

Supporting Statement A
Aviation Maintenance Technician Schools
OMB 2120-0040

Summary of Changes:

The existing information collection (IC) for 14 CFR part 147 is being revised as a result of a congressional mandate in Public Law 116-260, effective December 27, 2020. The law mandates publication of a 14 CFR part 147 interim final rule, which results in removed, changed, and new burdens from that reported in the last IC. Overall, there is a decrease in the burden to the public as a result of these changes.

On May 24, 2022, the FAA published the part 147 interim final rule in the Federal Register (87 FR 31391). The new part 147 regulations will be effective on September 21, 2022. Approval of this revised ICR by 9/21/2022 is requested to ensure the effectiveness of the new regulations.

The collection instrument, FAA Form 8310-6, Aviation Maintenance Technician School Certificate and Ratings Application, is also revised to reflect the new and changed requirements under 14 CFR part 147.

1. Circumstances that make the collection of information necessary.

49 U.S.C. 44701, *General requirements*, provides the general authority of the Administrator to prescribe regulations and minimum standards in the interest of safety for inspecting, servicing, and overhauling aircraft, engines, propellers, and appliances, including for other practices, methods, and procedures necessary for safety in air commerce.

49 U.S.C. 44702, *Issuance of certificates*, provides the authority of the Administrator to issue air agency certificates.

49 U.S.C. 44707, *Examining and rating air agencies*, empowers the Administrator of the Federal Aviation Administration (FAA) to examine and rate air agencies.

Section 135 of the Aircraft Certification, Safety, and Accountability Act (the Act), in Pub. L. 116-260, the Consolidated Appropriations Act, 2021 (134 Stat. 1182). Section 135, *Promoting Aviation Regulations for Technical Training*, provides the requirements and terms of 14 CFR part 147.

14 CFR part 147, *Aviation Maintenance Technician Schools*, implements the provisions of the sections of the Act referenced above by prescribing the requirements for issuing aviation maintenance technician school (AMTS) certificates and associated ratings and the general operating rules for the holders of those certificates and ratings. Specifically, part 147 imposes information collection burden on the public in the following sections:

Section 147.5, Application requirements. Applicants for a part 147 air agency certificate must complete an application form and provide the FAA with evidence of meeting all of the requirements of part 147. Application is made using **FAA Form 8310-6, Aviation Maintenance Technician School Certificate and Ratings Application**. Application requirements include:

- Section 147.5 (b)(1) through (b)(3) requirements for descriptions of the facilities, equipment, and materials used at each location, basis of curriculum, and instructor requirements;
- Section 147.5 (b)(4) requirement to submit any additional information necessary to demonstrate compliance with the requirements of part 147, which include:
 - o Section 147.17 Training requirements, requires the school to establish a curriculum aligned with the mechanic airman certification standards that meets the passing rate

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requirements and ensures students are prepared to take the requisite tests for a mechanic certificate and rating(s);

- o Section 147.19 Instructor requirements, requires the school to have instructors who are either FAA-certificated mechanics, or are otherwise specifically qualified;
- o Section 147.23 Quality control system, requires the school to either be accredited within the meaning of **20 U.S.C. §1001(a)(5)**, or have a quality control (QC) system approved by the FAA.

Section 147.15, Training provided at another location. The AMTS must notify the FAA of locations that the school will conduct training, in addition to the school's primary location.

Section 147.17, Training requirements. The AMTS must establish, maintain, and utilize a curriculum designed to continually align with mechanic airman certification standards as appropriate for the ratings held.

Section 147.21, Certificate of completion. The AMTS must issue documentation that shows when a student graduated from the curriculum required by § 147.17.

Section 147.23, Quality control system. An AMTS must either be accredited within the meaning of 20 U.S.C. 1001(a)(5) or have a quality control system approved by the FAA that provides for certain procedures listed in paragraph (b) of the section.

Section 147.31, Early testing. An AMTS may issue an authenticated document when a student satisfactorily completes only the General course content of a school's curriculum.

2. How, by whom, and for what purpose the information is to be used.

The respondents to this collection are current part 147 certificated AMTSs and applicants for a part 147 air agency certificate. Responding to the collection is required to obtain and/or retain a benefit.

The collection includes both reporting and recordkeeping requirements.

- Certain part 147 requirements involve reporting to the FAA at the time of application for an FAA air agency certificate. Other reporting requirements occur occasionally after certification, for example, when the certificate holder's operations change. Schools must issue graduation and/or completion documentation based on the graduation or curriculum completion schedule of the school.
- AMTS who are not accredited by an accrediting agency recognized by the Department of Education have recordkeeping requirements related to an FAA-approved QC system.

The information collected is provided to the certificate holder/applicant's appropriate FAA Flight Standards office in order for the FAA to determine compliance with the part 147 requirements for obtaining and/or retaining an FAA air agency certificate. For part 147 applicants, when all part 147 requirements have been met, an FAA air agency certificate with the appropriate ratings is issued. For certificated part 147 certificate holders, the FAA uses the information collected to (1) verify that the AMTS operates in accordance with their certificate and operations specifications, as required by § 147.3, (2) determine if the AMTS provides appropriate training as required by part 147, and (3) ensure that AMTS graduates receive appropriate documentation showing the graduate is eligible to take the FAA tests required to obtain a mechanic certificate, pursuant to part 65.

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3. Extent of automated information collection.

AMTS applicants initiate the part 147 certification process through an FAA form. AMTS certificate holders and/or applicants may submit the information described in this collection, including FAA Form 8310-6, *Aviation Maintenance Technician School Certificate and Ratings Application*, either electronically via e-mail or through a paper submission. Required application attachments may also be submitted electronically or using paper submissions, depending on the applicant's capabilities. A certificated AMTS typically uses paper and/or electronic submissions at their discretion.

FAA Form 8310-6 is available in electronic format from www.faa.gov/forms, and may be filled and signed electronically, as well as downloaded and printed, and filled and signed with pen-and-ink.

The results of the information collection will not be made available to the public over the internet.

4. Efforts to identify duplication.

We have reviewed the other FAA public use reports and find no duplication. We know of no other agency collecting information about part 147 or AMTS.

5. Methods used to minimize burden to small businesses.

The reporting and recordkeeping requirements described in this collection are the minimum necessary to ensure effective compliance with part 147. Most AMTS would be considered a small business/entity and most reporting requirements would not vary based on a schools size. Burden could vary in the following areas related to a schools size:

- Section 147.15, Training provided at another location. Adding training locations, in addition to the school primary location, is optional. However, all additional locations must be listed in the schools operations specifications, thus resulting in a reporting burden proportional to the number of additional locations being requested.
- Section 147.17, Training requirements. The AMTS must establish, maintain, and utilize a curriculum designed to continually align with mechanic airman certification standards as appropriate for the ratings held. Some schools may choose to implement additional curriculum content and/or school-specific requirements that are not necessarily required by the mechanic airman certification standards. These additions may be proportional to the size of the school and/or number of additional locations, and may cause additional burden, albeit, not required by the FAA.
- Section 147.21, Certificate of completion. The AMTS must issue documentation that shows when a student graduated from the part 147. Schools with less graduates would have a proportionally smaller documentation requirement than schools with more graduates.

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- Section 147.23, Quality control system. An AMTS, regardless of its size, has the option to either be accredited or to have a quality control system approved by the FAA. Schools who choose to implement a quality control system in lieu of accreditation may encounter a reporting burden that is proportional to the size of their school. For example, schools with larger student populations may require more reportable procedures for recordkeeping or graduation documentation.
- Section 147.31, Early testing. An AMTS may issue an authenticated document when a student satisfactorily completes only the General course content of a school's curriculum. Schools are not required to issue the documentation; however, if not issued, the school's students cannot exercise the early testing provision of § 65.77.

6. Impact of no, or less frequent, collection.

If the information described in this collection is not collected, the FAA would not be able to ensure that applicants or certificate holders meet the requirements of 14 CFR part 147, which enables the FAA to issue an air agency certificate, and to verify continued compliance with part 147 after issuance. Part 147 ensures that graduates from AMTS certificated under part 147 have the knowledge and skills necessary to be prepared to test for a mechanic certificate under part 65. If certificate holders did not meet part 147 requirements, then mechanic applicants may be testing for a mechanic certificate when they do not have the appropriate knowledge and skills.

The reporting information is only collected during application and if/when the certificate holder changes certain information that is required to be in the school's FAA-issued operations specifications, as an AMTS is required to operate in compliance with their operations specifications, pursuant to § 147.3. If the information is collected less frequently, the FAA would not be able to ensure that applicants or certificate holders meet the requirements of part 147 initially and when certain changes occur, relevant to the school's operations specifications.

Part 147 requires an AMTS to either be accredited by pursuant to 20 U.S.C. 1001(a)(5) or establish and maintain a quality control system. Should an AMTS comply with this provision by accreditation, the FAA must collect such information to ensure continual accreditation. Should an AMTS choose to establish and maintain a quality control system, the QC system must provide procedures for recordkeeping. However, the FAA does not impose specific recordkeeping methods or practices for such a quality control system. While an AMTS is free to define recordkeeping procedures that work for the AMTS, the applicant/certificate holder must describe its recordkeeping procedures in the quality control system. If a school did not describe its recordkeeping procedures, the school would not be maintaining evidence that graduates of the school completed the curriculum requirements and were thereby eligible to test for a mechanic certificate under part 65.

7. Special circumstances.

There are no special circumstances related to this information collection.

The information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2)(i)-(viii).

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8. Information on the PRA Federal Register Notice and public comments.

A 60-day Federal Register Notice was published in the Federal Register on March 15, 2022 (87 FR 14610). Comments were due by May 16, 2022. No comments were received.

A 30-day Federal Register Notice was published in the Federal Register on May 24, 2022 (87 FR 31604). Comments are due by June 23, 2022.

Additionally, the part 147 interim final rule was published in the Federal Register on May 24, 2022 (87 FR 31391). In the interim final rule, the FAA encourages persons to submit written comments containing relevant information, data, or views. The FAA also invites comments relating to the economic, environmental, energy, or federalism impacts that might result from adopting this final rule. Section IV, paragraph E. Paperwork Reduction Act, of the interim final rule, describes the paperwork burden to AMTS applicants and certificate holders as a result of the changed regulations. Comments are due by June 23, 2022.

9. Payments or gifts to respondents.

No gifts or payments are provided to respondents.

10. Assurance of confidentiality.

Respondents are not given an assurance of confidentiality.

11. Justification for collection of sensitive information.

This information collection does not collect information of a sensitive nature.

12. Estimates of the hour burden of the collection of information.

The new part 147 regulations results in the following:

- relocation of certain existing burden to new regulations within part 147,
- removal of some previously existing burden, and
- new burden.

In most cases, the burden of the new part 147 cannot be directly compared with the burden estimated under the previous part 147 requirements because the regulatory requirements changed overall. However, where applicable, discussion relative to changes from the previously reported burden is included in Question 15. Ultimately, respondent burden is decreased under the new regulatory requirements.

The part 147 interim final rule results in a total annual burden to respondents of **11,428** hours and **\$708,347**. The FAA estimates that 596 responses are made annually resulting in an average time per response of 19 hours.

Total Part 147	Responses	Hour Burden (hours)	Cost Burden
Reporting	595	11,118	\$696,043
Recordkeeping	1	310	\$12,304
Total	596	11,428	\$708,347

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Application (§147.5) Reporting Burden

Under § 147.5, Application requirements, an AMTS applicant must make application to the FAA on FAA Form 8310-6. See attachment, “**Form 8310-6 Details of IC,**” for details on the specific data collected on the form. Additionally, an applicant must provide the following descriptions for inclusion in the AMTS operations specifications:

- Under § 147.5(b)(1), a school must describe its facilities, including the physical address of the applicant’s primary location for operation of the school and any additional fixed training locations, and the equipment and materials to be used at each location;
- Under § 147.5(b)(2), a school must describe the manner in which the school’s curriculum will ensure the student has the knowledge and skills necessary for attaining a mechanic certificate and associated ratings under subpart D of part 65. When the school revises the description, it must provide the changed information to the FAA for inclusion in the AMTS operations specifications;
- Under § 147.5(b)(3), a school must describe the manner in which the school will ensure it provides the necessary qualified instructors to meet the requirements of § 147.19.
- Under § 147.5(b)(4), a school must provide any additional information necessary to demonstrate compliance with the requirements of part 147.

Following certification, if the certificated AMTS makes changes to the descriptions it provided during certification, the school must provide those descriptions to the FAA to update the AMTS operations specifications.¹ During application, there are additional attachments that would need to be submitted to the FAA, as required by § 147.5(b)(4) (e.g., accreditation documentation or quality control system information); however, the burden estimates for those items, to include burden at initial application, are calculated under the applicable regulatory requirement in the additional tables below.

The FAA estimates that time to fill out the application takes approximately 1 hour. Additionally, the FAA estimates that the time to gather and/or develop the application attachments will take each applicant between 20 and 80 hours, depending on the purpose of the application.

¹ Section 147.3 states that no person may operate an AMTS without, or in violation of, the issued AMTS certificate and the operations specifications. The FAA provides an AMTS with operations specifications based on their application and any subsequent amendments. Therefore, the AMTS must provide any changes to the FAA to update an AMTS’s operations specifications and ensure compliance with § 147.3.

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The FAA estimates the respondent burden related to the new § 147.5 requirements to be **210** hours and **\$16,884**.

147.5	147.5 Initial/Revise application FAA Form 8310-6	147.5(b)(1) Facilities, Equipment, Materials	147.5(b)(2) Curriculum basis	147.5 (b)(3) Instructor requirements	Total
# of Respondents	15				15
Responses per respondent	1	1	1	1	--
Total # of Responses	15				15
Time per Response	1	6	6	1	14
Hour Burden (hours)	15	90	90	15	210
Cost/Hour	80.40	80.40	80.40	80.40	--
Cost Burden (\$)	1,206	7,236	7,236	1,206	16,884

Training provided at another location (§147.15) Reporting Burden

In addition to a school's primary location, an AMTS has the option of providing training at fixed locations other than the school's primary location. Schools must notify the FAA in order to have the additional location provided in the operations specifications. The option to add additional training locations is a new provision implemented by the interim final rule.

The FAA estimates the new § 147.15 provision will result in an annual burden to schools of **250** hours and an annual cost of **\$17,334**.

§ 147.15 Training at Another Location	Director	Admin	Totals
# of Respondents (annually)	25		25
Responses per respondent (annually)	1		--
Total # of Responses (Annually)	25		25
Time per Response (hours)	8	2	10
Hour Burden (hours)	200	50	250
Cost/Hour (\$)	80.40	25.10	--
Cost Burden (\$)	16,079	1,255	17,334

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Training requirements (§ 147.17) Reporting Burden

AMTS must establish, utilize, and maintain a curriculum that is designed to continually align with the Mechanic Airman Certification Standards (ACS). The school must develop an initial curriculum during the certification process. The FAA estimates 10 initial certification projects occur each year. After certification, the school must revise the curriculum to ensure it continually aligns with the Mechanic ACS. The FAA expects the ACS to be revised once every 3 years, therefore, on an annual basis, there will be 61 curriculum revisions.

The FAA estimates the new § 147.17 provision will result in an annual burden to schools of **3,232** hours and an annual cost of **\$200,596**.

147.17 Curriculum	Initial Curriculum			Curriculum Revision			Total Burden
	Director	Instructor	Admin	Director	Instructor	Admin	
Job Classification							
# of Respondents (annually)	10			61			71
Responses per respondent (annually)	1			1			1
Total # of Responses (Annually)	10			61			71
Time per Response (hours)	90	75	24	16	4	2	45.5
Hour Burden (hours)	900	750	240	976	244	122	3232
Cost/Hour (\$)	80.40	40.93	25.10	80.40	40.93	25.10	--
Cost Burden (\$)	72,357	30,698	6,024	78,468	9,987	3,062	200,596

Graduation/Completion Documentation (§ 147.21) (Reporting Burden)

Under § 147.21, each AMTS must provide an authenticated document to each graduating student.

The FAA estimates that each school spends 24 hours issuing graduation certificates, each year. This results in a total respondent burden of **4,368** hours and **\$270,671**.

New 147.21 Graduation Documentation	Graduation Documentation		Total Burden
	Director	Admin	
Job Classification			
# of Respondents (annually)	182		182
Responses per respondent (annually)	1		--
Total # of Responses (Annually)	182		182
Time per Response (hours)	16	8	24
Hour Burden (hours)	2912	1456	4368
Cost/Hour (\$)	80.40	25.10	--
Cost Burden (\$)	234,125	36,546	270,671

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QC System – Accreditation (§ 147.23)

Under the new part § 147.23 quality control (QC) system requirements, AMTS who are accredited by an accrediting agency recognized by the Department of Education, have no additional quality control system requirements imposed by the FAA, other than being able to demonstrate the school is appropriately accredited.

The FAA estimates that 181 AMTS will submit evidence of accreditation at initial certification and annually after certification resulting in a burden of **18 hours** and **\$1,447**.

147.23 - QC System	Accreditation Evidence
Job Classification	Director
# of Respondents (annually)	181
Responses per respondent (annually)	1
Total # of Responses (annually)	181
Time per Response (hours)	0.1 (approx.5 minutes)
Reporting Burden (hours)	18
Cost/Hour (\$)	80.40
Reporting Cost Burden (\$)	1,447

QC System – FAA Approved QC System (§147.23) – Reporting & Recordkeeping

Under the new part § 147.23 quality control (QC) system requirements, AMTS who are not accredited as described in § 147.23 must obtain FAA approval of the AMTS QC system. The QC system must include procedures on recordkeeping, among other requirements. Thus, the requirements of new part § 147.23 impose both a reporting burden and a recordkeeping burden on the small number of AMTS applicants who are not accredited institutions.

The FAA estimates that only one of the currently certificated 182 AMTS are not accredited and must request approval of its quality control system from the FAA. Overall burden (reporting and recordkeeping) on these respondents is 470 hours and \$22,942 annually.

FAA-Approved QC System Reporting Burden

The FAA estimates that annually, 1 AMTS must develop a QC system for FAA approval, and that once per year the AMTS will revise its QC system procedures, resulting in 2 responses per year.

The FAA estimates the reporting burden to respondents in obtaining and maintaining a FAA-approved QC system is **150 hours** and **\$10,654** annually.

FAA-Approved QC System- Reporting	Initial/Revised QC System			Total Burden
	Director	Instructor	Admin	
Job Classification				
# of Respondents (annually)	1			1
Responses per respondent (annually)	2			2
Total # of Responses (annually)	2			2
Time per Response (hours)	60	8	7	75
Reporting Burden (hours)	120	16	14	150
Cost/Hour (\$)	80.40	40.93	25.10	--
Reporting Cost Burden (\$)	9648	655	351	10,654

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FAA-Approved QC System Recordkeeping Burden

The FAA estimates that one AMTS will have recordkeeping burden related to its FAA-approved QC system, annually.

The FAA estimates the recordkeeping burden to respondents for recordkeeping requirements prescribed by the FAA-Approved QC system is **320 hours** and **\$12,304**.

FAA-Approved QC System - Recordkeeping	School Records	Student Records		Total Burden
	Director	Instructor	Admin	
Job classification				
# of Respondents (annually)	1	1		1
Responses per respondent (annually)	1	1		1
Total # of Responses (Annually)	1	1		1
Time per Response (hours)	20	200	100	320
Hour Burden (hours)	20	200	100	320
Cost/Hour (\$)	80.40	40.93	25.10	--
Cost Burden (\$)	1,608	8,186	2,510	12,304

Early testing (§ 147.31) Reporting Burden

The FAA estimates that 120 of the currently certificated 182 schools will use the option to issue documentation to students showing completion of the General curriculum, as permitted by § 147.31. Similar to graduation certificates issued under § 147.21, the FAA estimates each school will spend 24 hours annually issuing the required documentation, resulting in a burden of **2880 hours** and **\$178,457**.

Section 147.31, Early testing certificate	Issue completion document for General curriculum		Total Burden
	Director	Admin	
Job classification			
# of Respondents (annually)	120		120
Responses per respondent (annually)	1		1
Total # of Responses (Annually)	120		120
Time per Response (hours)	16	8	24
Hour Burden (hours)	1920	960	2880
Cost/Hour (\$)	80.40	25.10	--
Cost Burden (\$)	154,363	24,095	178,457

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AMTS Labor Cost Estimates

Businesses affected by this rule would be classified using the 2020 North American Industry Classification System under NAICS code² 611500 “Technical and Trade Schools”.³ This U.S. industry comprises establishments primarily engaged in offering job or career vocational or technical courses. The major occupation codes for AMTS directors, instructors, and administrative assistant under the 611500 NAICS code are 11-1000, 25-1194, and 43-6014, respectively. The FAA believes that these occupation codes are the appropriate codes to estimate the salaries of AMTS employees. The BLS survey lists an annual mean wage for each of these occupation codes.

AMTS Base Salaries		
Job Category	Occupation Code	Annual Mean Wage
Director	11-1000	\$117,560
Instructor	25-1194	\$59,850
Administrative Assistant	43-6014	\$36,700
Source: May 2020 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 611500 - Technical and Trade Schools. https://www.bls.gov/oes/current/naics4_611500.htm		

The FAA starts with the base salaries for the director, instructor, and administrative assistant. The FAA then applies the appropriate multipliers for overhead (this includes health benefits, vacation, sick time, etc.). For private positions, we add a benefit overhead of 42.25%, which is based on the percent of total compensation for transportation employees.⁴

AMTS Salaries including Overhead			
Job Category	Director	Instructor	Administrative Assistant
Annual Base salary	\$117,560	\$59,850	\$36,700
Overhead benefit multiplier	1.4225	1.4225	1.4225
Salary including overhead	\$167,226	\$85,135	\$52,205
Hourly Wage	\$80.40	\$40.93	\$25.10

13. Estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.

There are no additional startup costs not already covered in question 12.

² The NAICS code is the standard used by Federal statistical agencies in classifying business establishments for the purpose of collecting, analyzing, and publishing statistical data related to the U.S. business economy.

³ U.S. Bureau of Labor Statistics, NAICS 611500 - Technical and Trade Schools
https://www.bls.gov/oes/current/naics4_611500.htm.

⁴ Percent of total compensation = 29.7%. Source: <https://www.bls.gov/news.release/pdf/ecec.pdf>.

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14. Estimates of annualized costs to the Federal government.

The estimated annual burden on the FAA is **2,360 hours** and **\$193,713**.

FAA Burden	§ 147.5 Application	§ 147.15 Additional Locations	§ 147.17 Training/ Curriculum	§147.23 QC System	§ 147.25 Passage Rate	Total FAA Burden
# of Respondents (annually)	15	25	71	182	1	114
Responses per respondent (annually)	1	1	1	1	4	--
Total # of responses (annually)	15	25	71	182	4	117
Time per Response (hours)	8	4	16	2	160	--
Hour Burden (hours)	120	100	1136	364	640	2360
Cost/Hour (\$)	90.06	90.06	90.06	90.06	60.64	--
Cost Burden (\$)	10,807	9,006	102,306	32,781	38,813	193,713

Application requirements (§ 147.5)

The FAA estimates that it reviews 15 initial and amended applications annually, spending an average of 8 hours per review. This results in an estimated burden of 120 hours and \$10,807 annually. Under § 147.5, an FAA inspector must:

- Review each applicant's application form, FAA Form 8310-6, whether submitted for initial certification or for amendment of a certificate;
- Review and enter the required descriptions for facilities, equipment, materials, curriculum basis, and instructor requirements into the AMTS operations specifications;
- Review the attachments to the application to ensure the applicant demonstrates compliance with part 147 requirements.

Training provided at another location (§ 147.15)

Under § 147.15, the FAA estimates a burden of 100 hours and \$9,006 annually. The FAA estimates that it will receive 25 requests each year for additional training locations and spend 4 hours reviewing each request. Upon AMTS notification of an additional training location, the FAA must determine the location meets part 147 requirements, and then an FAA inspector must enter the AMTS additional training locations into AMTS operations specifications.

Training requirements (§ 147.17)

Under § 147.17, the FAA estimates a burden of 1136 hours and \$102,306 annually. The FAA estimates that each certificated AMTS would revise its curriculum every 3 years to align with the revision schedule of the Mechanic ACS. The FAA must review the AMTS curriculum during certification to ensure it aligns with the Mechanic ACS as required by 147.17(a), at an estimated 16 hours per review. These reviews are conducted by an FAA inspector.

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Quality control system (§ 147.23)

Under § 147.23, the FAA estimates a burden of 364 hours and \$32,718 annually. The FAA must review and approve each non-accredited school's quality control system. The FAA estimates that there will be only 2 instances of either QC system initial approval review or revision review each year, taking 24 hours per review. Additionally, the FAA must verify each of the remaining 181 schools evidence of accreditation. The FAA estimates this will take 1 hour per school. Therefore, the average time spend reviewing AMTS requirements under § 147.23 is 2 hours per school. These tasks are completed by an FAA inspector.

Minimum passage rate (§ 147.25)

Under § 147.25, the FAA estimates a burden of 640 hours and \$38,813 annually. The FAA expects that 4 times per year it will produce a report on the minimum passage rate for each school. Time spent developing each report is estimated at 160 hours per report. The FAA must collect test results from the FAA mechanic written, oral, and practical tests, and then produce a report on those test results. The FAA must review each schools pass rate indicated on the report to ensure each schools compliance with the pass rate metric described in § 147.25. The collection and reporting are conducted by an FAA statistician.

For an explanation of changes in FAA burden from the previously reported IC, refer to question 15.

FAA Labor Cost Estimates

The FAA obtained the salary rates for FAA employees from the 2020 Core Compensation Plan Pay Bands (Excluding Locality Pay), effective January 5, 2020. The pay bands for principal inspectors and statisticians are shown in the table below. The FAA uses the mid-range salary for each of these positions.

FAA Base Salaries		
Job Category	Pay Band	Annual Mean Wage
Principal inspector	J	\$105,368
Statistician	H	\$70,954

Source: Core Compensation Plan Pay Bands, effective January 5, 2020.
https://employees.faa.gov/org/staffoffices/ahr/program_policies/policy_guidance/hr_policies/hrpm/comp/comp_ref/2020payadjustment/

The FAA starts with the base salaries for FAA principal inspectors and statisticians. Next, the FAA multiplies the base salaries by a locality multiplier. For instance, for the principal inspector and the statistician, the FAA assumes the affected position is in Washington, D.C. Therefore, the FAA uses the multiplier of 1.3048.⁵ The FAA then applies the appropriate multipliers for overhead (this includes health benefits, vacation, sick time, etc.). For federal positions, the standard is 36.25%.⁶

⁵https://employees.faa.gov/org/staffoffices/ahr/program_policies/policy_guidance/hr_policies/hrpm/comp/comp_ref/media/locality_pay_percentages.pdf

⁶ <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2008/m08-13.pdf>

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FAA Salaries including Overhead		
Job Category	Principal Inspector	Statistician
Pay band	J	H
Annual Base salary	\$105,368	\$70,954
Locality pay multiplier	1.3048	1.3048
Salary adjusted by locality pay	\$137,484	\$92,581
Overhead benefit multiplier	1.3625	1.3625
Salary including overhead	\$187,321	\$126,141
Hourly wage rate	\$90.06	\$60.64

15. Reasons for any program changes or adjustments.

Change Summary	Current IC	Previously Approved (2022)	Change
Annual Time Burden (hours)	11,428	64,025	-52,597 hours
Cost	\$708,347	\$2,532,123	-\$1,826,776

The following program changes were made:

- The current information collection request for 14 CFR part 147 is revised as a result of a congressional mandate in Public Law 116-260, effective December 27, 2020. The law mandates publication of a 14 CFR part 147 interim final rule which results in removed, changed, and new burdens from that reported in the last IC.
- The interim final rule reorganized and renamed provisions of part 147 to the extent that new information collection instruments cannot accurately be compared directly to previous information collection instruments.

Overall, the FAA estimates there is an hours reduction, and a cost savings as a result of the new regulation when compared to the previous IC request.

- The FAA estimates that only one AMTS will have FAA mandated recordkeeping costs, compared to all schools under the previous approval. This is the largest impact on overall paperwork burden reduction estimates for respondents.⁷
- Reporting requirements (i.e. number of responses) have increased primarily due to new provisions in part 147 such as additional training locations (§ 147.15) and early testing (§ 147.31), and the curriculum revision requirements of § 147.17.

⁷ Although part 147 does not impose recordkeeping requirements on AMTS other than through an FAA-approved QC system, an accredited school's accrediting organization may impose recordkeeping, or other requirements, on the school that are not mandated by the regulation/FAA. Burden that is not mandated by the FAA is not included in these estimates.

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The collection instrument, FAA Form 8310-6, *Aviation Maintenance Technician School Certificate and Ratings Application*, is revised to reflect the new and changed requirements under 14 CFR part 147. The burden associated with this application is reflected in § 147.5 burden estimates.

- Both initial applications and applications for an amended certificate are made on FAA Form 8310-6.
- See attachment “**Part 147 Form 8310-6 Details of IC**” for details on the specific data collected on the form.
- The estimated time spent completing this form has been revised from 40-80 hours to 15-80 hours. This estimate is based on the time it would take an applicant to complete the form and all required application attachments, to include curriculum development if applicable, that may be required to be submitted with the form. Required attachments can vary greatly depending on whether it is an initial application or an application for an amended certificate, and depend on the complexity of the applicant’s operations.

Changes to FAA Burden

The FAA estimates it will spend approximately **342 hours** more and **\$21,388** more in paperwork burden as a result of the new part 147 requirements. The following tables reflects the CHANGES in hours and cost burden from what was estimated in the previously approved IC.

Change Summary	Current IC	Previously Approved (2022)	Change
Annual Time Burden (hours)	2,360	2,018	342
Cost	\$193,713	\$172,325	\$21,388

Changes to FAA burden as a result of the interim final rule include:

- Section 147.5 Application requirements. Under new § 147.5, applicants have less information to submit to the FAA resulting in less FAA time spent reviewing initial and amended applications and attachments.
- Section 147.15 Training provided at another location. Because this is a new regulation in the in part 147 interim final rule, burden related to additional training locations has increased FAA burden estimates.
- Section 147.17 Training requirements. Under new § 147.17, the FAA will spend more time reviewing AMTS curriculum to ensure their alignment with the Mechanic ACS, which is estimated to be revised approximately every 3 years. Prior to the interim final rule, an AMTS’s curriculum was revised at the discretion of the AMTS.
- Section 147.23 Quality control system. Under the requirements of the new rule, more FAA time will be spent reviewing an AMTS QC system, however, only AMTS who are not accredited must submit a quality control system for FAA approval. Therefore, the estimates show less overall FAA time spent reviewing AMTS procedures compared to the previous approval.
- Section 147.25 Minimum passage rate. The FAA will spend more time collecting and reporting data for the new part 147 pass rate metric, as the metric includes data from all FAA mechanic tests (written, oral, and practical). Prior to the interim final rule part 147, the quality of instruction report only included written test data.

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16. For collections of information whose results will be published, outline plans for tabulation and publication.

No information collected from respondents is published.

The FAA collection of data related to minimum pass rates of each AMTS will be published quarterly on www.faa.gov.

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.

The FAA is not seeking approval to not display the date of expiration of this information collection.

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

There are no exceptions to the certification statement for this information collection.