

INFORMATION COLLECTION SUPPORTING STATEMENT

Aircraft Repair Station Security

OMB Control Number 1652-0060

Exp. 11/30/2022

- 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. (Annotate the CFR parts/sections affected).**

Section 611 the Vision 100 Century of Aviation Reauthorization Act (the Act) requires the Department of Homeland Security (DHS) to ensure the security of aircraft repair stations. Pub. L. 108-176 (Oct. 5, 2018) as codified at 49 U.S.C. 44924. The Act further requires a security review and audit of aircraft repair stations located outside the United States, with a 145-certificate issued by the FAA. *Id.* TSA, on behalf of DHS, is the agency to conduct the relevant tasks associated with this legislation. As required by the Act, TSA published a final rule setting forth the new requirements in 2014. *See* 79 FR 2119 (Jan. 13, 2014), as codified at 49 CFR part 1544.

Under TSA's regulations in 49 CFR part 1544, aircraft repair stations certificated by the FAA under 14 CFR part 145, and located on or adjacent to an airport as defined in 49 CFR 1554.101(a)(1) and (2), are required to implement certain security requirements. Unless located on a military installation, these aircraft repair stations are also subject to inspection by TSA. The required security measures include designating a TSA point of contact and preventing the operation of unattended large aircraft that are capable of flight. An aircraft repair station owner or operator also is responsible for maintaining updated employment history records to demonstrate compliance with the regulatory requirements. These records must be made available to TSA upon request.

Aircraft repair station owners and operators must also comply with security directives (SD) if issued by TSA, which could include requirements to maintain additional records or provide additional information to TSA. TSA may issue an SD when TSA determines that additional security measures are necessary to respond to specific threats or intelligence information. Repair station owners and operators must adopt each SD issued by TSA within the timeframe established by the SD. TSA will determine compliance with the requirements of an SD, which may include recordkeeping requirements, when conducting inspections.

TSA uses the collected information to determine compliance with the required security measures.

Section 44924 of title 49 U.S.C., also required TSA to conduct a security audit of all covered aircraft repair stations located outside the United States to evaluate security risks, as conditions warrant, and for compliance with any SDs that TSA may issue. TSA completed this security review in May 2014, consisting of an audit of 707 aircraft repair stations outside the United States that were active at the time of the publication of the rule. *See* 49 U.S.C. 44924(a). Having completed this audit, TSA now generally focuses its inspections on aircraft repair stations located on, or adjacent to, an airport covered by an airport security program under Part 1542 in the United States, or on the security restricted area of any

commensurate airport outside the United States regulated by a government entity. This focus is consistent with 49 U.S.C. 44924(e), which directs TSA to focus its audits on repair station posing the most significant security risks.

If TSA discovers security deficiencies during its inspections, an aircraft repair station may be subject to suspension or, in extreme cases, withdrawal of its 145-certificate by the FAA if such deficiencies are not corrected. An aircraft repair station owner or operator may petition for reconsideration (appeal) of a determination by TSA that FAA must suspend or revoke its certificate.

TSA conducts the following information collections:

- (1) **Recordkeeping.** Under 49 CFR 1554.3, aircraft repair stations that verify employee background information using employment history will be required to maintain employment history records and other records to demonstrate compliance with the security measures and directives, and make the records available for inspection by TSA upon request.
- (2) **Petition for Reconsideration.** TSA has established procedures for a repair station operator or owner to request reconsideration of a determination that its certificate must be suspended or revoked. The petition must be in writing, in English, signed by the repair station operator or owner, and follow the procedures in 49 CFR 1554.201 and 1554.203.

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.*

For employment history records, TSA will review the information submitted as necessary to ensure compliance with 49 CFR part 1554.

For information submitted as part of a petition for reconsideration, the TSA Administrator will review information submitted before issuing a final agency order. The TSA Administrator will either direct the TSA-designated official to notify FAA and the repair station that the determination is rescinded and the certificate may be reinstated or affirm the determination.

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. [Effective 03/22/01, your response must SPECIFICALLY reference the Government Paperwork Elimination Act (GPEA), which addresses electronic filing and recordkeeping, and what you are doing to adhere to it. You must explain how you will provide a fully electronic reporting option by October 2003, or an explanation of why this is not practicable.]*

This collection of information is in compliance with the Government Paperwork Elimination Act in that TSA will allow transmission of all documents via email, ars@tsa.dhs.gov (United

States), frs@tsa.dhs.gov (outside the United States) or fax, 703-603-4044, and retention of all records to be conducted electronically. See 42 U.S.C. 3504.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose(s) described in Item 2, above.**

This collection is not a duplication of existing Federal requirements. TSA's promulgation of 49 CFR part 1554 created a new security requirement for covered aircraft repair stations. As the scope is determined by FAA-certifications, TSA and FAA coordinate to avoid duplication of efforts. Once the FAA issues a new certificate to a repair station, the FAA sends an email to TSA with the aircraft repair station's information. Applications to become an FAA-certificated aircraft repair station are available at: <https://www.faa.gov/aircraft/repair/become>. Once TSA receives this information from the FAA, they send an email to the aircraft repair station to collect the information of the point(s) of contact, and notify them that they are subject to the requirements in 49 CFR part 1554. TSA has also entered into an agreement with FAA, whereby it lists the responsibilities of each office, lists the POCs in each office, and explains how to share new repair station information following FAA certification of a new station.

- 5. If the collection of information has a significant impact on a substantial number of small businesses or other small entities (Item 5 of the Paperwork Reduction Act submission form), describe the methods used to minimize burden.**

This collection of information does not have a significant impact on a substantial number of small businesses or other small entities.

- 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.**

TSA will not be able to meet its statutory requirements under 49 U.S.C. 44924 if the information described in this Supporting Statement is not collected.

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

None of the requirements are inconsistent with the guidelines in 5 CFR 1320.5.

- 8. Describe efforts to consult 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. 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.**

TSA respectively published two *Federal Register* notices, with a 60-day and a 30-day comment period, soliciting comments on this information collection request. See 86 FR 71905 (December 20, 2021) and 87 FR 22552 (April 15, 2022). The agency did not receive any comments on the collection of information.

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

TSA will not provide any payment or gifts to respondents for this information collection.

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

Although TSA will not provide any assurances of confidentiality to respondents, information collected that is determined by TSA to be Sensitive Security Information, in accordance with 49 CFR part 1520, will be protected as such. This information collection is covered under two Privacy Impact Assessments (PIAs): DHS/TSA/PIA-038 Performance and Results Information System (Sep. 18, 2012) and DHS/ALL/PIA-006 General Contact Lists (June 15, 2007). In addition, to the extent applicable the collection is covered by a System of Records Notice, DHS/TSA-001 Transportation Security Enforcement Record System. See 71 FR 44223 (August 4, 2006).

- 11. Provide additional justification for any questions of sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.**

This information collection does not involve any questions of a sensitive nature.

- 12. Provide estimates of hour and cost burden of the collection of information.**

The respondents to this information collection are the owners and/or operators of aircraft repair stations certificated by the FAA under 14 CFR part 145, which is estimated to be over 4,000 aircraft repair stations located within the United States and more than 900 active aircraft repair stations located outside the United States. Each repair station on or adjacent to an airport designated in 49 CFR 1554.101(a) is responsible for maintaining updated employment history records and other records to demonstrate compliance with the regulatory requirements and security directives, when issued by TSA. These records must be made available to TSA upon request. Additionally, a repair station operator or owner may appeal a determination by TSA that FAA must suspend or revoke its certificate.

To estimate the burden for domestic and foreign aircraft repair stations, TSA multiplies the fully-loaded¹ wage rate of the industry employee responsible for their respective information collection activity, by the time it takes to meet the compliance requirements. TSA uses a fully-loaded wage rate of \$27.92² for an administrative assistant and the fully loaded hourly wage rate for a first-line supervisor of mechanics, installers, and repairers of \$67.80.³ Lastly, TSA uses a fully-loaded wage rate of \$99.62⁴ for a Corporate Security Director.

Updating Point of Contact (POC) Information

Covered aircraft repair stations are required to designate a POC with TSA. TSA estimates that approximately 10 domestic and 10 foreign aircraft repair stations (20 total) either submit or update POC information each year. TSA estimates that it takes approximately 1.5 minutes (0.025 hours) to submit or update this information. This burden would typically be undertaken by an administrative assistant with a fully-loaded wage rate of \$27.92. TSA estimates an annual hour burden of 0.5 hours (1.5 hours over three years) and an annual hour burden cost of \$13.96 (\$41.88 over three years). Table 1 summarizes these estimates.

Table 1: Hour Burden Cost for Submitting or Updating POC Information

Number of Domestic Stations	Number of Foreign Stations	Hour Burden to Submit or Update POC information	Annual Hour Burden	Annual Hour Burden Cost
A	B	C	D = (A + B) x C	E = D x \$27.92
10	10	0.025	0.5	\$13.96

¹ A fully-loaded wage rate accounts for the non-salary elements of employee compensation, such as health and retirement benefits.

² The unloaded wage rate is for an administrative assistant is \$18.56. BLS. May 2020 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 481000-Air Transportation. Occupational Code: 43-4171 Receptionists and Information Clerks. Last Modified March 31, 2021 (accessed November 12, 2021), https://www.bls.gov/oes/2020/May/naics3_481000.htm#43-0000. TSA calculates a compensation factor to inflate the wage so it accounts for all elements of employer costs of employee compensation. TSA calculates this by dividing the total compensation for workers in the production, transportation, and material moving industry (\$32.63) by the wage and salaries component (\$21.69). TSA calculates a compensation factor of 1.50438 (\$32.63/\$21.69). BLS. Employer Costs for Employee Compensation-June 2021. Table 5. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: private-industry workers, production, transportation and material moving occupation. Last modified September 16, 2021 (accessed November 12, 2021), https://www.bls.gov/news.release/archives/ecec_09162021.htm. TSA then multiplies the unloaded wage rate by the compensation factor to calculate a fully loaded wage rate of \$27.92 (1.50438 x \$18.56).

³ The unloaded wage rate for first-line supervisors is \$45.07. BLS. May 2020 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 481000-Air Transportation. Occupational Code: 49-1011 First-Line Supervisors of Mechanics, Installers, and Repairers. Last Modified March 31, 2021 (accessed November 12, 2021), https://www.bls.gov/oes/2020/May/naics3_481000.htm#43-0000. TSA uses the same compensation factor as above to adjust this wage to make it fully-loaded. The fully-loaded wage rate is \$67.80 (1.50438 x \$45.07).

⁴ The unloaded wage rate for operations managers is \$66.22. BLS. May 2020 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 481000-Air Transportation. Occupational Code: 11-1021 General and Operations Managers. Last Modified March 31, 2021 (accessed November 12, 2021), https://www.bls.gov/oes/2020/May/naics3_481000.htm#43-0000. TSA uses the same compensation factor as above to adjust this wage to make it fully-loaded. The fully-loaded wage rate is \$99.62 (1.50438 x \$66.22).

Repair Station Inspections

TSA conducts multiple types of inspections of aircraft repair stations: domestic comprehensive inspections, domestic targeted inspections, Compliance Security Enhancement Through Testing (COMSETT) inspections, and foreign inspections. Annually, TSA conducts approximately 350 domestic comprehensive inspections, 44 domestic targeted/supplemental inspections, 9 COMSETT inspections, and 30 foreign inspections. Each inspection places an administrative burden on the repair station to comply with the inspections. TSA estimates each foreign inspection places an approximate burden of 30 minutes on the repair station Security Manager; a domestic comprehensive inspection places an approximate burden of 1 hour on the repair station Security Manager; a domestic targeted/supplemental inspection places a 30 minute (0.5 hour) time burden on the Security Manager; and a domestic COMSETT inspection places a 15 minute (0.25 hour) burden on the Security Manager. TSA estimates the fully-loaded wage rate of a repair station Security Manager to be \$99.62. TSA estimates a total annual hour burden of 389 hours (1,168 over three years) and an annual hour burden cost of \$38,777 (\$116,331 over three years). Table 2 summarizes these estimates.

Table 2: Hour Burden Cost of Repair Station Inspections

Type of Inspection	Number of Inspections	Hour Burden per Inspection	Annual Hour Burden	Annual Hour Burden Cost
	A	B	C = A x B	D = C x \$99.62
Foreign Repair Station	30	0.5	15	\$1,494.30
Domestic Repair Station, comprehensive	350	1	350	\$34,867.01
Domestic Repair Station, targeted	44	0.5	22	\$2,191.64
COMSETT	9	0.25	2.25	\$224.15
Total	433		389.25	\$38,777.10

Petitions for Reconsideration

A repair station operator or owner may request reconsideration of a determination that its certificate must be suspended or revoked. The petition must be in writing, in English, and signed by the repair station operator or owner. TSA estimates that, on an average annual basis, one repair station within the United States and one outside the United States will undergo the suspension and revocation process.

Within the United States, TSA estimates that it takes a repair station's first-line supervisor approximately 10 hours to fill-out a petition and send it to TSA. TSA calculates an annual cost and hour burden for domestic repair station revocations at \$678.02. Outside the United States, TSA estimates that it takes a repair station's first-line supervisor approximately 12 hours to fill out a petition and send it to TSA. TSA calculates an annual hour and cost burden for foreign repair station revocations at \$813.63. This represents a total annual hour burden of 22 hours (66 hours over three years) and an annual hour burden cost of \$1,491.65 (\$4,475 over three years). Table 3 summarizes these calculations.

Table 3: Hour Burden Cost for Petition for Reconsideration

	Number of Petitions	Hours Burden Per Petition	Annual Hour Burden	Annual Hour Burden Cost
Status of Petitioner	A	B	C = A x B	D = C x \$67.80
Domestic Station	1	10	10	\$678.02
Foreign Station	1	12	12	\$813.63
Total	2		22	\$1,491.65

Summary

In summary, TSA estimates a total annual hour burden for this collection to be 411.75 hours (1235.25 over three years) with a total annual hour burden cost of \$ 40,283 (\$120,848 over three years). Table 4 summarizes the annual hour burden costs.

Table 4: Summary of Public Burden

Burden Cost for Submitting or Updating POC information	Burden Cost for Inspections	Burden Cost for Petition for Reconsideration	Total Annual Hour Burden Cost
A	B	C	D = A + B + C
\$13.96	\$38,777.10	\$1,491.65	\$40,282.71

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

There are no additional costs to respondents or recordkeepers resulting from the information collection.

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, and other expenses that would not have been incurred without this collection of information.

POC Updates and Changes

TSA personnel must process updates and/or changes to POC information submitted by aircraft repair stations. TSA estimates it receives 20 updates or changes to POC information each year. TSA estimates it takes a J-Band employee 12 minutes (0.20 hours) to process the information change, for an annual hour burden to TSA personnel of 4 hours. The fully-loaded hourly wage rate for a J-Band employee is \$85.80. Therefore, TSA estimates an annual hour burden cost to TSA of \$343.20. Table 5 summarizes these calculations.

Table 5: TSA Hour Burden Cost to Process New or Updated POC Information

Number of POC Contact Information Submissions	Hour Burden per Submission	Annual Hours	Annual Hour Burden Cost
A	B	C = A x B	D = C x \$85.80
20	0.20	4	\$343.20

Inspections

The Federal Government is responsible for conducting live inspections and validating that aircraft repair stations store the employment records of their security point of contact among other requirements. TSA expects to conduct 350 comprehensive inspections, 44 targeted inspections, and 9 COMSATT inspections on domestic aircraft repair stations each year. TSA estimates it takes an inspector one hour to complete a comprehensive inspection, and 30 minutes (0.5 hours) to conduct a targeted or COMSATT inspection. TSA estimates that there will be an annual hour burden of 350 hours to TSA inspectors conducting comprehensive inspections, an annual hour burden of 33 hours for conducting targeted inspections, and an annual hour burden of 4.5 hours for conducting COMSATT inspections. Domestic inspections are conducted by TSA inspectors under multiple pay bands, and TSA uses a weighted average hourly wage rate of \$50.54⁵ for domestic inspectors. TSA estimates an average annual hour cost burden of \$17,687.51 for comprehensive inspections, \$1,112 for targeted inspections, and \$227 for COMSATT inspections.

TSA expects to conduct 30 live inspections at foreign aircraft repair stations each year. TSA estimates it takes 30-minutes to perform a live inspection. TSA estimates an average annual hour burden of 15 hours for foreign inspections. Foreign inspections are conducted by I-Band (international) Inspectors with a fully-loaded hourly wage rate of \$94.54⁶. TSA estimates an annual hour burden cost of \$2,836 to TSA for foreign inspections.

The total annual hour burden to TSA for all inspections is 433 hours (1,347 over three years) and the average annual hour burden cost to TSA of inspections is \$21,863 (\$65,589 over three years). Table 6 summarizes these calculations.

⁵ This is a weighted average of the hourly wage rate for G-Band (\$28.78) H-Band (\$43.21), (\$) and I-Band inspectors (\$72.73). There are 56 G-Band, 267 H-Band, and 143 I-Band Inspectors, for a total of 466 Inspectors. $\$50.54 = ([56 \div 466] \times \$28.78) + ([267 \div 466] \times \$43.21) + ([143 \div 466] \times \$72.73)$. TSA, Office of Finance, FY2021 Modular Cost Data.

⁶ TSA uses the I-Band hourly rate of \$72.73 and adds 30% to account for Foreign Allowance and Permanent Change of Station (PCS) costs, for an hourly compensation rate of \$94.54. TSA, Office of Finance, Modular Cost Data, FY 2021.

Table 6: TSA Hour Burden Cost to Conduct Inspections

Type of Inspection	Number of Inspections	Hour Burden per Inspection	Annual Hour Burden	TSA Wage	Annual Hour Burden Cost
	A	B	C = A x B	D	E = C x D
Foreign Repair Station	30	1	30	\$94.54	\$2,836.33
Domestic Repair Station, comprehensive	350	1	350	\$50.54	\$17,687.51
Domestic Repair Station, targeted	44	0.5	22	\$50.54	\$1,111.79
COMSETT	9	0.5	4.5	\$50.54	\$227.41
Total	433		406.5		\$21,863.03

Summary

TSA estimates a total yearly average hour burden of 408.17 hours (1,224.50 over three years) to the Federal Government at a cost of \$22,006 (\$65,589 over three years). Table 7 summarizes these estimates.

Table 7. Summary of TSA Hour Burden Costs

Annual Cost to Process New POC information	Annual Costs to Conduct Inspections	Total Annual TSA Costs
A	B	C = A + B
\$143.00	\$21,863.03	\$22,006.03

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

TSA decreased the foreign aircraft repair station inspections from 77 to 30 inspections and the hour burden per foreign inspection decreased from 2 hours to 0.50 hours. The FAA provided data for Aircraft Repair Stations located outside the United States, as per a signed Memorandum of Understanding between the TSA and FAA.

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.

This information collection will not be published for statistical 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.

TSA will display the OMB number and expiration date.

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

TSA is not seeking any exceptions to the certification requirement.