

**Supporting Statement A**  
**International Role of the Federal Aviation Administration**  
**OMB 2120-XXXX**

**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 § 40104 (49 U.S.C. § 40104) requires “the Administrator to promote and achieve global improvements in the safety, efficiency, and environmental effect of air travel by engaging with foreign counterparts, in the International Civil Aviation Organization (ICAO) and its subsidiary organizations, and other international organizations and fora, and with the private sector.” The statute further requires the Administrator to engage bilaterally and multilaterally on an ongoing basis to bolster international collaboration and to harmonize international aviation safety requirements, and to expand the technical assistance provided by the FAA in support of enhancing international aviation safety.

The information to be collected is necessary to accomplish the mandate in § 40104 to “provide technical assistance on any other aspect of aviation safety that the Administrator determines is likely to enhance international aviation safety.” The information also informs the FAA’s International Strategy, which is the agency’s mechanism for fulfilling its international role. The information collection directly supports the FAA’s International Strategy by enabling the FAA to reshape and further strengthen its longstanding international contributions. Specifically, the information collection:

- Facilitates core work and training arrangements with foreign counterparts, ICAO and its subsidiary organizations, other international organizations and fora, and with private entities around the world;
- Identifies opportunities and unexpected changes; and,
- Ultimately contributes to the fulfillment of the FAA’s mission to provide the safest, most efficient aerospace system in the world.

**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.**

The purpose of the information collection is summarized in question 1. Foreign affairs specialists assigned to the FAA Office of International Affairs will collect voluntary information from respondents (foreign counterparts, ICAO and its subsidiary organizations, other international organizations and fora, or from private foreign entities) verbally, in-person or telephonically, or in writing via letter, email, or other electronic means. This collection will occur as needed on an ongoing basis and is considered “reporting.”

The information that would be reported to the FAA by respondents is a foreign state, region, or organization's aviation system information. For example, when considering a request or proposal for technical assistance, the FAA Office of International Affairs may collect information from a foreign civil aviation authority that discloses their air traffic management policies, procedures, and training. The FAA Office of International Affairs would use this information to evaluate the merits of the technical assistance request or proposal. The information collected would enable a more data-informed decision about how to best address the core matter in the most efficient and effective way, be it through training, supply support, other advisory services, referral to other non-U.S.-government resources, or denying the request or proposal.

Although the information collected may not be expected to be disseminated directly to the public, results may be used in management, technical or general informational publications.

**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.**

The relevant regulations and advisory material are available to respondents electronically via the FAA's website ([www.faa.gov](http://www.faa.gov)), as are hyperlinks to appropriate general email mailboxes and contact information. As mentioned in question 2, FAA foreign affairs specialists may collect information from respondents telephonically, or in writing via letter, email, or other electronic means. Flexibility in information collection is necessary due to the wide array of technologies available (or unavailable) to respondents around the world. No forms are involved, though they may be developed in the future based on respondent capabilities. The results of the information collection will not be made available to the public over the internet.

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

We have reviewed our directives and guidance material to ensure that no duplication exists. No other agency is responsible for collecting foreign civil aviation information. The collection of information can only be supplied by foreign counterparts, ICAO and its subsidiary organizations, other international organizations and fora, or from private foreign entities. Similar information is not available from any sources other than in question 2.

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

Respondents, whether small or large entities, are guided through the information collection by FAA foreign affairs specialists. The burden is minimized by providing electronic means of submitting information, as described in question 3.

**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.**

Respondents are only asked pertinent information necessary for the FAA to make factual determinations regarding the state of aviation safety and efficiency, and environmental effects of air travel within the respondent's scope of authority. All information is gathered for the accomplishment of a specific statutory requirement necessary to accomplish the FAA's international role. The collection of information is often in response to a request from foreign counterparts, ICAO and its subsidiary organizations, other international organizations and fora, or from private foreign entities who are seeking international engagement and/or technical assistance from the FAA. Delay in the collection and documentation of this information may perpetuate vulnerabilities in the international airspace system.

The frequency of this information collection is ongoing; it is established as needed by respondents seeking technical assistance or other opportunities, and by the FAA when and where it identifies opportunities to accomplish a specific statutory requirement (reference question 1).

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

There are no special circumstances.

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

A Federal Register Notice published on February 13, 2023 (88 FR 9312), solicited public comment. No comments were received. A second Federal Register Notice will be published to further solicit public comment. No other consultation efforts have been made.

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

No payments or gifts are made to respondents.

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

No assurances given.

**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.**

We estimate 20 responses per year at an average of 4 hours per response, for a total annual hourly burden of 80 hours. This estimate is based on the time it takes the FAA to respond to information collection requests from foreign partners and international organizations, and the average number of requests for FAA technical assistance received annually.

We found that these activities are typically performed by the respondents' equivalent to a FAA foreign affairs specialist, for which the FAA assumes a mid-grade GS-13 salary, Rest of USA locality. Annual salary is \$111,628,<sup>1</sup> divided by 2,080 hours for an hourly rate of \$53.66. The FAA uses a fringe benefits and overhead cost, for FAA employees, of 100%.<sup>2</sup> This results in a fully loaded wage of \$107.33 per hour.

The total hourly burden of 80 multiplied by the fully loaded hourly rate of \$107.33 results in an annual economic burden of **\$8,586.77**.

**Total Burden Summary Table**

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<sup>1</sup> <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/23Tables/pdf/RUS.pdf>

<sup>2</sup> U.S. Department of Health and Human Services, "Guidelines for Regulatory Impact Analysis" (2016), [https://aspe.hhs.gov/system/files/pdf/242926/HHS\\_RIAGuidance.pdf](https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf). On page 30, HHS states, "As an interim default, while HHS conducts more research, analysts should assume overhead costs (including benefits) are equal to 100 percent of pretax wages...."

Summary (Annual Numbers)	Reporting	Recordkeeping	Disclosure
<b># of Respondents</b>	20	0	0
<b># of Responses per Respondent</b>	1	0	0
<b>Time per Response (hours)</b>	4	0	0
<b>Total # of Responses</b>	20	0	0
<b>Total Burden (hours)</b>	80	0	0

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

We estimate there will be no additional 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 total estimated annual cost to the Federal government is **\$85,864.00**.

This cost was determined based on the time required for a FAA foreign affairs specialist to collect, review and process information from respondents. We estimate 20 encounters with respondents at an average cost of 40 hours of foreign affairs specialists' time per encounter, yielding a total hourly burden of 800 hours.

The FAA assumes a mid-grade GS-13 salary, Rest of USA locality. Annual salary is \$111,628, divided by 2,080 hours for an hourly rate of \$53.66. The FAA uses a fringe benefits and overhead cost, for FAA employees, of 100%. This results in a fully loaded wage of \$107.33 per hour.

The total hourly burden of 800 multiplied by the fully loaded hourly rate of \$107.33 results in an annual cost burden of **\$85,864.00** to the Federal government.

We estimate no other expenses as a result of this information collection.

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

This is a new collection.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

There are no plans for publication of this information.

**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 an exemption.

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

There are no exceptions.