has been a change in the authorization holder's staff or organization until the FAA is notified of the change and it is documented in the approved procedures manual.

Estimated procedures manual changes	8
Estimated preparation time	2 hours
Estimated annual reporting burden	16 hours

Section 183.57: Responsibilities of an ODA Holder. Each authorization holder shall continue to meet the requirements for issuance of the authorization or shall notify the Administrator within 48 hours of any change that could affect meeting those requirements.

Estimated notifications	4
Estimated time per notification	1 hour
Estimated annual reporting burden	4 hours

Section 183.61: Records. Each authorization holder shall maintain at its facility current records that document the approvals they perform for the FAA. Each authorization holder must submit reports as required by the FAA. The recordkeeping requirements are dependent on the type of authorization holder. The following estimates are based on the assumption that there will be nine organizations with large ODA systems covering multiple ODA types, 20 organizations with significant ODA systems covering multiple approvals, and 55 organizations with very limited authority.

Estimated large authority authorization holders maintaining records	10
Estimated recordkeeping burden per holder	200 hours
Estimated recordkeeping burden	2000 hours

Estimated significant authority authorization holders	20
Estimated recordkeeping burden per holder	100 hours
Estimated recordkeeping burden	2000 hours

Estimated limited authority authorization holders	60
Estimated recordkeeping burden per holder	20 hours
Estimated recordkeeping burden	1200 hours

Section 183.63: Continuing Requirements: Products, parts, or appliances. If requested by the FAA, the authorization holders must investigate safety concerns and report the investigation results to the FAA. The ODA holder must submit the information required for corrective action if requested.

Estimated safety concerns requiring investigation	4
Estimated reporting burden per investigation	48 hours
Estimated total reporting burden	192 hours

Estimated items requiring corrective action	3
Estimated reporting burden per corrective action	40 hours
Estimated total reporting burden	120 hours

Section 183.65: Continuing Requirements: Operational approvals. Authorization holders that issue operational approvals must notify the FAA of errors in issuing certificates, and if it finds out, it issued a certificate to an unqualified applicant.

Estimated notifications of errors made or unqualified applicants	5
Estimated reporting burden per notification	1
Estimated total reporting burden	5

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

No cost other than indicated in question 12.

**14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational 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 annual cost to the Federal Government to analyze and process the information received is estimated to be \$15,019.20 per year. This estimate is based on 160 hours at \$93.87 per hour (\$68.90 salary [[https://www.faa.gov/jobs/working\\_here/benefits/](https://www.faa.gov/jobs/working_here/benefits/) average of I and J band minimum and maximum] plus \$24.97 benefits [36.25% per <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2008/m08-13.pdf>]). (See tab “Number 14” on the statics spreadsheet for calculations.)

Estimated number of Applications/Procedures Manuals	4
Estimated hours to review/approve	25
Estimated total hours	100
Estimated changes in functions	10
Estimated hours to review/approve	1
Estimated total hours	10
Estimated procedures manual changes	10
Estimated hours to review/approve	5
Estimated total hours	50

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

The burden has changed due to correction of errors in the previous information collection renewal.



**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 organization's numbers/descriptions of approvals may be published in ongoing FAA data products. Tabulation and publication are not specific to this data collection, but follow FAA standard practice for the publication of such data. For example, the FAA routinely publishes a description of certificates issued. Certificates issued by these organizations will be included in such a publication.

**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.**

There is no request for approval not to display expiration date for OMB.

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

No exceptions.