

Supporting Statement A
OMB 2120-0007

Flight Engineers and Flight Navigators

Summary of Changes:

- The numbers of schools in question 12 were updated for current numbers.
- The labor cost for this submission was based on data found on the BLS website.
- The burden for 63.42 has been removed. In the past 5 years, there have been no applications for Flight Engineer Certificates Issued on Basis of Foreign Flight Engineer License. Therefore, we have calculated no burden as it is not likely there will be an applicant for this rating in the next 3 years.
- The cost in Question 14 was eliminated as these are regular functions of an Aviation Safety Inspector that are already accounted for in their salary.
- The agency has separated collection activity into appropriate information collections, there has not been additional forms or applications added.

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

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

The information collection is necessary to determine applicant eligibility for flight engineer or flight navigator certificates, as well as to determine training course acceptability for those schools training flight engineers or navigators.

49 USC 44702(a) empowers the secretary to issue airman certificates to properly qualified persons. This clearance request covers the burden imposed on persons applying for certificates that will authorize them to perform the duties of flight engineers and flight navigators.

49 USC 44707(1) empowers the Secretary to provide for the examination and rating of civilian schools that give instruction in flying. The clearance request also covers the burden imposed on persons applying for approval of flight engineer and flight navigator training courses.

49 USC 44702(a)(2) requires the application for certificates under this act shall be in such a form, contain such information, and be filed as the Administrator may prescribe.

Federal Aviation Regulation Part 63-Certification: Flight Crewmembers other than Pilot (14 CFR 63) prescribes requirements for certification of flight engineers and flight

navigators. Part 63 also prescribes requirements for training courses for these two categories of airmen.

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.

Flight engineers and flight navigators seeking to receive or maintain certification and flight schools seeking approval of related training courses are mandated to report to this collection. Certificates are effective until surrendered, suspended, or revoked. There are 4 schools that annually train an average of 5 flight engineers each year. These schools are required to have their proposed training courses approved by FAA before they can be implemented, and course approval must be renewed every 24 months thereafter.

Training course operators are also required to keep accurate records of students training activities, and to make annual reports to FAA about the activities.

FAA Form 8400-3, Application for an Airman Certificate and/or Rating, (for flight engineer and flight navigator applicants) and applications for approval of related training courses are submitted to FAA for evaluation. The submission of this information to the FAA is mandatory, occurs on occasion and is considered reporting and record keeping. The information is reviewed by FAA personnel to determine applicant eligibility and compliance with prescribed provisions of FAR Part 63, Certification: Flight Crewmembers Other Than Pilots. Form 8400-3 is multiple-use form also used for control tower operators and aircraft dispatchers.

The information collected is not disseminated to the public. Although the information collected may not be expected to be directly disseminated to the public, results may be used in scientific, management, technical or general informational publications.

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.

Some progress has been made to collect the information on FAA Form 8400-3 through automated means (the Federal Office Modernization Program). No discernible technical or legal obstacles are anticipated, and we are working to reach compliance with the criteria of the Government Paperwork Elimination Act. However, other information collections with a much higher number of respondents remain a much higher priority. The 8400-3 Form is available electronically at:

<https://www.faa.gov/forms/index.cfm/go/document.information/documentID/1019810>.

Applications can now be submitted electronically via the Integrated Airman Certification and Rating Application (IACRA) system.

The results of this information collection are not available to the general public.

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 use of Form 8400-3 is an effort to avoid duplication by consolidating on one form, Flight Navigator, Aircraft Dispatcher and Control Tower Operator applicants for certification. Previous separate forms are no longer in use.

The information collected is only available from the applicants applying for certification or for training course approval and not from any other source.

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

The collection of this information does not involve small businesses. In any case, we believe there is minimum burden to all concerned.

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.

Frequency of collection is determined by the applicant requesting the benefit of certification or approval under FAR 63. An applicant that does not complete FAA Form 8400-3 will not obtain certification.

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.*

This collection of information is conducted in a manner consistent with the guidelines in CFR 1320.5(d)(2)(i)-(viii). There are no special circumstances.

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 26, 2021 (86 FR 67580) solicited public comment. No comments were received.

FAA stakeholders work directly with their Certificate Management Office. They are frequently able to share feedback with their appointed office.

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

There is no payment or gift to respondents.

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

Applicants are provided confidentiality under the provision of the Privacy Act and the Privacy system of records DOT/FAA 847, General Air Transportation Records on Individuals.

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 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.**

The hour burden to all respondents is 158.1 and the cost burden is \$7,781.29. The following costs are based on the paperwork burden being done by a Technical Analyst or equivalent staffer earning approximately \$32.43 an hour¹. A 31.4 percent multiplier was then applied to account for fringe benefits which brings the salary to the salary to \$42.61.² To account for overhead, a multiplier of 17 percent was applied.³ Therefore, the estimated hourly salary for a Technical Analyst is \$49.85.

The specific reporting and recordkeeping requirements covered by this request are as follows:

Section 63.3, Certificates and ratings required, states that no person may act as a flight engineer or a flight navigator of a civil aircraft of U.S. registry unless that person has in his personal possession a current flight engineer or flight navigator certificate. There is no burden associated with this regulation.

Section 63.11, Application and Issue, states that applications for flight engineer and flight navigator certificates with appropriate class rating are to made in a form and manner prescribed by the Administrator. Persons applying for these certificates must submit FAA Form 8400-3.

We estimate 21 new annual applications for certificate including appropriate class ratings.

Estimated new applications	21
Estimated burden of time (.2 hour each)	<u>X .2</u>
(total time)	4.2 hrs
Estimated cost for technical time	<u>x\$49.85</u>
	\$209.37

Summary (Annual numbers)	Reportin g	Recordkeepin g	Disclosur e
# of Respondents	21		
# of Responses per respondent	1		
Time per	.2 Hours		

¹ <https://www.bls.gov/oes/current/oes131151.htm>

² <https://www.bls.gov/news.release/ecec.nr0.htm>

³ Source: Cody Rice, U.S. Environmental Protection Agency, "Wage Rates for Economic Analyses of the Toxics Release Inventory Program" (June 10, 2002), <https://www.regulations.gov/document?D=EPA-HQ-OPPT-2014-0650-0005>.

Response			
Total # of responses	21		
Total burden (hours)	4.2 Hours		

Section 63.23 - Special Purpose Flight Engineer, Flight Navigator Certificates, states that the holder of a current foreign flight engineer or flight navigator certificate, license, or authorization issued by a foreign contracting state to the ICAO, who meets the requirements of this section, may hold a special purpose flight engineer or flight navigator certificate, as appropriate, authorizing the holder to perform flight engineer or flight navigator duties on a civil airplane of U.S. registry, leased to a person not a citizen of the U.S. carrying persons or property for compensation or hire.

We estimate 5 annual applications for flight engineer certificates.

Estimated annual applications	5
Estimated burden of time (.2 hour each)	<u>x.2</u>
(total time)	1 hr.

Total time	1 hr.
Estimated cost for technical time	<u>x\$49.85</u>
	\$49.85

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	5		
# of Responses per respondent	1		
Time per Response	.2 Hour		
Total # of responses	5		
Total burden (hours)	1 Hour		

Section 63.33, Aircraft Ratings, states that additional aircraft class ratings may be issued to eligible flight engineers after their original certificates and class rating have been issued. Applicants for additional class ratings must submit FAA Form 8400-3.

We estimate 1 annual application for additional aircraft class ratings.

Estimated number annual applications	1
Estimated burden of time (.2 hour each)	<u>x.2</u>
	.2 hrs
3	
Total time	.2 hrs
Estimated cost for technical time	<u>x\$49.85</u>
	\$9.97

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	1		
# of Responses per respondent	1		
Time per Response	.2 Hours		
Total # of responses	1		
Total burden (hours)	.2 Hours		

Section 63.42 - Flight Engineer Certificate Issued on Basis of Foreign Flight Engineer License, requires the holder of a current foreign flight engineer license issued by a contracting state to the ICAO, who meets the requirement of this section, may have a flight engineer certificate issued to him for the operation of civil aircraft of U.S. Registry.

In the past 5 years, there have been no applications for Flight Engineer Certificates Issued on Basis of Foreign Flight Engineer License. Therefore, we have calculated no burden as it is not likely there will be an applicant for this rating in the next 3 years.

Section 63.43, Flight Engineer Courses, requires an applicant for approval of a new training course to submit a letter requesting approval of each proposed course. An applicant must also submit an outline for each course description of the facilities and equipment to be used, and a list of the instructors and their qualifications. Approval of a course is effective for 24 months.

We estimate no annual requests for a new flight engineer course.

Section 63.61, Flight Navigator Courses, requires an applicant for approval of a new training course to submit a letter to FAA requesting approval of each proposed course. An applicant must also submit an outline for each course, a description of the facilities and equipment to be used, and a list of the instructions and their qualifications. Approval of a course is effective for 24 months.

We estimate no annual requests for approval of a new flight navigator course.

Appendix C(e), Revisions, states that the flight engineer course operators may apply for revisions to their approved course outlines, their facilities or their equipment. Each of the 4 flight engineer schools has an average of 2 approved courses (with an average of 1 course revision annually).

Estimated number of course revisions annually	4
Burden of time is 10 hrs per revision	<u>x10</u>
	40 hrs
Total time	40 hrs
Estimated cost for technical time	<u>x\$49.85</u>
	\$1,994

Summary (Annual numbers)	Reportin g	Recordkeepin g	Disclosur e
# of Respondents	4		
# of Responses per respondent	1		
Time per Response	10 Hours		
Total # of responses	4		
Total burden	40 Hours		

(hours)			
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Appendix C(f), Ground School Credits, states that training course operators may grant credit to students for any comparable previous flight engineer training or experience that is provable. The hours credited shall be incorporated as part of the student's training records.

We estimated 20 students will annually have credit allowances entered into their records.

Estimated number of record entries	20
Estimated burden of time (.5 hour each)	x.5
	10 hrs
Total time	10 hrs.
Estimated cost for technical time	<u>x\$49.85</u>
	\$498.50

Summary (Annual numbers)	Reportin g	Recordkeepin g	Disclosur e
# of Respondents		20	
# of Responses per respondent		1	
Time per Response		.5 Hours	
Total # of responses		20	
Total burden (hours)		10 Hours	

Appendix C(g), Records and Reports, requires that flight engineer course operators must keep a record of each student's training activities and make an annual report to FAA about students that graduate, fail, or drop out. Each of the 4 flight engineer schools will annually train an average of 5 students.

Respondents			
# of Responses per respondent	1		
Time per Response	20 Hours		
Total # of responses	4		
Total burden (hours)	80 Hours		

TOTAL ESTIMATED HOURS 10 + 80 = 90

TOTAL ESTIMATED COST \$498.50+ \$3,988 = \$4,486.50

Appendix C(m), Cancellation of Approval, Item (2), says that flight engineer course operators may cancel an approved course by submitting a written notice.

We estimate that 1 training course will be canceled annually.

Number of canceled courses annually 1

Estimated burden of time (.7 hour each) X .7

(total time) .7 hrs.

Total time .7 hrs.

Estimated cost for technical time (@\$77.50 an hour) ~~x\$49.85~~

\$34.90

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents		1	
# of Responses per respondent		1	
Time per Response		.7 Hours	
Total # of responses		1	
Total burden (hours)		.7 Hours	

Appendix C(o), Renewal, Item (2), states that application for renewal of approval for flight engineer courses may be made to FAA at any time within 60 days before the termination date approval. Approval of each course must be renewed every 24 months. Each of the 4 flight engineer schools has an average of 2 approved courses.

We estimate that each of the 4 flight engineer schools will renew approval on 1 course annually.

Estimated number of renewals annually	4
Estimated burden of time (3 hours each)	<u>x3</u>
	12 hrs
Total time	12 hrs
Estimated cost for technical time	<u>x\$49.85</u>
	\$498.20

Summary (Annual numbers)	Reportin g	Recordkeepin g	Disclosur e
# of Respondents		4	
# of Responses per respondent		1	
Time per Response		3 Hours	
Total # of responses		4	
Total burden (hours)		12 Hours	

SUMMARY OF BURDEN

Section	Hours Per Year	Cost Per Year
63.11	4.2	\$209.37
63.23	1	\$49.85
63.33	.2	\$9.97
Appendix C (e)	40	\$1,994
Appendix C (f)	10	\$498.50
Appendix C (g)	90	\$4,486.50

Appendix C (m)	.7	\$34.90
Appendix C (o)	12	\$498.20
TOTAL:	158.1 Hours	\$7,781.29

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

There are no additional costs not already included 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 FAA estimates no additional costs associated with this collection as the data gathered above is associated with normal job functions that an Aviation Safety Inspector would perform. Therefore, the costs would already be included in the salary that they receive.

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

The numbers of schools in question 12 were updated for current numbers.

The labor cost for this submission was based on data found on the BLS website.

The burden for 63.42 has been removed. In the past 5 years, there have been no applications for Flight Engineer Certificates Issued on Basis of Foreign Flight Engineer License. Therefore, we have calculated no burden as it is not likely there will be an applicant for this rating in the next 3 years.

The cost in Question 14 was eliminated as these are regular functions of an Aviation Safety Inspector that are already accounted for in their salary.

The agency has separated collection activity into appropriate information collections, there has not been additional forms or applications added.

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.

There is no plan for 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.

FAA is not seeking this approval.

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

There are no exceptions.