

**SUPPORTING STATEMENT**  
**for**  
**Certification of Airmen for the Operation of Light-Sport Aircraft**  
**2120-0690**

**CHANGES SINCE LAST APPROVAL:**

- This ICR no longer covers Light-Sport Aircraft certification activities under 14 CFR part 21; these activities are now covered under ICR 2120-0018.
- This ICR no longer covers applications from prospective designees under 14 CFR part 183; these activities are now conducted through the automated Designee Management Program, OMB control number 2120-0033
- Previous versions of this ICR included time and economic burdens incurred during knowledge testing and training, which are not information-collection activities. These burdens have been removed.

**Justification**

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

The purpose of Title 49 United States Code, Subtitle VII, Aviation Programs, is to encourage and foster the development of civil aeronautics, and to promote safety in air commerce.

Section 40113(a) empowers the Secretary of Transportation (or the Administrator of the Federal Aviation Administration with respect to aviation safety duties and powers designated to be carried out by the Administrator) to take action he/she considers necessary to carry out this part, including conducting investigations, prescribing regulations, standards and procedures, and issuing orders.

Section 44701 empowers the Administrator to promote safety by prescribing minimum safety standards and regulations necessary for safety in air commerce. It also empowers the Administrator to grant an exemption from a requirement of a regulation-if it is in the public interest.

Section 44702(a) specifies that applications shall be as the Administrator prescribes as to form, content, retention, and manner served.

Section 44703 specifically empowers the Administrator to issue airman certificates to properly qualified persons.

Title 49, United States Code, Section 44703 specifically empowers the Secretary of Transportation to issue airman certificates to properly qualified persons. This clearance request covers the burden imposed on airmen directly responsible for the control of light-sport aircraft. Each certificate issued specifies the capacity in which the holder is authorized to serve as an airman in connection with the operation of a light-sport aircraft.

Federal Regulations Part 61, Certification: Pilots, Flight Instructors, and Ground Instructors, prescribes minimum standards and requirements for the issuance of airman certificates, and they establish procedures for applying for airman certificates.

This information collection supports the Department of Transportation's strategic goals on safety and security. This collection is fundamental in order to promote the public health and safety by working toward the elimination of transportation-related deaths, injuries, and property damage.

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

This information collection mandates that applicants who wish to obtain or maintain certification as sport pilots or light sports aircraft flight instructors report information to the FAA on occasion.

The Airman certificate and/or Rating Application Form and the required records/logbooks/statements required by the federal regulations are submitted to Federal Aviation Administration (FAA) district offices or its representatives to determine qualifications of the applicant for issuance of a pilot or instructor certificate, rating, privilege, or authorization. Since light-sport airman certificates do not expire, these information-reporting and recordkeeping activities are conducted on occasion (i.e., when an individual decides to pursue a light-sport airman certificate, or fails a knowledge or practical test and decides to retake that test). There is no requirement for periodic re-testing or certificate-renewal.

Approximately 10,000 pilots and flight instructors have sought certification to date. Applicants for a new certificate for the student pilot, sport pilot, ground, and flight instructor with a sport pilot rating or new category or class privileges are required to submit FAA Form 8710-11, Sport Pilot Airman Certificate and/or Rating Application.

**3. *Describe any consideration of the use of improved information technology to reduce burden and any technical or legal obstacles to reducing burden.***

At the present time, there are two methods available to evaluate an applicant's qualifications. One is a review of the form completed and signed by the applicant and the other is a major automation initiative being developed by the FAA. The initiative is defined as Integrated Airman Certification and Rating Application (IACRA).

The system is fully implemented, to include the use electronic signatures. All airmen that will be issued airman certificates will be utilizing IACRA, found at <https://iacra.faa.gov/IACRA/Default.aspx>. If an airman certificate is issued, certain information about each airman – specifically, names, addresses, and the type, issue date and expiration date (if any) of the certificate – is available to the public at <https://amsrvs.registry.faa.gov/airmeninquiry>, pursuant to H.R.1000 – the Wendell H. Ford Aviation Investment and Reform Act for the 21st Century (<https://www.congress.gov/bill/106th-congress/house-bill/1000>). *Each airman has the right and the capability to redact his or her address from the public-facing database.*

The IACRA initiative incorporates the capability of the applicant and the designee to digitally sign the airman application for a designee to meet the initiatives of the Government Paperwork Reduction Act (GPEA) P.L. 105-277, Title XVII.

**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.**

We have reviewed other FAA public-use reports and find no duplication. Also, we know of no other agency collecting information from pilots and flight instructors prescribing the terms, conditions, and limitations of their operating certificates. This information is required under part 61 of the federal regulations.

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

This information collection does not involve small businesses. It involves only individuals who are required to complete an application form using IACRA, which is fully electronic.

**6. Describe the consequences to Federal program or policy activities if the collection were conducted less frequently.**

The frequency of information collection is determined by the applicants who submit certification applications to the FAA. A decrease in the frequency of collection is governed by the applicant, not the FAA, unless safety dictates otherwise (i.e. numerous violations of the federal regulations).

If the collection of this information were not conducted, FAA inspectors would not be able to determine applicant eligibility and qualifications. Without this determination, the appropriate certificate could not be issued.

**7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.5(d)(2).**

There are no special circumstances.

**8. Describe efforts to consult with person outside the Agency to obtain their views on the availability of data.**

The FAA did not engage in any communication with stakeholders. A notice was published in the Federal Register on April 7, 2022, 87 FR 20497. The FAA received one comment, from the Aircraft Owners and Pilots Association (AOPA). AOPA expressed concerns about the lack of instructions for completion of Form 8710-11.

AOPA recommended that the FAA create appropriate and clearly worded instructions and/or make such instructions readily available and easily accessible to those completing the form. AOPA suggested that the inclusion of instructions may not only reduce confusion, but may also reduce the time burden for respondents. The FAA agrees with this comment, and will include detailed instructions when the form is updated upon renewal.

In addition, AOPA suggested that FAA Form 8710-11 be amended to clarify whether alcohol offenses (generally) and those involving motor vehicle actions (specifically) should be reported on the form. The FAA agrees that the lack of clarity may result in confusion or the reporting of non-required information. The FAA will endeavor to remedy this after determining whether it is able to do so while adhering to existing regulations.

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

Respondents are provided no payment or gift in connection with the information collection burden.

**10. Describe any assurance of confidentiality.**

No assurance of confidentiality is provided or needed.

The information collected will become Part of the Privacy Act system of records DOT/FAA 847, General Aviation Records on Individuals and afforded the protection offered under the Privacy Act and that particular system.

**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.**

The Airman Certificate and/or Rating Application requires the applicant to respond to questions concerning a conviction under Federal or State statutes pertaining to narcotic drugs, marijuana, and or stimulant drugs or substance. This information is necessary to determine whether the applicant is in compliance with appropriate federal regulation 61 certification requirements.

**12. Provide estimates of the hour burden of the collection of information. Provide estimates of cost to respondents for the hour burdens for collections of information.**

**Pilot and Instructor Certification**

This information collection requires applicants for certification as sport pilots to complete FAA form 8710-11 and log training.

The Bureau of Labor Statistics (BLS) estimates that the mean annual salary for a chief flight instructor and designated pilot examiner is \$92,040, from which the FAA estimates an average wage of \$44.25 per hour. This wage was obtained using the North American Industry Classification System (NAICS) industry code 53-2010 designated for aircraft pilots and flight engineers. This wage estimate was derived by dividing \$92,040 by 2,080 hours (assuming a 40-hour work week for 52 weeks), which is \$44.25 per hour. Next, a fringe benefit multiplier 1.42 was included. This results in an annual salary of \$130,553 and hourly wage of \$62.77.

For pilots, the FAA has determined that most respondents are individual members of the aviation public from all walks of life; therefore, we are not using a particular occupation or title to determine the economic cost of their time. Instead, the FAA is using a general private

sector wage, including benefits, of \$34.72 per hour, provided by the Bureau of Labor Statistics. In addition, the FAA uses a 17 percent estimate for overhead costs such as rent, equipment and utilities.  $\$34.72 \times 1.17 = \$40.62$  for a fully loaded wage rate.

The FAA is using the following hourly wages, which include all fringe benefits:

Pilot wage:	\$40.62
Instructor wage:	\$62.77
DPE wage:	\$62.77

The FAA is also using the following assumption: The cost of training for pilots is \$100.

Percent of Pilots and instructors that fail knowledge test	10%
Percent of Pilots and instructors that fail practical test	10%
Cost of the training	\$100

A breakdown of the applicable sections of Federal Regulation Part 61 is listed below, showing the number of respondents impacted by this rule, frequency of response, annual hour burden, and how the burden has been estimated for the completion of FAA Form 8710-11 or required logbook endorsement.

<b>Average No. of Sport Pilots (SP) and Flight Instructors (FI) Impacted Annually</b>			
<b>EXISTING SPs annual</b>	<b>EXISTING FIs annual</b>	<b>NEW SPs/ NEW FIs</b>	
9200	900	500	40

#### A. Costs of Training, Testing, and Registering Sport Pilots

§ 61.307 stipulates that one must take and pass a knowledge test in order to receive sport pilot certification. Before taking the knowledge test, the applicant must receive a logbook endorsement from an authorized instructor:

- a) Each pilot must receive a logbook endorsement from an authorized instructor and all pilots must purchase a knowledge test (\$100), and
- b) For purposes of this evaluation, we estimate that 10% of the pilots will fail the knowledge test and be required to retake the test. Under § 61.49, an applicant who fails a knowledge or practical test may reapply for the test only after receiving training from an authorized instructor and a logbook endorsement from an authorized instructor. This includes repurchasing a knowledge test.

For a)and b):

# of new pilots (annually) – 500 - + 50 (10% retake) + 550

Amount of time for logbook endorsement – 5 minutes

Cost of logbook endorsement to pilots and instructors = (550) x 5/60 x \$\$40.62/hour = \$1862

Cost of logbook endorsement from instructors =  $(550) \times 5/60 \times \$62.77 = \$2865$   
Cost of purchasing knowledge test =  $(550) \times \$100 = \$55,000$   
Amount of time for logbook endorsement for pilots and instructors =  $(550) \times 5/60 = 46$  hours  
Amount of time for logbook endorsement from instructors =  $(550) \times 5/60 = 46$  hours  
**Total Cost = \$1862 + \$2865 + \$55,000 = \$59,727**  
**Total Time = 46 + 46 = 92 hours**

§ 61.311 requires that an applicant for a sport pilot certificate receive and log ground and flight training from an authorized instructor on certain areas of operation.  
# new pilots (annual) =  $500 + 10\% \text{ retake } (50) = 550$

Average logbook endorsement = 5 minutes  
Cost of logbook endorsements for pilots =  $550 \times (5/60) \times 40.62 = \$1,854$   
Cost of logbook endorsements for instructors =  $550 \times (5/60) \times \$62.77 = \$2,865$   
Time for logbook endorsements (pilots and instructors) =  $2 \times 550 \times (5/60) = 92$  hrs

**Total cost = \$1,854 + \$2,865 = \$4,719**  
**Total time = 92**

§ 61.13 requires the applicant for a pilot certificate and/or flight instructor certificate to submit FAA Form 8710-11 to the FAA district office or its representatives to determine qualifications of the applicant for issuance of a pilot or flight instructor certificate, rating, or authorization. Both pilots and instructors will need to work with an existing instructor in filling out the form.

# of new pilots (annual) –  $500 + 10\% \text{ retake } (50) = 550$

Time to fill out form for both pilot and instructor – 15 min.  
Time for DPE to verify form – 10 min.

Cost to fill out application for pilots =  $(550 \times 0.25 \times \$40.62) = \$5585$   
Cost of DPE and instructor verifying information =  $(550 \times (10/60) \times \$100) + (550 \times (10/60) \times \$62.77) = \$15,219$

Time to fill out applications =  $2 \times (550) \times 0.25 = 275$  hours  
Time for DPE to verify information =  $2 \times (550) \times (10/60) = 183$  hours

**Total cost = \$5585 + \$15219 = \$20804**  
**Total time = 275 + 183 = 458 hours**

§ 61.39 – New sport pilot candidates are required to take a practical test.

a) As a prerequisite to taking the practical test,  
§ 61.39 states that the applicant must have a logbook endorsement signed by an authorized instructor.

b) An estimated 10% who take the practical test may fail it. These pilots and instructors will need to reapply to take the test using FAA Form 8710-11 after failure, resulting in the logbook endorsement time and costs.

# of new pilots (annual) – 500 + 10% retake (50) = 550

Time for logbook endorsement – 5 minutes

Cost for pilots – (550) x \$40.62 x (5/60) = \$1,854

Cost for instructors – (550) x \$62.77 x (5/60) = \$2,865

Time for pilots - (550) x (5/60) = 46

Time for instructors – (550) x (5/60) = 46

**Total cost = \$1854 + \$2865 = \$4719**

**Total time = 46 + 46 = 92 hours**

The FAA requires FAA Form 8710-11, Sport Pilot Airman Certificate and/or Rating Application be completed by the airman receiving this additional category or class privilege, and signed by the recommending instructor, and the authorized instructor conducting the proficiency check. The authorized instructor conducting the proficiency check will be required to submit the completed FAA Form 8710-11, Sport Pilot Airman Certificate and/or Rating Application to the FAA upon satisfactory completion of the proficiency check. While this requirement will result in additional paperwork, the FAA has no record as to the number of sport pilots who would seek additional category and class ratings. Accordingly, the FAA is unable to estimate the cost and hour burden.

#### B. Cost to become certified as a flight instructor with a sport pilot rating

Cost of the knowledge test - A person applying for a flight instructor certificate with a sport pilot rating must pass knowledge tests on the fundamentals of instructing, as listed in § 61.407(a) and the aeronautical knowledge areas listed in § 61.407(c). While there is no hour burden with this, there is a paperwork cost:

# new instructors (annually) – 40

Cost of the knowledge test - \$100

Total cost of purchasing training courses = 40 x \$100 = **\$4000**

An estimated 10% who take the knowledge test may fail it. These pilots and instructors will need to reapply to take the test completing FAA Form 8710-11, Sport Pilot Airman Certificate and/or Rating Application, after failure, as well as repurchase the knowledge test:

# of new instructors (annually) – 40 + 4 (10 % retake)

Amount of time to fill out 8710-11 form – ¼ hour

Cost of the knowledge test - \$100

Cost to fill out form and purchase knowledge test = (44 x ¼ x \$62.77) + (44 x \$100) = \$690 + \$4400 = **\$5090**

Amount of time to fill out 8710-11 form = 44 x ¼ = **11 hours**

Applying to become an instructor - The FAA estimates, on average, that an instructor and a DPE will each need ¼ hour for the paperwork for new instructors to become an instructor:

# of new instructors (annual) – 40 + 4 = 44

Cost of applying = (44 x \$62.77 x ¼) + (44 x \$62.77 x ¼) = **\$1380**

Time to apply = (44 x ¼) + (44 x ¼) = **22 hours**

**Summary of all Burden Hours and Costs**

Section Number	Number of Respondents	Hours	Costs	Comment
61.307	1100	92	\$59727	Logbook endorsement prior to knowledge test
61.311	1100	92	\$4719	Logbook endorsements
61.13	1100	458	\$20804	Application using form 8710-11
61.39	1100	92	\$4719	Logbook endorsements related to practical test.
61.407	44	11	\$5090	Cost of test plus time burden of form 8710-11
61.407	40	0	\$4000	Cost to purchase training course
61.43	44	22	\$1380	Apply to become instructor (DPE and CFI)
<b>TOTAL</b>	<b>4528</b>	<b>767</b>	<b>\$100,439</b>	

**13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in items 12 and 14).**

There are no additional startup costs associated with this collection not already included in item number 12.

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

The FAA estimates that it spends approximately 4 hours reviewing each application to become a sport pilot or sport pilot instructor. The completed Form 8710-11 is reviewed by an Aviation Safety Inspector. For Aviation Safety Inspectors, the FAA assumes a mid-grade GS-13 salary, Rest of USA locality. Annual salary is \$104,429,<sup>1</sup> divided by 2,080 hours for an hourly rate of \$50.21. The FAA uses a fringe benefits and overhead cost, for FAA employees, of 100%.<sup>2</sup> This results in a fully loaded wage of \$100.42 per hour.

Assuming 550 applications are reviewed, at 4 hours each, the FAA spends 2,200 hours per year under this ICR. 2,200\*\$100.42 results in a **total FAA annual cost of \$220,924.**

**15. Explain reasons for changes in burden, including the need for increase.**

Federal government costs have been reinstated, as the FAA has determined that the review of applications under this ICR is an ongoing activity carried out by aviation safety inspectors.

<sup>1</sup> <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/RUS.pdf>

<sup>2</sup> U.S. Department of Health and Human Services, “Guidelines for Regulatory Impact Analysis” (2016), [https://aspe.hhs.gov/system/files/pdf/242926/HHS\\_RIAGuidance.pdf](https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf). On page 30, HHS states, “As an interim default, while HHS conducts more research, analysts should assume overhead costs (including benefits) are equal to 100 percent of pretax wages....”



This version of the ICR no longer contains aircraft-certification activities under part 21, or designee-management activities under part 183. These activities are now covered by separate ICRs.

Finally, many of the burden totals have changed as a result of corrections to arithmetic.

**16. For Collections of information whose results are planned to be published for statistical use, outline plans for tabulation, statistical analysis, etc.**

There are no plans to publish this information for statistical or other purposes.

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

The FAA is not seeking such approval.

**18. Explain each exception to the certification statement identified in Item 19, Certification of Paperwork Reduction Act Submissions, of OMB Form 83-1.**

No exception to the certification statement of OMB Form 83-1 is requested.