

**Supporting Statement A**  
**The Carbon Offsetting and Reduction Scheme for International Aviation (CORSAIA)**  
**Monitoring, Reporting, and Verification (MRV) Program OMB 2120-0790**

The Carbon Offsetting and Reduction Scheme for International Aviation (CORSAIA) Monitoring, Reporting, and Verification (MRV) Program has been successfully implemented since the approval of its original Information Collection Request (ICR). Participating operators have submitted Emissions Monitoring Plans (EMPs) and annual Emissions Reports (ERs) as expected. Moving forward, participating operators will not have to submit updated EMPs unless they experience substantive changes to their operations; all participating operators must continue to submit ERs on an annual basis. As part of this renewal, FAA is adding one new optional collection: an ER CORSAIA Eligible Fuels Annex (CEFA). Respondents may choose to complete an optional ER CEFA if they want to receive credit for their use of CORSAIA Eligible Sustainable Aviation Fuel (SAF) or Lower Carbon Aviation Fuel (LCAF).

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

On June 27, 2018 the United States (through its International Civil Aviation Organization [ICAO] Council Member) voted to adopt Annex 16, Vol. IV of the Chicago Convention. Annex 16, Vol. IV contains the Standards and Recommended Practices (SARPs) relating to the implementation of the Carbon Offsetting and Reduction Scheme for International Aviation (CORSAIA). Annex 16, Vol. IV is a direct result of implementation of the “European Union Emissions Trading Scheme Prohibition Act of 2011” (PL 112-200), which includes a provision instructing the Secretary of Transportation and the FAA Administrator to use their authority to conduct international negotiations to pursue a worldwide approach to aircraft emissions. Additionally, FAA is instructed by 49 USC § 40105(b)(A) to act consistently with the obligations of the United States Government under an international agreement. Annex 16, Vol. IV implements a single market-based measure for international aviation emissions and ensures a fair playing field for all operators. It also avoids a patchwork of country- or regionally-based regulatory measures that are inconsistently applied, bureaucratically costly, and economically damaging. To implement Annex 16, Vol. IV, U.S. aircraft operators are required to file an Emissions Monitoring Plan (EMP) if they emit more than 10,000 tonnes of emissions on international flights with fixed wing aircraft that have a maximum takeoff mass (MTOM) of greater than 5,700 kg. Flights for Heads of State, military, customs and police, and humanitarian, firefighting, and medical purposes are fully excluded. U.S. operators that have filed an EMP are also required to file an annual Emissions Report (ER). Together, an operator’s EMP and annual ERs allow an operator and the FAA to fulfill the emissions monitoring, reporting, and verification (MRV) requirements of Annex 16 Vol. IV. Pursuant to ICAO processes and procedures, ICAO Member States had until 22 October 2018 to register disapproval in whole or in part with Annex 16, Vol. IV.<sup>1</sup> In

---

<sup>1</sup> Pursuant to Article 90 of the *International Civil Aviation Organization (ICAO), Convention on Civil Aviation (Chicago Convention)*, “The adoption by the Council of the Annexes ... shall then be submitted by the Council to each contracting State. Any such Annex or any amendment of an Annex shall become effective within three months after its submission to the contracting States or at the end of such longer period of time as the Council may

addition, Member States had until 18 December 2019 to file differences with Annex 16, Vol. IV.<sup>2</sup>

References:

- European Union Emissions Trading Scheme Prohibition Act of 2011 (PL 112-200)
- 49 USC § 40105 (b)(A)
- Annex 16, Volume IV – Carbon Offsetting and Reduction Scheme for International Aviation (CORSA) of the Convention on Civil Aviation (hereinafter the “Chicago Convention”).

**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.**

Operators that are subject to the applicability of Annex 16 Vol. IV. (i.e., they emit more than 10,000 tonnes of emissions on international flights with fixed wing aircraft that have a maximum takeoff mass (MTOM) of greater than 5,700 kg) and choose to participate in the FAA program will continue submit their EMPs and ERs electronically as a result of this collection renewal. Both documents use Microsoft Excel-based templates and can be transmitted via email or uploaded to a web portal. EMPs that are submitted by operators will be used as a collaborative tool between the operator and FAA to document a given operator’s chosen fuel use monitoring procedures.

FAA will continue to retain a copy of the EMP and will share with ICAO a list of operators that are obligated to submit EMPs. This will demonstrate U.S. implementation of Annex 16 Vol. IV. FAA will not submit any specific EMPs from U.S. operators to ICAO. Annual ERs that have been submitted to FAA by operators and verifiers as a result of previous collections, and continue to be submitted to FAA as a result of this collection renewal, will be used to document each operators’ international emissions. FAA will use the ERs to calculate aggregated emissions data for all U.S. operators at the airport-pair level. FAA has submitted as a result of previous collections, and will continue to submit as a result of this collection renewal, the aggregated country-pair emissions data to ICAO to demonstrate U.S. implementation of Annex 16 Vol. IV.

---

prescribe, unless in the meantime a majority of the contracting States register their disapproval with the Council.”

<sup>2</sup> Pursuant to Article 38 of the *Chicago Convention*, “Any State which finds it impracticable to comply in all respects with any such international standard or procedure ... or which deems it necessary to adopt regulations or practices differing in any particular respect from those established by an international standard, shall give immediate notification ... of the differences between its own practice and that established by the international standard. In the case of amendments to international standards, any State which does not make the appropriate amendments to its own regulations or practices shall give notice to the Council within sixty days of the adoption of the amendment to the international standard, or indicate the action which it proposes to take. In any such case, the Council shall make immediate notification to all other states of the difference which exists between one or more features of an international standard and the corresponding national practice of that State.

**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.**

EMP, ER, and ER CEFA templates use Microsoft Excel-based templates, which maximizes convenience for operators given the application's widespread use and ease of data entry. FAA will allow operators to submit their completed EMPs, ERs, and ER CEFA's electronically via email.

**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.**

Information currently submitted to and collected by FAA or DOT (e.g., BTS Form 41 fuel burn data) does not provide the necessary level of fidelity on emissions and fuel data to enable the United States to meet its obligations under Annex 16, Vol. IV.

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

This collection will not involve small businesses or small entities.

*Note: As described in 1., there are no filing requirements for small U.S. aircraft operators since only operators who emit more than 10,000 tonnes of emissions on international flights are required to file an EMP and annual ERs.*

**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.**

Annex 16 Vol. IV requires operators submit a single EMP to document its monitoring plans (i.e., the first step of the MRV process), and must only submit an updated EMP if there are substantive changes to their operations. Annex 16 Vol. IV also requires operators to submit an ER annually to report its emissions and have them verified (i.e., the subsequent steps of the MRV process). If an operator does not submit an EMP, nor its annual ERs, the United States will not be in compliance with Annex 16 Vol. IV.

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

Annex 16 Vol. IV requires operators to keep records relevant to demonstrating their compliance for a period of 10 years, which is considered a "special circumstance" in the list below. This information collection results in no other "special circumstances."

- ***requiring respondents to report information to the agency more often than quarterly;***

- *None*
- ***requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;***
  - *None*
- ***requiring respondents to submit more than an original and two copies of any document; requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;***
  - *Annex 16 Vol. IV requires operators to keep records relevant to demonstrating their compliance for a period of 10 years.*
- ***in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;***
  - *None*
- ***requiring the use of a statistical data classification that has not been reviewed and approved by OMB;***
  - *None*
- ***that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or***
  - *None*
- ***requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.***
  - *None*

**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 January 25, 2023 (88 FR 4878), solicited public comment. Two comments were received: one from an anonymous commentor, and a second from Airlines for America.

The anonymous commentor stated their view that they believed the PRA renewal was a good idea, that the burden seemed reasonable, and suggested more frequent reporting requirements to more effectively track airline emissions. Regarding the suggestion to increase the reporting frequency, FAA does not agree that more frequent reporting requirements would result in more effective emissions tracking. The CORSIA MRV Program is designed to monitor, report, and verify operator emissions on an annual basis and would require major changes and likely increased burdens to accept more frequent Emissions Report submissions, without resulting in improved data quality.

Airlines for America submitted comments that were strongly supportive of CORSIA and the proposal to renew the information collection, but requested clarifications, including action by the FAA to renew the underlying CORSIA MRV Program. As explained by Airlines for America in their comments, the CORSIA MRV Program originally included reporting requirements for 2019 and 2020, but airlines have continued to voluntarily submit Emissions Reports in subsequent years. Additionally, Airlines for America requested clarification that airlines would not be required to submit new Emissions Monitoring Plans or updated signatory forms documenting their voluntary participation in the CORSIA MRV Program as a result of this renewal. Last, Airlines for America noted that the proposed Emissions Report (ER) CORSIA Eligible Fuels Annex (CEFA) was not included in the original PRA information collection request but was otherwise supportive of including it; FAA views the ER CEFA as an optional annex to the original ER form. Airlines for America noted that the estimated burden appeared reasonable but noted that as production of Sustainable Aviation Fuel scales, it may be necessary to reevaluate these estimates for future renewals and consider revising the information collection to more effectively and efficiently support implementation of the CORSIA MRV Program. As a result of the comments received from Airlines for America, FAA posted an updated CORSIA MRV Program Statement on FAA's webpage on May 25, 2023. The updated CORSIA MRV Program Statement directly addresses the comments received from Airlines for America, including extended reporting years, clarification that new EMPs and signatory forms are not required as part of the renewal, and content regarding ER CEFA submissions.

Prior to receiving comments on the Federal Register Notice, FAA notified both Airlines for America and the National Business Aviation Association regarding the opportunity to comment on the information collection request renewal. Ultimately, only Airlines for America submitted formal comments.

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

N/A. The FAA will not be providing any payments or gifts to respondents.

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

No assurance of confidentiality to respondents.

**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.**

This collection does not contain any questions of a sensitive nature.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

Overall, this collection is estimated to result in the following for EMPs:

- **EMP Number of respondents (total):** From the outset, 35 operators submitted an EMP. These operators may submit an updated EMP if the operator experiences substantive changes to its operations that would impact the information contained in its EMP. Some additional operators could submit an EMP over time (as CORSIA moves from voluntary to mandated reporting). Based on experience with reporting since 2019 and using secondary data sources to gap fill the Emissions Report, approximately 15 operators could submit an EMP, including 6 respondents who would use a Fuel Use Monitoring Method and 9 respondents who may use a simplified Monitoring Method. Additional operators that would be identified as being within the scope of applicability of CORSIA or cross applicability threshold due to growth in their international aviation activity could submit new EMPs in the future.
- **EMP submission frequency per respondent:**
  - **Initial EMP submission:** 1 per respondent
- **EMP hour burden per year (total):** It is expected that filling and submitting an EMP could on average take approximately 28.6 hours per operator. This assumes 47.5 hours for respondents using Fuel Use Monitoring Methods and 16 hours for respondents using simplified Monitoring Methods.
- **EMP annualized cost (total):** Based on hourly cost assumptions described in the section below: “Explanation of how ER and EMP burdens,” the total estimated cost for filling and submitting an EMP is approximately \$3500 per operator and per submission for respondents using Fuel Use Monitoring Methods

and \$1200 per operator and per submission for respondents using simplified Monitoring Methods.

Overall, this collection is estimated to result in the following for ERs:

- **ER Number of respondents (total):**
  - o **Number of respondents using Fuel Use Monitoring Methods:** A total of 21 operators using Fuel Use Monitoring Methods submitted an ER in 2021.
  - o **Number of respondents using simplified Monitoring Methods:** During the 2021 reporting year, one operator submitted an Emissions Report using a simplified Monitoring Method.

**ER submission frequency per respondent:** 1 per respondent for any given year (y).

- **ER hour burden per year (total):**
  - o **ER hour burden per year for respondents using Fuel Use Monitoring Methods:** Filling and reporting an Emissions Report would take on the order of 68 hours per operator and per year for operators using a Fuel Use Monitoring Method (i.e., monitoring fuel at individual flight level). This includes 60 hours per operator per year for filling and reporting an Emissions Report and an additional potential 8 hours for filling and reporting the Emissions Report CORSIA Eligible Fuels Annex.
  - o **ER hour burden per year for respondents using simplified Monitoring Methods:** Filling and reporting an Emissions Report would take on the order of 21.5 hours per operator and per year for operators using a simplified Monitoring Methods (i.e., using the ICAO CORSIA CERT). This includes 17.5 hours per operator per year for filling and reporting an Emissions Report and an additional potential 4 hours for filling and reporting Emissions Report CORSIA Eligible Fuels Annex.
- **ER annualized cost (total):**
  - o **ER annualized cost per submission per operator using Fuel Use Monitoring Methods:** For operators using a Fuel Use Monitoring Method (i.e., monitoring fuel at individual flight level), reporting cost could be on the order of \$5,010 per operator and per year.
  - o **ER annualized cost per submission per operator using simplified Monitoring Methods:** For operators using a simplified Monitoring Methods (i.e., using the ICAO CORSIA CERT), reporting cost could be on the order of \$1,580 per operator and per year.

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
IC 1) Emission Monitoring Plan (EMP)			
Note: An additional 15 respondents are expected to submit 1 EMP each in a 3 year window. These values are annualized below.			
<b># of Respondents</b>	5	5	0
<b># of Responses per respondent</b>	1	1	0
<b>Time per Response (hours)</b>	27.6	1	0
<b>Total # of responses</b>	5	5	
<b>Total burden (hours)</b>	138	5	
IC 2) Emission Report (ER)			
Note: 50 respondents are expected to submit 1 ER each, annually.			
<b># of Respondents</b>	50	50	0
<b># of Responses per respondent</b>	1	1	0
<b>Time per Response (hours)</b>	42	1	0
<b>Total # of responses</b>	50	50	
<b>Total burden (hours)</b>	2100	50	
IC 3) ER CORSIA Eligible Fuels Annex (CEFA)			
Note: 50 respondents are expected to submit 1 ER CEFA each,			



annually.			
<b># of Respondents</b>	50	50	0
<b># of Responses per respondent</b>	1	1	0
<b>Time per Response (hours)</b>	5.9	0.5	0
<b>Total # of responses</b>	50	50	
<b>Total burden (hours)</b>	295	25	
All ICs			
<b>Total # of responses</b>	105	105	0
<b>Total burden (hours)</b>	2,533 = 138 + 2100 + 295	80 = 5 + 50 + 25	0

Explanation of how ER and EMP burdens were estimated:

The number of respondents was assessed based on information collected during the ongoing phase of reporting of the Carbon Offsetting and Reduction Scheme for International Aviation (CORSA) Monitoring, Reporting, and Verification (MRV) Program.

The hourly rates for the preparation and submission of an Emissions Monitoring Plan are based on a mix of wage rates that include a 50% burden on General and Operations Managers (11-1021) with an hourly rate of \$55.41 and a 50% burden on a Management Analysts (13-1110) with an hourly rate of \$48.33<sup>3</sup>. The fully loaded rate of \$73.68 was calculated using a multiplier of 1.42 based on the United States average of wage and salaries and benefits for private industry workers<sup>4</sup>. In mathematical terms, the fully loaded rate of \$73.68 =  $(\$55.41 \times 50\% + \$48.33 \times 50\%) \times 1.42$ .

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

**Overall, this incremental collection is estimated to result in the following for EMPs:**

- **EMP total costs:** The total cost to additional U.S. operators of filling and submitting an EMP (once per operator) could be approximately \$31,600 for a three-year period or \$10,530 per year.

**Overall, this collection is estimated to result in the following for ERs:**

- **ER total capital/startup costs (annualized):** Given that U.S. operators generally have sophisticated IT systems and fuel monitoring system already in place for other purposes (e.g., internal fuel management procedures or external reporting), it was assumed that the reporting requirements associated with Annex 16, Vol. IV should not require any new IT system/infrastructure to operators.
- **ER total operation and maintenance and purchase of services:** Excluding labor, no other operation and maintenance expenses are expected.

**Explanation of how ER and EMP costs were estimated:**

Annual unit cost of reporting to the FAA, were based on analyses of cost of MRV conducted by the ICAO Global Market Based Measure technical Task Force (GMTF), with the support from U.S. experts. Given that U.S. operators generally have sophisticated IT systems and fuel monitoring system already in place for other purposes (e.g., internal fuel management procedures or external reporting), it was assumed that the reporting requirements associated with Annex 16, Vol. IV should not require any new IT system/infrastructure to operators. In addition, for operators eligible to use simplified procedures, the CERT tool required by Annex 16, Vol. IV is available free of charge and runs on commonly used laptops and/or desktop computers.

---

<sup>3</sup> U.S. Bureau of Labor Statistics, "Occupational Employment and Wage Statistics, May 2021 National Occupational Employment and Wage Estimates United States", available at: [www.bls.gov/oes/current/oes\\_nat.htm](http://www.bls.gov/oes/current/oes_nat.htm)

<sup>4</sup> U.S. Bureau of Labor Statistics, "Employer Costs for Employee Compensation Summary", available at: [www.bls.gov/news.release/ecec.nr0.htm#:~:text=Total%20employer%20compensation%20costs%20for,and%20accounted%20for%2029.6%20percent](http://www.bls.gov/news.release/ecec.nr0.htm#:~:text=Total%20employer%20compensation%20costs%20for,and%20accounted%20for%2029.6%20percent).

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.

***Estimated annualized cost to the Federal government:*** The total estimated cost to the Federal government related to the EMP and ERs are expected to be approximately \$68,300 per year. It is calculated based on the following formula: (5 EMPs per year \* 12 hours per EMP + 30 ERs per year \* 7.5 hours per ER + 20 ERs per year \* 5 hour per ER + 10 hours for notifying ICAO + 160 for compiling ERs + 10 hours for submitting the US Report + 2 hours for submitting the aeroplane operator and verifiers lists) \* an hourly rate of \$ 120.54 = \$ 68,346.18

Explanation of how annualized cost to the Federal government was estimated:

Estimates of costs to the Federal government include; cost of managing EMPs and ERs, cost of supporting reporting systems (contracted out) as well as the cost of reporting the list of operators and the aggregated emissions reports to ICAO.

The collection and review of the Emissions Monitoring Plan are assumed to take 12 hours per operator.

The collection and review (i.e., order of magnitude check of the verified emissions report) is estimated to require 7.5 hours for operators that use a fuel use monitoring method and 5 hours for operators that use simplified monitoring procedures.

The reporting to ICAO is estimated to require; 10 hours per year for notifying ICAO of the decision to voluntarily participate, 160 hours per year for compiling the aggregated emissions report from States to ICAO, 10 hours per year to submit CO<sub>2</sub> emissions to ICAO and 2 hours for submitting the updated list of airplane operators and verifiers ICAO.

The wage rates of Federal employees at FAA in Washington, DC were estimated using the midpoint (Step 5) for Grades 13 and 15 of the General Schedule in the Washington, DC locality area<sup>5</sup>. The hourly wage and salaries rates were

---

<sup>5</sup> Source: Office of Personnel Management, "2022 Pay & Leave, Salaries and Wages, Salary Table 2022-DCB" [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/22Tables/html/DCB\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/22Tables/html/DCB_h.aspx)

multiplied by 2 to account for a fringe benefits rate of 69 percent<sup>6</sup> and an overhead rate of 31 percent<sup>7</sup>.

The hourly rate (\$120.54) for collecting, reviewing Emissions Monitoring Plans and Emissions Reports, managing and submitting the Emissions Reports and relevant lists of Operators are based on a mix of wage rates including a 10% burden on GS-15 with hourly rate of \$161.26 (i.e., \$80.63 \* 2) and 90% burden on a GS-13 with hourly rate of \$116.02 (i.e., \$58.01\*2). The hourly rate of \$120.54 is calculated as the weighted sum of \$80.63 multiplied by 2 to account for fringe and overhead multiplied by 0.1 for work share and \$58.01 multiplied by 2 to account for fringe and overhead multiplied by 0.9 for work share; or in mathematical terms  $0.1*2*\$80.63+0.9*2*\$58.01=\$120.54$ .

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

As part of this renewal, FAA is including adjusted estimates for the number of respondents and response time based on our experience since the original ICR was submitted. It also adds one optional collection: an ER CORSIA Eligible Fuels Annex (CEFA). Respondents may choose to complete an optional ER CEFA if they want to receive credit for their use of CORSIA Eligible Sustainable Aviation Fuel (SAF) or Lower Carbon Aviation Fuel (LCAF).

Separately, as part of the terms of clearance for the original Notice of Office of Management and Budget Action, FAA was directed to evaluate mechanisms for accommodating ‘...respondents whose data exports use FAA identifiers (in addition to ICAO airport codes).’ After considering alternatives (e.g., only requiring FAA identifiers on the form, or creating a lookup mechanism on the form), FAA believes ICAO airports codes are better suited than FAA identifiers for this collection because: 1) ICAO airport codes help reduce the likelihood of data entry errors between airports with similar FAA identifiers in different countries; and 2) the overwhelming majority of ICAO airport codes for airports in the United States only require respondents to insert a single letter, ‘K,’ in front of the three character FAA identifier.

#### **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**

---

<sup>6</sup> Source: Congressional Budget Office, “Comparing the Compensation of Federal and Private-Sector Employees, 2011 to 2015” (April 2017), <https://www.cbo.gov/publication/52637>. The wages of Federal workers averaged \$38.30 per hour over the study period, while the benefits averaged \$26.50 per hour, which is a benefits rate of 69 percent.

<sup>7</sup> Source: 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...” To isolate the overhead rate, the benefits rate of 69 percent were subtracted from the recommended rate of 100 percent.

**and ending dates of the collection of information, completion of report, publication dates, and other actions.**

The FAA has not, and does not plan to, directly publish the results of this data collection. FAA, however, has and will continue to share a list of operators that are obligated to submit EMPs with ICAO. FAA has and will also continue use the ERs to calculate aggregated emissions data for all U.S. operators at the airport-pair level and submit the aggregated country-pair emissions data to ICAO to demonstrate U.S. implementation of Annex 16 Vol. IV. FAA will not submit any individual operator's EMPs or ERs to ICAO.

**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.**

FAA is seeking approval not to display an expiration date for both the EMP and ER template. Annex 16 Vol. IV only requires an operator to file a single EMP at the start of the MRV process. If, however, an operator experiences substantive changes to its operations that impact the information contained in its EMP it is required to submit an updated EMP. Since the EMP template is not expected to change in future years, but operators may need to submit an updated EMP due to potential operational changes, FAA requests approval not to display an expiration date. Similarly, since Annex 16 Vol. IV requires an operator to submit an annual ER to FAA, and the ER template is not expected to change in future years, FAA requests approval not to display an 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 to the certification statement.