Supporting Statement A

Part 121 Operating Requirements: Domestic, Flag, and Supplemental Operations OMB #2120-0008

- The number of active air carriers operating under part 121 has increased from the previous submission from 66 in 2021 to a current number of 90. This is the primary driver of the overall increase in estimated responses.
- The estimate for the number of aircraft operated by air carriers under part 121
 has increased from the previous submission. The increased numbers of aircraft
 may reflect an increase in the fleet size of air carriers or the increased use of
 smaller regional jets.
- The number of pilots in command of active air carriers operating under part 121 has increased from the previous submission.
- The number of other pilots of active air carriers operating under part 121 has increased from the previous submission.
- The number of flight attendants of active air carriers operating under part 121 has increased from the previous submission.
- The hour and cost estimates have all been updated to reflect 2024 wages and statistics.
- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

This information collection supports the Department of Transportation's strategic goal of safety. Specifically, the goal is to promote the public health and safety by working toward the elimination of transportation-related deaths, injuries, and property damage/loss.

Title 49 USC, Section 44702, empowers the Secretary of Transportation to issue air carrier operating certificates and to establish minimum safety standards for the operation of the air carrier to whom such certificates are issued. Under the authority of Title 49 CFR, Section 44701, Federal Aviation Regulations Part 121 prescribes the terms, conditions, and limitations as are necessary to ensure safety in air transportation.

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.

Each operator which seeks to obtain, or is in possession of, an air carrier operating certificate is mandated to comply with the requirements of FAR Part 121 in order to maintain (recordkeeping, reporting) data which is used to determine if the air carrier is operating in accordance with minimum safety standards. Original certification is completed in accordance with part 119. Continuing certification is completed in accordance with part 121. The information reviewed as a part of this collection (manuals and guidance documents) is used to determine air operators' compliance with the minimum safety standards and the applicants' eligibility for air operations certification. The FAA will use the information it reviews to ensure compliance and adherence to regulations and, if necessary, take enforcement action on violators of the regulations. The information collected will not be disseminated to the public or used to support publicly disseminated information.

Since there are many components to this collection, the information is collected as required by the regulation. Some collections are one time while others are more frequent.

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 burden associated with FAR 121 is recording and recordkeeping. The FAA has encouraged the use of automation by the air carriers to reduce their burden. Operating Specifications are now automated and issued by FAA. Many operators are transmitting manuals to their employee groups via electronic format.

Additionally, in accordance with the Government Paperwork Elimination Act (GPEA), the FAA encourages the use of automation and electronic media for the gathering, storage, presentation, review, and transmission of all requests, records, reports, tests, or statements required by this final rule with the provision that such automation or electronic media has adequate provision for security (i.e., that such submissions may not be altered after review and acceptance by the FAA) and that the systems or applications are compatible with the systems or applications used by the FAA.

This collection does not involve any forms. The results of the information collection will not be made available to the public.

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.

All other FAA public-use reports have been reviewed and no duplication has been found. Also, we know of no other agency collecting information from air carriers prescribing the terms, conditions, and limitations of their operating certificate. This information, required by Part 121, is to ensure air transportation safety.

The information collected is only available from the applicant applying for an operating certificate. The applicant must prescribe his/her own data based on the proposed operation. The information is not available from any other source.

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

Applicants for operating certificates, whether small business or large, are guided through the administrative requirements of FAR Part 121 by the local Flight Standards office assigned certificate responsibilities. The actual operations specifications are automated and the paragraphs that are issued are only those appropriate to a specific carrier's operation. For other reporting or recordkeeping burden listed, the smaller operators have burdens in proportion to the size of their operation.

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 frequency of information collection is dependent on the applicant's business plan and the need for operators who have obtained air carrier certification to undergo recertification if they plan to conduct new kinds of operations. The applicants who request certification benefits, for the most part, determine the frequency of information collection.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner:
 - requiring respondents to report information to the agency more often than quarterly;
 - requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
 - 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;

- 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;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- 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
- 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.

This collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2)(i)-(viii), with the exception that some records are maintained longer than three years. Qualification records for crewmembers and aircraft dispatchers are maintained for as long as the person works for the company.

With respect to maintenance recording/recordkeeping requirements (FAR 121.380, 121.380a) "Each certificate holder who sells a US registered aircraft shall transfer to the purchaser, at the time of sale, the following records of that aircraft." This means that there are certain maintenance records that stay with the aircraft for the life of the aircraft and are transferred from owner to owner.

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 17, 2024 (89 FR 3020) solicited public comment. No comments were received.

Air Carrier management has frequent communication with their assigned FAA office. They are able to comment on current issues during these frequent meetings.

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

There are no monetary considerations for this collection 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 confidentially.

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. The statement should:
 - Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices. * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
 - Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under item 13.

The following costs are based on the paperwork burden being done by a Technical Analyst or equivalent staffer earning approximately \$45.81 an hour¹. A 31.4 percent multiplier was then applied to account for fringe benefits which brings the salary to the

¹ Management Analysts: Occupational Outlook Handbook: : U.S. Bureau of Labor Statistics (bls.gov)

salary to \$60.19.² To account for overhead, a multiplier of 17 percent was applied.³ Therefore, the estimated hourly salary for a Technical Analyst is \$70.

An Administrative Assistant earns approximately \$20.87 an hour⁴. A 31.4 percent multiplier was then applied to account for fringe benefits which brings the salary to \$27.42.⁵ To account for overhead, a multiplier of 17 percent was applied.⁶ Therefore, the estimated hourly salary for an Administrative Assistant is \$32.

A flight attendant earns approximately \$75.90 an hour⁷. A 31.4 percent multiplier was then applied to account for fringe benefits which brings the salary to \$99.73.8 To account for overhead, a multiplier of 17 percent was applied.9 Therefore, the estimated hourly salary for a flight attendant is \$117.

There are 90 air carriers currently operating under the provisions of part 121¹⁰.

The following data regarding operations under part 121 are also used to update the renewal of this collection:

- 46,692 PICs
- 56,215 Other Pilots
- 62 Flight Engineers
- 139,213 Flight Attendants
- 3,146 Aircraft Dispatchers
- 0 Navigators
- 7,935 Aircraft

² https://www.bls.gov/news.release/ecec.nr0.htm

³ Source: Cody Rice, U.S. Environmental Protection Agency, "Wage Rates for Economic Analyses of the Toxics Release Inventory Program" (June 10, 2002), https://www.regulations.gov/document?D=EPA-HQ-OPPT-2014-0650-0005.

⁴ Secretaries and Administrative Assistants, Except Legal, Medical, and Executive (bls.gov)

⁵ https://www.bls.gov/news.release/ecec.nr0.htm

⁶ Source: Cody Rice, U.S. Environmental Protection Agency, "Wage Rates for Economic Analyses of the Toxics Release Inventory Program" (June 10, 2002), https://www.regulations.gov/document?D=EPA-HQ-OPPT-2014-0650-0005.

⁷ Flight Attendants: Occupational Outlook Handbook: : U.S. Bureau of Labor Statistics (bls.gov)

⁸ https://www.bls.gov/news.release/ecec.nr0.htm

⁹ Source: Cody Rice, U.S. Environmental Protection Agency, "Wage Rates for Economic Analyses of the Toxics Release Inventory Program" (June 10, 2002), https://www.regulations.gov/document?D=EPA-HQ-OPPT-2014-0650-0005.

¹⁰ https://www.transportation.gov/sites/dot.gov/files/2022-03/Cert%20Carrier%20List_March%202022_0.pdf

§121.133, Preparation, requires that each carrier prepare and keep current a manual for the use and guidance of Flight, ground operations, and management personnel; section 121.137, Distribution and Availability, requires that each certificate holder furnish copies of the manual required by 121.133 to its personnel and the Administrator, and that each person shall keep it current; Sec 121.139, Requirement for Manual Aboard Aircraft: Supplemental Operations, contains requirements for operators related to manuals when operating under Supplemental rules; and Sec 121.141, Airplane Flight Manual, requires that each certificate holder shall keep a current approved airplane flight manual for each type airplane except non-transport category certificated prior to January 1965. For each type airplane that requires this manual, the operator may carry this manual or the manual required by 121.133. The manufacturer, not the carrier, is responsible to develop revisions and give them to the carrier.

Original manuals are a part of original certification (part 119). Revisions to manuals are part 121. Revisions of various manuals: Average of 100 revisions per carrier per year x 90 carriers x 2 technical hours per revision and .5 admin hours per revision.

	Section	Туре	Carr	Revision	Total	# of	Total	Hourly	Total
			iers			Hours	Hours	Rate	
I	121.133	Technical	90	100		2	18,000	\$70	\$1,260,000
					9,000				
		Admin	90	100	9,000	0.5	4,500	\$32	\$144,000
ĺ							22,500		\$1,404,000

Summary			
(Annual	Reportin	Recordkeepin	Disclosur
numbers)	g	g	е
# of			
Respondents		90	
# of			
Responses			
per			
respondent		100	
Time per			
Response		2.5 Hours	
Total # of			
responses		9,000	
Total burden			
(hours)		22,500	

§121.153, Aircraft Requirements: General –Files a copy (paragraph c4) of the aircraft lease or charter agreement with the FAA Aircraft Registry. Only applies to foreign registered aircraft (FAA estimates no more than 6 leases/charters a year system wide).

Section	7 1	Carr iers	Revision				Hourly Rate	Total
121.153	Admin	6	1	6	.2	1	\$32	`\$32

Summary (Annual	Reportin	Recordkeepin	Disclosur
numbers)	g	g	е
# of			
Respondents		6	
# of			
Responses			
per			
respondent		1	
Time per			
Response		.2 Hours	
Total # of			
responses		6	
Total burden			
(hours)		1 Hour	

§121.198, Cargo Service Airplanes: Increased Zero Fuel and Landing Weights – The Airplane Flight Manual (paragraph f) for each airplane operated under this section must be appropriately revised to include the operating limitations and limitation needed for operation at the increased weights. This burden is included in Section 121.133 above.

§121.207, Provisionally Certificated Airplanes: Operating Limitations – Requires that each air carrier shall keep a log of each provisionally certificated aircraft flight conducted under this part. Each air carrier shall keep accurate and complete records of each inspection made and all maintenance performed on the airplane.

Section	Туре	Total	# of Hours	Hourly Rate	Total
121.207	Admin	5	0.2		\$32

Summary			
(Annual	Reportin	Recordkeepin	Disclosur
numbers)	g	g	е
# of			
Respondents		5	
# of		1	

Responses		
per		
respondent		
Time per		
Response	.2 Hour	
Total # of		
responses	5	
Total burden		
(hours)	1 Hour	

- §121.285, Carriage of Cargo in Passenger Cargo Compartments (b)(2) the maximum weight of cargo that the bin is approved to carry and any instructions necessary to ensure proper weight distribution within the bin must be conspicuously marked on the bin. Bins are traditionally labeled (metal not paper) by the manufacturer. The carrier is responsible to see that the regulation is complied with. The carrier would develop procedures to ensure this. The burden would be included in Sec 121.133, 121.137, 121.139, 121.141.
- §121.309, Emergency Equipment (b)(3) Equipment must be clearly identified and clearly marked to indicate its method of operations. This is traditionally done by the manufacturer who sold the equipment to the carrier. The carrier is responsible to ensure compliance of the regulation. The carrier would develop procedures to ensure this. The burden would be included in Sec 121.133, 121.137, 121.139, 121.141.
- §121.310, Additional Emergency Equipment -- This section requires various signs, placards, and directions to guide users of emergency equipment. Such requirements are met by the manufacturers of the airplane or of the equipment. The carrier is responsible to ensure compliance of the regulation. The carrier would develop procedures to ensure this. The burden would be included in Sec 121.133, 121.137, 121.139, 121.141.
- §121.311, Seats, Safety Belts, and Shoulder Harnesses -- (b)(2)(ii) Requires labels for child seats. The labels are on the seat as sold by the manufacturer. The carrier is responsible to ensure compliance of the regulation. The carrier would develop procedures to ensure this. The burden would be included in Sec 121.133, 121.137, 121.139, 121.141.
- §121.313, Miscellaneous Equipment -- (h) Requires a placard on doors that are a means of access to a required passenger emergency exist to indicate that the door must be open during takeoff and landing. Placards are added by the manufacturer or by the carrier during original certification. The carrier is responsible to ensure compliance of the regulation. The carrier would develop procedures to ensure this. The burden would be included in Sec 121.133, 121.137, 121.139, 121.141.
- §121.315, Cockpit Check Procedures -- (a) Requires that each certificate holder provide an approved cockpit check procedure for each type of aircraft. The original procedure is

part of the original carrier certification (see section 119.35). The airplane manufacturer develops the checklist and a carrier may adapt it to fit their unique operation.

Revisions:

Section	Туре	Carriers	Rev		1	Total Hours	_	Total
121.315	Technical	90	1	90	5	450	\$70	\$31,500
	Admin	90	1	90	0.5	45	\$32	\$1,440
						495		\$32,940

Existing carriers' addition a new make/model to the fleet:

Section	Туре				Hourly Rate	Total
121.315	Technical	8	9	72	\$70	\$5,040
	Admin	8	2	<u>16</u>	\$32	<u>\$512</u>
				88		\$5,552

Totals:

121.315			495	\$32,940
			88	\$5,552
			583	\$38,492

Revisions

176/1310113			
Summary			
(Annual	Reportin	Recordkeepin	Disclosur
numbers)	g	g	е
# of			
Respondents		90	
# of			
Responses			
per			
respondent		1	
Time per			
Response		5.5 Hours	
Total # of			
responses		90	
Total burden			
(hours)		495 Hours	

Adding to Fleet

Cummon	Donortin	Recordkeepin	Disologue
Summary	Reportin	Recorakeepin	Disclosur
<u> </u>			

(Annual			
numbers)	g	g	е
# of			
Respondents		8	
# of			
Responses			
per			
respondent		1	
Time per			
Response		11 Hours	
Total # of			
responses		8	
Total burden			
(hours)		88 Hours	

- §121.317, Passenger Information This section requires various signs and placards. Signs and placards are done by the manufacturer or by the carrier during original certification. The carrier is responsible to ensure compliance of the regulation. The burden would be included in Sec 121.133, 121.137, 121.139, 121.141.
- §121.333, Supplemental Oxygen -- (f) Requires a passenger briefing before flight is conducted above flight level 250. The briefing must be accomplished by a crewmember. Traditionally that crewmember is a flight attendant. Only the transport category airplanes would be operating above flight level 250, which would utilize Flight Attendants. The burden would be included in Sec 121.133, 121.137, 121.139, 121.141.
- §121.337, Protective Breathing Equipment (c) (2) Requires the carrier to designate at least one crewmember to perform before takeoff checks of the first flight of the day. This designation must be in the carrier's operations manual (§ 121.133). If the flight has Flight Attendants, they would do the briefing. If not, a pilot would do the briefing. The burden would be included in Sec 121.133, 121.137, 121.139, 121.141.
- §121.339, Emergency Equipment for Extended Overwater Operations (a) (4) Requires the date for replacement or recharge of a battery be "legibly marked on the outside of the transmitter." This requirement does not apply if the battery is water-activated such that it is unaffected during probable storage intervals. (Most batteries used are water-activated.) (b) Requires that life preservers, and survival type emergency locator transmitters be installed in "conspicuously marked approved locations". The carrier is responsible to see that the regulation is complied with. The carrier would develop procedures to ensure this. The procedures would be in the manuals. Approved equipment locations are part of original certification. The burden would be included in Sec 121.133, 121.137, 121.139, 121.141.
- §121.340, Emergency Flotation Means (b) Requires an emergency flotation mean for each occupant on overwater flights and provides for deviations in some cases.

Estimated total of 10 applications for deviation request per year at one (1) hour technical and .2 admin hour each.

Section	Туре	Total	# of	Total	Hourly	Total
			Hours	Hours	Rate	
121.340	Technical	10	1	10	\$70	\$700
	Admin	10	0.2	2	\$32	<u>\$64</u>
				12		\$764

Summary			
(Annual	Reportin	Recordkeepin	Disclosur
numbers)	g	g	е
# of			
Respondents		10	
# of			
Responses			
per			
respondent		1	
Time per			
Response		1.2	
Total # of			
responses		10	
Total burden			
(hours)		12 Hours	

§121.353, Emergency Equipment For Operation Over Uninhabited Terrain Areas: Flag, Supplemental, and Certain Domestic Operations - (b) Requires the date for replacement or recharge of a battery be "legibly marked on the outside of the transmitter". This requirement does not apply if the battery is water-activated such that it is unaffected during probably storage intervals. The carrier is responsible to see that the regulation is complied with. Most batteries used are water activated. The carrier would develop procedures to ensure this. The burden would be included in Sec 121.133, 121.137, 121.139, 121.141.

§121.354, Terrain Awareness and Warning System: (c) requires the airplane flight manual to contain procedures for (1) The use of the terrain awareness and warning system; and (2) Proper flight crew reaction in response to the terrain awareness and warning system audio and visual warnings. The FAA estimates a 1-hour paperwork burden for each aircraft in which the system is installed. Installation in existing aircraft was completed by March 29, 2005. Installation on newly constructed aircraft must be completed during production. The combined burden of compliance with this section and section 121.360 is one hour per aircraft of technical labor.

The FAA estimates approximately 183 newly constructed aircraft per year with one hour of technical labor at \$70/hr per aircraft.

Section	Туре	Total	# o Ho		Total Hours	Hourly Rate	Tota	ul
121.354	Technical	183	1		183	\$70	\$12,	810
Summa (Annual	ry numbers)	Reporti	ng	Reco	ordkeeping	Disclos	ure	
# of								
Respon	dents			183				
# of Res	sponses							
per resp	ondent			1				
Time pe	er							
Respon	se			1 Ho	ur			
Total #	of							
respons	ses			183				
Total bu	ırden							
(hours)				183 H	Hours			

§121.369, Manual Requirements - This section requires certain information in the maintenance manual. The burden is shown in part 43 - Section 43.9(b). Part 43 has OMB control number 2120-0020. See also § 121.380 below.

§121.371, Required Inspection Personnel - Requires each certificate holder to maintain a current listing of persons who have been trained, qualified, and authorized to conduct required inspections and a written description to those listed persons indicating their responsibilities, authorities, and inspectional limitations. New entrant carriers are addressed, in part 119 (119.35). If the lists are maintained in the manuals, the burden is covered in §121.133, 121.17, 121.139, and 121.141. Because the FAA feels that most carriers do not put the list in the manual, this burden estimate is based on zero lists being in manuals. Of approximately 90 carriers, about 25% (23 carriers) would have a turnover of designated employees in any given year. 23 x 4 revisions each year x .3 technical hour and .1 admin hour per year.

Section	Туре	Carriers	Rev	Total	# of	Total	Hourly	Total
					Hours	Hours	Rate	
121.371	Technical	23	4	92	0.3	28	\$70	\$1,960
	Admin	23	4	92	0.1	9	\$32	\$288
						37		\$2,248

Summary (Annual numbers)	Reportin g	Recordkeepin	Disclosur e
# of	9	9	
Respondents		23	
# of		4	
Responses			

per		
respondent		
Time per		
Response	.4 Hours	
Total # of		
responses	92	
Total burden		
(hours)	37 Hours	

§121.377, Maintenance and Preventive Maintenance Personnel DIU Time Limitation -Requires each air carrier to keep maintenance personnel duty times. It is customary business practice to do this via payroll timecards: No additional burden.

§121.380, Maintenance Recording Requirements - Requires that each certificate holder keep records for maintenance performed on each aircraft and make the records available for inspection by the Administrator or NTSB. The burden is shown in part 43 - Section 43.9(b). Part 43 has OMB control number 2120-0020.

§121.380a, Transfer of Maintenance Records - Requires that each certificate holder who sells a U.S. registered aircraft transfer to the purchaser the records required by Section 121.380 for that aircraft. No additional burden.

§121.397, Emergency and Emergency Evacuation Duties - Requires that each certificate holder shall assign to each category of required crewmember the necessary functions to be an emergency situation and describe the functions in its manual. The burden for new entrants is at the time of initial certification (§119.35). The burden would be included in Sec 121.133, 121.137, 121.139, 121.141.

§121.401, Training Program: General -- (a)(1) Requires initial and final approval of a training program, (a)(3) Requires training material, examinations, forms, instructions, and procedures, (c) Requires certification of proficiency and knowledge in a record (may be computerized). The original certification is part of 119 (119.33). The burden would be included in Sec 121.133, 121.137, 121.139, 121.141.

§121.403, Training Programs: Curriculum - (a) Requires the certificate holder to prepare and keep current a written training program curriculum for each type airplane with respect to each crewmember and dispatcher required. For new entrants this is part of their original certification requirement per part 119 (119.35). Once a training program curriculum is established, it seldom changes. However, carriers may add a new type airplane to their fleet. Approximately 25% of part 121 carriers would add a new type airplane over a one year period.

Section	Туре	Carr iers	Rev	1	# of Hours		Hourly Rate	Total
121.403	Technical		1	23	10			\$16,100
	Admin	23	1	23	3	69	\$32	\$2,208

			299		\$18,308
			_ 0 0	l	4 -0,000

Summary			
(Annual	Reportin	Recordkeepin	Disclosur
numbers)	g	g	е
# of			
Respondents		23	
# of			
Responses			
per			
respondent		1	
Time per			
Response		13 Hours	
Total # of			
responses		23	
Total burden			
(hours)		299 Hours	

Additionally, 121.403 was amended on November 12, 2013, to require a list of all the training device mockups, systems trainers, procedures trainers, or other training aids that the certificate holder will use. No later than March 12, 2019, a list of all the training equipment approved under §121.408 as well as other training aids that the certificate holder will use. This amendment has OMB Control number 2120-0739.

<u>Section 121.405, Training Program and Revision: Initial and Final Approval</u> – Requires the certificate holder to submit to the Administrator an outline of the proposed or revised curriculum to an approved training program. New entrant carriers are addressed in part 119 (119.35). Manual revisions are covered in §121.133, 121.137, 121.139, and 121.141. However, since these manuals do not specifically address training, we added another burden here.

Section	Туре		# of Hours	1	Hourly Rate	Total
121.405	Technical	90	0.5	45	\$70	\$3,150
	Admin	90	0.1	9	\$32	<u>\$288</u>
				54		\$3,438

Summary			
(Annual	Reportin	Recordkeepin	Disclosur
numbers)	g	g	е
# of			
Respondents		90	
# of		1	
Responses			

per		
respondent		
Time per		
Response	.6 Hours	
Total # of		
responses	90	
Total burden		
(hours)	54 Hours	

§121.407, Training Program: Approval of Airplane Simulators and Other Training Devices -- (a)(5) Requires a daily discrepancy log. The use of simulators is optional. Carriers use them because they are so much more economical to train in than the actual airplane. There also may not be any discrepancies. No additional burden.

§121.467, Flight Attendant Duty Period Limitations and Rest Requirements: Domestic, Flag, and Supplemental Operations - (c) Allows carriers to use the pilot flight and rest rules for their flight attendants if they develop written procedures. The burden would be included in Sec 121.133, 121.137, 121.139, 121.141.

§121.537, Responsibility for Operational Control: Supplemental Operations - (a)(2) Requires each certificate holder who conducts supplemental operations to list in its manual each person authorized by it to exercise operational control. Initial burden is shown in part 119 (119.35). Manual revisions are covered above. No additional burden. §121.539, Operations Notices - Requires each certificate holder to notify operations personnel of changes in equipment, navigation aids, airport, and potentially hazardous meteorological conditions: FAA estimates that each of the 90 active part 121 carriers issues an average of 300 notices per year and uses .3 technical hours and .1 admin hours on each notice.

Section	Туре	Carriers	Rev	Total	# of	Total	Hourly	Total
					Hours	Hours	Rate	
121.539	Technical	90		27,000 notices	0.3	8,100	\$70	\$567,000
	Admin	90		27,000 notices	0.1	<u>2,700</u>	\$32	\$86,400
						10,800		\$653,400

Summary (Annual numbers)	Reportin g	Recordkeepin g	Disclosur e
# of			
Respondents		90	
# of		300	
Responses			
per			

respondent	
Time per	
Response	.4 Hours
Total # of	
responses	27,000
Total burden	
(hours)	10,800 Hours

§121.557, Emergencies: Domestic and Flag Operations - (c) Requires a pilot in command or dispatcher to send a written report through the air carrier's operations manager to the Administrator if an emergency is declared.

Section	Туре	Total	# o Ho	f urs	Total Hours	Hourly Rat	е	Total
121.557	Technical	50 reports	0.5		25	\$70		\$1,750
Summary (Annual numbers)		Reporti	Recordk ting eping			Disclosu re		
Respon	# of Respondents							
per res	sponses condent	1						
Respon	Time per Response		5					
Total #	ses	50						
Total bu (hours)	ırden	25 Hour	S					

§121.559. Emergencies: Supplemental Operations - (c) Requires a pilot in command or other person to send a written report through the Director of Operations to the Administrator if they declare an emergency.

Section	Туре		1	1	Hourly Rate	Total
121.559	Technical	10 reports	0.5	5	\$70	\$350

Summary			
(Annual	Reportin	Recordkeepin	Disclosur
numbers)	g	g	е
# of			
Respondents	10		

# of		
Responses		
per		
respondent	1	
Time per		
Response	.5 Hours	
Total # of		
responses	10	
Total burden		
(hours)	5 Hours	

§121.563, Reporting Mechanical Irregularities. -- Requires that all mechanical irregularities occurring during flight be entered in the maintenance log. The log is available for inspection by the FAA, but these entries are not reported to FAA.

Section	Туре	Event	Day		l	Total Hours	Hourly Rate	Total
121.563	Technical	25,534	365	9,319,910	0.01	93,199	\$70	\$6,523,930

Summary			
(Annual	Reportin	Recordkeepin	Disclosur
numbers)	g	g	е
# of			
Respondents	25,534		
# of			
Responses			
per			
respondent	365		
Time per	.01		
Response	Hours		
Total # of	9,319,91		
responses	0		
Total burden	93,199		
(hours)	Hours		

§121.565, Engine Inoperative: Landing; Reporting: - (d) Requires the pilot in command to give a written report in duplicate to the Director of Operations if the pilot in command landed at an airport other than the nearest suitable airport. There would be a minimal impact for reporting in those few instances when the airplane lands at other than the nearest suitable airport.

Section	Туре				Hourly Rate	Total
121.565	Technical	10	3	30	\$70	\$2,100

Summary	Reportin	Recordkeepin	Disclosur
---------	----------	--------------	-----------

(Annual			
numbers)	g	g	е
# of			
Respondents	10		
# of			
Responses			
per			
respondent	1		
Time per			
Response	3 Hours		
Total # of			
responses	10		
Total burden			
(hours)	30 Hours		

§121.569, Equipment Interchange: Domestic and Flag Operations - (b) Requires the certificate holder conducting domestic or flag operations include the pertinent provisions and procedures involved in the equipment interchange agreement in its manuals. The burden would be included in Sec 121.133, 121.137, 121.139, 121.141.

§121.571, Briefing Passengers Before Takeoff - (a) Requires an oral briefing various times and, (b) Requires printed cards supplementing the oral briefing, and (c) Requires description of procedures for oral briefings. The burden would be included in Sec 121.133, 121.137, 121.139, 121.141.

The Flight Attendant oral briefings have been included in this report. The Bureau of Transportation Statistics reported approximately 20,431 revenue departures of U.S. air carriers domestically each day. This number is does not include international flights by U.S. air carriers. Therefore, 25,000 flights was estimated based on pre pandemic numbers and expected travel increase as the pandemic comes under control. The average Flight Attendant wage is estimated to be \$117 per hour. Section 121.571, Briefing Passengers Before Takeoff, Section 121.573, Briefing Passengers: Extended Overwater Operations (the majority of flights are not extended overwater). The announcements that FAA requires are estimated to take 3 minutes per flight. The burden for manual procedures would be included in Sec 121.133, 121.137, 121.139, 121.141.

Section	Туре	Carrier	Rev	Total	# of	Total	Hourly	Total
		S			Hours	Hours	Rate	
121.571	FA	25,000	365	9,125,000	0.05	456,250	\$117	\$53,381,250

Summary			
(Annual	Reportin	Recordkeepin	Disclosur
numbers)	g	g	е
# of		25,000	

¹¹ <u>Air Travel Consumer Report: October 2023 Numbers | Bureau of Transportation Statistics (bts.gov)</u>

Respondents		
# of		
Responses		
per		
respondent	365	
Time per		
Response	.05 Hours	
Total # of		
responses	9,125,000	
Total burden		
(hours)	456,250 Hours	

§121.573, Briefing Passengers: Extended Overwater Operations - (a) Requires an oral briefing on the location and operation of life preservers, life rafts, and other flotation means, including a demonstration of the method of donning and inflating a life preserver. The burden would be included in Sec 121.133, 121.137, 121.139, 121.141.

§121.575, Alcoholic Beverage - (d) Requires certificate holders to report to the Administrator, within 5 days, any person refusing to comply with paragraph (a) of this section (requires certificate holder to serve the drink) or any disturbance caused by a person who appears intoxicated aboard. Estimated 50 reports per year system wide.

Section	Туре		l		Hourly Rate	Total
121.575	Technical	50	0.5	25	\$70	\$1,750

Summary			
(Annual	Reportin	Recordkeepin	Disclosur
numbers)	g	g	е
# of			
Respondents	50		
# of			
Responses			
per			
respondent	1		
Time per			
Response	.5 Hours		
Total # of			
responses	50		
Total burden			
(hours)	25 Hours		

§121.583, Carriage of Persons Without Compliance with The Passenger-Carrying Requirements of This Part – Provides relieving requirements for the carriage of certain passengers. Manuals and briefings previously addressed. No additional burden.

§121.585, Exit Seating - (a)(3) Requires the certificate holder to designate which seats will be used, (n) and (p) requires approval of the procedure. Original certification would be part 119 (119.35). Manual Revisions are previously addressed. No additional burden.

§121.586, Authority to Refuse Transportation - (a)(I) requires the certificate holder to develop procedures, (b) to provide those procedures to the FAA, to make revisions upon demand of FAA (a), (b), and (c) are covered in manuals (previously discussed), to provide a copy of those procedures at airports, which can be accomplished via review of manual procedures. The burden would be included in Sec 121.133, 121.137, 121.139, 121.141.

§121.631. Original Dispatch or Flight Release, Redispatch or Amendment of Dispatch or Flight Release. The burden for original is in §121.663 (Domestic and Flag) and §121.689 (Supplemental). The rest of the burden is:

25,000 departures per day of U.S. air carriers worldwide x 365 days a year = 9,125,000 dispatches per year divided by 2 because there are an average of two flights per dispatch/release = $4,562,500 \times .02$ because only 2% of all dispatchers/flights releases are redispatch/amendments = 91,250 per year x .02 technical hours¹²

Section	Туре				Hourly Rate	Total
121.631	Technical	91,250	0.02	1,825	\$70	\$127,750

Summary			
(Annual	Reportin	Recordkeepin	Disclosur
numbers)	g	g	е
# of			
Respondents		91,250	
# of			
Responses			
per			
respondent		1	
Time per			
Response		.02 Hours	
Total # of			
responses		91,250	
Total burden			
(hours)		1,825 Hours	

§121.663, Responsibility for Dispatch Release: Domestic and Flag Operations – Requires each Domestic and Flag air carrier to prepare a dispatch release for each flight between specified points that contains certain information about the flight.

¹² Dispatch systems for 121 operators are primarily computer generated. To redispatch or amend a release is a very simple and quick process.

25,000 departures per day of U.S. air carriers worldwide x 365 days a year = 9,125,000 x .02 technical hours

Section	Туре	Dept.	Rev		# of Hours		Hourly Rate	Total
121.663	Technical	25,000	365	9,125,000	0.02	182,500	\$70	\$12,775,000

Summary			
(Annual	Reportin	Recordkeepin	Disclosur
numbers)	g	g	е
# of			
Respondents		9,125,000	
# of			
Responses			
per			
respondent		1	
Time per			
Response		.02 Hours	
Total # of			
responses		9,125,000	
Total burden			
(hours)		182,500 Hours	

§121.665, Load Manifest - Requires each certificate holder to prepare a load manifest form before each takeoff.

25,000 departures per day of U.S. air carriers worldwide x 365 days a year

Section	Туре	Dept.	Rev	Total	# of	Total	Hourly	Total
					Hours	Hours	Rate	
121.665	Technical	25,000	365	9,125,000	0.02	182,500	\$70	\$12,775,000

Summary			
(Annual	Reportin	Recordkeepin	Disclosur
numbers)	g	g	е
# of			
Respondents		9,125,000	
# of			
Responses			
per			
respondent		1	
Time per			
Response		.02 Hours	

Total # of		
responses	9,125,000	
Total burden		
(hours)	182,500 Hours	

§121.683, Crewmember and Dispatcher Record - (a) (1) Requires each certificate holder to maintain current records on each crewmember and dispatcher that shows whether or not they comply with this chapter. (2) Requires each certificate holder to record each action taken concerning the release from employment or physical or professional disqualification and keep for 6 months. The records may be on computer record systems.

Reporting: 90 active carriers have an estimated:

46,692 pilots in command x an average of 5 entries per year =233,460 entries per year 56,215 other pilots x an average of 3 entries per year = 168,645 entries per year. 62 flight engineers x an average of 1 entry per year = 62 entries per year. 139,213 flight attendants x an average of 1 entry per year = 139,213 entries per year 3,146 dispatchers x and average of 1 entry per year =3,146 entries per year. .001 admin hours per recording entry

Section	Туре	# Crew	Entries	Total	# of	Total	Hourly	Total
					Hours	Hours	Rate	
121.683	Admin	46,692	5	233,460	0.00 1 ¹³	233	\$32	\$7,456
		56,215	3	168,645	0.001	169	\$32	\$5,408
		62	1	62	0.001	1	\$32	\$32
		139,213	1	139,213	0.001	139	\$32	\$4,448
		3,146	1	3,146	0.001	<u>3</u>	\$32	<u>\$96</u>
				544,526		545		\$17,440

Recordkeeping:

90 active primary carriers x 1 admin hour per carrier

Section	Type	Carrier	Rev	Total	# of	Total	Hourly	Total
					Hours	Hours	Rate	
121.683	Admin	90	1	90	1	90	\$32	\$2,880

Totals:

544,526				545	\$32	\$17,440
90	1	90	1	90	\$32	<u>\$2,880</u>

¹³ Typically 121 carriers keep these records in an electronic system. This would be a quick entry by personnel tasked with doing this job.

	544,616		635	\$20,320

Summary (Annual	Reportin	Recordkeepin	Disclosur
numbers)	g	g	e
# of	9	9	
Respondents	544,526	90	
# of			
Responses			
per			
respondent	1	1	
Time per	.001		
Response	Hour	1 Hour	
Total # of			
responses	544,526	90	
Total burden	545		
(hours)	Hours	90 Hours	

§121.685, Aircraft Record: Domestic and Flag Operations: Requires each Domestic and Flag air carrier to maintain a current list of each aircraft that it operates in scheduled air transportation and to send a copy of the record and each change to the FAA Air Carrier District Office charged with the overall inspection of its operations. The burden is in part 119, operations specifications (119.43).

§121.689, Flight Release Form: Supplemental Operations - Requires each operator that conducts supplemental operations to prepare a flight release for each flight between specified points. The release must contain certain information about the flight. See § 121.631 above. No additional burden.

§121.695- Disposition of Load Manifest, - Dispatch Release and Flight Plans: Domestic and Flag Operations: Requires each domestic and flag air carrier to keep copies of the load manifests, dispatch releases, and flight plans for 3 months, and Section 121.697, Disposition of Load Manifest, Flight Release. And Flight Plans: Supplemental Operations: - Requires each operator who conducts supplemental operations to keep copies of the load manifests, flight releases, and flight plans for 3 months.

Recordkeeping for both §121.695 and §121.697:

90 active primary carriers x 1 admin hour per carrier

Section	Type	Carriers	Rev		# of Hours		Hourly Rate	Total
121.695	Admin	90	1	90	1	90	\$32	\$2,880

Summary	Reportin	Recordkeepin	Disclosur
Julilialy	Reportin	RecoluRecpin	Disclosui

(Annual			
numbers)	g	g	е
# of			
Respondents		90	
# of			
Responses			
per			
respondent		1	
Time per			
Response		1 Hour	
Total # of			
responses		90	
Total burden			
(hours)		90 Hours	

§121.701, Maintenance Log: Aircraft: - (a) Requires each certificate holder to make or have made a record and develop an approved procedure for keeping adequate copies of records of malfunctions reported in the maintenance log and (b) Have a procedure to make the procedure available to each flight crewmember and to put the procedure in the manual, and (c) The manuals are covered previously. The log entry is covered in §121.563. This is an additional entry made by the person taking action on the initial entry and it takes a little longer than the initial entry. See also §121.380 and part 43 -Section 43.9(b). Part 43 has OMB control number 2120-0020.

25,000 departures a day x 365 days a year = 9,125,000

Section	Type	Dept.	Days	Total	# of	Total	Hourly	Total
					Hours	Hours	Rate	
121.701	Tech.	25,000	365	9,125,000	0.02	182,500	\$70	\$12,775,000

Summary			
(Annual	Reportin	Recordkeepin	Disclosur
numbers)	g	g	е
# of			
Respondents		9,125,000	
# of			
Responses			
per			
respondent		1	
Time per			
Response		.02 Hours	
Total # of			
responses		9,125,000	

Total burden		
(hours)	182,500 Hours	

§121.703, Mechanical Reliability Reports - Requires each certificate holder to report the occurrence or detection of each failure, malfunction, or defect concerning 17 items stipulated in this section. In addition to each failure, malfunction, or defect of emergency evacuation systems and components the FAA requires air carriers to collect, record, analyze, and disseminate data concerning those failures, malfunctions, or defects that occur during training, testing, or actual emergency conditions to improve the levels of emergency evaluation system reliability and safety. The air carrier industry uses FAA Form 8070-1, Service Difficulty Report, to submit the required information or use a method that is suitable to its management system. Burden for submission of Service Difficulty Reports is covered under OMB control number 2120-0663.

§121.704: Service Difficulty Reports (structural) Burden for submission of Service Difficulty Reports is covered under OMB control number 2120-0663.

§121.705, Mechanical interruption Summary Report, - Requires each certificate holder to send a summary report of certain mechanical interruptions to the FAA.

SDR Data was analyzed to show an average of 132 SDRs per day were filed by Part 121 Air Carriers. 132 was multiplied by 365 days in a year to arrive at 48,180 SDRs approximately filed in a given year.

48,180 reports per year x 1 technical hour

Section	Туре				Hourly Rate	Total
121.705	Technical	48,180	1	48,180	\$70	\$3,372,600

Summary			
(Annual	Reportin	Recordkeepin	Disclosur
numbers)	g	g	е
# of			
Respondents	48,180		
# of			
Responses			
per			
respondent	1		
Time per			
Response	1 Hour		
Total # of			
responses	48,180		
Total burden	48,180		

(hours)		

§121.707, Alteration and Repair Reports - Requires each certificate holder to prepare and submit to the FAA and keep a report of each major alteration of an airframe, engine, propeller, or appliance operated. The burden is shown in part 43 - Section 43.9(b). Part 43 has OMB control number 2120-0020.

§121.709, Airworthiness Release or Aircraft Log Entry - (a) Requires the certificate holder to prepare or cause to be prepared (1) An airworthiness release; or (2) an appropriate try in the aircraft log, (b) When an airworthiness release form is prepared the certificate holder must give a copy to the pilot in command and must keep a record thereof for at least two months.

1 release per airplane per day, estimated 7,935 airplanes x 1 release x 365 days a year x .1 technical hour

Section	Туре	Dept.	Rev	Total	# of	Total	Hourly	Total
					Hrs	Hours	Rate	
121.709	Technical	7,935	365	2,896,275	0.1	289,628	\$70	\$20,273,960

Summary			
(Annual	Reportin	Recordkeepin	Disclosur
numbers)	g	g	е
# of			
Respondents		7,935	
# of			
Responses			
per			
respondent		365	
Time per			
Response		.1 Hour	
Total # of			
responses		2,896,275	
Total burden			
(hours)		289,628 Hours	

§121.711, Communication Records: Domestic and Flag Operations: 121.711 was amended on November 12, 2013 to establish new requirements that each certificate holder conducting domestic or flag operations record each enroute communication between the certificate holder and its pilots using a communication system as required by §121.99 of this part. This amendment has OMB Control number 2120-0739.

§121.713- Retention of Contracts And Amendments: Commercial Operators Who Conduct Intrastate Operations For Compensation Or Hire - (a) -Requires each commercial operator to keep a copy or memorandum of each contract for one year.

Recordkeeping:

Section	Type	Resp.	Rev				Hourly Rate	Total
121.713	Admin	15	3	45	0.5	23	\$32	\$736

And (b) Submit two financial reports each year.

Reporting:

Section	Туре	Res	Rev	Total	# of	Total	Hourly	Total
		р			Hours	Hours	Rate	
121.713	Technical	15	2	30	5	150	\$70	\$10,500
	Admin	15	2	<u>30</u>	1	30	\$32	<u>\$960</u>
				60				\$11,460

TOTALS:

Section	Туре	Hours	Cost
121.713	Admin	53	\$1,696
	Technical	150	\$10,500
TOTAL		203	\$12,196

Summary			
(Annual	Reportin	Recordkeepin	Disclosur
numbers)	g	g	е
# of			
Respondents	15	15	
# of			
Responses			
per			
respondent	2	3	
Time per			
Response	6 Hours	.5 Hours	
Total # of			
responses	30	45	
Total burden	180		
(hours)	Hours	23 Hours	

Part 121, Appendix G -- Doppler Radar and Inertial Navigation System (INS): Request for Evaluation; Equipment and Equipment Installation; Training Program; Equipment Accuracy and Reliability; Evaluation Program. Request for evaluation of inertial navigation systems must be sent to the certificate holding district office 30 days prior to using the system. Very infrequent because of most air carrier aircraft do not use this technology. New entrants would apply as part of their original certification in part 119.

The burden for any new make and model added to an existing certificate or modification to an existing make and model is shown here:

Section	Туре				Hourly Rate	Total
121.AppG	Technical	6	2	12	\$70	\$840
	Admin	6	1	<u>6</u>	\$32	<u>\$192</u>
		12		18		\$1,032

Summary			
(Annual	Reportin	Recordkeepin	Disclosur
numbers)	g	g	е
# of			
Respondents	6		
# of			
Responses			
per			
respondent	1		
Time per			
Response	3 Hours		
Total # of			
responses	6		
Total burden			
(hours)	18 Hours		

<u>Part 121, Appendix H - Advanced Simulation Plan</u>- Requires operators to submit a plan if they want to train in advanced simulators (optional). New carriers would submit a plan as part of original certification under part 119. The burden for adding or changing an advanced simulation plan is shown here:

Section	Туре	Total	# of	Total	Hourly	Total
			Hours	Hours	Rate	
121.AppH	Technical	10	5	50	\$70	\$3,500
	Admin	10	1	<u>10</u>	\$32	<u>\$320</u>
				60		\$3,820

Summary (Annual numbers)	Reportin g	Recordkeepin g	Disclosur e
# of			
Respondents	10		
# of			
Responses			
per			
respondent	1		

Time per		
Response	6 Hours	
Total # of		
responses	10	
Total burden		
(hours)	60 Hours	

SUMMARY OF BURDEN

Section	Responses	Total Hours	Total Cost
121.133	9,000	22,500	\$1,404,000
121.153	6	1	\$32
121.207	5	1	\$32
121.315	98	583	\$38,492
121.340	10	12	\$764
121.354	183	183	\$12,810
121.371	92	37	\$2,248
121.403	23	299	\$18,308
121.405	90	54	\$3,438
121.539	27,000	10,800	\$653,400
121.557	50	25	\$1,750
121.559	10	5	\$350

121.563	9,319,910	93,199	\$6,523,930
121.565	10	30	\$2,100
121.571	9,125,000	456,250	\$53,381,250
121.575	50	25	\$1,750
121.631	91,250	1,825	\$127,750
121.663	9,125,000	182,500	\$12,775,000
121.665	9,125,000	182,500	\$12,775,000
121.683	544,616	635	\$20,320
121.695	90	90	\$2,880
121.701	9,125,000	182,500	\$12,775,000
121.705	48,180	48,180	\$3,372,600
121.709	2,896,275	289,628	\$20,273,960
121.713	75	203	\$12,196
121.AppG	6	18	\$1,032
121.AppH	<u>10</u>	<u>60</u>	<u>\$3,820</u>
		_	
	49,437,039	1,472,143	\$124,187,212

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 costs not associated with guestion #12.

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 FAA estimates that the total estimated annual cost to the Federal Government is \$267,662. This cost is based on the FAA employee time spend reviewing and processing carrier information submitted to the FAA as identified in this document. As an average salary, we have used the same cost for technical expertise (\$70) that was used in question #12.

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

The number of active air carriers operating under part 121 has increased from the previous submission from 66 in 2021 to a current number of 90. This is the primary driver of the overall increase in estimated responses.

The estimate for the number of aircraft operated by air carriers under part 121 has increased from the previous submission. The increased numbers of aircraft may reflect an increase in the fleet size of air carriers or the increased use of smaller regional jets.

The number of pilots in command of active air carriers operating under part 121 has increased from the previous submission.

The number of other pilots of active air carriers operating under part 121 has increased from the previous submission.

The number of flight attendants of active air carriers operating under part 121 has increased from the previous submission.

The hour and cost estimates have all been updated to reflect 2024 wages and statistics.

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 is no publication plan. The FAA does not publish the information collected on its website.

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.

There are no forms associated with this collection.

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

There are no exceptions in Item 19, OMB Form 83-I.