

Supporting Statement A
REPORTING OF INFORMATION USING SPECIAL AIRWORTHINESS
INFORMATION BULLETINS (OMB No. 2120-0731)

Revisions/Changes

- Number of SAIBs per year – Q5
- Number of SAIBs that include reporting requests – Q5 and Q12
- Annualized cost to the respondents – Q12
- Annualized cost to the Federal government – Q14

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

Chapter 447 of Title 49 United States Code (49 USC) defines the Administrator's powers and duties regarding the promotion of safety of flight of civil aircraft. Section 40113 of 49 USC authorizes the Administrator to take action he or she "considers necessary to carry out this part, including investigations, prescribing regulations, standards, and procedures, and issuing orders." This section, in conjunction with 49 USC §§ 44701, 44702, and 44704, constitutes the basis for the FAA's authority to issue airworthiness directives (ADs) to correct unsafe conditions.

One of the FAA's primary functions is to require the correction of an unsafe condition under Title 14 of the Code of Federal Regulations (14 CFR) part 39 for type certificated products (that is aircraft, aircraft engines, propellers, or appliances) by means of an AD. Rulemaking in the form of an AD is appropriate only when an unsafe condition exists in a product and that unsafe condition is likely to exist or develop in other products of the same type design.

A special airworthiness information bulletin (SAIB) is an important tool that helps the FAA to gather information to determine whether an AD is necessary. An SAIB alerts, educates, and make recommendations to the aviation community and individual aircraft owners and operators about ways to improve the safety of a product. It contains non-regulatory information and guidance that is advisory and may include recommended actions or inspections with a request for voluntary reporting of inspection results.

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 FAA sometimes includes a request for voluntary reporting of information (e.g., inspection results, etc.) in SAIBs. The inspection results may help the FAA in an ongoing investigation to determine the cause of a specific condition, or whether the condition is likely to exist or develop on other products of the same type design. We may also require reports if a potential unsafe condition is a result of manufacturing quality control problems. We need these reports to determine the scope of the problem

and how adequate the design approval holder's corrective actions are. As such, each reporting situation is unique.

To date, our only means for obtaining reporting information is from design approval holders through 14 CFR § 21.3. We have no other authorized method for notification and collection of information from owner/operators to help in our assessment of a potential unsafe condition. If the FAA is unable to obtain this information, we may need to conduct a directed safety investigation. This is a burden on both the FAA and the owner/operator.

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.

Following the Government Paperwork Elimination Act (GPEA), we use e-mail and the Internet for corresponding with industry, accepting their 100% electronic submission of information. How to send the information to us, however, is up to owners and operators. We cannot mandate electronic submission of reports, because some of the affected parties are small businesses and/or individuals lacking electronic/Internet communication.

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

The FAA is the only government agency that issues SAIBs. Each SAIB is unique and concerns a specific condition on certain products. The information we need is only available from the owner/operator whose aircraft or aircraft product is inspected, modified, or repaired in accordance with the recommendations included in the SAIB.

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

While we cannot predict exactly who owns the products that are the subject of SAIBs, there are on average over the last three years (2018 through 2020) 31 SAIBs issued annually, with approximately 4 of those recommending a report for inspection results. With SAIBs, there is no intended burden on small businesses or other small entities because SAIBs are advisory only and include recommended actions and voluntary reporting.

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.

We keep the information collection requirement to a minimum because we search our own databases and work with the design approval holder whenever possible before issuing an SAIB. We ask for reports only when we need more information to help us determine if an unsafe condition exists. The technical obstacle to reducing the burden is that we will not be able to obtain needed technical data to determine whether safety is at risk.

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

This information collection will be consistent with the requirements of 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 November 6, 2020 (85 FR 71135), solicited public comment. Comment period ended January 5, 2021. One comment was received that did not pertain to the subject of the notice.

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

We do not provide any payment or gifts to respondents.

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

We give respondents no assurance of confidentiality.

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

There are no sensitive questions.

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.

| Summary (Annual numbers) | Reporting | Recordkeeping | Disclosure |
|-------------------------------|-----------|---------------|------------|
| # of Respondents | 1,340 | | |
| # of Responses per respondent | 4 | | |
| Time per Response | 5 min | | |
| Total # of responses | 5,360 | | |
| Total burden (hours) | 447 | | |

We estimate that 4 SAIBs yearly will recommend reporting of information and findings. The average SAIB affects about 1,340 owners/operators. Therefore, 4 SAIBs times 1,340 owners/operators per year equals 5,360 reports [4 x 1,340]. These reports, requiring an average of 5 minutes to prepare, consume 447 reporting hours [(5,360 x 5)/60]. The 5 minute preparation time has not changed since our last submission.

The total annualized cost to respondents is \$33,141. We base this on the 447 reporting hours times an estimated hourly rate of \$32/hour per respondent.¹ Adding a fringe of 31.7% which equals \$10.14/hour and an overhead of 100% per direct labor hour this total annual salary cost to respondents is \$33,141 [32 + 10.14 + 32 x 447].^{2,3} The average cost to the respondents per SAIB per year is \$6.18 [\$33,141/5,360].

¹ Source: U.S. Bureau of Labor Statistics, "2020 Occupational Outlook Handbook," <https://www.bls.gov/ooh/installation-maintenance-and-repair/aircraft-and-avionics-equipment-mechanics-and-technicians.htm>.

² Source: U.S. Bureau of Labor Statistics, "Employer Costs for Employee Compensation – September 2018," <https://www.bls.gov/ooh/architecture-and-engineering/aerospace-engineers.htm>.

³ Source: U.S. Department of Health and Human Services, "Guidelines for Regulatory Impact Analysis" (2016), https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf.

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

The information collection burden is a reporting burden only. SAIB record keeping is covered as follows: 14 CFR §§ 43.9, 43.11, and 91.417 require each registered owner/operator to keep records regarding the work performed on each aircraft. The records must include a description of the work performed, the date of completion of the work, and the name of the person performing the work.

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 total estimated annual cost to the Federal government is \$181,476. We determined this cost based on time required by FAA certification engineers to review the inspection reports.

The annual estimate of 5,360 reports requires an average of 15 minutes each to review, totaling 1,340 $[(5,360 \times 15) / 60]$ total hours. At \$57/hour, the median pay for an aerospace engineer, the annual salary, without fringe and overhead, cost to the Federal government is \$76,380 $[57 \times 1,340]$.⁴ Adding a fringe of 37.6% which equals \$21.43/hour and an overhead of 100% per direct labor hour this total annual salary cost to the Federal government is \$181,476 $[57 + 21.43 + 57 \times 1,340]$.^{5,6} The 15 minute preparation time has not changed since our last submission.

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

From the previous submission, we have revised our number of SAIBs per year to reflect the actual average of SAIBs between the years 2018 – 2020. We have also revised our number of SAIBs that include reporting requests to reflect up to date numbers from recent years. Our annualized cost to the respondent and annualized cost to the Federal government have been updated with 2020 data available from the U.S. Bureau of Labor Statistics.

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

⁴ Source: U.S. Bureau of Labor Statistics, "2020 Occupational Outlook Handbook," <https://www.bls.gov/ooh/architecture-and-engineering/aerospace-engineers.htm>.

⁵ Source: U.S. Bureau of Labor Statistics, "Employer Costs for Employee Compensation – September 2018," <https://www.bls.gov/ooh/architecture-and-engineering/aerospace-engineers.htm>.

⁶ Source: U.S. Department of Health and Human Services, "Guidelines for Regulatory Impact Analysis" (2016), https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf.

and ending dates of the collection of information, completion of report, publication dates, and other actions.

We have no plans for statistical use, and/or publication of this information

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

We do not seek approval to not display the expiration date of the OMB approval.

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

There are no exceptions.