

Supporting Statement A
Safety Statement Requirement for Manufacturers of Small Unmanned Aircraft
OMB 2120-XXXX

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

Section 2203 of the FAA Extension, Safety, and Security Act of 2016 (P.L. 114-90) requires manufacturers of small unmanned aircraft to make available to the owner a safety statement that satisfies requirements detailed in that section. The requirements include:

1. Information about, and sources of, laws and regulations applicable to small unmanned aircraft;
2. Recommendations for using small unmanned aircraft in a manner that promotes the safety of person and property;
3. The date that the safety statement was created or last modified; and
4. Language approved by the Administrator regarding the following:
 - a. A person may operate the small unmanned aircraft as a model aircraft (as defined in section 336 of the FAA Modernization and Reform Act of 2012 (49 U.S.C. 40101 note)) or otherwise in accordance with Federal Aviation Administration authorization or regulation, including requirements for the completion of any applicable airman test.
 - b. The definition of a model aircraft under section 336 of the FAA Modernization and Reform Act of 2012 (49 U.S.C. 40101 note).
 - c. The requirements regarding the operation of a model aircraft under section 336 of the FAA Modernization and Reform Act of 2012 (49 U.S.C. 40101 note).
 - d. The Administrator may pursue enforcement action against a person operating model aircraft who endangers the safety of the national airspace system.

By statute, manufacturers will be required to make a safety statement available to small UAS owners. This manufacturer insert serves as an example safety statement that UAS manufacturers may use. Formal FAA guidance for manufacturers to develop their own safety statements is currently in coordination and is expected to be issued in FY23.

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 requirement mandates manufacturers to provide safety information to the public for using small unmanned aircraft. This information must be provided when someone purchases a small unmanned aircraft and may be done as a packing insert or via electronic means. No additional information is anticipated to be disseminated to the public. The FAA will not be collecting information related to this requirement.

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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.

Section 2203 does not prescribe how manufacturers must satisfy the requirement. It is up to the manufacturer to select their method of compliance, including website content, mobile applications, or other electronic means.

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

There is no duplication.

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

In order to minimize the burden on small businesses, the FAA has developed an example safety statement that can be used to satisfy the requirement.

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 is a Congressional requirement under Section 2203 of the FAA Extension, Safety, and Security Act of 2016 (P.L. 114-90). A person who violates subsection (a) shall be liable for each violation to the United States Government for a civil penalty described in section 46301(a) of title 49, United States Code.

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

There are no special circumstances that would require this collection to be conducted in a manner inconsistent with the points presented in 5 CFR section 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

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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 for published on May 7, 2019 (84 FR 19989) solicited public comment. Three comments were received, one comment was from Airlines from America and two from individuals.

- The FAA agrees with Airlines for America: “The Safety Statement is an important safety and oversight tool to ensure that sUAS manufacturers are compliant with FAA accepted consensus safety standards, while imposing minimal burden upon the sUAS industry.”
- Since the requirement for manufacturers to make safety statements available is statutory, this information collection request is not an overstep by the FAA, but part of the process to implement Section 2203 of the FAA Extension, Safety, and Security Act of 2016 (Pub. L. 114-90). In addition, to reduce the burden on manufacturers, the FAA has provided a sample safety statement for manufacturers to use to satisfy this requirement or as a guide to create a custom safety statement. The FAA has updated the sample safety statement as needed and will continue to do so.

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

No payments or gifts were provided to respondents.

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

No assurance of confidentiality is provided.

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

No sensitive information is collected.

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

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Due to the fast pace of the UAS industry, it is difficult to reliably estimate the number respondents as new manufacturers are frequently joining the UAS industry while existing manufacturers leave. Additionally, the FAA has developed an example safety statement that can be used to satisfy the requirement and reduce the burden to the manufacturer, however the manufacturer may elect to develop materials of their own.

Assuming there are 100 UAS manufacturers: 50% of those use the FAA developed guidance and 50% develop their own guidance, the time burden would be:

40 hours/year to develop and approve content x \$75/hour¹ = \$3,000 development cost
 50 manufacturers x \$3,000 development cost = \$150,000/year

Summary (Annual Numbers)	Disclosure	Recordkeeping	Reporting
Estimated Number of Respondents	50 manufacturers	N/A	N/A
Estimated Number of Responses per Respondent	1 response per year per manufacturer	N/A	N/A
Cost per Response	\$3,000	N/A	N/A
Hours per Response	40	N/A	N/A
Total Number of Responses	50	N/A	N/A
Total Burden (Hours)	2,000	N/A	N/A
Total Burden (Cost)	\$150,000	N/A	N/A

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

Section 2203 does not prescribe how manufacturers must satisfy the requirement. It is up to the manufacturer to select their method of compliance (including but not limited to printed materials, website content, mobile applications, or other electronic means).

If manufacturers elect to print materials:

\$0.01/safety statement (printing, shipping, and placement) x 2 million drones = \$20,000

If manufacturers elect electronic delivery:

Cost for electronic delivery are included in question 12 above.

¹ U.S. Bureau of Labor Statistics (BLS); Occupational Employment and Wage Statistics

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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.

Annualized costs to the Federal government could include content modification development, coordination, and distribution.

80 hours x \$60/hour² (or J band equivalent) = \$4,800/year

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

This is a new information 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 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.

The FAA is not seeking approval to not display the expiration date.

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

There are no exceptions to the certification statement.

² Federal Aviation Administration (FAA) Pay and Benefits