

**Federal Aviation Administration**  
**Supporting Statement A**  
**OMB CONTROL NUMBER: 2120-0774**  
**Safety Assurance System (SAS) External Portal**

**Introduction**

This Information Collection is submitted to the Office of Management and Budget (OMB) to request a revision to an existing Information Collection currently under OMB control number 2120-0774, Safety Assurance System (SAS) external portal that includes 14 CFR parts 121, 135 and 145. This revision is to include the SAS external portal for the purpose of collecting information and processing initial certification application and Element Design (ED) Data Collection Tools (DCTs) for 14 CFR parts 141, 142 and 147.

**Part A Justification**

**1. Explain the circumstances that make the collection of information necessary.**

Flight Standard's authority to collect this information is derived generally from 49 U.S.C. § 106(f) which establishes the FAA Administrator's responsibilities with respect to aviation safety. The collection of this information is consistent with the Administrator's authority under 49 U.S.C. 44701(c). The following requirements in 49 U.S.C. are also applicable to SAS; § 44702, Issuance of Certificates, § 44705, Air Carrier Operating Certificates, and §44707, Examining and Rating Air Agencies.

SAS contains an internal and external portal. The internal portal is a web-based tool used by the Federal Aviation Administration (FAA) Flight Standards Service (FS) employees to conduct initial certification, surveillance, and certificate management for applicants and certificate holders under 14 CFR parts 121, 135, 141, 142, 145 and 147. SAS is not a separate safety standard and does not impose additional requirements on applicants or certificate holders. SAS policy and procedures provide Principal Inspectors (PIs), Certification Project Managers (CPMs), Training Center Program Managers (TCPMs) and other FS employees with standardized protocols to evaluate, approve or accept initial certification applications and certificate holder programs required by regulations.

The external portal is a web-based tool developed for applicants and certificate holders (also referred to as external users) to exchange information with FS employees, primarily the Certification Project Managers (CPMs), Principal Inspectors (PIs) and Training Center Program Managers (TCPMs). SAS external portal creates the ability for our external users to collaborate and communicate with their FS counterparts in the execution of the following functions:

- Submitting a Preapplication Statement of Intent (PASI) Form (FAA Form 8400-6) (14 CFR parts 121, 135 and 141);
- Submitting an Application for Repair Station (FAA Form 8310-3) (14 CFR part 145);

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- Submitting an Application for Aviation Maintenance School Certificate and Ratings Application (FAA Form 8310-6) (14 CFR part 147);
- Submitting a Letter of Intent (14 CFR part 142);
- Submitting Element Design (ED) data collection tools (DCTs); and,
- Sharing of other documentation as needed.

Use of the SAS external portal is optional for our external users. If an external user decides to use the SAS external portal, they will enter their request for access on the “SAS Registration” page. An automated email containing a registration link will be sent from the FAA to the email address provided. Once the user submits all required information, the request for external portal access is routed to the user’s responsible FS office that was provided in the registration. Benefits to the certificate holder or applicant to use the external portal include:

- Ease of submission and expedited processing and tracking of documents/requests;
- Documents/requests are sent directly to the FS employees, which eliminates wait time for the entry of information by the PI/CPM; and,
- Access to DCTs.

**2. Indicate how, by whom, and for what purpose the information is to be used.**

*How and by whom and for what purpose application information is collected:*

Entities that currently hold certificates or wish to hold certificates under Title 14 CFR parts 121, 135, 141, 142, 145 and 147 are mandated to report information to this collection on occasion. The application information varies by certification type but typically collects information on the location of the operations, management personnel, type of operation or agency rating, and aircraft data is collected using a web-based portal that contains the application in an electronic fillable form, the application information is sent to the FS office using the web-based portal. FS employees review the application for the following:

- Assist the certificate holder or applicant with the application process;
- Review the application package for accuracy and completeness; and,
- Accept or reject the submission.

*How and by whom and for what purpose DCT information is collected:*

Element Design (ED Data Collection Tools (DCTs) are electronic tools that are exchanged between FS employees and the external user and contain the regulatory and other requirements for the FS employees to approve or accept applications and programs.

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

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- Submitting a Preapplication Statement of Intent (PASI) Form (FAA Form 8400-6) (14 CFR parts 121, 135 and 141);
- Submitting an Application for Repair Station (FAA Form 8310-3) (14 CFR part 145);
- Submitting an Application for Aviation Maintenance School Certificate and Ratings Application (FAA Form 8310-6) (14 CFR part 147);
- Submitting a Letter of Intent (14 CFR part 142);
- Submitting Element Design (ED) data collection tools (DCTs); and,
- Sharing of other documentation as needed.

Use of the SAS external portal is optional for our external users. If an external user decides to use the SAS external, portal they will enter their request for access on the “SAS Registration” <https://sas.faa.gov/sas.external.portal/ext/accounts> page. An automated email containing a registration link will be sent from the FAA to the email address provided. Once the user submits all required information, the request for external portal access is routed to the user’s responsible FS office that was provided in the registration.

#### **4. Describe efforts to identify duplication.**

We have reviewed other FAA public reports and find no duplication. In addition, the FAA knows of no other agency collecting the same information. The information sought is required information regarding certification and other activities for a specific applicant or certificate holder. The information necessary is available from that applicant or certificate holder only, and is not available from any other source.

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

FS developed the SAS external portal to ease the burden associated with this information collection and to better facilitate efficient certification, surveillance and certificate management activities. Additionally, the SAS external portal is accessible to all users via the internet, regardless of geographical location of the certificate holder or applicant, thus making it easier for small entities in remote locations to collaborate with FS employees.

**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.**

If an applicant or certificate holder applies for a certificate or collaborates with the FAA about an existing certificate, the external portal provides an efficient method for an external user to enter data or collaborate and communicate with FS employees. Without this information collection, FS will be unable to efficiently facilitate initial certification activities, process other program requests and document certificate management activities.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with 5 CFR 1320.5(d)(2)(i) through (viii).**

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

**8. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any) and on data elements to be recorded, disclosed, or reported.**

The FAA published a Notice in the Federal Register in Volume 86 published on July 16, 2021 concerning its intent to request OMB approval for this collection activity. No comments were received and no stakeholder engagement occurred.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

No payment nor gift will be made to operators or air agencies who provide information regarding SAS data through the SAS external portal.

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

The respondents have been given no assurance of confidentiality.

**11. Provide additional justification for any questions of a sensitive nature.**

There are no questions of a sensitive nature.

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**12. Provide estimates of hour burden of the collection information.**

FS estimates the hour burden information to respondents based on statistical information collected each fiscal year. In addition, to estimate the annualized costs to the respondents, we note the following:

- The FAA uses a seven percent discount rate for calculating present values of costs as prescribed by OMB in Circular A-4.
- Estimates are provided in fiscal year 2020 dollars.
- The FAA uses the Bureau of Labor Statistics (BLS) mean hourly wage for a General and Operations Manager and Transportation and Material Moving Workers.
- The FAA believes that one to three managers would be required to enter the Application or Certificate holder information into the SAS External Portal. For this analysis the FAA uses the average two managers  $((1 + 3) / 2)$  to enter the Application or Certificate holder information.
- The FAA estimates that it will take approximately 15 minutes to 30 minutes to complete the Pre-Application Form and Letter of Intent in the SAS External Portal. For this analysis the FAA uses the average time of 22.5 minutes  $((15 + 30)/2)$  multiplied by two managers for a total of 67.5 minutes per applicant.
- The FAA estimates that it will take approximately 30 minutes to 60 minutes to complete the Element Data Collection Tool in the SAS External Portal. For this analysis the FAA uses the average time of 45 minutes  $((30 + 60)/2)$  multiplied by two managers for a total of 135 minutes per applicant.

Since the identity of the respondent completing the application or program request varies widely from the owner or operator of a small business to junior employees for a large business, we use the hourly rate from the BLS category Business and Financial Operation Occupation. We believe this BLS category most closely matches the industry respondent. Based upon the U.S. Bureau of Labor Statistics Occupational Handbook the estimated mean wage for a Business and Financial Operation Occupation is \$38.79 per hour.<sup>1</sup> Using BLS's Employer Costs for Employee Compensation memo released March 18, 2021,<sup>2</sup> the FAA calculated the mean hourly wage, plus benefits, for these managers to be \$56.46  $(\$38.79 + \$17.67)$ .

We calculated the annual cost by multiplying the number of respondents by the burden hours per respondent for the Total Burden hours. The FAA then multiplies the Total Burden hours by the mean hourly rate plus benefits for the annual cost. The following tables shows the results for Applicants, Certificate holders, and total cost.

Table 1 – Estimated Burden for Applicant Information Collection

<b>Collection Instrument</b>	<b># of Respondents A</b>	<b>Burden Hours Per Respondent</b>	<b>Total Burden Hours</b>	<b>Mean Hourly Rate Plus</b>	<b>Annual Cost</b>
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<sup>1</sup> <https://www.bls.gov/oes/current/oes130000.htm>

<sup>2</sup> <https://www.bls.gov/news.release/pdf/ecec.pdf>

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			<b>(A*B)</b>	<b>Benefits</b>	
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>(C*D)</b>
Application Form (14 CFR parts 121, 135, 141, 142, 145, 147)	833	45	37,485	\$56.46	\$2,116,511
Letter of Intent (14 CFR part 142 only)	89	45	4,005	\$56.46	\$226,134
Element Data Collection Tools (ED DCTs) (applicants only)	922	90	82,980	\$56.46	\$4,685,290
<b>Total:</b>			<b>124,470</b>		<b>\$7,027,935</b>

Table 2 – Estimated Burden for Certificate Holders Information Collection

<b>Collection Instrument</b>	<b># of Respondents A</b>	<b>Burden Hours Per Respondent</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>
Element Data Collection Tools (ED DCTs) (certificate holders)	7,892	90	710,280	\$56.46	\$40,104,456
<b>Total:</b>			<b>710,280</b>		<b>\$40,104,456</b>

We then summed the costs from Table 1 and Table 2 for a total cost over the three-year period of analysis. We calculated the annualized costs over a three-year period of analysis using a financial function that returns the periodic payment. The following table shows we estimate the total cost to respondent to be about \$186 million dollars with an annualized cost of about \$47 million at a seven percent value over the three-year period of analysis.

Table 3 – Total Estimated Burden and Annualized Cost

<b>Year</b>	<b>Annual Cost (Applicant) (A)</b>	<b>Annual Cost (Certificate Holder) (B)</b>	<b>Total Annual Cost (A+B)</b>	<b>7 % Present Value</b>
<b>Fiscal Year 1</b>	\$7,027,935	\$40,104,456	\$47,132,391	\$44,048,963.39
<b>Fiscal Year 2</b>	\$7,027,935	\$40,104,456	\$47,132,391	\$41,167,255.51
<b>Fiscal Year 3</b>	\$7,027,935	\$40,104,456	\$47,132,391	\$38,474,070.57
<b>Total Cost</b>			<b>\$141,397,172</b>	<b>\$123,690,289</b>
<b>Annualized Cost</b>				<b>\$47,132,391</b>

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**13. Provide estimates of the total annual cost burden to respondents or record-keepers resulting from the collection of information.**

There are no costs associated with this collection that have not already been identified in the responses to item Numbers 12 and 14.

**14. Provide estimates of annualized cost to the Federal government.**

There is no cost to maintain the ED DCTs since no additional equipment or people will be required to maintain those tools.

Flight Standards Training Costs

The training to support the external portal consists of two courses both are web-based courses that have no cost associated with them. This information was provided by the Workforce Development Division.

<b>Course</b>	<b>Type of Course</b>	<b># of Attendees</b>	<b>Cost</b>
27100205 Intro to SAS External portal External portal for Certificate Holders and Applicants:	2 hour Web-based course. Delivered through a virtual platform.	524	No cost associated with this course due to the virtual delivery and the FS employee can complete the training during his/her normal duty time
27100215 Intro to the SAS External portal External portal for AFS	5 hour Web-based. Delivered through a virtual platform.	2,393	No cost associated with this course due to the virtual FS employee can complete the training during his normal duty time

IT Costs

IT operations and maintenance (O&M) costs for the external portal are contained within the cost to maintain the internal portal and are not broken out as a separate cost. The costs are estimated to be range from 1% to 2% per year of the total costs of \$4.22M for the external portal. We calculate the O&M costs range from \$42,200 to \$84,400 per year ( $0.01 * \$4.22M$  and  $0.02 * \$4.22M$ ) or an average of \$63,300 per year ( $(42,200 + 84,400) / 2$ ) with an annualized cost of \$63,300 at a seven percent value over the three-year period of analysis. The table below provides the projected O&M costs for the SAS internal portal.

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<b>Year</b>	<b>Annual Cost</b>	<b>7 % Present Value</b>
<b>Fiscal Year 1</b>	\$63,300	\$59,159
<b>Fiscal Year 2</b>	\$63,300	\$55,289
<b>Fiscal Year 3</b>	\$63,300	\$51,672
<b>Total Cost</b>	<b>\$189,900</b>	<b>\$166,119</b>
<b>Annualized Cost</b>		<b>\$63,300</b>

**15. Explain reasons for program changes or adjustments reported in Items 13 or 14 of OMB Form 83-I.**

The SAS External Portal was changed to include 14 CFR part 141, 142 and 147 applicants and certificate holders. Those business entities can voluntarily collaborate with the Flight Standards employees for certification and surveillance information. Furthermore, the burden for the rest of the CFR parts (121, 135 and 145) was adjusted to show a more accurate number of applicants and certificate holders who could voluntarily use the SAS external portal to exchange information with their Flight Standards counterparts.

**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.**

Results of this information collection will not be published.

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

The FAA is not seeking approval to eliminate display of the expiration date for OMB approval of the information collection.

**18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.**

There are no exceptions to the certification statement identified in item No. 19 of OMB Form 83-I.