

Supporting Statement A
Reduced Vertical Separation Minimum
OMB #2120-0679

- This collection has been updated to reflect the current level of activity (**3,036 respondents and 14,664 hours**) for aircraft operators of United States (U.S.) registry seeking operational authorization to conduct Reduced Vertical Separation Minimum (RVSM) operations. This is a slight increase of the number or respondents from 2021. The two ICRs reflect a time burden difference between updating an existing application and submitting a new application for authorization.
- The slight increase is due to an increase in overall aircraft sales both in general aviation and commercial aircraft. The trend for overall applications is forecast to increase in upcoming years.
- Existing 14 CFR 91.706 still requires application for RVSM authorization when an operator of an U.S. registered aircraft conducts operations in RVSM airspace outside the U.S. where other State authorities require specific authorization. (62 FR 17487, Apr. 9, 1997). This is why applications have not been eliminated.

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

The authority to collect data from aircraft operators seeking specific operational Authorization to conduct RVSM operations is contained in the Code of Federal Regulations, Title 14 (14 CFR), Part 91, Section 91.180, as established by a final rule published in the Federal Register on October 27, 2003 (68 FR 61304, Oct. 27, 2003) and Section 91.706 by a final rule published April 9, 1997 (62 FR 17487, Apr. 9, 1997). Aircraft operators seeking specific operational authorization to conduct RVSM operations must submit their application to the responsible Federal Aviation Administration (FAA) Flight Standards safety office. Specific authorization is required when aircraft operators intend to operate in RVSM airspace outside the United States (U.S.) or their aircraft are not equipped with Automatic Dependent Surveillance Broadcast (Out). The responsible FAA Flight Standards safety office issues the specific operational authorizations and registers RVSM approved airframes in the FAA RVSM Approvals Database.

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.

RVSM airspace is implemented between Flight Level (FL) 290 and FL 410, inclusive, worldwide. Safe operations in RVSM designated airspace requires sound operational judgment, knowledge of airspace procedures, and highly accurate aircraft altimetry system performance. When RVSM was first established, the requirement for operators

to obtain a specific RVSM authorization was established. The specific authorization was needed because most aircraft required significant design changes to qualify for an authorization. Additionally, operators lacked familiarity with RVSM operations. At that time application for authorization included information on the operator's compliance with RVSM equipment standards, a description of the operator's RVSM maintenance program, and evidence of initial and recurrent pilot training. In 2016, the requirement to submit a separate RVSM maintenance program was removed (81 FR 470009, July 20, 2016). Since then, operators have become more familiar with RVSM operations, requirements, and procedures. Additionally, the height-keeping performance of aircraft equipped with ADS-B Out systems can be continually monitored to confirm that these aircraft are meeting RVSM performance standards. Consequently, between then and today the application for specific authorization has been streamlined and is only required when the aircraft is not equipped with ADS-B Out or is operating outside the United States where foreign authority continues to require specific authorization. All aircraft operators obtain specific authorization by submitting application to their responsible FAA Flight Standards safety office.

The type of information collected by this form includes, evidence of meeting RVSM equipment and performance standards, knowledge of RVSM policy and procedures and recent RVSM altimetry system performance monitoring, if applicable.

When operators complete airworthiness, continued airworthiness and operations program requirements, the responsible FAA Flight Standards safety office grants the specific operational authorization. Operators must submit application when new to RVSM operations and must update application upon changes in aircraft or their operational programs. Upon review of the applications the responsible FAA Flight Standards safety office grants specific operational authorization and registers RVSM approved airframes in the FAA RVSM Approvals Database. The information is required to ensure that operators and their aircraft are properly qualified and equipped to conduct flight operations while separated by 1,000 feet vertically and ensure compliance with the RVSM requirements is maintained outside the U.S. where other States require specific operational authorization.

This adjustment reflects a slight increase in the number of both new and updated applications for RVSM authorization. The slight increase is likely due to an increase in overall aircraft sales both in general aviation and commercial aircraft. The trend for overall applications is forecast to increase in upcoming years. As described above, aircraft equipped with ADS-B Out and operating in domestic RVSM airspace do not need to submit application for RVSM specific authorization. However, ADS-B Out equipment alone is not sufficient to operate under these provisions. According to Federal Air Regulations, the operator is still responsible for assuring the aircraft meets RVSM altitude keeping performance and each pilot has knowledge of RVSM requirements, policies, and procedures sufficient for the conduct of operations in RVSM airspace on an ongoing basis. Additionally, the totals reflect the number of applications for RVSM operators continuing to seek authorization when conducting RVSM operations outside the U.S. where other States require specific operational authorization.

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

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

Using the guidance provided in FAA Advisory Circular (AC) 91-85B, Authorization of Aircraft and Operators for Flight in Reduced Vertical Separation Minimum (RVSM) Airspace, operators can develop and submit their application for RVSM authority to the FAA 100% electronically. Per FAA guidance and the information sheet instructions, operators submit application to directly to their responsible FAA Flight Standards safety office based on the address of the aircraft's principle base of operation.

The Government Paperwork Elimination Act (GPEA) is an important tool to improve customer service and governmental efficiency through the use of information technology. This improvement involves transacting business electronically with Federal agencies and widespread use of the Internet and its World Wide Web. The website provides a suitable mechanism for dissemination of information via downloading of materials relating to RVSM operational authorization in accordance with the GPEA. The FAA RVSM Webpage can be found at:

https://www.faa.gov/air_traffic/separation_standards/rvsm/documentation/

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.

Some elements of the application package such as a minimum equipment list are furnished to the FAA when the operator applies for other operating authorities. However, duplication in data collection is necessary because the data must be modified to reflect the specific requirements of RVSM. The duplicate data elements are easily provided by the respondents without additional search of existing data sources. The duplicate data collection therefore would not require a significant burden.

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

This collection will not involve small business or small entities.

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.

If this collection is not renewed or conducted less frequently, operators will be unable to initiate the process to receive specific operational authorization by submitting their application to their responsible FAA Flight Standards safety office.

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.*

The collection does not require any special circumstances.

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

A Federal Register Notice published on February 21, 2024 (89 FR 13133), solicited public comment. No comments were received.

The FAA routinely engages with outside stakeholders in forums to address issues related to operational applications. Operational authorization streamlining is an ongoing process.

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

There are no payments or gifts to respondents.

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

We do not provide any assurance of confidentiality for this submission.

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 Questions of a sensitive nature are asked.

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.**

Since RVSM Letters of Authorization do not have an expiration date, the total number of

applications estimated to be processed annually is 3036; 900 applications where RVSM was new to the operator and 2,136 applications where the operator was updating an existing authorization. The estimated preparation time for an operator to complete and submit an application for a new operational authorization to their responsible FAA Flight Standards safety office would be 6.8 hours. The estimated preparation time to update an existing authorization would be 4.00 hours. The 900 operators estimated to seek a new operational authorization would result in 6,120 hours in preparation time. The 2,136 operators estimated to update an existing operational authorization would result in 8,544 hours in preparation time. The estimated total annual burden in hours would be 14,664 hours.

The average time to complete applications for part 91 RVSM letters of Authorization are based on the required elements for RVSM authorization explained in Advisory Circular 91-85B, *Authorization of Aircraft and Operators for Flight in Reduced Vertical Separation Minimum (RVSM) Airspace.*, Chapter 5. In accordance with Chapter 5.5 of this document, an operator new to RVSM operations would need to supply a simple letter of request, evidence that the aircraft is RVSM compliant by supplying a copy of existing documentation that the aircraft is compliant; i.e., a statement from the Airplane Flight Manual Supplement or Type Certificate Data Sheet. If the airplane was modified through Service Bulletin, Supplemental Type Certificate or Service Letter, only a copy of the existing maintenance log. Additionally, operators should supply documentation of training through training certificates or an existing in-house training program. Additional existing information may be submitted, as applicable for RVSM altitude keeping performance monitoring and operating history. An operator updating an application would only need to supply evidence or administrative information for portion(s) of the authorization that are changing, e.g., a new aircraft registration number.

The estimated total annual operator cost burden, assuming the value of an owner or operator’s time is \$53.16 per hour, will be \$779,538 (53.16 x 14,664 hours). The fully burdened operator rate of \$53.16 assumes an operations research analyst rate of \$41.21 per hour and a multiplier of 1.29 fringe benefit salary multiplier.¹

| | Number Responses | Time per Response (hours) | Total Hour Burden |
|----------------------|------------------|---------------------------|-------------------|
| New applications | 900 | 6.8 | 6,120 |
| Updated applications | 2,136 | 4.0 | 8,544 |
| Total | 3,036 | | 14,664 |

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

No cost other than those in question 12 and 14.

¹ U.S. Bureau of Labor Statistics: <https://www.bls.gov/ooh/math/operations-research-analysts.htm>.

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 assumes that it would take Inspectors on average 4.85 hours to process each applicant submission. Assuming each inspector at a GS-12 level, the time and cost to the Federal Government for processing 3,036 application packages is 14,725 hours and \$748.619, assuming an Inspector rate of \$50.84 per hour including benefits.² The Inspector rate assumes a base salary for a GS-12 step 5 of \$38.81 and a fringe salary multiplier of 1.31)

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

The previously reported 2854 respondents for an estimated annual burden of 13,813 hours has been updated to reflect the slightly increased current level of activity (3,036 respondents and 14,664 hours) for aircraft operators of U.S. registry seeking operational authorization to conduct RVSM operations outside the U.S. Previously in 2018, Appendix G to 14 CFR Part 91 was revised to remove the requirement for certain operators to submit a RVSM application for authorization when equipped with ADS-B) Out and operating in U.S. airspace, (83 FR 65487, Dec. 21, 2018). Operators still need to submit application for RVSM authorization when operating outside the U.S. RVSM has been implemented for more than 10 years and operators seek to update existing authorizations more than applying for new authorizations annually. The time burden for updated application is less than an application for an operator new to RVSM. A recent analysis of operator RVSM authorization data within the U.S. Minimum Aircraft System Performance Specification (MASPS) indicates that on average, 900 operators per year seek new RVSM authorizations and 2,136 operators seek to update existing authorizations.

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.

Results will not be published except for listings of airframes that have received operational authorization, which are maintained by the North American Approvals Registry and

² Source Salary Table 2023 GSA Hourly Basic Rates GS-12 (Step 5):
https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/GS_h.pdf.

Monitoring Organization (NAARMO) and are available at http://www.faa.gov/air_traffic/separation_standards/naarmo/rvsm_approvals/.

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.

Not applicable.

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

There are no exceptions.