

**Supporting Statement A**  
**FAA Entry Point Filing Form – International Registry**  
**OMB Control Number 2120-0697**

Revisions have been made to the following items:

1. Added Reauthorization Act of 2018 requirement.
2. Updated to show implementation date and changes to form.
3. Updated to include current CARES information.
12. Updated to show correct wage rate and fringe benefit costs

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

On August 9, 2004, the President signed the Cape Town Treaty Implementation Act of 2004 (hereinafter referred to as Cape Town Treaty or Treaty), Public Law 108-297, which requires conforming changes to the regulations concerning registration and deregistration of aircraft. The Convention on International Interest in Mobile Equipment, as modified by the Protocol to the Convention on International Interests in Mobile Equipment on Matters Specific to Aircraft Equipment, provides for the creation of the International Registry.

The primary aim of the Treaty is to resolve the problem of obtaining certain and opposable rights to high-value aviation assets, namely airframes, aircraft engines and helicopters which, by their nature, have no fixed location. This problem arises primarily from the fact that legal systems have different approaches to securities, title retention agreements and lease agreements, which creates uncertainty for lending institutions regarding the efficacy of their rights. This hampers the provision of financing for such aviation assets and increases the borrowing cost. The Treaty is intended to reduce risks for creditors, and consequently the borrowing costs to debtors, through improved legal certainty. This promotes the granting of credit for the acquisition of more modern and thus more fuel-efficient aircraft.

14 CFR 49.61 designates the FAA Civil Aviation Registry (the FAA Aircraft Registry) as the entry point for authorizing the transmission of information affecting an interest in certain types of eligible U.S. registered aircraft, helicopters and aircraft engines to the International Registry. The information collected is necessary to obtain an authorization code for transmission of interests to the International Registry. The International Registry is an electronic registry system that works in tandem with the current system operated by the FAA Aircraft Registry for the United States.

To transmit interests to the International Registry, interested parties (referred to as “Respondents”) must file a completed FAA Entry Point Filing Form for the International Registry, AC Form 8050-135 with the FAA Aircraft Registry. Upon receipt of the completed form, the FAA Aircraft Registry verifies the accuracy of the submitted data and issues a unique authorization code. The submitter then uses that authorization code to enter their interest into the International Registry.

*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 The Act, 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.**

Respondents wishing to register an interest in certain U.S. aircraft and eligible aircraft equipment must do so through the International Registry, which is operated by Aviareto, a joint-venture between SITA SC and the Irish Government. However, under the Treaty and FAA’s implementing regulations, the FAA is responsible for reviewing the information provided for completeness and accuracy. The purpose of this information collection is to allow the FAA to authenticate a claim. Once the FAA assesses the form for completeness and accuracy, the FAA provides the respondent with an authorization code that accompanies the transmission of information to the International Registry. Responding to this collection is mandatory in order to obtain an authorization code; however, submitting the information to the International Registry is voluntary. Respondents are typically financial or leasing institutions but could be individuals or companies.

**Today**, the FAA Aircraft Registry scans the original paper form to store an image file in the digital administrative records, and enters the party name(s), collateral description(s), and the authorization code into the existing database for recordkeeping. Interested parties may access or request a copy of the completed AC Form 8050-135 by submitting a written request pertaining to a particular authorization code.

**In the Fall/Winter of 2022**, CARES will streamline the way this form is 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 authorization code, 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 users to help streamline processing of the public users’ request. 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 3<sup>rd</sup> 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 AC Form 8050-135 is available for download via the FAA Forms website at [https://www.faa.gov/licenses\\_certificates/aircraft\\_certification/aircraft\\_registry/aircraft\\_regn\\_forms/](https://www.faa.gov/licenses_certificates/aircraft_certification/aircraft_registry/aircraft_regn_forms/). The completed form must be hand delivered or mailed to the FAA Registry in conjunction with a recordable security agreement or lease. The security agreement or lease must meet the recording requirements of 14 CFR Part 49. If the security agreement or lease is digitally signed, then the forms may be submitted as an email attachment addressed to: [9-avs-ar-electronic-submittals@faa.gov](mailto:9-avs-ar-electronic-submittals@faa.gov). An AC Form 8050-135 filed for a prospective interest only (i.e. no security agreement or lease is filed with it) may be submitted by fax or as an email attachment addressed to: [9-avs-ar-electronic-submittals@faa.gov](mailto:9-avs-ar-electronic-submittals@faa.gov).

FAA Aircraft Registry personnel undergo a manual process to issue an authorization code to the respondent. Upon receipt of a completed AC Form 8050-135, FAA Aircraft Registry personnel review the provided information for completeness and authenticity. Once deemed adequate, FAA personnel retrieve an available authorization code from the Registry Modernization System (RMS) database, which is then imprinted on the original AC Form 8050-135 through the use of a specialized printer. Then, FAA personnel print and retain a hardcopy of the original AC 8050-135 form, and return the original copy to the respondent. The information supplied on the retained form is hand-typed into the RMS database and the hardcopy form is scanned as an image file for storage and future access. The saved data and corresponding image files are retrievable by anyone with access to RMS by entering either the authorization code, name, registration number, or serial number pertaining to the inquiry. The FAA Aircraft Registry maintains control of all assigned unique authorization codes pertaining to each corresponding AC Form 8050-135 request.

In the event the public user would like to access the FAA Aircraft Registry system or review processing status, they must physically visit the FAA 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 FAA Aircraft Registry processor. This web-based portal will streamline the manner in which the form information is populated and submitted to the FAA 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 form information is provided by the public user to the FAA Aircraft Registry office for review.

**FAA 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, referred to as 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 the cases where the public user opts to mail paper-based forms to the 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.**

The FAA Aircraft Registry is the exclusive U.S. entry point to obtain an authorization code for transmissions to the International Registry. There is no duplication of records or recordkeeping.

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

We have reduced the respondent burden to a minimum. The procedures and information needed to obtain an authorization code 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.**

The frequency of the collection is determined by the respondent. Without this collection respondents would not be able to record their interest in certain types of mobile equipment on the International Register.

**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. The frequency of this information collection is determined by the Respondent. The collection is based on the need to record an interest in certain types of mobile equipment, which usually doesn't occur more than once yearly, possibly less frequently. The FAA Aircraft Registry collects the party name, address, and telephone number, a description of the affected mobile equipment, the type of interest and the submitter's information if different from the interested party, on the AC Form 8050-135. Respondents are only required to submit one copy of the form but may retain a copy for their records.

**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 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.

Throughout the drafting of the changes to 14 CFR Parts 47 and 49, the changes to 49 U.S.C. Chapter 441, and the creation of the AC Form 8050-135, the FAA Civil Aviation Registry, working with the Aeronautical Center Counsel, consulted interested persons outside the agency. An interested group of attorneys and lawyers, the U.S. State Department, and a representative of the Export-Import Bank to name a few, were key to making these changes.

**9. Explain any decisions to provide any 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 promise 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.**

Most companies that file these types of security agreements are law firms and financial institutions. A technical level person (Paralegal/Legal Assistant) usually completes the form and submits it to the FAA Aircraft Registry for review. Statistical data collected from FY20 was used to calculate the annualized costs. There were 14,360 filings during FY20. The time per response is 0.5 hours. A Paralegal/Legal Assistant mean hourly wage of \$27.03 was taken from the Bureau of Labor Statistics, U.S. Department of Labor, *Occupational Outlook Handbook*<sup>1</sup> was used to estimate the annualized cost. Using BLS's Employer Costs for Employee Compensation memo released September 16, 2021<sup>2</sup>, the FAA calculated the mean hourly wage, plus benefits, for a Paralegal/Legal Assistant to be \$39.17 (\$27.03 + \$12.14). The total estimated annual cost burden to respondents is 7,180 X \$39.17 for a total annual cost of \$281,240.60.

Summary (Annual numbers)	Reportin g	Recordkeepin g	Disclosur e
<b># of Respondents</b>	14,360		
<b># of Responses per respondent</b>	1		
<b>Time per Response</b>	0.5		
<b>Total # of responses</b>	14,360		
<b>Total burden (hours)</b>	7,180		

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

There are no additional costs.

**14. Provide estimates of annualized cost 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.**

<sup>1</sup> <https://www.bls.gov/ooh/legal/paralegals-and-legal-assistants.htm>

<sup>2</sup> [Employer Costs for Employee Compensation - June 2021 \(bls.gov\)](https://www.bls.gov/news.release/comp21.pdf)

The estimated annualized cost burden for the Federal Government is \$187,092.77. The FAA Registry staffs its Cashier's section with full-time employees who, with part of their time, support the FAA Registry's responsibility as the portal to the International Registry both in issuing the code and QA processing of completed work packets. In addition, a very small amount of the Cashier's section supervisor's time is required for this function. Contractors perform the preparation, indexing and scan functions. Copier, printer, and computer equipment are required for performing the process. We use a five-year life cycle for equipment in calculating the annualized equipment cost for the government. The copier requires an annual maintenance contract/agreement. Copier paper and printer ribbon are the only additional supplies the FAA Registry anticipates requiring to support this function. The FAA Registry mainframe computer usage is costed at \$2.29 per unit. This figure is based on calculations used in the development and submission of user fees. A unit is loosely defined as a transaction between the FAA Registry and the mainframe. Each time the FAA Registry communicates with the mainframe a transaction occurs. There were 14,360 filings for FY20 and only the indexing and QA functions will require accessing the computer network mainframe.

	Driving Item Count		Qty per Item	Unit		Rate	Cost	Annual Cost
<b>Personnel</b>								<b>\$61,602.56</b>
Cashier Supervisor	6	Actions	0.250	Hrs	@	\$43.86	\$65.79	
Legal Assistant IR	14,360	Form Packets	0.083	Hrs	@	\$26.51	\$31,596.74	
Legal Assistant QA	14,360	Form Packets	0.083	Hrs	@	\$25.12	\$29,940.03	
<b>Contract Personnel Time Required</b>								<b>\$51,832.70</b>
Prep	14,360	Form Packets	0.020	Hrs	@	\$26.14	\$7,507.41	
Index	14,360	Form Packets	0.083	Hrs	@	\$26.14	\$31,155.74	
Scan	14,360	Form Packets	0.015	Hrs	@	\$20.38	\$4,389.85	
Store	14,360	Form Packets	0.015	Hrs	@	\$20.38	\$4,389.85	
Dispose	14,360	Form Packets	0.015	Hrs	@	\$20.38	\$4,389.85	
<b>Supplies</b>								<b>\$6,322.71</b>
Portfolio Folders	14,360	Form Packets	1.000	Each	@	\$0.3836	\$5,508.50	
Blue Paper	14,360	Form Packets	1.000	Sheet	@	\$0.0324	\$465.26	
White Paper	14,360	Form Packets	3.000	Sheet	@	\$0.0081	\$348.95	
<b>Computer Time</b>								<b>\$65,768.80</b>
Index	14,360	Form Packets	1.000	Unit	@	\$2.29	\$32,884.40	
QA	14,360	Form Packets	1.000	Unit	@	\$2.29	\$32,884.40	



0	Packets	0
<b>Equipment and Maintenance</b>		<b>\$1,566.00</b>
Copier Purchase & Maintenance	\$7500/5 yrs      Used for IR 100%	\$750.00
Gov't Computer	\$1200/5 yrs	\$240.00
Printer	\$2882/5 yrs	\$576.00
		<b>Total Annual Cost</b>
		<b>\$187,092.77</b>

**15. Explain 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.