

SUPPORTING STATEMENT

November 1, 2021

OMB No. 2138-0041, 14 CFR Part 234 – Airline Service Quality Performance

- DOT requests extension of previously approved collection of information from airlines.
- There have not been any program changes since the last revision (concluded 12/4/2018).
- This request includes an increase in the number of annual recurrent burden hours since the last revision due to an adjustment in DOT’s estimates. The increase was not due to a program change, but rather DOT revisiting its considerations for estimating burden hours.
- This request includes a decrease in the number of responses due to an estimated decrease in the number of respondents since the last revision.

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

Under 14 CFR Part 234, U.S. airlines accounting for at least one-half percent of domestic schedule passenger revenue must report monthly flight performance data (section 234.4 “Reporting of on-time performance.”) and monthly information on mishandled baggage and wheelchairs and scooters (section 234.6 “Baggage-handlings statistics.”) to the Department of Transportation (DOT or Department) for the flights they operate and for flights operated by their branded codeshare partners, if any. As described in more detail below, the DOT Bureau of Transportation Statistics (BTS) processes and publishes the information it collects for the benefit of air transportation consumers, airlines, federal entities, and others.

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.

DOT uses the data reported by the airlines to publish on-time performance, mishandled baggage, and mishandled wheelchairs and scooters statistics and rankings in the Department's monthly [Air Travel Consumer Report](#) (ATCR). The information and airline rankings enable the public to better evaluate transportation options. In addition, news reports, industry analyses, academic studies, and consumer commentaries frequently refer to the rankings. The information and rankings can have a significant impact on an airline's image and brand identity and serve as an incentive to airlines to improve performance and customer service.

The Department's Federal Aviation Administration (FAA) DOT's Federal Aviation Administration (FAA) uses data reported by airlines in Part 234 on-time performance reports to analyze air traffic delays. Wheels-up and wheels-down times are used by the FAA in conjunction with departure and arrival times to show the extent of ground delays. Actual elapsed flight time (wheels-down minus wheels-up time) is compared by the FAA to scheduled elapsed flight time to identify airborne delays. The reporting of the aircraft tail number allows the FAA to track an aircraft through the air network, which enables the FAA to study the ripple effects of delays at hub airports. The data can be analyzed by the FAA for airport design changes, new equipment purchases, and the planning of new runways or airports based on current and projected airport delays and traffic levels. The identification of the reason for delays allows the FAA, airport operators, and air carriers to pinpoint delays under their control.

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, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

In 2010, the Department issued a final rule that requires reporting carriers to submit their recurrent reports to the Department electronically using a comma separated values (.CSV) format or, where applicable, a portable document format (.PDF). 100% of reporting carriers are able to upload the reports into the system via Web browsers.

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's Operational Network (OPSNET) data was evaluated as a substitute data source for on-time performance. OPSNET data are collected by air traffic controllers to track air traffic control delays of 15 minutes or more. The Department determined the

OPSNET cannot be used to serve the purpose of collecting on-time performance data because it captures only a portion of delays.

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

The carriers that are required to submit flight performance and mishandled baggage data are all large air carriers with at least 0.5% in annual scheduled domestic passenger revenues. Small entities do not submit Part 234 on-time performance or mishandled baggage data.

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.

Without collecting the data, DOT would not be able to continue providing useful and relevant information on airline flight performance and baggage handling to the public and Federal entities. The data should be collected and published frequently because the data can become stale over time and lose their usefulness.

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.**

Because of the time-sensitive nature of the flight performance and mishandled baggage and wheelchair and scooters data, carriers submit monthly reports within 15 days after the end of the applicable month. Most of the air carriers use a computer system called the ACARS system that amasses the data for on-time reporting. ACARS allows for almost real-time data submission.

The Department requires that the on-time performance and mishandled baggage and wheelchair and scooter data be submitted monthly because the information is included in the Department's monthly Air Travel Consumer Report, along with monthly consumer complaint statistics. The information enables the public to compare airlines based on current available information.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

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 the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The Department has published Paperwork Reduction Act Burden Statements regarding OMB Control Number 2138-0041 that provide an agency contact for the public to send comments on any aspect of the collections of information. The Department has not received any such comments since the last renewal.

On August 11, 2021, the Department published notice in the Federal Register of its intent to seek renewal of the authorization of the information collection and sought public comment regarding the collections (86 FR 44137). The comment period closed 60 days after publication of the notice. The Department did not receive any comments.

DOT staff communicates with representatives of the reporting carriers in the normal course of business and has developed an understanding of the processes and systems airlines use to report flight performance and mishandled baggage data.

In developing the cost estimates for the renewal of the mishandled baggage collection, DOT staff confirmed with a representative of a reporting carrier that the carrier still used the manual process for recording whether an item checked was a wheelchair or scooter as opposed to an automated system.

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

There are no payments or gifts to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

There are no assurances 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. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

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 12 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 ‘Annual Cost to Federal Government’.

Respondents: Certificated U.S. air carriers that account for at least 0.5 percent of the domestic scheduled-service passenger revenue are required to report flight performance data (referred to as on-time performance data) to DOT and to report information on mishandled baggage, and separate information on mishandled wheelchairs and scooters to DOT, for the covered flights that they operate as described in 14 CFR 234.4 and 234.6; Certificated U.S. air carriers that account for at least 0.5 percent of domestic scheduled-service passenger revenues and that market flights that carry the carrier’s code as the only U.S. carrier code that are operated by another U.S. carrier are required to report the data to DOT for the these branded code-share flights as described in 14 CFR 234.4 and 234.6.

Requirements	Number of Respondents	Frequency (per year)	Burden Per Respondent	Estimated Total Annual Burden (all respondents)	Estimated Total Annual Burden Cost (all respondents)
On-time Data (reported as described in 14 CFR 234.4 and BTS technical directive)	17 carriers reporting for the flights they operate (4 of which market branded code-share flights)	Monthly	<ul style="list-style-type: none"> • 10 hours for each respondent for the requirement to report for the flights operated by the respondent. • An additional 16 hours if the respondent reports for covered 	2,808 hours $[17(10) + 4(16)]$ multiplied by 12 months = 2,808 *** See additional information concerning the burden hours entered into ROCIS below this	\$124,225.92 $[2,808 \text{ multiplied by } \$44.24 \text{ (hourly bookkeeping, accounting, and clerk wage and benefits)} = \$124,225.92]$

			flights operated by branded code-share partners.	chart***	
Mishandled Baggage (reported as described in 14 CFR 234.6 and BTS technical directive)	17 carriers reporting for the flights they operate (4 of which market branded code-share flights)	Monthly	<ul style="list-style-type: none"> • 10 hours for each respondent for the requirement to report for the flights operated by the respondent. • PLUS an additional 16 hours if the respondent reports for covered flights operated by branded code-share partners. • PLUS an additional .00138 hours (5 seconds) per item for data entry if the carrier employs a manual process for entering wheelchairs and scooters checked. Assumes 12,000 items are entered manually per year. 	<p>2,825 hours total</p> <p>[[17(10) + 4(16) multiplied by 12 months = 2,808 hours] + [.00138 (12,000) = 16.56 hours, round up to 17 hours] = 2,825 hours total]</p> <p>*** See additional information concerning the burden hours entered into ROCIS below this chart***</p>	<p>\$124,606.72</p> <p>[[2,808 hours multiplied by \$44.24 (hourly bookkeeping, accounting, and clerk wage and benefits) = \$124,225.92] + [17 hours multiplied by \$22.40 (hourly customer service representative wage and benefits) = \$380.80] = \$124,606.72]</p>
			Total Estimated Annual	5,633 [2,808 +	\$248,832.64 [124,225.92+124,606.72]

			Burden for Information Collections Under OMB Control Number 2138-0041	2,825]]
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***** Regarding DOT’s ROCIS Submission- Because the agency’s estimates assume that some airlines will incur more burden than others, for the purposes of entering information on the burden estimates into the ROCIS system, the agency used the average hourly burden per response across carriers which is 13.764 rounded up to the next highest whole number to be 14 hours per carrier and entered this number in ROCIS. Due to the rounding for ROCIS, the total annual burden request in ROCIS is 2,856 compared to our estimates of 2,808 and 2,825 hours, above.*****

Estimated Number of Respondents: 17 air carriers account for at least 0.5 percent of the domestic scheduled-service passenger revenue. 4 of these air carriers market flights carrying the carrier’s code as the only U.S. carrier code that are operated by branded codeshare partners.

Frequency: The carriers submit on-time performance and mishandled baggage and wheelchairs and scooters reports monthly. Airlines generally upload and submit the required on-time flight performance information and mishandled baggage and wheelchairs and scooters information through the secured Web portal <https://esubmit.rita.dot.gov> at the same time.

Burden Per Respondent:

For instructions on reporting on-time performance to the Department see [BTS Technical Directive #27, effective January 1, 2018](#).

- For the requirement to report information on flight performance (on-time performance), the estimated burden per respondent is:
 - o 10 hours each month for each of the 17 reporting carriers.¹
 - o PLUS an additional 16 hours each month for each of the 4 reporting carriers that report for branded code-share flights.²³

1 The estimate of 10 hours for reporting on-time performance information here, and 10 hours for reporting mishandled baggage and wheelchair data, below, is consistent with accepted past estimates.

2 The hourly burden estimate of 16 hours for the airlines to report on-time performance data for their covered branded codeshare operations and 16 hours for the airlines to report mishandled baggage and wheelchairs and scooters data for their covered branded codeshare operations is consistent with the estimate of annual recurring burden hours provided for in the regulatory analysis for the final rule implementing the codeshare reporting requirements. 81 FR 76822.

3 As described in [BTS Technical Directive #27, effective January 1, 2018](#), the four airlines that report on-time performance data for flights operated by their branded codeshare partners use up to four formats or “forms” to report this data that are in addition to the format/form that all reporting carriers use to report the information for the flights

* This includes staff time to manage and process the data and submit it to DOT.

- For the requirement to report information on mishandled baggage and wheelchairs and scooters, the estimated burden per respondent is:
 - o 10 hours each month for each of the 17 reporting carriers.
 - o PLUS an additional 16 hours each month for each of the 4 reporting carriers that report for branded code-share flights.
 - * This includes staff time to manage and process the data and submit it to DOT.
 - o PLUS an additional .00138 hours (5 seconds) per item for data entry if carrier employs manual process for entering wheelchairs and scooters.⁴

For instructions on reporting Mishandled Baggage and Wheelchair and Scooter information see [Technical Reporting Directive #30A- Mishandled Baggage and Wheelchairs and Scooters \(Amended\)](#).

Estimated Total Annual Burden:

For the requirement to report flight performance data under 14 CFR 234.4, we estimate a total annual burden of 2,808 hours. The total was calculated as follows: 17 air carriers reporting the flight performance information for the flights they operate × 10 hours per response × 12 months = 2,040 hours) + (4 air carriers reporting the flight performance information for flights operated by their codeshare partners × 16 hours ours per response × 12 months = 768 hours).

For the requirement to report mishandled baggage and mishandled wheelchair and scooters information under 14 CFR 234.6, we estimate a total annual burden of 2,825. The total was calculated as follows: 17 air carriers reporting the mishandled baggage and mishandled wheelchairs and scooters information for flights they operate × 10 hours per response × 12 months = 2,040 hours) + (4 air carriers reporting the mishandled baggage and mishandled

they operate directly. The forms/formats enable DOT to collect additional information that is necessary to identify the marketing carrier for the flight, or to identify the carriers and flights involved in a codeshare swap. The airlines submit separate .CSV files to the Department for the flights reported in each format. Because each carrier's operations vary, some of the four airlines that report for their branded codeshare operations have fewer codeshare partners than the others, may not need to report using both codeshare formats/forms, or may not report codeshare swaps. This results in one of the four carriers reporting a single file total per month for its branded codeshare operations, while two of the carriers each generally report three files per month for their codeshare operations. The estimated burden hours per carrier of 16 hours (average) to report this information is consistent with estimates that would equate to approximately 10 burden hours for each codeshare form and approximately 1-2 burden hours for each codeshare swap form, which generally accounts for much fewer flight operations than the other codeshare forms.

⁴ The Final Rule to Amend Rules Requiring Reporting of Mishandled Baggage, Regulatory Impact Analysis, October 18, 2016, estimated a data entry burden of 5 seconds for each wheelchair or scooter recorded manually. See Docket No. RITA-2011-0001-0287. We estimate that 12,000 wheelchairs or scooters are recorded manually per year. This estimate is based on one reporting carrier using the manual process and data published by DOT in the APCR on the number of wheelchairs and scooters enplaned.

wheelchairs and scooters information for flights operated by their codeshare partners × 16 hours per response × 12 months = 768 hours) + (.00138 hours for manual data entry related to wheelchair or scooters × 12,000 manual entries total per year = 17 hours).

ESTIMATED ANNUALIZED COST TO RESPONDENTS

- For the requirement to report flight performance data under 14 CFR 234.4, we estimate the total annual cost to be \$124,225.92. This estimate was calculated by multiplying the total number of total burden hours estimated (2,808) by the hourly wage in the 90th percentile for bookkeeping, accounting, and auditing clerks (Standard Occupational Classification code 43-301), as of May 2020, marked up to account for benefits (\$44.24).⁵
- For the requirement to report mishandled baggage and mishandled wheelchair and scooters information under 14 CFR 234.6, we estimate the total annual cost to be \$124,606.72. This estimate was calculated by multiplying the total number of burden hours estimated for carriers to report the information for the flights they operate and, if applicable, their branded codeshare flights (2,808) by the hourly wage in the 90th percentile for bookkeeping, accounting, and auditing clerks (Standard Occupational Classification code 43-301), as of May 2020, marked up to account for benefits (\$44.24), as calculated above. To that sum of \$124,225.92, we added \$380.80 which is the product of the estimated number of total hours required for manual entry of wheelchair and scooters (17 hours) and the median hourly wage for customer service representatives (Standard Occupational Classification code 43-4051), as of May 2020, marked up to account for benefits (\$22.40).⁶

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions**

⁵ The hourly wage data is from the Bureau of Labor and Statistics (BLS) website, available here: <https://www.bls.gov/oes/current/oes433031.htm>. We used the wage amount in the upper (90%) percentile, that is \$30.72, instead of the median wage amount because we assume supervisory review time is involved. We marked up the wage amount by 1.44 to account for benefits. We calculated the markup for benefits by calculating the ratio of total compensation (28.23) to wages (19.59) for office and administrative support occupations on table 4 of the BLS Employer Costs for Employee News Release, June 2021, available here: <https://www.bls.gov/news.release/pdf/ecec.pdf#:~:text=Employer%20costs%20for%20employee%20compensation%20for%20civilian%20workers,%2412.07%20and%20accounted%20for%20the%20remaining%2031.3%20percent>.

⁶ The hourly wage data is from the BLS website, available here: <https://www.bls.gov/oes/current/oes434051.htm>. The median wage for customer service representatives was \$17.23. We marked up the wage amount by 1.3 to account for benefits. We calculated the markup for benefits by calculating the ratio of total compensation (18.40) to wages (14.18) for service occupations on table 4 of the BLS Employer Costs for Employee News Release, June 2021, available here: <https://www.bls.gov/news.release/pdf/ecec.pdf#:~:text=Employer%20costs%20for%20employee%20compensation%20for%20civilian%20workers,%2412.07%20and%20accounted%20for%20the%20remaining%2031.3%20percent>.

Data management and accounting; contacting carriers regarding reporting issues; database management.

Technology ⁸	\$44,000
Total Government Cost	\$236,000

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.

There are no program changes involved since the 2018 revision. The increase in burden hours since the last OMB renewal from 4,320 hours to 5,633 hours (5,712 requested in ROCIS) is mainly the result of DOT revisiting its considerations underlying its estimate of burden for the airlines to report information for branded code-share partner operations. The burden estimates for the 2018 revision assumed there were no additional burden hours for reporting for branded code-share partners because, as noted on page 1 of the Supporting Statement, airlines had the data, but just were not required to report it. For the purposes of this renewal, our estimates are adjusted based on the assumption that airlines will encounter burden hours for submitting codeshare files in addition to the files with data for their own operations and that airlines will encounter burden for managing codeshare data for certified reporting purposes.

In addition, DOT has now built into its estimates the assumption that some airlines use a manual process to record whether a checked-item is a wheelchair or scooter versus another kind of checked item. This enables the airline to then report separate statistics for wheelchairs and scooters to the Department.

The estimated number of responses changed from 432 in the last approval to 408 due to a change in the number respondents DOT anticipates will report on-time data and mishandled baggage data from 18 respondents to 17 respondents. Currently, 17 carriers report the data.

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.

DOT's Office of Aviation Consumer Protection, a unit with the Office of the General Counsel, publishes the monthly *Air Travel Consumer Report* (ATCR) with flight performance and mishandled baggage and wheelchair and scooter statistics. The ATCR is

Analyses: Conceptual Framework and Best Practices, available at <https://aspe.hhs.gov/sites/default/files/private/pdf/257746/VOT.pdf>

⁸ This is the estimated annual reoccurring OAI system cost attributable to on-time and mishandled baggage reporting.

available on DOT's aviation consumer protection webpage:

<https://www.transportation.gov/individuals/aviation-consumer-protection/air-travel-consumer-reports> .

The Bureau of Transportation Statistics makes available flight performance data on a monthly flight-by-flight basis for download by the public at: www.transtats.bts.gov

By regulation, airlines must report monthly flight performance and mishandled baggage and wheelchair and scooter data within 15 days of the end of the month for which the data pertains. DOT generally publishes the data approximately one month after it is reported to DOT by the airlines.

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.

We are not seeking approval to not display the OMB expiration date on the data.

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

There are no exceptions.