

**Department of Transportation
Federal Aviation Administration**

**SUPPORTING STATEMENT
Pilot Records Improvement Act of 1996/Pilot Records Database
2120-0607**

INTRODUCTION

This information collection is submitted to the Office of Management and Budget (OMB) to request a three-year approval clearance for the information collection entitled Pilot Records Improvement Act of 1996/Pilot Records Database (OMB Control No. 2120-0607). This is a revision to an existing information collection (OMB Control No. 2120-0607). In response to Title 49 United States Code (49 U.S.C.) § 44703(h): Records of Employment of Pilot Applicants, the FAA will be collecting additional information beyond that specified in the previous information collection. The additional collections include the following:

- FAA Forms 8060-14 and -15 which are used for administrative functions related to use of the Pilot Records Database
- Web based collection instruments which allow reporting entities to provide records to the PRD such as training, final disciplinary actions, and other employment related records as required by part 111.

Part A. Justification

1. Circumstances that make collection of information necessary.

a. Title 49 United States Code (49 U.S.C.) § 44703(h): Records of Employment of Pilot Applicants, which was established by the Pilot Records Improvement Act of 1996 (PRIA), mandates that air carriers who have been issued a part 119 air carrier certificate and are authorized to conduct operations under Title 14 of the Code of Federal Regulations (14 CFR) part 121 or part 135 as well as part 125 and 135 operators, request and receive FAA records, air carrier and other operator records, and the National Driver Register records before allowing an individual to begin service as a pilot. Additionally, fractional ownerships operating in accordance with subpart K of part 91 are required to complete a pilot safety background check before allowing an individual to begin service as a pilot (reference § 91.1051). Furthermore, air tour operators operating in accordance with § 91.147 are required to obtain an individual's previous drug and/or alcohol testing records before allowing an individual to begin service as a pilot. All requestors are heretofore referred to as "operators."

b. Title 49 U.S.C. § 44703(h)(8) also requires the Administrator to promulgate standard forms for use by the air carrier in order to: request the records; inform the individual who is the subject of the request; obtain the individual's written consent; and, inform the individual of the individual right of that individual to receive a copy of any records furnished in response to the request. A summary of the PRIA/PRD form numbers, titles, and purpose is provided in Table 1.

c. Section 203 of the Airline Safety and Federal Aviation Administration Extension Act of 2010 (Pub. L. 111-216, 124 Stat. 2348) (the Act), codified at 49 United States Code 44703(i) require the FAA to establish an electronic pilot records database. The Act requires air carriers to access the database and evaluate any relevant records maintained therein pertaining to an individual before allowing that individual to begin service as a pilot. In addition, the database must be populated with records maintained by the FAA as well as records maintained by air carriers and other employers of pilots. At a minimum, air carriers and operators employing pilots must report “records that are generated by the air carrier or other person after [August 1, 2010]” as well as “records that the air carrier or other person [was] maintaining, on [August 1, 2010],” pursuant to § 44703(h)(4). In order to meet this mandate, the FAA developed a phased approach to implementing the PRD.

The FAA Extension, Safety, and Security Act of 2016 (Public Law 114-190), Section 2101 requires the FAA to establish the Pilot Records Database no later than April 30, 2017. Therefore, a subsequent phase of PRD was expedited and deployed prior to April 30, 2017 that included several enhancements and permits proxies to access the application on behalf of an air carrier. The final phase of PRD, the air carrier portion of the database, was implemented via rulemaking which was published in January 2021.

Table 1: Summary of PRIA/PRD Forms and other Data Collection Tools

FAA Form Number or identifier	FAA Form Title	Purpose
8060-11*	Air Carrier and Other Records Request	A hiring air carrier requests to receive a copy of the current and/or previous employer’s records on the consenting individual’s performance as a pilot.
8060-11A*	Airman Notice and Right to Receive Copy – Air Carrier and Other Records	An airman requests to receive a copy of the records provided by current and/or previous employer’s to a hiring air carrier in response to FAA Form 8060-11.
8060-12**	Authorization for Release of DOT Drug and Alcohol Testing Records Under PRIA and Maintained Under Title 49 of the Code of Federal Regulations (49 CFR) Part 40	A hiring air carrier requests to receive a copy of the current and/or previous employer’s records on the consenting individual’s drug and alcohol testing.
8060-13	National Driver Register Records Request (PRIA)	A hiring air carrier requests the National Driver Register to search state driving records on a consenting individual.

8060-14	Pilot Consent/Revocation for Air Carrier Access to Pilot Records Database	In cases where a pilot cannot access the Pilot Record Database themselves, the pilot may use this form to release their records to an air carrier via the PRD.
8060-15	PRD Pilot Record Dispute	This form is used by pilots to dispute non-FAA records found in the PRD when the pilot is unable to dispute the record themselves via the web site.
Web based collection instrument #1	Drug and Alcohol Records input form	A web page on the PRD web site which allows authorized users to enter Drug and Alcohol Records into the PRD.
Web based collection instrument #2	Training, Qualification, and Proficiency Records input form	A web page on the PRD web site which allows authorized users to enter Training, Qualification, and Proficiency Records into the PRD.
Web based collection instrument #3	Final Disciplinary Action Records input form	A web page on the PRD web site which allows authorized users to enter Final Disciplinary Action Records into the PRD.
Web based collection instrument #4	Verification of Motor Vehicle Driving Record Search and Evaluation input form	A web page on the PRD web site which allows authorized users to enter Verification of Motor Vehicle Driving Record Search and Evaluation into the PRD.
Web based collection instrument #5	Date of Hire input form	A web page on the PRD web site which allows authorized users to enter the Date of Hire into the PRD.
Web based collection instrument #6	Assignment to Duty Records input form	A web page on the PRD web site which allows authorized users to enter Assignment to Duty Records into the PRD. (optional)
Web based collection instrument #7	Separation of Employment Records input form	A web page on the PRD web site which allows authorized users to enter Separation of Employment Records into the PRD.
Web based collection instrument #8	Previous Employers input form	A web page on the PRD web site which allows pilots to enter their previous aviation employers into the PRD.

Web based collection instrument #9	MyAccess Registration input form	A web page on the MyAccess web site which allows users to register for a MyAccess account.
Web based collection instrument #10	Pilot Consent form	A web page on the PRD web site which allows pilots to grant consent to reviewing entities.

*Alternate form to be completed by the hiring air carrier before allowing an individual to begin service as a pilot if the records are not available via the PRD.

** Required form to be completed by the hiring air carrier before allowing an individual to begin service as a pilot.

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

What is the purpose of the collection and revisions since last submission?

With the exception of Form 8060-14 and -15, an operator utilizes the various 8060 series forms to report a request for the applicable records of all applicants for the position of pilot with their company as needed under PRIA. The information collected on these forms will be used only to facilitate search and retrieval of the requested records, and submission is mandatory until PRIA sunsets. Operators then “may use such records only to assess the qualification of the individual in deciding whether or not to hire the individual as a pilot.” (49 U.S.C. § 44703(h)(11)). Form 8060-14 is used by pilots who cannot access the PRD themselves in order to release records to an operator, and its use is voluntary until the FAA issues the PRD final rule. While the FAA expects most pilots will access the PRD web-based application themselves and release records to operators for review, there will be cases when pilots cannot access the PRD application. In those cases, the pilot will complete the Form 8060-14 and submit to the FAA. The form instructs the FAA to access the PRD on behalf of the pilot and release the records to the specified operator(s). The form may also be used to revoke consent to the records, and update the pilot’s employment history if needed. The information is collected on an as needed basis. The Form 8060-15 will also be used also used by pilots who cannot access the PRD themselves. This form allows a pilot to mark a record as disputed and to initiate the correction process for non-FAA forms. Information may also be reported by members of the aviation public to create a MyAccess registration and authenticate into the PRD.

The remaining “web-based” data collection tools are used by operators to enter various records into the PRD as required by part 111. Pilots also use the PRD web site to enter their previous aviation employers. The information entered is associated with a pilot, which is then made available to a hiring operator after the pilot grants consent allowing the records to be viewed. The hiring operator then uses the information to help them perform a comprehensive assessment of the pilot prior to making a hiring decision, as required by the Act.

This submission extends use of the previous collection instruments and adds new instruments needed to facilitate part 111 and the associate record collections as well as the various administrative functions.

Is the response mandatory?

Responding to this information request is mandatory as described in part 111 and the underlying statute for both PRIA and the PRD.

Who must respond to this collection?

The users of both PRIA and the PRD include pilots who hold commercial, airline transport, or remote pilot certificates; operators who have employed those pilots; and air carriers and operators who intend to hire those pilots. The following table shows which groups will be entering information using each collection instruments:

Collection Instrument	Pilots	Previous and current employers of pilots	Air carriers and operators intending to hire the pilots
8060-11	*		*
8060-11A	*		
8060-12	*		*
8060-13	*		*
8060-14	*		
8060-15	*		
Web based collection instrument #1		*	
Web based collection instrument #2		*	
Web based collection instrument #3		*	
Web based collection instrument #4			*
Web based collection instrument #5		*	
Web based collection instrument #6		*	
Web based collection instrument #7		*	
Web based collection instrument #8	*		
Web based collection instrument #9	*	*	*
Web based collection instrument #10	*		

Is this collection reporting, recordkeeping, or disclosure?

This information collection is primarily for third party disclosure as the information submitted is stored for later release to members of the public. There is also information collection for

reporting which is for administrative functions within PRIA and PRD such as requesting information from the FAA or other functions performed with the system.

What is the frequency of the collection?

All of the collections occur on an as-needed basis.

What information is reported?

Primarily, the information reported includes relevant facts from the various types of pilot records¹. This includes the following types of records:

- Training, Qualification, and Proficiency Records
- Drug and Alcohol Records
- Final Disciplinary Records
- Employment History Records (provided by current and previous employers) which includes Assignment to Duty
- Employment History (provided by pilots)
- Verification of Motor Vehicle Driving Record Search and Evaluation

Additionally, various administrative information is reported such as when a pilot grants consent for a hiring employer to access the records.

Who receives the information?

The information reported from the previous and current employers into the PRD by the various web forms is maintained until at some point in the future when the pilot grants consent for a hiring employer to see the information. Information from the 8060--14, and -15 is submitted to the FAA to have the requests fulfilled. Information from the -11, -11A, and -12 is seen by the previous employers and instructs them to complete various administrative functions. Information collected via the -13 is received by the appropriate state department of motor vehicles. The remaining administrative web forms are used by the PRD system to perform various internal actions such as allowing a hiring employer to have access to certain records.

3. Extent of automated information collection.

The 8060 forms are available for downloading from the FAA's website for use by an operator and pilot. These forms are accepted through the United States postal service, mail carriers, facsimile, and electronic mail to receive requests from operator and third party customers. Once the FAA processes the forms, replies are returned to the requestor in the same manner as the request was received unless otherwise noted.

The FAA deployed a web-based online application called the Pilot Records Database (PRD) in December 2016 which benefits hiring operators and pilots required to comply with PRIA. This application automates the current PRIA process and provides an operator with

¹ The PRD does not contain actual pilot records submitted via the collection instruments. The PRD instead receives specific facts contained within the original records such as pilot name, date, training event, etc. These facts are entered by the previous and current employers using the appropriate collection instrument.

immediate access to a consenting pilot's records. An operator would receive the following information that an individual has viewed and provided the FAA an electronic consent to release:

- previous employers that the individual served as a pilot;
- current airman certificates, associated ratings, and any limitations to the certificate or ratings;
- date and certificate grade sought for any failed attempt to pass a practical test required to obtain a certificate or type rating under part 61 of Title 14, Code of Federal Regulations (since August 2010);
- current medical certificate including its class and any limitations;
- closed enforcement information;
- accident and/or incident;
- drug and alcohol records entered by the FAA if applicable; and
- other records entered by previous employers related to that pilot.

A hiring operator is still required to obtain drug and alcohol records from certain current and/or previous employers, as well as search and evaluate the National Drivers Register using the consent to release records forms from Table 1.

The MyAccess registration and authentication process is performed via the internet using only electronic forms.

4. Efforts to identify duplication.

The collection of certain pilot records is within the purview of the FAA. Title 49, United States Code, 44703(h) requires the FAA to establish standard forms for use by the operator in order to: request the records; inform the individual who is the subject of the request; obtain the individual's written consent; and, inform the individual of the individual right of that individual to receive a copy of any records furnished in response to the request. Additionally, Title 49, United States Code, 44703(i) requires the FAA to establish an electronic Pilot Records Database and phase-out PRIA. No other Federal agency has similar requirements.

5. Efforts to minimize the burden on small businesses.

This collection could impact small businesses; however, the burden is reduced by a provision which allows some operators who are required to report records to the PRD to only report those records when they have actually been requested by a hiring operator or other operator. This is different from operators who must report records within 30 days regardless of if a request has been received or not.

6. Impact of less frequent collection of information.

Implementation of the information collection process, as facilitated by the PRIA/PRD forms, is statutorily mandated. Failure to collect and use the information collected may have a significant impact on air safety. Consequently, several NTSB recommendations related to air carrier accidents were issued to the FAA to facilitate the sharing of pilot records among operators. This information collection responds to those NTSB recommendations.

7. Special circumstances.

Title 49 U.S.C. § 44703(i)(5) requires the Administrator to maintain pilot records described in 49 U.S.C. § 44704(i)(2) for the life of the pilot.

Additionally, 49 United States Code 44703(i) requires the FAA to establish an electronic pilot records database containing “records that are generated by the air carrier or other person after [August 1, 2010]” as well as “records that the air carrier or other person [was] maintaining, on [August 1, 2010],” pursuant to §44703(h)(4). In order to meet this mandate, operators are currently maintaining pilot records dating from August 1, 2005 until the the records have been entered into the PRD.

8. Compliance with 5 CFR 1320.8.

Comments have not been received since a notice of intent to request renewal of the forms was published on pages 71067 and 71068 of the Federal Register, December 26, 2019, Vol 84 #247 (84 FR 71067). In addition, the FAA published an NPRM on March 30, 2020, with a comment period that closed on June 29, 2020. No comments on the information collection were received.

9. Payments or gifts to respondents.

No gifts or payments are provided for the reporting of records or access for purposes of evaluation of records through PRIA or in the PRD.

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

Title 49 U.S.C. § 44703(h)(11) and (i)(9) provides that an air carrier may use such records only to assess the qualifications of the individual in deciding whether or not to hire the individual as a pilot. The air carrier is directed to take such actions as may be necessary to protect the privacy of the pilot and the confidentiality of the records. This holds true with the one exception of the FAA inspectors who, during the course of their normal duties for the FAA, cannot be denied access to the PRIA-related records of any operator for the purpose of surveillance or inspection.

11. Justification for collection of sensitive information.

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

12. Estimate of burden hours for information requested.

The following wage assumptions apply to the analysis. These are based on the approved Regulatory Impact Analysis for the aforementioned rulemaking that will publish in January 2021.

- Employee benefit factors
 - Private sector: 31.80% ²
- Calculations will use the following wage rates.
 - Human Resource Manager ³
 - Wage rate: \$62.29
 - Fully-burdened wage rate : \$91.33
 - Training and Development Manager ⁴
 - Wage rate: \$59.36
 - Fully-burdened wage rate : \$87.04
 - Pilot (non-flying) ⁵
 - Wage rate: \$31.56
 - Fully-burdened wage rate: \$46.28

Number of active operators and pilots. The following information was obtained from the National Vital Information System (NVIS) and other sources and represents the total number of operators required to comply with PRIA/PRD.

Table 2: Entities Required to Comply with PRIA/PRD

Part 121	76
Part 135	2,057
Part 125	70
Part 91K	7
Part 91.147	1, 091
Public Aircraft Operators	323
Corporate Flight Departments	1, 413
Pilots	17,715
Total	22,752

PRIA Burden

The following table details the burden for airmen and operators to complete PRIA forms in complying with PRIA until it is discontinued 3 years and 90 days after publication of the rule.

² Based on the percent of employer cost for total employee compensation that is related to benefits (not wages and salaries). This amounts to 31.80% in 2016 based on the Bureau of Labor Statistics, Employer Costs for Employee Compensation (<https://www.bls.gov/news.release/pdf/ecec.pdf>; data provided in news release that vary slightly by month).

³ Occupational Employment and Wages, May 2019, 11-3121 Human Resources Managers, Bureau of Labor Statistics, Mean Hourly Wage Rate. <https://www.bls.gov/oes/2019/may/oes113121.htm>.

⁴ Occupational Employment and Wages, May 2019, 11-3121 Training and Development Managers, Bureau of Labor Statistics, Mean Hourly Wage Rate. <https://www.bls.gov/oes/2019/may/oes113131.htm>.

⁵ The FAA used a ground Instructor hourly wage rate to represent the pilot non-flying wage rate. Unburdened wage based on Bureau of Labor Statistics (BLS) Occupational Employment Statistics for Air Transportation Industry. (<https://www.bls.gov/oes/2019/may/oes131151.htm>): Training and Development Specialists (13-1151).

Table 3: Estimated Burden Hours and Costs for Hiring Entity and Pilot for PRIA Forms

FAA Form	Number of Forms Completed Annually	Minutes to Complete Form			Hourly Wage		Cost			Hours	Respondents
		Airman	HRM - Hiring Entity	HRM - Previous Employer	Airman	HRM	Airman	HRM	Total	Hours	
8060-11	28,138	7	7	N/A	\$46.28	\$91.33	\$151,924	\$299,811	\$451,735	6,565	28,138
8060-11A	28,138	10	10	N/A			\$217,035	\$428,301	\$645,336	9,379	28,138
8060-12	28,138	6	6	17			\$130,221	\$985,093	\$1,115,313	13,600	28,138
8060-13	28,138	10	10	N/A			\$217,035	\$428,301	\$645,336	9,379	28,138
	112,552						\$716,214	\$2,141,506	\$2,857,720	38,923	112,552

*Totals may not add due to rounding.

To obtain time burden in hours, number of minutes to complete each form is divided by 60 and multiplied by the number of respondents. To obtain cost burden the number of hours is multiplied by the appropriate hourly wage rate.

Pilot Records Database

The following tables present the burden to register for access to, and report records to the pilot records database. Total hours are estimated by multiplying the time to perform the function by the number of respondents. Total cost is estimated by multiplying total hours by the appropriate hourly wage rate.

Table 4: Burden for Application for Database Access*

Users Expected to Apply /Register	Respondents (1)	Hourly Rate	Time to Register in hours	Total Costs	Total Hours	Average Costs per Year (2)	Average Hours per Year (2)
Responsible persons	5,037	\$91.33	0.50	\$230,015	2,519	\$76,672	840
Pilots	175,989	\$46.28	0.33	\$2,687,774	58,077	\$269,237	5,817
Authorized Individuals	10,066	\$91.33	0.50	\$459,664	5,033	\$153,221	1,678
Proxies	1,904	\$91.33	0.50	\$86,946	952	\$28,982	317
Total	192,996			\$3,464,399	66,581	\$528,112	8,652

Note: Row and column totals may not sum due to rounding.

(1) Pilot respondents total is # of pilots registering in the first 10 years after PRD rule is published. Other respondents register in the first year.

(2) Average costs and hours are three year averages. For average cost pilot totals divide by 10, other user totals divide by 3.

Table 5: Cost of Electronic Reporting of Present and Future Records

Operator Type	Respondents	Hours per respondent	Hourly Rate	Initial Cost for Electronic Reporting	Annual Cost for Electronic Reporting	Initial Hours for Electronic Reporting/Year ⁶	Annual Hours ⁷
Small 121	51	20	\$120	\$122,400	\$76,500	340	1,020
Mid-size 121	13	35	\$75	\$34,125	\$19,500	152	260
Large 121	4	400	\$89	\$142,400	\$6,000	533	80
Total 121	68	455		\$298,925	\$102,000	1,025	1,360
Small 135	234	20	\$120	\$561,600	\$351,000	1,560	4,680
Mid-size 135	2	35	\$75	\$5,250	\$3,000	23	40
Total 135	236	55		\$566,850	\$354,000	1,583	4,720
Small 125	18	20	\$120	\$43,200	\$27,000	120	360
Total 125	18	20		\$43,200	\$27,000	120	360
Part 91K	4	1,897	\$95	\$720,800	\$6,000	2,529	80
Total 91K	4	1,897		\$720,800	\$6,000	2,529	80
Total	326	2,427		\$1,629,775	\$489,000	5,258	6,520

Note: Row and column totals may not sum due to rounding.

Table 6A: Manual Record Entry Activity by Type Operator

Manual Record Entry Activity	Time per event (minutes)	Number of Events per Pilot						
		Part 121	Part 135	Part 125	Air Tours	91K	PAO	Corp. Flight Dept.
Training/checking events - per year (web based collection instrument #2)	4.0	2.6	2.7	2.5	1	2.7	2.5	0.75
Ground training - per year (web based collection instrument #2)	4.0	1	1					1
Drug and Alcohol per year (web based collection instrument #1)	4.0	0.01	0.01		0.01	-	-	
Verification of NDR Search (web based collection instrument #4). See note (1)	0.5	0.031	0.031			0.031		
Separation events not including termination per year (web based collection instrument #7)	4.0	0.0305	0.0305	0.0305	0.0305	0.0305	0.0305	0.0305
Termination – per year (web based collection instrument #7)	10.0	0.0005	0.0005	0.0005	0.0005	0.0005	0.0005	0.0005
Disciplinary – per year resulting in removal (web based collection instrument #3)	10.0	0.01	0.01	0.01	0.005	0	0.005	0.005
Disciplinary – per year (web based collection instrument #3).	4.0	NA	NA	NA	0.0005	00.1	0.005	0.005
Initial train/check (one time event for new pilots) (web based instrument #2)	4.0	0.186	0.248	0.155	0.031	0.248	0.155	0.155

(1)Public aircraft operators (PAO), air tour operators, and corporate flight departments are referred to “PAC Operators.” Of this group only air tour operators are required to report drug and alcohol records, and none of them are required to report NDR verification. (See page 21 of the regulatory impact analysis for this rule: <https://www.regulations.gov/document/FAA-2020-0246-0810>).

⁶ Number of respondents times hours per respondent divided by 3.

⁷ Number of respondents times 20 hours to represent annual to monitor, trouble-shoot, and modify.

Table 6B: Manual Record Entry Activity by Job Classification

Manual Record Entry Activity	Web-Based Collection Instrument Number	Job Classification	Fully-Burdened Hourly Wage Rate
Training/checking events - per year	#2	Training & Development Manager	\$87.04
Ground training - per year	#2	Training & Development Manager	\$87.04
Drug and Alcohol - per year	#1	Human Resources Manager	\$91.33
Verification of NDR Search	#4	Human Resources Manager	\$91.33
Separation events not including termination per year	#7	Human Resources Manager	\$91.33
Termination - per year	#7	Human Resources Manager	\$91.33
Disciplinary - per year resulting in removal	#3	Human Resources Manager	\$91.33
Disciplinary - per year	#3	Human Resources Manager	\$91.33
Initial train/check (one time event for new pilots)	#2	Training & Development Manager	\$87.04

Table 7: Manual Record Entry Burden by Event (per pilot)

Row #	Operator Type	135		121		125		Air Tour		91K		PAO		Corp Flt Dept	
		Time*	Cost (\$)	Time*	Cost (\$)	Time*	Cost (\$)	Time*	Cost (\$)	Time*	Cost (\$)	Time*	Cost (\$)	Time*	Cost (\$)
1	Training/checking events - per year	10.800	15.667	10.400	15.087	10.000	14.507	4.000	5.803	10.800	15.667	10.000	14.507	3.000	4.352
2	Ground training - per year	4.000	5.803	4.000	5.803	0.000	0.000	0.000	0.000	4.000	5.803	0.000	0.000	4.000	5.803
3	Drug and Alcohol per year	0.040	0.061	0.040	0.061	0.000	0.000	0.040	0.061	0.000	0.000	0.000	0.000	0.000	0.000
4	Verification of NDR Search	0.016	0.024	0.016	0.024	0.016	0.024	0.000	0.000	0.016	0.024	0.000	0.000	0.000	0.000
5	Separation events not including termination per year	0.122	0.186	0.122	0.186	0.122	0.186	0.122	0.186	0.122	0.186	0.122	0.186	0.122	0.186
6	Termination - per year	0.005	0.008	0.005	0.008	0.005	0.008	0.005	0.008	0.005	0.008	0.005	0.008	0.005	0.008
7	Disciplinary - per year resulting in removal	0.050	0.076	0.050	0.076	0.050	0.076	0.050	0.076	0.050	0.076	0.050	0.076	0.050	0.076
8	Disciplinary - per year	0.050	0.076	0.050	0.076	0.050	0.076	0.020	0.030	0.050	0.076	0.020	0.030	0.020	0.030
9	Initial train/check (one time event for new pilots)	0.992	1.439	0.744	1.079	0.620	0.899	0.124	0.180	0.992	1.439	0.620	0.899	0.000	0.000
10	Time/cost burden per pilot per year	16.075	23.339	15.427	22.399	10.863	15.775	4.361	6.343	16.035	23.278	10.817	15.706	7.197	10.455

*Time is in minutes.

Column totals may not sum due to rounding.

Calculation for Time: "Time per Event" (from Table 6A) multiplied by the "Number of Events per Pilot" (from Table 6a).

Calculation for Cost: "Fully Burdened Wage Rate" (from Table 6B) divided by 60 minutes, and then multiplied by "Time" (from Table 7).

**Table 8A: Manual Entry of Present and Future Records for Select Operators
(Parts 121, 135, 125, and 91K)**

Type Operator	Year *	Respond-ents	Pilots	Time to Enter Pilot Records per Pilot (minutes)	Cost to Enter Pilot Records (per Pilot)	Total Hours	Total Cost
Part 121	2	8	273	15.43	\$22.40	70.2	\$6,115
Part 121	3	8	275	15.43	\$22.40	70.7	\$6,160
Part 135	2	1,821	13,028	16.07	\$23.34	3,490.3	\$304,060
Part 135	3	1,821	13,076	16.07	\$23.34	3,503.2	\$305,180
Part 125	2	52	528	10.86	\$15.78	95.6	\$8,329
Part 125	3	52	528	10.86	\$15.78	95.6	\$8,329
Part 91K	2	3	399	16.03	\$23.28	106.6	\$9,288
Part 91K	3	3	399	16.03	\$23.28	106.6	\$9,288
Total -Part 121						140.9	\$12,275
Total - Part 135						6,993.5	\$609,240
Total - Part 125						191.2	\$16,659
Total - Part 91K						213.3	\$18,576
Grand Total						7,538.8	\$656,749
3-Year Average						2,512.9	\$218,916

Row and column totals may not sum due to rounding.

There are no estimates for Year 1.

Calculation for Total Hours: ("Pilots" multiplied by "Time to Enter Pilot Records per Pilot")/60 minutes.

Calculation for Total Cost: "Pilots" multiplied by "Cost to Enter Pilot Records per Pilot."

**Table 8B: Manual Entry of Present and Future Records for "PAC" Operators
(Air Tour Operators, Public Aircraft Operators, and Corporate Flight Departments)**

Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 10	Col. 11	Col. 12	Col. 13	Col. 14
Type Operator	Year	Re- spond- ents	Pilots	Time to enter Upon Request Records per Pilot (minutes)	Time to enter Disci- plinary Records per Pilot (minutes)	Cost to Enter Upon Request Records (Per Pilot)	Cost to Enter Disci- plinary Records (Per Pilot)	Total Time to enter Upon Request Record s (Hours)	Total Time to enter Disci- plinary Records (Hours)	Total Cost to Enter Upon Request Record s	Total Cost to Enter Disci- plinary Records	Total Hours to enter Record s	Total Cost to Enter Records
Air Tour	2	1,091	3,091	4.266	0.095	\$6.199	\$0.145	2.198	4.894	\$192	\$447	7.092	\$639
Air Tour	3	1,091	3,091	4.266	0.095	\$6.199	\$0.145	4.395	4.894	\$383	\$447	9.289	\$830
PAO	2	323	2,821	10.762	0.055	\$15.622	\$0.084	5.060	2.586	\$441	\$236	7.646	\$677
PAO	3	323	2,824	10.762	0.055	\$15.622	\$0.084	10.125	2.589	\$882	\$236	12.714	\$1,118
CFD	2	1,413	2,826	7.142	0.055	\$10.371	\$0.084	33.639	2.591	\$2,931	\$237	36.229	\$3,167
CFD	3	1,413	2,826	7.142	0.055	\$10.371	\$0.084	67.278	2.591	\$5,862	\$237	69.868	\$6,098
Total-Air Tour												16.381	\$1,469
Total-PAO												20.360	\$1,795
Total-CFD												106.097	\$9,266
Grand Total												142.838	\$12,529
3-Year Avg												47.613	\$4,176

Table Notes: Row and column totals may not sum due to rounding.

Calculations by column number are shown below:

Col. 5: From the "Time" column in Table 7 (by Type Operator): Row 10 - (Row 3 + Row 6 + Row 7)

Col. 6: From the "Time" column in Table 7 (by Type Operator): Row 3 + Row 6 + Row 7

Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 10	Col. 11	Col. 12	Col. 13	Col. 14
Type Operator	Year	Re-spond-ents	Pilots	Time to enter Upon Request Records per Pilot (minutes)	Time to enter Disciplinary Records per Pilot (minutes)	Cost to Enter Upon Request Records (Per Pilot)	Cost to Enter Disciplinary Records (Per Pilot)	Total Time to enter Upon Request Records (Hours)	Total Time to enter Disciplinary Records (Hours)	Total Cost to Enter Upon Request Records	Total Cost to Enter Disciplinary Records	Total Hours to enter Records	Total Cost to Enter Records

Col. 7: From the "Cost" column in Table 7 (by Type Operator): Row 10 - (Row 3 + Row 6 + Row 7)

Col. 8: From the "Cost" column in Table 7 (by Type Operator): Row 3 + Row 6 + Row 7

Col. 9: Air Tour Operators and PAOs Only: The FAA assumes that each year 1% of pilots working for an air tour operator or a PAO will apply for employment as a pilot with an air carrier. Thus for Year 2 the calculation is (Col. 4 × .01 × Col 5)/60 minutes. For Year 3 the calculation is (Col. 4 × .01 × Col 5)/60 minutes + Year 2 estimate. The calculation for corporate flight departments is the same as that for air tour operators and PAOs with the exception that each year 10% of pilots working for a corporate flight department will apply for employment as a pilot with an air carrier.

Col.10: (Col. 4 × Col. 6)/60 minutes.

Col. 11: Air Tour Operators and PAOs Only: The FAA assumes that each year 1% of pilots working for an air tour operator or a PAO will apply for employment as a pilot with an air carrier. Thus for Year 2 the calculation is (Col. 4 × .01 × Col 7). For Year 3 the calculation is (Col. 4 × .01 × Col 7) + Year 2 estimate. The calculation for corporate flight departments is the same as that for air tour operators and PAOs with the exception that the FAA assumes each year 10% of pilots working for a corporate flight department will apply for employment as a pilot with an air carrier.

Col. 12: (Col. 4 × Col. 8)

Col. 13: (Col. 9 + Col. 10)

Col. 14: (Col. 11 + Col. 12)

**Table 8C: Manual Entry of Present and Future Records for All Operators
(Table 8A plus Table 8B)**

Type of Operations	Hours	Cost	Respondents
Part 121	140.9	\$12,275	8
Part 135	6,993.5	\$609,240	1,821
Part 125	191.2	\$16,659	52
Air Tours	16.4	\$1,469	1,091
Part 91K	213.3	\$18,576	3
PAO	20.4	\$1,795	323
Corporate Flight Dept	106.1	\$9,266	1,413
Total	7,681.7	\$669,278	4,711
3-Year Average	2,560.6	\$223,093	1,570

Estimates may not total due to rounding.

Table 9: Electronic Reporting of Historical Records

Type of Operations/ Size Groupings	Respondents	Hours/ Respondent	Hourly Rate	Cost per Carrier/Operator	One-Time Cost of Electronic Reporting	Electronic Reporting Hours
Small 121	51	20	\$120	\$2,400	\$122,400	1,020
Mid-size 121	13	2,333	\$75	\$175,000	\$2,275,000	30,329
Large 121	4	6,774	\$89	\$602,875	\$2,411,500	27,096
Total part 121 (1)	68				\$4,808,900	58,445
Small 135	226	20	\$120	\$2,400	\$542,400	4,520
Mid-size 135	2	70	\$75	\$5,250	\$10,500	140
Total part 135	228				\$552,900	4,660
Small part 125	18	20	\$120	\$2,400	\$43,200	360
Total part 125	18				\$43,200	360
Part 91K	4	385	\$95	\$36,550	\$146,200	1,540
Total Part 91K	4			\$36,550	\$146,200	1,540
Total Burden	318				\$5,551,200	65,005

*Table note: (1) Includes carriers certificated under both parts 121 and part 135.

Table 10: Manual Entry of Historical Records

Type of Operations	Respondents	Total Hours	Total Cost
Part 121	18	1,439,468	\$71,024,535
Part 125	33	857	\$80,595
Part 135	1,912	94,250	\$9,053,110
Part 91K	5	5,759	\$545,407
Total	1,968	1,540,334	\$80,703,647

Table 11: Burden and Cost ⁸ for Reporting Pilot Employment History ⁹

Number of Pilots	Hourly Rate	Time to complete Employment History	Cost to complete Employment History
175,989	\$46.28	2 mins	\$271,492

Table 12: Deviation Requests

Operator Type	Respondents	Hours	Hourly rate	Total hours	Total Cost
Part 121	0.76	2	\$87.04	1.52	\$132
Part 135	20.53	2	\$87.04	41.06	\$3,574
Total				42.58	\$3,706

⁸ Represents burden over 10 years.

⁹ Web based instrument #8.

Table 13: Summary of PRD Burden for First Three Years (after the publication of the Pilot Records Database rule)*

Section	Respondents	Year 1		Year 2		Year 3		Total	
		Hours	Cost	Hours	Cost	Hours	Cost	Hours	Cost
§ 111.15 - Annual Registration burden	69,804	14,305	\$1,045,051	5,818	\$269,234	5,831	\$269,864	25,954	\$1,584,149
§ 111.205 (a) Reporting Present and Future Records									
<i>Electronic Reporting</i>									
Initial costs	326			15,773	\$1,629,775			15,773	\$1,629,775
Annual costs	326			6,520	\$489,000	6,520	\$489,000	13,040	\$978,000
<i>Manual Data Entry</i>									
Annual costs	4,711			3,814	\$332,275	3,868	\$337,004	7,682	\$669,279
§ 111.255 Historical Record Reporting									
<i>Electronic Reporting</i>									
	318			23,356	\$5,551,200			23,356	\$5,551,200
<i>Manual Data Entry</i>									
	1,968			770,712	\$40,406,046	770,712	\$40,406,046	1,541,424	\$80,812,092
111.310 Written consent (Employment History) ¹⁰	17,629			5,863	\$27,189	5,865	\$27,249	11,728	\$54,439
111.255 Deviation request	2,129			43	\$3,706	43	\$3,706	86	\$7,412
Total	97,211	14,305	\$1,045,051	831,899	\$48,708,425	792,839	\$41,532,869	1,615,687	\$91,286,346

*Row and column totals may not sum due to rounding.

MyAccess Registration

The following table presents the burden for MyAccess Registration. Total hours is derived by multiplying time per registrant by total registrants. This burden may include the burden to register for access to the pilot records database.

Table 14: Estimated Burden Hours and Costs for MyAccess Registration

	Total Registrants (one time registration)	Time per Registrant	Total Hours	Costs
MyAccess Registration	250,129	.25	62,528	\$2,894,472

Collection of information is a one-time occurrence

Summary of All Information Collections

The following table summarizes the paperwork burden for the PRIA, PRD, MyAccess registration and the new form 8060-14, which were addressed in more detail earlier.

¹⁰ Entered via webform #8.

Table 15: Summary of Associated Information Collections (average/year over 3 years)

Title	Response	Time (Hours)	Costs
Pilot Records Improvement Act of 1996	112,552	38,924	\$2,857,720
PRD Burden ¹¹	32,404	538,562	\$30,428,782
MyAccess Registration Portal	250,129	62,528	\$2,894,472
Form 8060-14 ¹²	3,015	1,508	\$69,767
Form 8060-15 ¹³	60	15	\$694
Assignment to Duty	3,227	1,089	\$99,458
Total*	401,387	642,626	\$36,404,893

*These numbers may appear different than what will be publicly displayed on Reginfo.gov (<https://www.reginfo.gov/public/do/PRAMain>) due to system rounding. The following table provides the estimates with system rounding.

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

There are no additional costs not already included in question 12.

14. Estimate of cost to the Federal government. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate costs, 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. Agencies also may aggregate cost estimates from items 12, 13, and 14 in a single table.

Table 16: Federal Government Financial Burden¹⁴

ANNUAL FEDERAL GOVERNMENT FINANCIAL BURDEN					
Description of Action	Cost Per Hour	# Hours Per Employee Per Year	Number Employees	% Of Time	Total Cost
Receiving and Sorting	\$28.59	2,080	2	25%	\$29,730
Examine and Processing	\$28.59	2,080	2	25%	\$29,730
Printing and Mailing	\$28.59	2,080	2	25%	\$29,730
Filing and Archiving	\$28.59	2,080	2	25%	\$29,730
Program Management	\$37.71	2,080	1	50%	\$39,216

¹¹ Includes burden to register for PRD, to report records, written consent and deviation request.

¹² This is a new form to be used with PRD.

¹³ PRD Pilot Record Dispute Form, Form number being assigned.

¹⁴ Based on 2016 FAA Core Compensation E and G pay bands hourly wages adjusted for benefits as a percentage of basic pay by a factor of 36.25% per OMB Guidance (<https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2008/m08-13.pdf>).

ANNUAL FEDERAL GOVERNMENT FINANCIAL BURDEN					
Program Plans and Policy	\$37.71	2,080	1	50%	\$39,216
TOTAL					\$197,352

15. Explanation of program changes or adjustments. Explain the reasons for any program changes or adjustments reported.

Labor costs had been incorrectly entered into ROCIS on previous submissions. However, this submission adjusts for that mistake. Since there are no material costs, this submission shows zero for respondent costs. This is a revision to an existing information collection under OMB control number 2120-0607. The revision also includes information on the deployment of the Pilot Records Database and the use of related forms.

The deployment of the PRD final rule requires air carriers and other operators to report information about pilots, which is currently shared under PRIA, via several web-based forms. There are also two new physical forms used for various administrative functions designated as Form 8060-14 and 8060-15. Both of the new physical forms and the various new web forms are described here:

- **Form 8060-14:** The Form 8060-14 was listed on the previous submission as Form 8060-XX. The form has been designated since as the 8060-14 and its function has been expanded. Traditionally under PRIA, pilots would release their FAA records by submitting Form 8060-10 to the FAA for processing. The FAA would then provide the requested records to the reviewing entity. With the transition to the PRD, pilots will generally no longer be submitting the Form 8060-10 to release their records but will instead release the records themselves by accessing the PRD. After the records are released, the reviewing entity will access the records via the PRD. The FAA expects there will be cases where pilots are not able to access the PRD to release their records. This is due to various technical limitations of the identity verification process of MyAccess. In response to these cases, the FAA developed Form 8060-14. Pilots may complete the Form 8060-14 and submit it to the FAA for processing. The FAA will then access the PRD on behalf of the pilot and release the records as indicated on the form. The revised Form 8060-14 also now allows a pilot to update their employment history which is entered into the PRD. Again, this is only for cases when the pilot cannot access the PRD themselves. Normally, employment history is entered via the Employment History records reporting form (web #8) described below.
- **Form 8060-15:** This form allows pilots to dispute or request a correction to certain records stored in the PRD. Generally, pilots will request corrections via the PRD dispute process from the web site, but as discussed above, some pilots may not be able to access the PRD directly themselves. For those pilots who cannot access the PRD themselves, they may submit a Form 8060-15 to the FAA for processing. The FAA will then access the PRD on their behalf and perform the dispute actions specified by the pilot.
- **Drug and Alcohol Records input form (Web based collection instrument #1):** Part 111 specifies that certain drug and alcohol records be reported to the PRD by reporting entities. This form allows reporting entities to submit the required records.
- **Training, Qualification, and Proficiency Records input form (Web based collection instrument #2):** Part 111 specifies that certain training, qualification, and proficiency records

be reported to the PRD by reporting entities. This form allows reporting entities to submit the required records.

- Final Disciplinary Action Records input form (Web based collection instrument #3): Part 111 specifies that certain final disciplinary action records be reported to the PRD by reporting entities. This form allows reporting entities to submit the required records.
- Verification of Motor Vehicle Driving Record Search and Evaluation input form (Web based collection instrument #4): Part 111 specifies that verification of motor vehicle driving record searches be reported to the PRD by reporting entities. This form allows reporting entities to submit the required records.
- Date of Hire input form (Web based collection instrument #5): Part 111 specifies that reporting entities enter dates of hire to the PRD. This form allows reporting entities to submit the required dates.
- Assignment to Duty Records input form (Web based collection instrument #6): Part 111 specifies that certain assignment to duty records may be reported to the PRD by reporting entities. This form allows reporting entities to submit the records.
- Separation of Employment Records input form (Web based collection instrument #7): Part 111 specifies that certain separation of employment records be reported to the PRD by reporting entities. This form allows reporting entities to submit the required records.
- Previous Employers input form (Web based collection instrument #8): Part 111 specifies that pilots must specifically consent to the release of their records via the PRD. This form allows pilots to provide consent to release their records.
- Pilot Consent Form (Web based collection instrument #10): Part 111 specifies that pilots must enter their previous aviation employers into the PRD. This form allows pilots to submit the required employment history.

16. Publication of results of data collection.

The results of this information collection will be provided to hiring operators with the consent of the individual seeking employment.

17. Approval for not displaying the expiration date of OMB approval.

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

18. Exceptions to certification statement.

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

Attachments:

1. Supporting Statement
2. 30 Day Notice
3. 60 Day Notice
4. Form 8060-11

5. Form 8060-11A
6. Form 8060-12
7. Form 8060-13
8. Form 8060-14
9. Form 8060-15
10. MyAccess Registration Forms (screen captures)