

Supporting Statement A
Aircraft Registration
OMB Control Number 2120-0042

Revisions have been made to the following items:

1. Added Reauthorization Act of 2018 requirement.
2. Updated to show implementation date and changes to forms.
3. Updated to include current CARES information.
12. Updated to show correct hourly wage and fringe benefits

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

This information collection supports the Department of Transportation's strategic goals on safety and security. Maintaining proper registration of aircraft is fundamental to ensure compliance with operations/airworthiness safety requirements in order to promote the public health and safety by working toward the elimination of transportation-related deaths, injuries, and property damage. Proper registration of aircraft is necessary to advance the nations vital security interest in support of national strategies by ensuring that the national transportation system is secure.

The registration system provides identification of all civil aircraft in the United States. The registration records contain aircraft registration applications, recorded security interests and leases, and evidence of ownership which may be used in court if there is an ownership controversy. The form of registration certificate and the basic rules concerning aircraft identification marks are prescribed by Annex 7 to the Convention of International Civil Aviation, which the United States signed and has the force of law. Public Law 103-272 states that all aircraft must be registered before they may be flown. It sets forth registration eligibility requirements, provides for application for registration as well as suspension and/or revocation of registration, and recordation of conveyances, leases, and security instruments.

14 CFR Parts 47 and 49 prescribe procedures that implement Public Law 103-272. DOT/FAA – 801; Aircraft Registration System, System of Records Notice (SORN) prescribes policies and practices for storing, retrieving, accessing, retaining, and disposing of records in the registration system.

The FAA Reauthorization Act of 2018 (Public Law 115-254 or The Act), Section 546, "FAA Civil Aviation Registry Upgrade", requires:

1. The digitization of non-digital Registry information, including paper documents, microfilm images, and photographs, from an analog or non-digital format to a digital format;
2. The digitalization of Registry manual and paper-based processes, business operations, and functions by leveraging digital technologies and a broader use of digitized data;

3. The implementation of systems allowing a member of the public to submit any information or form to the Registry and conduct any transaction with the Registry by electronic or other remote means; and
4. Allowing more efficient, broader, and remote access to the Registry.

In response to this requirement, the FAA created Civil Aviation Registry Electronic Services (CARES) which will change this information collection to accommodate electronic registry submissions.

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.

This information collection is mandatory for any person or entity wanting to register an aircraft. The information is collected and used by the FAA Aircraft Registration Branch (Aircraft Registry) to: 1) maintain documentation of aircraft ownership; 2) register aircraft for the issuance of a registration certificate and; 3) record conveyances affecting an interest in an aircraft. Bi-annual reporting of U.S. Flight Hours is also collected from corporations that are not considered U.S. citizens to monitor compliance in accordance with 14 CFR 47.9. The information collected is maintained in a database for recordkeeping purposes. As with all information collected by the Aircraft Registry this information is available to the public upon request.

Registration and evidence of ownership information is collected utilizing the following forms:

- 1) The AC Form 8050-1, Aircraft Registration Application, which must be used for the initial registration when ownership of an aircraft transfers from one entity to another.
- 2) The following four forms, though their use is not required, are available to use as evidence of ownership to accompany the AC Form 8050-1:
 - AC Form 8050-2, Aircraft Bill of Sale
 - AC Form 8050-88, Affidavit of Ownership for Amateur-Built and Other Non-Type Certificated Aircraft
 - AC Form 8050-88A, Affidavit of Ownership for Light-Sport Aircraft
 - AC Form 8050-4, Certificate of Repossession of Encumbered Aircraft
- 3) The AC Form 8050-1B, Registration Renewal Application, is used for the stated purpose (renewal) every three years following notification to the aircraft owner that their aircraft's registration is eligible for renewal. (If the registration expires, the owner must use the AC Form 8050-1 to apply for reinstatement and may not operate the aircraft until the reinstated registration is accomplished.)
- 4) The AC Form 8050-98, Aircraft Security Agreement, may be used by secured parties to record any financial encumbrances against an aircraft and eligible engines, propellers, and spare part locations.

5) The AC Form 8050-117, Flight Hours for Corporations Not U. S. Citizens, is used as bi-annual notification and is then returned with report data from corporations not considered U.S. citizens for compliance with 14 CFR 47.9, which requires that at least 60% of the aircraft's flight hours be in U.S. airspace.

The forms identified in items one through four above are available for download at https://www.faa.gov/licenses_certificates/aircraft_certification/aircraft_registry/aircraft_regn_forms/. The 8050-117 is generated automatically every six months and sent directly to the registered owner for completion.

In the Fall/Winter of 2022, CARES will streamline the way these forms are submitted by providing an online portal for users to submit the form information electronically. In cases where the FAA initiates a notification to the user, such as the AC Form 8050-117, CARES will send a notification directly to the user via email. Alternatively, for public users opting to use a paper-based format, the system will send a mail-based notification to the user via the mailing address provided and anticipate any hardcopy forms be returned in a similar manner.

All paper forms will be revised to collect the email address of the public user to help streamline processing of the public users' request. Some forms have been reformatted to make space available for email address and to allow for easier extraction of the information provided. The modified paper forms will supersede all prior forms.

Information for User Identity Verification:

Today, there is no process for collecting information on the individual for identity verification (ID Verification) purposes. Any public individual submitting information is assumed to be whom they claim to be, and the information they submit is accepted as-is.

In the Fall/Winter of 2022, CARES will leverage FAA's MyAccess capability to validate the identity of a public user through a 3rd party vendor, ID DataWeb. Upon establishing an online user account, MyAccess will request that public users provide additional information directly to ID DataWeb to be used for ID Verification. ID DataWeb will provide MyAccess with a *pass* or *fail* indicator, conveying whether the public user was verified. A public user that failed ID verification will still be permitted to use functionality within CARES, but at a greater level of oversight and scrutiny, which may hinder or slow down the processing request.

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.

Today, the public user submits information and images through the mail in a paper-based format, where the Aircraft Registry enters this information into a file that is retained in an electronic based records management system. The Aircraft Registry maintains the records and does not affect the collection of information; collection of

information must originate from each individual aircraft owner or secured party, primarily through the paper-based submission process (i.e. USPS). In 2020, the Aircraft Registry began accepting digitally signed documents through an electronic submission email portal. Documents received through the email portal are printed to a paper-based format and electronically scanned into a work packet for examination and entry into the Aircraft Registry electronic records management system.

The existing Aircraft Registry service has several limitations and involves unnecessary tasking on both the public user and the Aircraft Registry processors. The public user must manually populate paper-based forms with information prior to submitting the forms through the mail. Once documentation is received by the Aircraft Registry, a processor must manually enter the information into the Aircraft Registry system, as an initial step that requires ample time, labor, and is prone to error. Any information that is absent, incorrect, or lacking in detail must be formally requested, resulting in the public user to submit more paper-based documentation through the mail, invariably slowing down the process.

In the event the public user would like to access the Aircraft Registry system or review processing status, they must physically visit the Aircraft Registry location and use an FAA provided computer.

In the Fall/Winter of 2022, CARES will utilize modern Cloud services, which includes an interactive web-based portal, allowing for immediate transmission of information between the public user and the Aircraft Registry processor. This web-based portal will streamline the manner in which the form information is populated and submitted into the Aircraft Registry, while also helping to ensure that correct information is provided in full. A web-based means of submitting information allows for a more guided information exchange process (e.g., pre-populating known data, providing guidance material, client-side data validation techniques, etc.), and is expected to streamline the manner and timeframe in which the full and complete application information is provided by the public user to the Aircraft Registry office for review.

Aircraft Registry Processing to Make Determination:

Today, aircraft-related activities require considerable manual processing and transporting of paper documents. To provide aircraft registration and recordation services, the Aircraft Registry processes a large quantity of paper documents, primarily in the form of mail, fax, and hand delivered submissions. FAA processing is typically initiated by the retrieval and opening of mail sent into the Aircraft Registry. Processing paper documentation requires numerous steps to prepare information to be entered into the legacy mainframe infrastructure, often referred to as the Registry Modernization System (RMS). This process involves manual preparation, scanning, and indexing. Most of the information received is manually converted into electronic images and data, which examiners use to continue processing the documentation through RMS. Depending on the submitted request, the process may follow a standard or non-

standard approach, and usually results in an issuance, denial, or request for additional information.

In the Fall/Winter of 2022, CARES will provide a web-based portal for users to submit aircraft information electronically and allow for a near real-time digital receipt of information. Electronic retrieval of the information will allow for the information to be processed automatically and expeditiously.

In cases where the public user opts to mail paper-based forms to the Aircraft Registry, the CARES automation process will leverage Optical Character Recognition (OCR) and Intelligent Character Recognition (ICR) technologies to detect, extract, and analyze information provided on the paper forms. This information will then be properly formatted and imported into CARES, where it will be processed automatically, or redirected for FAA Examiner review when necessary.

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.

There is only one Aircraft Registry. There is no duplication of records or record-keeping.

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

The Aircraft Registry has reduced the burden on all respondents to the minimum amount necessary to register an aircraft, modify aircraft record information, and/or record a security interest. The procedures and information required are the same for all respondents.

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.

As identified in 14 CFR Parts 47 and 49, collection occurs when: an aircraft changes ownership; registered owners address changes; an aircraft registration is renewed; or a security interest is granted. Collection of flight hour data for each aircraft owned by corporations that are not U.S. citizens occurs every 6 months. Non-compliance with public law is a consequence of not collecting the information.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document; requiring respondents to retain records, other than health,

medical, government contract, grant-in-aid, or tax records, for more than three years;

- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special circumstances and no proprietary or confidential information is collected.

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A 60-day Federal Register Notice was published on January 27, 2022 (87 FR 4325) soliciting public comments. There were no comments.

There have been no efforts to consult with persons outside the agency to obtain their views other than the request for comments asked for in the 60-day Federal Register Notice.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

No payments or gifts were provided.

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

Information collected is public information. There is no assurance of confidentiality.

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

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices. * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under item 13.**

The AC Form 8050-1 and AC Form 8050-1B are the only required forms to be used by respondents. The public may report a transfer of ownership by any viable instrument. Lenders may report their interest in an aircraft via their own security agreement. Non-US citizen corporations may report their US/Non-US flight hours with the AC Form 8050-117 or by other means such as a written statement, as long as the information is reported according to regulations.

However, on the assumption that the public makes full use of the forms the Aircraft Registry provides for the required purposes, and based on workload statistics from FY 2019, the table below provides estimates of the annual number of responses received for each of the reporting and recording requirements set forth in 14 CFR Parts 47 and 49.

When calculating the number of respondents, the Aircraft Registry considers a number of the responses to be re-filed documents rejected for correction. The Aircraft Registry rejected 93,760 documents in FY-19. Therefore, the number of respondents reported is calculated as 267,830 responses minus 93,760 rejections, which equals approximately 174,070 respondents.

Summary of Burden:

Form/Document Group	Responses	Average Time in Hours	Total Hours
Evidence of Ownership Documents AC Form 8050-2 AC Form 8050-4 AC Form 8050-88 AC Form 8050-88A	86,103	0.5	43,052
Application for Registration AC Form 8050-1	74,443	0.5	37,222
Application for Renewal (Electronic) AC Form 8050-1B	55,919	0.5	27,960
Application for Renewal (Paper) AC Form 8050-1B	20,053	0.5	10,026
Security Agreement AC Form 8050-98	29,952	0.75	22,464
Flight Hour Report AC Form 8050-117	1360	0.5	680
			141,404

Evidence of Ownership Documents (-2, -4, -88 & -88A)

Summary (Annual numbers)	Reporting	Recordkeepin g	Disclosure
# of Respondents	86,103		
# of Responses per respondent	1		
Time per Response	0.5		
Total # of responses	86,103		
Total burden (hours)	43,052		

Application for Registration (-1)

Summary (Annual numbers)	Reporting	Recordkeepin g	Disclosure
# of Respondents	74,443		
# of Responses per respondent	1		
Time per Response	0.5		
Total # of	74,443		

responses			
Total burden (hours)	37,222		

Application for Renewal (-1B electronic)

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	55,919		
# of Responses per respondent	1		
Time per Response	0.5		
Total # of responses	55,919		
Total burden (hours)	27,960		

Application for Renewal (-1B paper)

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	20,053		
# of Responses per respondent	1		
Time per Response	0.5		
Total # of responses	20,053		
Total burden (hours)	10,026		

Security Agreement (-98)

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	29,952		
# of Responses per respondent	1		
Time per Response	0.75		
Total # of responses	29,952		
Total burden	22,464		

(hours)			
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Flight Hour Report (-117)

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	1360		
# of Responses per respondent	1		
Time per Response	0.5		
Total # of responses	1360		
Total burden (hours)	680		

Entities that submit documents/forms to the Registry come from a very broad spectrum. The range is a scale from a rural owner of a powered parachute to a corporate attorney with a Forbes company that owns a multi-million dollar aircraft. As a result, we have used a Paralegal/Legal Assistant wage. Based upon the U.S. Bureau of Labor Statistics Occupational Handbook the estimated median wage for a Paralegal/Legal Assistant is \$26.45 per hour¹. Using BLS's Employer Costs for Employee Compensation memo released March 19, 2020,² the FAA calculated the mean hourly wage, plus benefits, for the Legal Assistant to be \$37.73 (\$26.45 + \$11.28). The total estimated annual cost burden to the respondents is \$37.73 x 141,404 hours' time (indicated above) for a total annual cost of \$5,335,172.92.

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

Additional costs for postage are shown in the table below in accordance with the following.

- Evidence of Ownership may be mailed alone as evidenced by the larger quantity indicated by the table entry in question.
- Initial submittal of the Application for Registration must always be accompanied by an Evidence of Ownership document.
- Security Agreements normally accompany a Bill of Sale (Evidence of Ownership) and typically significantly increases weight/cost.
- The Flight Hours Report is mailed alone and not filed with the other documents.

Packet Type	Responses	Cost	Total
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¹ <https://www.bls.gov/oes/2019/may/oes232011.htm>

² [Employer Costs for Employee Compensation - December 2019 \(bls.gov\)](#)

Ownership, Application & Security Agreement	29,952	\$1.64	\$49,121.28
Ownership & Application	56,151	\$0.55	\$30,883.05
Ownership Only	11,660	\$0.55	\$6,413.00
Renewal Application	20,053	\$0.55	\$11,029.15
Flight Hours Report	1,360	\$0.55	\$748.00
		Total	\$98,194.48

The total annual additional cost burden to all respondents is estimated at \$98,194.48.

14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

Operational expenses, such as equipment, overhead, printing, computer, maintenance, and support staff and any other expense that would not have been accrued without this collection of information are not included in any cost estimates for this collection. Agencies also may aggregate cost estimates from items 12, 13, and 14 in a single table.

FAA Aircraft Registration Branch Legal Instruments Examiners and contract staff process all incoming documents. Based on workload statistics from FY 2019, the chart below shows a breakout of processing time in hours for both Legal Instruments Examiner (\$27.14 per hour) and contractor staff (\$20.38 per hour), and related mailing costs (@ \$.55) for distribution of some of the forms in this collection. All forms, except the -117, are available in electronic format online, but must be printed and submitted via USPS or other courier.

Form/Document Group		Evidence of Ownership Documents	Application for Registration	Application for Renewal (Electronic)	Application for Renewal (Paper)	Security Agreement	Flight Hours Report
Counts	Mailed Out	0	0	0	0	0	1,707
	Incoming	86,103	74,443	55,919	20,053	29,952	1,360
Time in Hours	Fed	43,052	37,222	0	5,013	14,976	570
	Contractor	28,701	24,814	0	6684	9,984	12
Cost In \$	Fed	\$1,168,431	\$1,010,205	\$0	\$136,052	\$406,449	\$15,470
	Contractor	\$584,926	\$505,709	\$0	\$136,220	\$203,474	\$245
	Mail	\$0	\$0	\$0	\$0	\$0	\$0
	Total	\$1,753,357	\$1,515,914	\$0	\$272,272	\$609,923	\$15,715

Total	\$4,167,181
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The burden is based on customer submissions which fluctuates up or down from year to year. FY19 saw an increase in ownership, application and security agreement packets and ownership and application packets. There was a decrease in ownership alone packets. Renewal application submissions increased due to the number of registrations increasing. Flight hour reports decreased due to less non-citizen corporations registering aircraft and de-registering or transferring aircraft already registered.

15. Explain the reasons for any program changes or adjustments.

The CARES initiative was established in response to the FAA Reauthorization Act of 2018 (Public Law 115-254 or The Act) Section 546. The United States Government Accountability Office (GAO) also published a report titled, "Aviation FAA Needs to Better Prevent, Detect, and Respond to Fraud and Abuse Risks in Aircraft Registration", in March of 2020. In response to both of these, the FAA created CARES and has continued to evolve the CARES solution to enhance its ability to detect and mitigate against fraud and other abuses. The CARES team is implementing design solutions that are user-focused and satisfies the shortcomings identified in both the Reauthorization Act and the GAO report.

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.

There are no plans for tabulation or publication of the information collected.

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

There are no issues with displaying the expiration date for OMB approval.

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

There are no exceptions.