

**Supporting Statement A**  
**OMB #2120-0663**

**CHANGES:**

In the notice of proposed rulemaking, Integration of Powered-Lift: Pilot Certification and Operations (RIN 2120-AL72), The FAA proposes a Special Federal Aviation Regulation for alternate eligibility requirements to safely certificate initial groups of powered-lift pilots. The FAA has estimated the increase in the existing burden for this collection based on **four** part 119 certificate holders beginning powered lift operations under part 135 by the end of the third year following finalization of this proposed rule.

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

Title 49, United States Code, Section 44701 makes the Administrator responsible for promoting safe flight of civil aircraft in air commerce. Subsection 44701 (a) (5) authorizes the Administrator to prescribe regulations and minimum standards that the Administrator finds necessary for safety. Subsection 44701 (c) authorizes the Administrator to carry out assigned duties and responsibilities in a way that best tends to eliminate or reduce the possibility of recurrence of accidents in air transportation. The Administrator determined, based on evaluations of previous accidents and other incidents, that certain events involving malfunctions and defects may be precursors to recurrence of accidents. Regulations included in the 2005 Service Difficulty Report final rule (70 FR 76974), which modified the previously existing requirements, enumerate these events and require that operators and repair stations report them to the Administrator. Based on these reports the Administrator can systematically evaluate the circumstances and conditions that cause the events and determine whether or not corrective action is needed.

This activity supports the US DOT Strategic Plan on Safety.

- 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.**

FAA Form 8070-1, Service Difficulty Report (SDR), may be used by the air carrier industry and repair stations to submit mandated reporting of occurrences or detection of failures, malfunctions, or defects. As described in 14 CFR 121.703(e), these submitters may use another method that is suitable to their management system, provided that system is acceptable to the Administrator and contains mandated information. Service difficulty information may also be submitted in an electronic format.

Repair stations certificated under Part 145 and Air taxi operators certificated under Part 135 are required to submit Malfunction or Defect Reports, or Service Difficulty Reports.

FAA Form 8010-4, Malfunction and Defect Report may be used by the general aviation public to submit voluntary reporting of occurrences or detection of failure, malfunctions, or defects. General Aviation is the largest user of the Form 8010-4.

Report information is collected, collated by the FAA, and used to determine service performance of aeronautical products. When defects are reported which are likely to exist on other products of the same or similar design, the FAA may disseminate safety information to a particular section of the aviation community. The FAA also may adopt new regulations or issue Airworthiness Directives (AD's) to address a specific problem. AD's are mandatory repair or modifications essential for the prevention of accidents

The regulations enhance air carrier safety by collecting additional and timelier data pertinent to critical aircraft components. This data identifies mechanical failures, malfunctions, and defects that may be a hazard to the operation of an aircraft. The FAA uses this data to identify trends that may facilitate the early detection of airworthiness problems. Reports are submitted on occasion.

**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.**

This required information is now and will in the future involve mechanical and electronic means for data collection. In compliance with the Government Paperwork Elimination Act, this collection is 100% submittable electronically. Currently, approximately 90% are voluntarily submitted in an electronic format on the Service Difficulty Reporting website at <http://av-info.faa.gov/sdrx>. The mechanical or paper form is also available. The electronic submission of data may eliminate the costs of mailing and storing service difficulty information in a paper format. The Service Difficulty Report and Malfunction/Defect form can be downloaded from the website: <https://www.faa.gov/forms/>.

The submitted reports can be searched at the following website: <https://av-info.faa.gov/sdrx/>

The current legacy application is undergoing a full modernization (system replacement) which is anticipated to launch late October 2024. This will aid in expediting the processing of the Service Difficulty Report and Malfunction or Defect reports and better serve our customers and lessen the burden on reporting.

**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.**

We have reviewed other FAA data collection reports and find no duplication. Also, we know of no other agency collecting this data. In fact, the FAA provides this information to other government agencies and foreign regulatory authorities upon request.

Most of the usable data collected is only available from certificate holders, although certain limited data would be available from FAA inspectors during the course of their daily involvement with the aviation industry. FAA inspectors may also collect this information as a result of an accident.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for the purposes described in Item 2 above.**

We are currently evaluating the different FAA systems that may be collecting very similar data as part of our SDR Modernization project. Currently, Aircraft Manufacturing captures similar information using 21.3 reporting. The data that is collected is from the aircraft manufacturing side. We collect from the aircraft maintenance side. The information may be similar; however, there will be difference that we will need to identify. Ultimately, integrating similar data collection tools into the same platform will be our goal. The SDR modernization project began January 2023 and is anticipated to be complete late October 2024. Phase I of system deployment is focused on development of a single source aviation maintenance data platform, incorporating SDRs in its first module, and enabling the incorporation of additional maintenance data (ETOPS, Event Based Reporting, etc.) in a phased and scalable approach.

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

The FAA has found that this collection does not have a significant impact on a substantial number of small businesses.

**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 FAA would have no means of systematically collecting information on incidents and occurrences that are considered to be precursors of unsafe conditions that may lead to accidents and incidents. The frequency of collection is totally dependent on the amount of reportable service difficulties that a certificate holder encounters.

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

There is an exception to the requirements of not submitting a report more often than quarterly. Each report of occurrences during a 24-hour period shall be submitted to the FAA within the next 96 hours. This is not anticipated to be a burden, as the existing rule requires certificate holders to report occurrences during a 24-hour period within the next 72 hours. This reporting requirement is consistent with the rest of the guidelines in 5 CFR 1320.5(d)(2).

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

The revision of this information collection supports the notice of proposed rulemaking, Integration of Powered-Lift: Pilot Certification and Operations (RIN 2120-AL72) published on [insert publish date] [insert citation]. That rule sought public comment on the revisions to this information collection associated with that rule. The information collection was submitted to the Office of Management and Budget for review upon publication of the notice of proposed rulemaking.

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

There are no monetary or gift considerations for the submission of information.

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

Respondents have been given no assurance of confidentiality.

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

There are no questions of a sensitive nature.

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

1. Sections 121.703, 125.409, 135.415 permit part 121, 125, and 135 certificate holders to authorize a repair station to submit an SDR on their behalf.

Section 145.221 requires that the repair stations provide a copy of the report submitted by the repair station to the part 121, 125, or 135 certificate holder on whose behalf the report was submitted. FAA Form 8070-1 is used to submit the reports.

**Table 1:**

<b>Summary (Annual numbers)</b>	<b>Reporting</b>	<b>Recordkeepin g</b>	<b>Disclosure</b>
# of Respondents	6,000		
# of Responses per respondent	1		
Time per Response	.667		
Total # of responses	6,000		
Total burden (hours)	4002		
Labor Cost	\$170,005		

2. These are reporting requirements for part 121, 125, and 135 certificate holders. FAA Form 8070-1

These sectional changes are:

- o 121.703(a)(1), 125.410(a)(3); 135.415(a)(9).
- o 121.703(a)(2); 125.410(a)(4), 135.415(a)(10);
- o 121.703(a)(3), 125.410(b); 135.415(a)(12).
- o 121.703(a)(4); 135.415(a)(1), 135.415(c);
- o 121.703(a)(5), 135.415(a)(2), 135.415(e)(11);
- o 121.703(a)(6); 135.415(a)(3).
- o 121.703(c), 135.415(a)(4);
- o 121.703(e)(11), 135.415(a)(5).
- o 125.409(a); 135.415(a)(6)

**Table 2:**

<b>Summary (Annual numbers)</b>	<b>Reportin g</b>	<b>Recordkeepi ng</b>	<b>Disclosur e</b>
# of Respondents	14,004		
# of Responses per respondent	1		

<b>Summary (Annual numbers)</b>	<b>Reportin g</b>	<b>Recordkeepi ng</b>	<b>Disclosur e</b>
Time per Response	.667		
Total # of responses	14,004		
Total burden (hours)	9,341		
Labor Cost	\$396,806		

3. These are reports submitted by the general aviation. Submissions are voluntary. FAA Form 8040-1 is used to submit the reports.

**Table 3:**

<b>Summary (Annual numbers)</b>	<b>Reportin g</b>	<b>Recordkeepi ng</b>	<b>Disclosur e</b>
# of Respondents	2,000		
# of Responses per respondent	1		
Time per Response	.667		
Total # of responses	2,000		
Total burden (hours)	1334		
Labor Cost	\$56,668		

**BURDEN TOTALS**

<b>Summary (Annual numbers)</b>	<b>Reporting</b>	<b>Recordkeepin g</b>	<b>Disclosure</b>
Time per Response	.667		
Total # of responses	22,004		
Total burden (hours)	14,677		
Labor Cost	\$623,054		

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Since most respondents are individual members of the aviation public from all walks of life, we are not using a particular occupation or title to determine the economic cost of their time. Instead, the FAA is using a general private sector wage, including

benefits and overhead, of **\$42.48** per hour, provided by the Bureau of Labor Statistics.<sup>1</sup>

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

There are no additional material costs.

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

The Agency has expended an average of \$758,787 annually over the last 5 years on its legacy system. This amount includes the cost of manpower and system maintenance. In October 2022, the Agency approved a full system modernization at the cost of 3.7 million dollars. This investment will replace the mostly manual process used today, with a fully automated system that will enable real-time submission reviews, improve data quality, and ultimately increase our ability to perform predictive analytics using real-time data, at an annual cost of **\$528,571**. This investment will result in a positive return on investment as a result of reduced manpower and sustainment costs over a 7 year period.

Additionally, the SDRS automation program requires two full-time program managers, two organizational research analysts (40 hours annually each), and for each response in Table 1 of Question 12, 30 minutes of review and analysis by aviation safety inspectors across the organization.

To estimate the FAA cost, the average hourly wage for each job series is multiplied by a FAA fringe benefit factor of 1.3625, for a fully loaded wage.<sup>2,3</sup> The fully loaded wage is then multiplied by hours worked. The results of these calculations are presented below.

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<sup>1</sup> <https://www.bls.gov/news.release/ecec.nr0.htm>; "Total employer compensation costs for civilian workers averaged \$42.48 per hour worked in December 2022, the U.S. Bureau of Labor Statistics reported today. Wages and salaries cost employers \$29.32 and accounted for 69.0 percent of total costs, while benefits cost \$13.17 and accounted for the remaining 31.0 percent.

<sup>2</sup> Source: [Pay & Leave : Salaries & Wages - OPM.gov](https://www.opm.gov/pay-data-survey/). To estimate a fully loaded wage for each job series, the mid-range hourly wage from the OPM General Schedule is multiplied by a FAA benefit fringe factor. The mid-range hourly wage for a SDRS program manager is equivalent to FG 14, Step 1, for an hourly wage of \$55.77. The mid-range hourly wage for an organizational research analyst and aviation safety inspector is equivalent to an FG 13, Step 1, for an hourly wage of \$47.20.

<sup>3</sup> Source: <https://obamawhitehouse.archives.gov/sites/default/files/omb/memoranda/fy2008/m08-13.pdf>. The FAA benefit fringe factor is 1.3625 (See page 2 of the source). The fully loaded hourly wage for a SDRS program manager is \$75.99. The fully loaded hourly wage for an organizational research analyst and an aviation safety inspector are both \$64.31.





FAA Burden

Job Series	Hours (Annual)	Fully Loaded Wage (Hourly)	FAA Annual Cost
SDRS Program Manager (2)	4,160	\$75.99	\$316,118
Organizational Research Analysts (2)	80	\$64.31	\$5,145
Aviation Safety Inspectors	3,000	\$64.31	\$192,930
Automation Program			\$528,571
<b>Totals</b>	<b>7,240</b>		<b>\$1,042,764</b>

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

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

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**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.**

Collection of the required data is an ongoing effort. Publication of data will be on the FAA, Flight Standards Service, Service Difficulty Reporting web site, < <http://av-info.faa.gov/sdrx/>>. Data is available to query on-line with tools available on the web site. It is also available for download in flat file format in both weekly and yearly summaries.

**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.**

We are not seeking approval to not display the expiration date.

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

There are no exceptions.