
Supporting Statement for Aircraft Services Flight Request

OMB No. 1910-New

BPA F 4450.01e Aircraft Services – Flight Request

October 2021

U.S. Department of Energy
Washington, DC 20585

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Introduction

Provide a brief introduction of the Information Collection Request. Include the purpose of this collection, note the publication of the 60-Day Federal Register Notice, and provide the list of forms within this collection.

Bonneville Power Administration (BPA) is submitting to the Office of Management and Budget (OMB) for clearance a proposal for collection of information pursuant to the Paperwork Reduction Act of 1995. The proposed collection will allow BPA to gather passenger information for the safe operation of BPA aircraft in the BPA service area.

The Department published a 60-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on June 28, 2021, volume 86, number 121, and page number 33997. The notice described the collection and invited interested parties to submit comments or recommendations regarding the collection. No comments were received.

This collection requires OMB approval under the Paperwork Reduction Act because the form gathers information from employees, contract employees, and members of the public. The relevant instrument for this collection is the following form:

BPA F 4450.01e Aircraft Services – Flight Request

A.1. Legal Justification

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 information collection.

BPA is a power marketing administration, a federal nonprofit agency based in the Pacific Northwest. Although BPA is part of the U.S. Department of Energy, it is self-funding and covers its costs by selling its products and services. BPA markets wholesale electrical power from 31 federal hydro-electric dams in the Columbia River Basin, one non-federal nuclear plant and several other small non-federal power plants. The U.S. Army Corps of Engineers and the Bureau of Reclamation own and operate the federal dams. BPA is responsible for marketing about one-third of the electric power used in the Northwest.

BPA also operates and maintains about three-fourths of the high-voltage transmission in its service territory. BPA's service territory includes Idaho, Oregon, Washington, western Montana and small parts of eastern Montana, California, Nevada, Utah, and Wyoming.

As part of its responsibilities, BPA promotes energy efficiency, renewable resources, and new technologies. The agency also funds regional efforts to protect and rebuild fish and wildlife populations affected by hydroelectric power development in the Columbia River Basin.

BPA aircraft have been acquired for and are primarily used to meet mission requirements. Mission requirements include activities that constitute the discharge of official agency responsibilities. BPA's published mission statement, its legal obligations and government to government relationships all define those official responsibilities and are used to define mission flights. Therefore, any flight that

directly supports activities in power supply, transmissions system, fish and wildlife mitigation efforts and BPA's other legal and government to government obligations are considered mission flights.

On occasion, official travel falls into the category of "other official travel". This type of travel is that which does not directly support those activities that define mission use but are still official BPA activities.

BPA derives its flight authority from several acts. FAA-H-80831A - Aircraft Weight & Balance Regulation is the primary authority for collecting this information. The Bonneville Project Act, particularly Sections 2(f) and 8 (16 U.S.C. § 832 et seq.), grants authority to the Bonneville Administrator to contract for supplies and services. The Federal Columbia River Transmission System Act of 1974, particularly Section 11(b) (16 U.S.C. § 838 et seq.), grants authority to the Bonneville Administrator to make expenditures without appropriations from Congress or limitation to fiscal year. The Pacific Northwest Electric Power Planning and Conservation Act, particularly Section 9(a) (16 U.S.C. § 839 et seq.), reaffirms the need for the special contracting authorities in Section 2(f) of the Bonneville Project Act.

A.2. Needs and Uses of Data

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection

The information is collected using BPA F 4450.01e, FLIGHT REQUEST. The information collection instrument collects the following information for the following purposes:

- Name of requestor and approving official to document authorization of the flight;
- Flight details (date, time, aircraft, etc) to document the details of the request for flight planning purposes;
- Purpose of the flight to document connection to the BPA mission;
- Passenger information (name, personnel type, organization, contact information, emergency contact information, and weight) to document authorized passengers, contact passengers with questions, contact next of kin for emergencies (and comply with FAA standards) and balance the weight of the aircraft for safety.

For reporting purposes and balance of weight on a plane, BPA Aircraft Services requires Personally Identifiable Information (PII) including current passenger weight, current Next of Kin, and, for Canada travel, current passport information. It is the traveler's responsibility to comply with PII policies and the Privacy Act Statement of 1974.

A.3. Use of Technology

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.

The instrument is a fillable electronic PDF form submitted via encrypted email, internal mail, fax, or hand delivery. The cost of additional automation significantly outweighs the potential reduction in burden on respondents.

A.4. Efforts to Identify Duplication

Describe efforts to identify duplication.

The information is not collected by other means or in another form by BPA.

A.5. Provisions for Reducing Burden on Small Businesses

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

This collection will not have a significant impact on small entities such as small businesses, organizations, or government bodies.

A.6. Consequences of Less-Frequent Reporting

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 collection is not conducted, Aircraft Services could not operationally and safely plan and facilitate flights with passengers. The collection is conducted on an as-needed basis only; reducing the collection frequency would prevent passenger flights from occurring altogether.

BPA does not conduct FAA-certificated air carrier operations. There is no requirement to submit reports containing PII to the FAA or any outside entity, outside of a formal investigation by the FAA, NTSB, or TSA.

A.7. Compliance with 5 CFR 1320.5

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines:

- (a) requiring respondents to report information to the agency more often than quarterly;**
- (b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- (c) requiring respondents to submit more than an original and two copies of any document;**
- (d) requiring respondents to retain records, other than health, medical government contract, grant-in-aid, or tax records, for more than three years;**
- (e) in connection with a statistical survey, that is not designed to product valid and reliable results that can be generalized to the universe of study;**
- (f) requiring the use of statistical data classification that has not been reviewed and approved by OMB;**
- (g) that includes a pledge of confidentiality that is not supported by authority established in stature of 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

(h) 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.

The information collection is conducted in a manner consistent with OMB guidelines.

A.8. Summary of Consultations Outside of the Agency

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 5CFR 320.8(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 in response to the comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside DOE 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 report.

The Department published a 60-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on June 28, 2021 (Volume 86, Number 121, Page 33997). No comments were received.

The Department will publish a 30-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on January 21, 2022.

A.9. Payments or Gifts to Respondents

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

Respondents will not receive any payment or gift.

A.10. Provisions for Protection of Information

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

BPA provides notice on the instrument that information from the proposed collection is part of a system of records covered by the Privacy Act of 1974. BPA ensures that the collection is authorized by law and only disclosed based on need-to-know within the agency, or as authorized by law outside the agency.

A.11. Justification for Sensitive Questions

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 DOE 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.

Information collected of a sensitive nature, included next of kin and passenger weight, is required by the FAA for all flights on aircraft prior to boarding. Consent is obtained through individual participation by the applicant.

A.12A. Estimate of Respondent Burden Hours

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, DOE should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample fewer than 10 potential respondents is desirable.

Table A1. Estimated Respondent Hour Burden

Form Number/Title (and/or other Collection Instrument name)	Type of Respondents	Number of Respondents	Annual Number of Responses	Burden Hours Per Response	Annual Burden Hours*	Annual Reporting Frequency
BPA F 4450.01e Aircraft Services – Flight Request	Government Employees	325	325	.1	33	1
BPA F 4450.01e Aircraft Services – Flight Request	Private Employees	325	325	.1	33	1
TOTAL		650	650		66	

*Figures are rounded

The totals in the above table are three-year averages provided by BPA’s Aircraft Services staff. The number of government employees versus private employees (contractors and visitors) is about 50/50. The burden was derived by observation.

A.12B. Estimate of Annual Cost to Respondent for Burden Hours

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’.

Table A2. Estimated Respondent Cost Burden

Type of Respondents	Total Annual Burden Hours	Hourly Wage Rate	Total Respondent Costs*
Government Employees	32.5	50.21	1632
Private Employees	32.5	26.88	874
TOTAL	65		2506

*Figures are rounded

These rates originated from the US Bureau of Labor Statistics “Employer Costs for Employee Compensation Summary” and are fully burdened.

A.13. Other Estimated Annual Cost to Respondents

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

Other than those described above, BPA does not anticipate any additional annual cost burden to respondents. There will be no ongoing operation or maintenance costs for respondents.

A.14. Annual Cost to the Federal Government

Provide estimates of annualized cost to the Federal government.

The estimated budget for the Aircraft Services office that processes this information collection is \$3,263.65 annually. This includes estimated federal burden for BPA personnel processing the completed forms, which is based on the total number of hours it would take to complete review and verification of information. The estimate for a fully burdened, average full time equivalent (FTE) is approximately \$50.21/hr. DOE approximates 0.5 hours to review each form.

- 130 reports/year x 0.5 hour/report x \$50.21/hour = \$3,263.65

Note that “130” refers to the total number of forms (collection instruments) processed by BPA’s Aircraft services. Each form contains an average of five responses.

A.15. Reasons for Changes in Burden

Explain the reasons for any program changes or adjustments reported in Items 13 (or 14) of OMB Form 83-I.

This is a new collection, therefore there are no program changes or adjustments scheduled.

A.16. Collection, Tabulation, and Publication Plans

For collections whose results will be published, outline the plans for tabulation and publication.

This information collection will not be published.

A.17. OMB Number and Expiration Date

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

DOE will display the OMB Control Number and expiration date on all collection vehicles.

A.18. Certification Statement

Explain each exception to the certification statement identified in Item 19 of OMB Form 83-I.

There are no exceptions to the certification statement.

