

**Supporting Statement A**  
**Commercial Air Tour Operator Reports**  
**OMB 2120-0750**

- The number of respondents decreased from 47 in 2021 to 39 in 2024.
- Additional information is required for parks with completed air tour management plans (ATMP). No completed air tour management plans were in place during previous renewals.
- The burden estimates are updated based on operator input and to account for additional reporting requirements.
- The hour and cost estimates are updated to reflect currently available wages and statistics data from the US Bureau of Labor Statistics.

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

The Federal Aviation Administration has the responsibility and authority to:

- Assign and maintain safety as the highest priority in air commerce (49 U.S.C. § 40101);
- Develop plans and policies for the use of navigable airspace (49 U.S.C. § 40103);
- Regulate the safe and efficient use of airspace (49 U.S.C. § 40103);
- Preserve, protect, and enhance the environment by minimizing, mitigating, or preventing the adverse effects of aircraft overflights on public and tribal lands (National Parks Air Tour Management Act of 2000, Pub. L. 106-181 § 802 (2000));
- Establish ATMPs, which may set conditions for the conduct of air tour operations over national parks, such as commercial air tour routes, maximum or minimum altitudes, time-of-day restrictions, restrictions for particular events, maximum number of flights per unit of time, intrusions on privacy on tribal lands, and mitigation of noise, visual, or other impacts (49 U.S.C. § 40128(b)(3)(B)); and
- Require commercial air tour operators to submit reports to the FAA. (49 U.S.C. § 40128(d)).

Conditions established by an ATMP are memorialized in the air tour operator's operations specifications. Any air tour operator certificated under 14 CFR part 119 is required to hold and comply with operations specifications. 14 C.F.R. § 119.5(g).

The statute provides that commercial air tour operators conducting tours over national park units must report, at a frequency and in a format prescribed, the number of commercial air tour operations over each national park that are conducted by the operator and such other information as the Administrator and Director may request in

order to facilitate administering the provisions of this section. FAA Modernization and Reform Act of 2012, Pub. L. 112-95, § 501, 126 Stat. 11, 103 (2012); 49 U.S.C. 40128(d).

The ATMPs require operators to equip all aircraft used for air tours with flight monitoring technology, to use flight monitoring technology during all air tours covered by the ATMP, and to report flight monitoring data as an attachment to the operator's semi-annual reports.

Flight monitoring data required to be reported includes:

- Unique flight identifier;
- Latitude;
- Longitude;
- Geometric altitude;
- Tail number;
- Date;
- Time stamp;
- Operator and Doing Business As (DBA), if different;
- Aircraft type; and
- Aircraft model.

Positional data (including latitude, longitude, and altitude information) and tail numbers are necessary to fully ensure the safety of the National Airspace System over national parks. FAA oversight of operations is maintained through a multi-layered approach that includes, among other things, radar tracking of commercial flights. While the FAA can track nearly all commercial flights in the United States, air tour flights over national parks are typically conducted in remote locations and at the lowest altitudes possible to provide better views for passengers, leaving them outside radar coverage.

All other data is used to preserve, protect, and enhance the environment by minimizing, mitigating, or preventing the adverse effects of aircraft overflights on public and tribal lands, as discussed above.

The parks with completed ATMPs that have a flight monitoring requirement listed below. For all parks, the draft ATMP was made available for a 30-day public comment period. During the 30-day public comment period for each park, NPS and FAA held a public meeting to review the draft ATMPs. A summary of public comments is provided in the public engagement appendix to the Records of Decision<sup>1</sup> for each park where a Categorical Exclusion was applied to meet the NEPA requirements. For parks where an environmental assessment was completed, a summary of public comments with agency responses and the full raw public comment data is included in the associated public engagement appendix to the final environmental assessment for the park. Comments

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<sup>1</sup> The Record of Decision, Final ATMP, and associated environmental documents for each park can be found at [Air Tour Management Plan \(ATMP\) | Federal Aviation Administration \(faa.gov\)](#) or [Air Tours - Natural Sounds \(U.S. National Park Service\) \(nps.gov\)](#).

varied from support of the monitoring requirement to recommendation to remove due to cost and impact to operators. The agencies did not provide responses to individual comments but did provide comment either in the ROD or the comment summary report.

Name of Park	Date of Public Meeting	Federal Register Notice (for public meeting and public comment period)
Olympic National Park	Aug 25, 2021	<a href="#">86 FR 40897</a>
Mount Rainier National Park	Aug 16, 2021	<a href="#">86 FR 40897</a>
Death Valley National Park	Aug 17, 2021	<a href="#">86 FR 40897</a>
Glacier National Park	Sep 21, 2021	<a href="#">86 FR 49593</a>
Bryce Canyon National Park	Sep 27, 2021	<a href="#">86 FR 49593</a>
Arches National Park	Sep 20, 2021	<a href="#">86 FR 49593</a>
Canyonlands National Park	Sep 22, 2021	<a href="#">86 FR 49593</a>
Natural Bridges National Monument	Sep 23, 2021	<a href="#">86 FR 49593</a>
Great Smoky Mountains National Park	Sep 16, 2021	<a href="#">86 FR 49593</a>
Bay Area ATMP (Golden Gate National Recreation Area/Point Reyes National Seashore/San Francisco Maritime National Historical Park)	Oct 26, 2021	<a href="#">86 FR 57471</a>
Hawaii Volcanoes National Park	Jun 7, 2023	<a href="#">88 FR 31840</a>
Haleakala National Park	May 25, 2023	<a href="#">88 FR 31840</a>

The Record of Decision for each park also affirms the ATMPs were developed in accordance with the National Parks Air Tour Management Act (NPATMA), as amended and its implementing regulations (14 CFR Part 136). This includes conducting Section 106 Tribal Consultations in accordance with the National Historic Preservation Act. Tribal consultation is described in the ROD and associated Section 106 documentation is included in the associated National Historic Preservation Act appendix for each park. This collection applies to these completed parks and any parks in the future that develop ATMPs with flight monitoring requirements.

The FAA and NPS received an initial three-year approval on this information collection request in December 2012. The current three-year approval expires on February 29, 2024. This renewal includes additional collection requirements included in final ATMPs. There were no completed air tour management plans prior to the last renewal. These additional collection requirements fall within the existing provisions stated above.

**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.**

This collection is mandatory and an ongoing requirement per the FAA Modernization and Reform Act of 2012. Entities required to respond are commercial air tour operators with the authority to conduct air tours over national park units as reflected in their Operation Specifications or Letters of Authorization. This collection is reporting of information to the FAA and NPS on the number of air tours conducted over national park units. Operators will report on a semi-annual (every six months) basis for national park units with greater than 50 air tours annually, or with an existing ATMP or voluntary agreement. For national park units with less than 50 flights annually and no ATMP or voluntary agreement in place, operators will report on annual basis.

For parks without an ATMP or voluntary agreement, the information collected will continue to include:

- date and time of the tour;
- aircraft type; and
- air tour route flown.

Additional reporting requirements included in this renewal are specific to parks with completed ATMPs where commercial air tours are allowed. In addition to submitting the data collection form, operators in these parks are required to install flight monitoring equipment that provides flight monitoring information at intervals no greater than 15 seconds during an air tour. The data will be submitted in a file format such as .csv or .xlsx and as a separate file with the report described above. The information collected includes:

- unique flight identifier;
- latitude and longitude;
- geometric altitude;
- tail number;
- date and time of the tour; and
- aircraft type and model.

The data is received by both FAA and NPS. NPATMA requires the FAA and the NPS to develop an ATMP or voluntary agreement for national park units that exceed 50 commercial air tours annually. The information collected regarding air tours in parks without an ATMP or voluntary agreement is used by the FAA and NPS in developing

and publishing an annual list of parks with 50 or fewer air tour operations a year which was an amendment provision to NPATMA in the FAA Modernization and Reform Act of 2012. ATMP provisions vary between parks and may include stipulations such as minimum altitudes, maximum lateral deviation from air tour routes, and time of day or day of week restrictions, for example. The agencies use the data to:

- analyze the reported activity, aggregating the data so as not to disclose operator specific information and publishing an annual report summarizing commercial air tour activity in national park units;
- when an ATMP or voluntary agreement is required, to develop ATMPs or voluntary agreements; and
- assist in evaluating compliance with the ATMP operational provisions by using the submitted data to show if the air tour operator deviated below minimum altitudes, lateral offsets, or time of or number per day restrictions and as available.

As the agencies refine analysis methodologies, areas of duplication and opportunities to reduce burden will be addressed via a future revision or renewal.

**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.**

Commercial air tour operators will continue to be able to download an Excel spreadsheet reporting template with blank fields in which they can populate their information / data (see reporting template attached) which is available at either of the following websites:

- [Air Tour Management Plan \(ATMP\) | Federal Aviation Administration \(faa.gov\)](#), or
- [National Parks Air Tour Management Program - Natural Sounds \(U.S. National Park Service\) \(nps.gov\)](#)

Operators will continue to submit reports to both FAA and NPS by either submitting via email to two email addresses (one FAA reporting email address, one NPS reporting email address) or if preferred, via postal mail service to FAA. The additional data collection requirement included as part of this renewal does not require a new form or any modifications to the existing report form. Operators required to report flight monitoring data will submit the downloaded flight monitoring information in .csv, .xlsx, or comparable format electronically. Operators will continue to have the option to submit reports via e-mail or paper format.

The information collected will not be disseminated directly to the public, however, the information collected may be shared as part of the ATMP or voluntary agreement development process or as aggregated information in the annual commercial air tour report (See Section 2 above).

**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.**

Commercial air tour operators were not required to report annual air tour operations or any other related data until NPATMA was amended by the FAA Modernization and Reform Act of 2012. The initial 3-year information collection request was granted by OMB in December 2012. There was no similar existing information collection available prior to the initial approval for this collection. In addition, there are no similar existing information collections ongoing that could be used or modified to meet the needs and purposes of this collection.

For operators required to submit flight monitoring data, they would submit that data in addition to completing the reporting template. The agencies acknowledge that some duplication of effort may occur as operators will transpose limited types of data from the flight monitoring report onto the reporting template spreadsheet. This is a necessary quality control step to ensure that the downloaded flight monitoring data accurately reflects the number of air tours as well as only air tours. As flight monitoring data is received and analyzed, the agencies will work to identify and refine opportunities to reduce burden on the operators with the goal of removing the requirement for completion of the reporting template for parks where operators submit flight monitoring data in compliance with existing ATMPs.

Both the FAA and NPS receive the information via email to their respective agency email address. The operators can send the information to both agencies in the same email, separate emails are not required. It is necessary for both agencies to receive this information for their own records related to air tour management. While the agencies work jointly to review the reported data, each agency analyzes the data through their own authorities and agency mission requirements.

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

The information requested is limited to the minimum information necessary to fulfill the reporting requirements as developed by FAA and NPS. Over the course of renewals and revisions since the initial approval by OMB in 2012, the agencies have continued to refine the reporting requirements to reduce the burden on operators and ensure only necessary information is requested and able to be submitted easily. Examples of changes include reduction of number of categories or types of information requested and a reduction in the number of submissions per year. While these changes benefit all operators, the smaller operators continue to have burdens proportionate to the size of their operation.

For the additional information requested in the renewal, the FAA has identified the need for additional data to assist in evaluating compliance with the ATMP operational provisions.

FAA sought alternative methods to minimize the cost to all operators. One solution considered was to utilize Automatic Dependent Surveillance-Broadcast (ADS-B) technology to capture the data; however, ADS-B coverage is lacking in these remote locations and at low altitudes. Another solution considered was to install additional radar sites near national parks; however, the FAA determined this would be prohibitively expensive for the taxpaying public due to the need to lease or acquire land and install and maintain multi-million-dollar radar equipment. These additional radar sites would also be unlikely to provide a broader benefit outside the monitoring of air tour operators as they are for the sole purpose of monitoring aircraft (and not weather). A better, less expensive solution was determined to be to require air tour operators to install flight recorders that capture latitude, longitude, and altitude information (similar to radar data) during air tour operations. Commercial off-the-shelf equipment exists and can be acquired at a reasonable cost.

**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.**

Operators are required to submit reports per NPATMA, as amended by the FAA Modernization and Reform Act of 2012. Not conducting the data collection, described by this renewal to include the report and flight monitoring data, as required would significantly impact the agencies' ability to continue to implement and ensure national park units are in compliance with NPATMA. Without the reported data, the agencies would not have the information needed on the number of air tour operations to determine the need for federal action to develop an ATMP or voluntary agreement. The absence of flight monitoring data would hinder the ability of the agencies to evaluate operator compliance with ATMPs.

As described above, the agencies previously identified opportunities to reduce the frequency burden on operators by reducing the requirement for operators to report from quarterly to every six months and down to annually for operators in parks with fewer than 50 flights annually and no existing ATMP or voluntary agreement. The agencies will continue to identify efficiencies and opportunities to continue to reduce the frequency burden on operators.

**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.*

There are no special circumstances that are applicable to this request.

**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 October 03, 2023 (88 FR 68271) solicited public comment. Two comments were received. Both comments were provided by the same entity. The primary areas of concern from the commenter were suggested inaccuracy in burden calculations, suggested simplification of the reporting template, lack of consistency in requirement of flight monitoring data between parks, and lack of OMB approved data request.

In response to the comment regarding the lack of an OMB approved data request for the flight monitoring data collection, this renewal addresses the new circumstance of parks with completed ATMPs that have an additional requirement of operators to provide flight monitoring data for the purpose of evaluating compliance with ATMP operational provisions. The flight monitoring data is not a new collection, but rather an additional requirement to the current approved air tour report collection and is provided for by the same authorizations described above.

The burden calculations have been adjusted in this renewal based on multiple operator input and updated agency estimates. While the commenter provided their own estimates for the time and cost burden related to the time required to complete the existing data collection (without the flight monitoring requirement), the agency determined this calculation to be flawed. The commenter calculated the annual hourly burden as follows: 24 hrs of work for the Commenter x 2 times a year x 3 times the work for the average larger company x 48 operators equals 6,912 hours. The commenter calculated the cost burden at a rate of \$100 per hour labor x 6,912 hours.

This calculation assumes first, that all 48 operators are “larger operators” that require 3 times the number of hours the commenter stated they need to complete the report, and second, the average hourly rate for labor is \$100 an hour. In fact, the last renewal included calculations for 16 small operators, 14 mid-size operators, and 17 large operators. The last renewal included one average labor calculation of \$35.96 per hour. The hourly burden calculations in this renewal have been adjusted to reflect updated estimated burdens based on input, the decrease in the number of operators, and a shift in the company size ratios due to a change in authorized flights per established ATMPs or VAs.

The commenter also estimated an annual salary of \$120,000 as a basis for calculating the hourly wage burden. In response to the commenter, this burden calculation has also been adjusted to reflect more accurately the range in potential employee types that might be expected to complete the reports. As described in the burden calculations, wage information is taken from the US Bureau of Labor Statistics. Wage calculation updates take into account the smaller operators likely use more senior or higher paid staff to complete the reporting requirements, a mid-size operator may likely use a professional level employee, and large operator likely uses clerical staff. In addition to the mean hourly wage rate, the average benefits percentage was used from the US Bureau of Labor Statistics for comparable positions.

In addition to the adjustments described above, the additional equipment and flight monitoring report submission requirement is reflected in the burden calculations for this renewal through inclusion of additional hours of work for operators with the flight monitoring requirement and initial and ongoing costs related to the required equipment and service. All burden calculation changes are discussed in detail in their respective sections below.

The lack of consistency in the requirement of flight monitoring data between parks is due to the fact that each park is unique as well as the operational provisions of the ATMPs and voluntary agreements. ATMPs require the completion of more vigorous environmental analysis and review. Therefore, it is critical to receive flight monitoring data from operators to assist in evaluating compliance with the ATMPs. Since voluntary agreements do not require the same level of modeling and analysis, the same level of flight monitoring is not required.

Further simplification of the report template by eliminating the time-of-day requirement, as requested by the commenter, removes the ability for agencies to correlate a reported air tour with other existing data like ADS-B or the flight monitoring data if also submitted by an operator. Understanding the current conditions of operations includes several factors like altitude, GPS track positions, and the time of day. Each of these may impacts park resources and the data provided by the operators helps build the best picture of current conditions in the park.

The agencies also regularly interact with commercial air tour operators via annual meetings as required by ATMPs and voluntary agreements and during the process of report submissions as described in this submission. The agencies also held the annual National Parks Overflight Advisory Group (NPOAG) meeting in March 2023. This group is established per NPATMA and is comprised of members from the commercial air tour industry, environmental sector, and tribal representation. NPOAG discusses issues related to commercial air tours in national park units and implementation of NPATMA. The meetings also provide a space for public comment. During the March 2023 meeting, NPOAG discussed the flight monitoring requirement, its burden on operators, and ways to improve implementation of the requirement.

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

No payment or gift to respondents is made.

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

No specific authority for confidential information applies to the reported data.

**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.**

No information of a sensitive nature is requested.

**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 number of active commercial air tour operators decreased from 47 to 39, of which 15 are large operators (greater than 1,000 authorized annual air tours), 16 are mid-size operators (between 100 and 1,000 authorized annual air tours), and 8 are small operators (less than 100 authorized annual air tours). Based on the variance in personnel resources among companies, it is assumed that there are some operators that use much less time than the estimate while some use more, therefore the burden calculation represents the average for that category of operators. As with the hourly burden calculation, it is also assumed that some operators use workers that vary with skill and wage rates, therefore the estimates used for the wage calculation represent an average among the operators.

The base hourly burden for operators was increased by 50% to provide a more accurate time requirement for operators to complete the data collection report based on operator input and public comment received. The additional requirement of submission of flight monitoring data was not previously included in calculations but has been added for this renewal. For operators that are required to submit flight tracking data, their burden calculation is estimated to increase by 150%. This additional burden accounts for the time required to download, provide minimal required formatting, and submission of the data.

Those operators who report semi-annually will input their data on the attached Excel spreadsheet template, which has some general information the operator must input regarding his company (name of company, dba, FAA certificate number, and their FAA Flight Standards District Office). In addition, for each commercial air tour operation they conducted during the six-month period they will need to enter the date and time of day the operation occurred, aircraft make / model / series, and flight route. For air tour operators at exempt parks, and need only report annually, they would just need to report the number of flights they conducted over the park for that year.

As mentioned earlier, however, for parks having less than 50 operations annually, operators only report on an annual basis (not semi-annual) and only need to report the number of operations they conducted over that park in that year (not the additional information requested for semi-annual reporting). This exception affects a small number of operators. Based on current reporting information, only 2 operators report on an annual basis for any park units where they conduct tours. As this is such a negligible difference, the labor burdens calculated include semi-annual reports for all operators as

the minimum and represent a good estimate for the commercial air tour operators involved in this information collection.

Previous renewals included a single employee compensation rate for all operators. This renewal adjusts employee compensation based on operator input and public comment received. The updated rates account for the different types of employees that are likely to be used by the different groups of operators. For smaller operators, assume few to no employees so the wage type would be executive level as there are not likely clerical or administrative staff to complete the work.

The following cost data is from the US Bureau of Labor Statistics Occupational Employment and Wage Statistics for the Scenic and Sightseeing Transportation occupational classification<sup>2</sup>. The benefit percentages were based on private industry employee compensation information for similar wage types under the Service-providing industry series<sup>3</sup>. Overhead was calculated based on previously identified rates of 20%.

### Wage Estimates by type of operator

Operator Size	Wage Type	Hourly Wage Rate	Benefits %	Overhead	Total Hourly Rate	Annualized
Small	Executive	\$45.57	30.10%	20.00%	\$68.40	\$142,273.19
Mid-size	Professional (Technical/ Business Operations)	\$29.55	29.80%	20.00%	\$44.27	\$92,073.07
Large	Clerical	\$20.39	31.40%	20.00%	\$30.87	\$64,210.56

### Small Operators – No flight monitoring data required

Type	# of Operators	# of Annual Reports	# of hours per report	Annual Hours per operator	Hourly Rate	Cost Burden Total
Executive	4	2	4.5	9	\$68.40	\$2,462.40

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	4		

<sup>2</sup> [Scenic and Sightseeing Transportation, Other - May 2022 OEWS Industry-Specific Occupational Employment and Wage Estimates \(bls.gov\)](https://www.bls.gov/news.release/ocwage22.pdf)

<sup>3</sup> [Table 4. Private industry workers by occupational and industry group - 2023 Q03 Results \(bls.gov\)](https://www.bls.gov/news.release/tables22.pdf)

<b># of Responses per respondent</b>	2		
<b>Time per Response</b>	4.5		
<b>Total # of responses</b>	8		
<b>Total burden (hours)</b>	36		

### Small Operators – Flight monitoring data submission required

Type	# of Operators	# of Annual Reports	# of hours per report	Annual Hours per operator	Hourly Rate	Cost Burden Total
Executive	4	2	6.75	13.5	\$68.40	\$3,693.60

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
<b># of Respondents</b>	4		
<b># of Responses per respondent</b>	2		
<b>Time per Response</b>	6.75		
<b>Total # of responses</b>	8		
<b>Total burden (hours)</b>	54		

### Mid-size Operators – No flight monitoring data required

Type	# of Operators	# of Annual Reports	# of hours per report	Annual Hours per operator	Hourly Rate	Cost Burden Total
Professional	3	2	12	24	\$44.27	\$3,187.44

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
<b># of Respondents</b>	3		
<b># of Responses per</b>	2		

<b>respondent</b>			
<b>Time per Response</b>	12		
<b>Total # of responses</b>	6		
<b>Total burden (hours)</b>	72		

### Mid-size Operators – Flight monitoring data submission required

Type	# of Operators	# of Annual Reports	# of hours per report	Annual Hours per operator	Hourly Rate	Cost Burden Total
Professional	13	2	18	36	\$44.27	\$20,718.36

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
<b># of Respondents</b>	13		
<b># of Responses per respondent</b>	2		
<b>Time per Response</b>	18		
<b>Total # of responses</b>	26		
<b>Total burden (hours)</b>	468		

### Large – No flight monitoring data required

Type	# of Operators	# of Annual Reports	# of hours per report	Annual Hours per operator	Hourly Rate	Cost Burden Total
Clerical	7	2	36	72	\$30.87	\$15,558.48

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
<b># of Respondents</b>	7		

# of Responses per respondent	2		
Time per Response	36		
Total # of responses	14		
Total burden (hours)	504		

### Large Operators – Flight monitoring data submission required

Type	# of Operators	# of Annual Reports	# of hours per report	Annual Hours per operator	Hourly Rate	Cost Burden Total
Clerical	8	2	54	108	\$30.87	\$26,671.68

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	8		
# of Responses per respondent	2		
Time per Response	54		
Total # of responses	16		
Total burden (hours)	864		

### SUMMARY OF BURDEN, annualized

Type of Operator	Total # of responses annually	Total hours annually	Total cost annually
Small - No Tracking	8	36	\$2,462.40
Small - With Tracking	8	54	\$3,693.60
Mid-size - No Tracking	6	72	\$3,187.44
Mid-size - With Tracking	26	468	\$20,718.36
Large - No Tracking	14	504	\$15,558.48
Large - With Tracking	16	864	\$26,671.68
<b>ANNUAL TOTALS</b>	<b>78</b>	<b>1,998</b>	<b>\$72,291.96</b>

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

The requirement to install flight monitoring equipment and provide flight monitoring data is identified in several ATMPs. The purchase of the flight monitoring equipment and services are solely to evaluate compliance with ATMP operating conditions. The agencies did not require a specific brand or type of equipment, but rather specified performance-based metrics to allow operators to select the equipment and service to best meet their needs.

The ATMPs specify that the required flight monitoring data must include the following information for each row of data (i.e., each ping):

- Unique flight identifier
- Latitude
- Longitude
- Geometric altitude
- Tail number
- Date
- Time stamp
- Operator and Doing Business As (DBA), if different
- Aircraft type
- Aircraft model

The ping rate should be set to a maximum of 15 seconds. Further the ATMPs state that operators already using aircraft equipped with flight monitoring technology shall ensure it meets the performance standards listed above or acquire and install acceptable flight monitoring technology. Therefore, any equipment and service combination that provides the minimum data at the minimum data interval will meet the report data requirements.

The estimates for annual cost burden may vary greatly among operators and are dependent on the number of aircraft operated that need to be equipped and the type of equipment and service selected. For this estimate, the agency calculated the burden based on costs averaged from a sampling of products that meet the performance requirements for the flight monitoring data. The # of flight hours used for this estimate are the average flight hours from the operators per group (small, mid-size, large) that are required to submit flight monitoring data.

Size Operator	# of Operators	Estimated maximum # of aircraft	Installation cost (one-time)	Recurring Equipment Cost	Annual cost burden (one-time)
Small	4	3	\$2,000	None	\$24,000
Mid-size	13	10	\$2,000	None	\$260,000
Large	8	20	\$2,000	None	\$320,000
					\$604,000

Size Operator	# of Operators	Estimated maximum # of aircraft	Monthly Service per aircraft	Additional cost for service based on	Annual cost burden (recurring)

				usage	
Small	4	3	\$50	30	\$2,400
Mid-size	13	10	\$100	343	\$15,600
Large	8	20	\$150	7131	\$14,400
					\$32,400

**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 air tour operators electronically submit this collection information concurrently to FAA and NPS. Agency costs include review of each operator’s submittal to ensure information looks to be properly reported and to ensure every operator has submitted a semi-annual report, or annual report if the park is on the exempt list. The additional data required with this renewal, the agencies will format the received spreadsheet and import for analysis as described above. These actions are estimated to be approximately 100 hours for each agency, each six-month reporting period, for a total of 400 hours for the FAA and NPS.

The reviews would be likely be conducted by three employees at the GS-13 equivalent level located in Washington D.C<sup>4</sup>. The benefit % is based on data from a Congressional Budget Office publication<sup>5</sup> comparing public and private sector compensation.

Wage Type	Hourly Wage Rate	Benefits %	Overhead	Total Hourly Rate	Annualized
GS-13, Washington DC	\$56.52	39%	20.00%	\$89.87	\$186,929.60

Therefore, the burden estimate to the federal government is estimated to be 400 hours per year at a cost of \$35,948.00.

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

The number of respondents decreased from 47 in 2021 to 39 in 2024.

Additional information is required for parks with completed air tour management plans (ATMP). There were not completed air tour management plans for any national park unit in place during previous renewals.

The burden estimates are updated based on operator input and to account for additional reporting requirements.

<sup>4</sup> [SALARY TABLE 2024-DCB \(opm.gov\)](https://www.opm.gov/policy-data-oversight/salaries-tables/)

<sup>5</sup> [Comparing Benefits and Total Compensation in the Federal Government and the Private Sector \(cbo.gov\)](https://www.cbo.gov/publications/2018/03/01/comparing-benefits-and-total-compensation-in-the-federal-government-and-the-private-sector)

The hour and cost estimates are updated to reflect currently available wages and statistics data from the US Bureau of Labor 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.**

No publication of the comprehensive data set is anticipated as it is primarily for internal use and tracking. General summary reports (aggregated so as not to disclose operator specific information) have been posted to agency websites to provide high-level data on air tour operations over national park units. Some of the specific operational information collected (such as number of operations and aircraft types and routes) may be included as background information to document baseline conditions in National Environmental Policy Act (NEPA) documents prepared in association with any air tour management plan or voluntary agreement.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.**

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

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

There are no exceptions to the certification statement.