

The Supporting Statement for OMB 0596-0015

Airplane Pilot Qualifications and Approval Record, Helicopter Pilot Qualifications and Approval Record, Airplane Data Record, and Helicopter Data Record 2021

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.**

Laws, Statutes, and Regulations

- Public Law 106-181 (April 5, 2000) – Wendell H. Ford Aviation Investment and Reform Act for the 21st Century
- Office of Personnel Management (OPM) Aircraft Operation Series 2181
- Forest Service Manual (FSM) 5700 – Aviation Management
- Forest Service Handbook (FSH) 5709.16 – Aviation Management Handbook, Ch. 50
- Title 14 CFR – Federal Aviation Administration Regulations Part 61, 91, 107

The Forest Service operates and maintains aircraft through the use of Federal Government contracts and agreements with private industry. The federal fleet that the Forest Service manages is second in size only to the Department of Defense. Pilot qualification and aircraft condition information must be collected to verify that specific standards are met to support safe aviation operations.

Two types of aviation acquisitions are utilized: Exclusive Use contracts and Call-When-Needed (CWN) agreements. Currently, well over 500 private aircraft contract with the Forest Service. The Forest Service also owns and operates more than 20 agency aircraft.

Exclusive Use contracts are contracts between the Forest Service and private industry during which private industry guarantees aircraft, pilot, and maintenance staffing for a specified period of time for use by the Forest Service.

On the other hand, CWN agreements are agreements between the Forest Service and private industry that, at the option of the contracted company, guarantee aircraft, pilot, and maintenance staffing for government optional use by the Forest Service.

These contractor aircraft and pilots deliver water and chemical retardants on fires, transport firefighters to fires (including smokejumpers), search for lost personnel, and perform reconnaissance, resource surveys, and fire detection. They carry firefighting personnel in all weather conditions over long distances to mountainous helicopter landing sites, to small airports, in a wide range of aircraft both large and small.

Forest Service Contracts for these services include rigorous qualification

The Supporting Statement for OMB 0596-0015

Airplane Pilot Qualifications and Approval Record, Helicopter Pilot Qualifications and Approval Record,
Airplane Data Record, and Helicopter Data Record
2021

requirements for pilots and specific conditions/equipment/performance requirements for aircraft. Forest Service Aviation Policy FSM 5700 and FSH 5709.16 are the basis for contract requirements, and they are built from applicable Federal Aviation Administration Regulations in Title 14 of the Code of Federal Regulations. Title 14 CFR is specific to aeronautics and governs all aviation activities in the United States. These regulations are necessary to maintain an acceptable level of safety, mission preparedness, and cost effectiveness in aviation operations. The standards relating to fire suppression missions account for the increased risks that come with operations under extremely adverse conditions of weather, terrain, turbulence, smoke reduced visibility, minimally improved landing areas, and congested airspace around wildfires.

It is critical that agency contracting officers executing these contracts have assurance that the pilots and aircraft offered meet these special Forest Service qualifications and specific requirements. The only practical way to accomplish this is to require prospective contract pilots to provide certified qualification information. The Forest Service uses forms FS-5700-20 and FS-5700-20a to obtain this qualification information from prospective contract pilots.

The aircraft equipment utilized to transport personnel must also be maintained to required standards of safety. Forest Service aviation maintenance inspectors use forms FS-5700-21 and FS-5700-21a as worksheets and approval documentation when checking aircraft for contract compliance. The maintenance inspectors provide a copy of a portion of the completed form to the contractor as proof of compliance.

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.

a. What information will be collected - reported or recorded? (If there are pieces of information that are especially burdensome in the collection, a specific explanation should be provided.)

Qualification information is collected from all pilots of all airframe types, including permanent career personnel, all contractors and agreement holders supporting aerial fire suppression on behalf of the Forest Service. The purpose of the collection is to confirm that the pilot meets contractual requirements and serves no other purpose. Pilot data is not disseminated beyond the Forest Service Pilot Inspector, the government agent who reviews the pilot application. The exception would be in the event of an accident or incident; in this case the information is provided to the National Transportation Safety Board (NTSB), Aviation Safety personnel, and applicable Federal Authorities as required. Note: Department of Interior Office of Aviation Services and connected official partners may review the pilot qualification cards that are produced from the 5700-20 and 5700-20a forms for contract compliance prior to utilizing them in interagency support operations.

The agency is currently utilizing a Box filing database called Pinyon. Pinyon is

The Supporting Statement for OMB 0596-0015

Airplane Pilot Qualifications and Approval Record, Helicopter Pilot Qualifications and Approval Record,
Airplane Data Record, and Helicopter Data Record
2021

where Forest Service Pilot Inspectors upload, store, and maintain electronic records of fixed-wing pilot qualifications and aircraft records. In addition, the Forest Service has developed an online accessible application called AvCheck where agency inspectors complete the inspections and enter the information gathered to generate the forms and issue cards. The Forest Service Pilot Inspectors are the administrators of AvCheck; they control access to create and view inspections with the pilot data. The contractors and vendors do not have viewing access in AvCheck. Contractors and vendors are extended upload only access for their individual data to the separate Forest Service Pinyon folder for the inspector to review. Data collected is not reported to any other agency, private or government; however, the pilot and aircraft data cards that the Forest Service issues may be viewed by partners including the Department of Interior Office of Aviation Services when conducting joint partner operations.

Data collected includes pilot and career experience, Forest Service course curriculum accreditation, FAA certification, and FAA medical certification. Forms FS-5700-20 (Airplane Pilot Qualifications and Approval Record) and FS-5700-20a (Helicopter Pilot Qualifications and Approval Record) collect the following information from pilots:’

Pilot Information Collected:

- (1) Name, date of birth, and contact information;
- (2) Current and previous employment history;
- (3) Medical Certification;
- (4) Previous agency approval information;
- (5) Airman Certificate;
- (6) Date of last agency evaluation flight and inspector information;
- (7) Training and Checkride records
- (8) Pilot Logbook records
- (9) Pilot-In-Command Flight Time and Type of Flying;
- (10) Aircraft Accidents/FAA Violations; and
- (11) Pilot Certification.

Aircraft (airplane and helicopter) information collected provides the Forest Service with aircraft maintenance and inspection history. Quality Assurance in aircraft maintenance is critical to safety. The collected information shows agency officials how well the aircraft is equipped to meet specific contract requirements. Forms FS-5700-21, Parts 1 and 2 (Airplane Data Record) and FS-5700-21a (Helicopter Data Record) collect the following information from contractors for aircraft considered for Forest Service use:

The Supporting Statement for OMB 0596-0015

Airplane Pilot Qualifications and Approval Record, Helicopter Pilot Qualifications and Approval Record,
Airplane Data Record, and Helicopter Data Record
2021

Aircraft Information Collected:

- (1) Operator's address and contact information;
- (2) Aircraft make, model, FFA Registration Number, Manufacturer's Serial Number;
- (3) Gross Weight, Number of Passenger Seats, and other aircraft specifications;
- (4) Authorized Uses;
- (5) Airframe Information;
- (6) Engine Information;
- (7) Equipment; and
- (8) Avionics.
- (9) Aircraft Logbook, Inspection and Maintenance Records.

b. From whom will the information be collected? If there are different respondent categories (e.g., loan applicant versus a bank versus an appraiser), each should be described along with the type of collection activity that applies.

The information is collected from private industry contractors and vendors soliciting for Forest Service government aviation contracts, as well as from pilots employed by private industry who are currently under contract with the federal government.

c. What will this information be used for - provide ALL uses?

Qualification information is collected to confirm that the pilots meet contractual requirements and serves no other purpose. Pilot data is not disseminated beyond the Forest Service Pilot Inspector, the government agent who reviews the pilot application. The exception would be in the event of an accident or incident; in this case the information is provided to the National Transportation Safety Board (NTSB), Aviation Safety personnel, and applicable federal authorities as required.

Once the Forest Service Pilot Inspector determines that a pilot's qualifications meet contractual requirements, a pilot qualification and approval card is issued to the pilot. The pilot application documents are kept by the Forest Service Pilot Examiner and are not disseminated to government or private industry.

The issued pilot qualification and approval card provides the "license" and "proof" that the pilot has met all contractual requirements and is able to safely and effectively perform Forest Service flight missions. Forest Service personnel using these pilots are required to verify possession of properly approved cards.

The pilot qualification and approval card contains the following information:

- (1) Name;

The Supporting Statement for OMB 0596-0015

Airplane Pilot Qualifications and Approval Record, Helicopter Pilot Qualifications and Approval Record,
Airplane Data Record, and Helicopter Data Record
2021

- (2) Company;
- (3) Type of aircraft approved for operation;
- (4) Expiration date;
- (5) Approval authority (Forest Service Pilot Inspector); and
- (6) Approved mission types.

No other information is annotated on the card.

Aircraft qualification cards are issued to each specific aircraft certified by Aircraft Maintenance Inspectors as proof that the aircraft has met the requirements of the contract. Forest Service personnel using these aircraft must verify possession of properly approved aircraft cards.

Without the information supplied on the application forms, Forest Service contracting officers, aircraft inspectors, and pilot inspectors cannot document and determine if pilots and aircraft meet the detailed qualifications, equipment, and condition requirements essential to safe and efficient accomplishment of Forest Service specified special use missions that the aircraft and pilots are contracted to conduct.

d. How will the information be collected (e.g., forms, non-forms, electronically, face-to-face, over the phone, over the Internet)? Does the respondent have multiple options for providing the information? If so, what are they?

The information is collected via the following forms:

- FS-5700-20 - Airplane Pilot Qualifications and Approval Record
- FS-5700-20a - Helicopter Pilot Qualifications and Approval Record
- FS-5700-21 - Airplane Data Record
- FS-5700-21a - Helicopter Data Record

The information is collected on the forms above via a fillable PDF that can be uploaded to the Forest Service Pinyon folder most commonly before or during face to face or teleconference meetings with inspectors; it may also be encrypted and submitted electronically or submitted by hard copy. Blank forms may be downloaded online and filled out. Forms accessible via Forest Service Websites do not electronically save online nor archive data typed onto the form; unless a blank form has been downloaded; then filled forms may be saved to a device.

Aircraft information is collected onsite at the aircraft's location.

The completed forms are maintained by Forest Service approved agency Pilot and Aircraft Inspectors. Once the fixed wing pilot and aircraft data is received, Forest Service Inspectors store and access the information in AvCheck; vendors and contractors do not have AvCheck access. Helicopter pilot data is not currently stored in AvCheck.

e. How frequently will the information be collected?

Collection occurs annually as contractors offer aircraft or pilot(s) for use on a Forest

The Supporting Statement for OMB 0596-0015

Airplane Pilot Qualifications and Approval Record, Helicopter Pilot Qualifications and Approval Record,
Airplane Data Record, and Helicopter Data Record
2021

f. The information be shared with any other organizations inside or outside USDA or the government?

Pilot application form information is not shared with any government or private industry entity beyond the applicant and the pilot inspector. The items on the Pilot Qualification and Approval Cards are the only items shared with Forest Service Personnel utilizing contract pilots and aircraft for contract compliance and credential verification purposes.

Aircraft application form information is shared between the United States Department of Interior, Aviation Management Directorate, and the Forest Service. The Forest Service and the Department of Interior maintain an Interagency Agreement that allows aircraft contracted by either agency to be used by either agency. This aircraft information consists of the contract number, aircraft type and specifications, and point of contact information with the contracted private company.

g. If this is an ongoing collection, how have the collection requirements changed over time?

The requirements have not changed from the previous version. The form provides an all-inclusive request for information thereby eliminating a need for additional requests for information. Only contractually required information is collected.

To clarify, federal government contracts between the Forest Service and private enterprise must meet Federal Aviation Administration (FAA) and Forest Service endorsement and certification requirements. These endorsements and certificates provide supporting documentation as proof that applicants meet contractual requirements.

The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6 and the Privacy Information Act of 1974.

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.

The collection of information does not involve use of automated, electronic, mechanical, other technological collection techniques, or other methods of information technology. Forms must be downloaded locally, then they can be filled in and either printed or saved to the respondent's personal device, then uploaded to the Forest Service Pinyon Folder. Then Forest Service Inspectors can store the received completed form information electronically in AvCheck.. Note: Non-Forest Service respondents do not have access to the Forest Service intranet.

Use of information technology has been implemented in an effort to reduce the burden of printing and paper by providing electronic access to a blank

The Supporting Statement for OMB 0596-0015

Airplane Pilot Qualifications and Approval Record, Helicopter Pilot Qualifications and Approval Record,
Airplane Data Record, and Helicopter Data Record
2021

form that can be downloaded and then filled in electronically or handwritten. While uploading of these electronically filled forms is most common, direct online submission of this data is open to Forest Service Inspectors only through AvCheck. **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 Department of Interior and Forest Service contract from private industry for use of aviation assets. An interagency agreement between the Department of Interior and the Forest Service allows the use of federal government contracted aviation assets to be used by either agency in the conduct of Wildland Firefighting operations.

However, specific contract differences in the conduct and certification of other than wildland firefighting activities require different and/or increased data collection from Department of Interior aviation contract requirements. Therefore, a single form cannot be used by both the Department of Interior and the Forest Service to cover both fire and non-fire missions, so four forms were developed.

In an effort to further reduce duplication, the Forest Service and Department of Interior are now using these forms so that both agencies are standardized.

The differing agency application forms are not carried by the pilot. However, the agency issued qualification and approval cards are carried by the pilots and aircraft. These qualification cards are identical in that they provide a summary of the pilot, approved aircrafts, and approved missions that the pilot can perform.

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

The information collection has no unique impact on small business.

The collection of information, and resulting burden, for approval and issuance of pilot and aircraft qualification cards is identical for each pilot and aircraft evaluated within a company, regardless of the size of the company. Therefore, small business burden would be reduced only by a decrease in the number of pilots employed and aircraft on contract.

5. 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 the agency were not able to collect this information or the frequency of collection is reduced, Forest Service contracting officers and pilot/aircraft inspectors could not determine if pilots and aircraft meet the detailed qualification and currency, equipment, and condition requirements essential for safe, efficient accomplishment of Forest Service aviation missions, which are included in contract specifications. Without a reasonable basis and oversight through annual evaluations to determine pilot qualifications and aircraft capability, Forest Service employees, other federal and state agency

The Supporting Statement for OMB 0596-0015

Airplane Pilot Qualifications and Approval Record, Helicopter Pilot Qualifications and Approval Record,
Airplane Data Record, and Helicopter Data Record
2021

employees, and the public would be exposed to unnecessary hazards and compromise the integrity of the program as a whole.

Agency Pilot Standardization, Airworthiness and Aviation Safety Branches are required to independently verify the qualifications and conditions of aircrew and aircraft supporting Forest Service operations for safety, security, and accountability purposes in accordance with federal regulations. Additionally, aircraft and pilot evaluations provide built-in oversight of the contract to assure the Federal Government is getting full value, while maintaining the safety and mission preparedness as required in the contract. Less frequent collection of this information, or no information collection, would work against the purpose of the contract and the interest of the Federal Government.

6. 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;**

With the exception of an accident or incident, there are no circumstances requiring information to be reported more than quarterly

- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

With the exception of an accident or incident, there are no circumstances 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;**

There are no circumstances 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;**

Pilots operating for hire and entities conducting public aircraft operations are required by Federal Aviation Regulation to maintain continuous record of their licenses and qualification experience. Accident records must also be maintained for greater than 3 years.

14 CFR Parts 11, 91, and 111; Pilot Records Database

- **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;**

Not applicable

- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

Not applicable

The Supporting Statement for OMB 0596-0015

Airplane Pilot Qualifications and Approval Record, Helicopter Pilot Qualifications and Approval Record,
Airplane Data Record, and Helicopter Data Record
2021

- **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**

Not applicable

- **Requiring respondents to submit proprietary trade secret, 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.**

There are no other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

- 7. 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.**

Notice of the 60-day comment period was published in the Federal Register (83 FR 38116) and is attached.

Applicable regulations: OMB Number: 0596-0015; p. 38266 Federal Register / Vol. 86, No. 136 / Tuesday, July 20, 2021 / Notices

One response was received from Mr. Gregory Walden of the Small UAV Coalition. (202)496-7436 1900 K St. NW, Washington, DC 20006 | US Internal 47436
gregory.walden@dentons.com

The Small UAV Coalition listed the following three concerns:

1. None of the four forms included in this Notice, FS-5700-20, FS-5700-20a, FS-5700-21, and FS-5700-21a, was created with UAS in mind.

Forest Service Response: The data collection included on the forms being renewed (FS-5700-20, FS-5700-20a, FS-5700-21, and FS-5700-21a) is only for manned aircraft. Forms have been developed specifically for contracted UAS but in general most of the currently used UAS are agency-owned aircraft with the Forest Service or Department of Interior fleet.

2. The Coalition recommends that each of these forms be revised to address UAS and UAS pilots.

Forest Service Response: There are specific forms for the inspection and approval of UAS. The Forest Service currently utilizes the Department of Interior's Office of Aviation Services Form 36U for UAS operations labeled FS-5700-21b.

The Supporting Statement for OMB 0596-0015

Airplane Pilot Qualifications and Approval Record, Helicopter Pilot Qualifications and Approval Record,
Airplane Data Record, and Helicopter Data Record
2021

3. The Coalition strongly supports automating these forms so that respondents can fill them out and submit them online.

Forest Service Response: The forms are developed for and utilized by Forest Service Aircraft Inspectors to fill out when they are inspecting contracted aircraft for contract compliance. The Forest Service is aggressively pursuing IT applications that UAS Inspectors will use to automate the process as the Coalition suggests. The approval process for USDA IT applications is extensive and our hope is to field the UAS inspection application soon. The FS-5700-21 and FS-5700-21a forms for manned aircraft have been integrated into an IT application and are fillable via laptop, iPad or other device but must be downloaded for submission.

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 record keeping, 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.

Contact was made with the following individuals, who were asked to provide comment on the renewal of this information collection:

OAS:

Arlyn Miller: (208) 433-5079
Scott Curtis: (208) 484-1762

CalFire:

Barry Lloyd: (916) 704-7102
Dennis Brown: (916) 712-8768

All individuals approved the use of the forms in their current state and recommended that no changes be made.

In accordance with the Federal Register Notice mentioned above, the Forest Service did solicit input from the aviation public outside of the Federal Government on the information collected and received one response from the Small UAV Coalition described above regarding UAV opportunities.

8. Explain any decision to provide any payment or gift to respondents, other than re-enumeration of contractors or grantees.

The only payment is for services rendered under the contract. No payment is rendered for collection of information.

9. Describe any assurance of confidentiality provided to respondents and

The Supporting Statement for OMB 0596-0015

Airplane Pilot Qualifications and Approval Record, Helicopter Pilot Qualifications and Approval Record,
Airplane Data Record, and Helicopter Data Record
2021

the basis for the assurance in statute, regulation, or agency policy.

The information provided is only for internal Federal Government use. However, apart from protection of pilot information records required by Public Law 93-579 and 5 USC 552A; no assurance of confidentiality is given. Forest Service Privacy Act System of Records USDA/FS-44 (Pilot Qualification Records) covers collection, storage, maintenance, use of pilot information collected, and public requests for information collected and processed according to Freedom Information Act and Privacy Act regulations.

- 10. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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.**

No such questions are included in the forms.

- 11. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.**

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form.**

a) Description of the collection activity

Collection activity is comprised of the private industry applicant filling out the applicable application form for each aircraft and pilot applicant. Applicants are further required to provide supporting documentation to verify data submitted via the form. This application package is submitted to the appropriate government agent for review, evaluation, and processing. The applicant may fill out the form via electronic or handwritten methods. The package, itself, may be submitted via mail, email, upload access only to the Forest Service Pinyon Folder or in person to the appropriate agent responsible for review and evaluation of the submitted package.

b) Corresponding form number (if applicable) See Table 1.

c) Number of respondents. See Table 1.

d) Number of responses annually per respondent. See table 1.

e) Total annual responses (columns c x d). See table 1

f) Estimated hours per response. See table 1.

g) Total annual burden hours (columns e x f). See table 1.

The Supporting Statement for OMB 0596-0015

Airplane Pilot Qualifications and Approval Record, Helicopter Pilot Qualifications and Approval Record,
Airplane Data Record, and Helicopter Data Record
2021

Table 1: Estimates of Burden Collection note 1

| (a) Description of the Collection Activity | (b) Form Number | (c) <small>note 2</small> Number of Responden ts | (d) <small>note 5</small> Number of responses annually per Responden t | (e) Total annual response s (c x d) | (f) <small>note 6</small> Estimate of Burden Hours per response | (g) Total Annual Burden Hours (e * f/60) |
|---|-----------------------|---|--|--|---|---|
| Airplane Pilot Record | FS-5700-20 | 401 | 1 | 401 | 1.0 | 401 |
| Helicopter Pilot Record | FS-5700-20a | 1157 | 1 | 1157 | 1.0 | 1157 |
| Airplane Approval Record | FS-5700-21 | 180 | 1 | 180 | 4.0 | 720 |
| Helicopter Approval Record | FS-5700-21a | 397 | 1 | 397 | 4.0 | 1588 |
| Totals | --- | 2,135 | --- | 2135 | --- | 3866 |

Notes:

1. Best professional judgment was used to determine estimates of burden collection data. The assessment estimates were developed by federal agency evaluators involved in the processing of applications having experience working with private industry applicants for several years. The Federal Government does not manage any database that compiles, or tracks estimates of collection burden hour data specifically.
2. A respondent is defined as a single pilot applicant or single aircraft applicant. Values listed include initial and recurrent applicants.
3. Times includes data collection, support document collection, administrative processing, and form submission, but not the additional time required to verify the data provided or complete the inspections captured on the forms. Previous year burden hour estimates included the time required to verify information collected, and were therefore much longer
 - **Record keeping burden should be addressed separately and should include columns for:**
 - a) Description of record keeping activity:** Hardcopies of records are kept at the regional level with pilot and aircraft inspectors and are not distributed; neither are records distributed within the federal agency, it's federal and state partners, or private industry.
 - b) Number of record keepers:** 20 (Includes Regional and National Pilot and Aircraft Inspectors)
 - c) Annual hours per record keeper:** Negligible
 - d) Total annual record keeping hours (columns b x c):** Negligible
 - **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

The Supporting Statement for OMB 0596-0015

Airplane Pilot Qualifications and Approval Record, Helicopter Pilot Qualifications and Approval Record,
Airplane Data Record, and Helicopter Data Record
2021

Table 2: Estimates of Annualized Cost to Respondents

| (a) Description of the Collection Activity | (b) Estimated Total Annual Burden on Respondent s (Hours) | (c) ^{note 1} Estimated Average Income per Hour (GS13 step 5 X 1.3= \$65.05) | (d) Estimated Cost to Respondents |
|--|---|--|---|
| Airplane Pilot Record, FS-5700-20 | 401 | \$65.05 | \$26,085.05 |
| Helicopter Pilot Record, FS-5700-20a | 1157 | \$65.05 | \$75,262.85 |
| Airplane Approval Record, FS-5700-21 | 720 | \$65.05 | \$46,836.00 |
| Helicopter Approval Record, FS-5700-21a | 1588 | \$65.05 | \$103,299.40 |
| Totals | 3866 | --- | \$251,483.30 |

Notes:

- The FS-5700-20 and FS-5700-20a forms are completed with pilot data prior to agency inspector verification and approval. Completion of forms FS-5700-21 and FS-5700-21a are nearly the sole responsibility of agency inspectors, with vendors (pilots, aircraft owner, maintenance personnel, etc.) providing aircraft logbooks during inspections. Wages are based on FY21 Department of Labor Wage Determination No: 1995-0222, Revision 46 for Occupation code 31010 Pilot hourly wage + \$4.48/hour health and welfare wage + 31% for benefits.

12. Provide estimates of 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 shown in items 12 and 14). The cost estimates 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.

There are no capital operation or maintenance costs to respondents or record keepers associated with this collection. However, it is estimated that \$251,483.30 would be a cost to respondents for total burdens hours.

13. Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

The response to this question covers the actual costs the agency will incur as a result of implementing the information collection. The estimate should cover the entire life cycle of the collection and include costs, if applicable, for:

- Employee labor and materials for developing, printing, storing

The Supporting Statement for OMB 0596-0015

Airplane Pilot Qualifications and Approval Record, Helicopter Pilot Qualifications and Approval Record,
Airplane Data Record, and Helicopter Data Record
2021

forms

Not applicable

- **Employee labor and materials for developing computer systems, screens, or reports to support the collection**

Not applicable

- **Employee travel costs**

Reference Table 3

- **Cost of contractor services or other reimbursements to individuals or organizations assisting in the collection of information**

Not applicable

- **Employee labor and materials for collecting the information**

Reference Table 3

- **Employee labor and materials for analyzing, evaluating, summarizing, and/or reporting on the collected information**

Reference Table 3

The Supporting Statement for OMB 0596-0015

Airplane Pilot Qualifications and Approval Record, Helicopter Pilot Qualifications and Approval Record,
Airplane Data Record, and Helicopter Data Record
2021

Table 3: Estimates of Annualized Cost to Government

| GOVERNMENT EMPLOYEE ACTIVITY | NUMBER OF RESPONSES | TIME TO REVIEW/CERTIFY AIRCRAFT AND/OR PILOT | EMPLOYEE WAGE RATE <small>NOTE 3</small> | EMPLOYEE ANNUAL TRAVEL COSTS <small>NOTE 4</small> | ANNUAL COST TO THE GOVERNMENT PER IC <small>NOTE 5</small> |
|-------------------------------------|----------------------------|---|--|--|--|
| Review/Finalization of FS-5700-20 | 401 | .42 hrs <small>Note 1</small> | \$68.17 | \$25,200 | \$36,681.19 |
| Review/Finalization of FS-5700-20a | 1157 | .42 hrs <small>Note 1</small> | \$68.17 | \$25,200 | \$58326.52 |
| Review/Finalization of FS-5700-21 | 180 | .75 hrs <small>Note 2</small> | \$68.17 | \$25,200 | \$34,402.95 |
| Review/Finalization of FS-5700-21a | 397 | .75 hrs <small>Note 2</small> | \$68.17 | \$25,200 | \$45,497.61 |
| Total Cost to the Government | 2,135 | --- | --- | | \$174,308.27 |

Notes:

- Historically typical time to review and certify a pilot application package.
- Historically typical time to review and certify an aircraft application package.
*New or initial aircraft contracts can include inspections and verification that take additional hours to complete.
- FY21 Federal employee wage rate GS-13, step 5 (\$50.04/hr) was used to calculate the wage rate (Reference https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/RUS_h.pdf. 36.25 % was added for benefit costs. Cost of living allowance was not included. Some Pilot and most aircraft inspectors are paid at this average GS level.
- Travel expenses are required due to non-located government agent location and private industry aircraft location. Government agents are required to travel to the aircraft location to conduct pilot and aircraft evaluations. Travel expenses include airfare, lodging, per diem, and rental car expenses. It does not include wages while in travel status. An average travel expense of \$2,100 per month has been generally incurred as indicated by historical travel data; that cost may be higher this year due to the impact of COVID-19 on lodging and rental car availability. Annual travel expenses are calculated to be \$25,200 but may actually be higher.
- Annual cost = number of responses x hours x wage rate + travel cost.
In summary, the annual costs to the Federal Government to collect this pilot and aircraft information is \$174,308.27, which includes the total costs of inspectors reviewing all forms from vendors and contractors at 1.3 times the average hourly wage of a GS-13 step 5 X 1.3 to record this information. The collected data life cycle is 36 months in accordance with 5 CFR 1320.

The Supporting Statement for OMB 0596-0015

Airplane Pilot Qualifications and Approval Record, Helicopter Pilot Qualifications and Approval Record,
Airplane Data Record, and Helicopter Data Record
2021

14. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of OMB form 83-I.

This submission is based on current and projected aircraft and pilot contractual oversight beyond FY21. There is an expected decrease of both responses and burden hours; It further reflects changes necessary to facilitate accurate and efficient Forest Service Aviation Management as described in section 2g.

15. For collections of information whose results are planned to be published, outline plans for tabulation and publication.

Collection results are not published.

A summary of aircraft type/model/series, contract number, and business point of contact information is published for use by those agencies included under the Interagency Agreement.

Pilot information is not published.

16. 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 Forest Service is not requesting approval to omit the OMB expiration date.

17. Explain each exception to the certification statement identified in item 19, "Certification Requirement for Paperwork Reduction Act."

The Forest Service does not request any exceptions.

B. Collections of Information Employing Statistical Methods

This information collection does not employ statistical methods.