

**Supporting Statement A**  
**Advisory Circular (AC): Reporting of Laser Illumination of Aircraft**

**OMB Control Number:** 2120-0698

**Summary of changes:** To help better investigate laser incidents LEAP, and ASH requested changes to the laser incident report questionnaire. There has been a decrease in the amount of responses received. This could be for several reasons to include: outreach (public announcements/news reports), education and as a result more participation from pilots in reporting the laser events. The form used to collect laser incident reports has changed per guidance from ASH for pilots.

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

This collection specifically supports the FAA Modernization and Reform Act of 2012 by sharing the information with legal entities (both federal and local) who in turn are able to hold accountable those who knowingly and willingly aim a laser pointer at an aircraft. The collection and dissemination of the information together improve aviation safety and capacity.

**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.**

Responding to the collection of the information is voluntary and essential to provide a timely method of sharing the information via the Domestic Events Network (DEN). The entities who are encouraged to respond include Pilots and Crewmembers. Daily, pilots and crewmembers report the time, location, color, and description of laser events to be used for record keeping, analysis, and disclosure. Also disclosed are the legal agencies contacted during the process of reporting. The purpose of the collection is to provide statistical awareness, analysis for safety, and in some cases legal prosecution.

The collected information is consolidated and distilled into a report and distributed to government addressees to include law enforcement/first responders. The report allows recipients or FAA leadership to use the collection for other purposes or to complete further analysis as their mission dictates. The report is also published on the FAA Laser website at <https://www.faa.gov/aircraft/safety/report/laserinfo>.

**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.**

This collection is able to be submitted 100% electronically.

**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.**

No duplication exists. There is no other established means to collect this information from pilots after an incident occurs.

**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. Providing this information is voluntary.

**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 consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently would include an inability to educate the general public of the dangers of laser illumination, as well as the inability to assist federal and local law enforcement agencies in recommending and applying mitigation actions that would ensure safe and orderly flight operations. It would also severely impact the ability of law enforcement to take immediate action to locate and prosecute the offenders of the FAA Modernization and Reform Act of 2012 and source of unauthorized laser transmission.

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

There are no special circumstances.

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

A Federal Register Notice published on January 16, 2024 (89 FR 2707) solicited public comment. No comments were received.

<https://www.federalregister.gov/documents/2024/01/16/2024-00687/>

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

No payments or gifts are provided to respondents.

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

We are not providing any assurance of confidentiality.

**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.

Note: see Supporting Information attachment for #12

<b>#12. Total Amount of emails received: 2339 (Public burden)</b>							
	<b>QTY</b>	<b>Type/Time per response</b>		<b>Total Min</b>	<b>Total Hours</b>	<b>Hourly Wage Rate</b>	<b>Labor Cost</b>
Reporting	<b>291</b>	Long form (.pdf)	10 min	2910	48.5	\$58.25	\$2,825.13
	<b>2048</b>	Mobile app	5 min	10240	170.6	\$58.25	\$9,937.45

We estimate that the time required for the submission of the mobile app report to be total of 5 minutes maximum. At an estimated 2048 responses per year, the total is 170.6 hours annually.

We estimate that we receive 12% .pdf long forms via email at 291 responses X 10 minutes = 48.5 hours

Mobile app hours = 170.6 hours

Paper questionnaire = 48.5 hour

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Total annual hours 219.1 hour

The cost associated with the .pdf long form of the submission, at approximately \$58.25 per hour, times 48.5 hours, is \$2825.13 per year.

Cost is derived from the 2022 U.S. Department of Labor, Bureau of Labor and Statistics website. Reported annual median pay is \$121,565. This equates to GS-14 Step 9 pay on Salary Table 2022-GS, effective January 2017. Hourly rate is \$58.25.

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

There are no other costs.

**14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.**

#14.			Total Min	Total Hours	Hourly Wage Rate	Labor Cost
Record Keeping	2339	15 min	35,085	584.75	\$42.96	\$25,120.86
Third Party Disclosure		5 min	11,695	194.92	\$42.96	\$8,373.62
Total		20 min	46,780	779.67	\$42.96	\$36,494.48

15 minutes x 2339 total emails = 35085 min/60 min = 584.75 hours total

**One contractor with annual salary of \$82,495 or \$42.96 (hourly) processes and performs record keeping and third party disclosure.**

We estimate that the required time for receipt and finalization of documents to be 15 minutes maximum. Anticipate an average of 2339 reports per year.

**The estimated annualized cost to the Federal Government is \$85,184.45**

**per year at \$85.92 per hour, times 991.67 hours.**

Labor rate x 2 (HHS fringe multiplier) = annual labor burden rate (record keepers)  
42.96 x 2 = 85.92. We multiplied the hourly wage rate by 2 to account for a fringe

benefits rate of 69 percent<sup>1</sup> and an overhead rate of 31 percent.<sup>2</sup>

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

In 2023 ASH contacted System Operations Security to change the Laser Questionnaire conversations to have more questions required, better question about crewmember being lasered, and removal of an entry. Questions included did the laser cause you to divert your attention from your crewmember duties, did you search for the source of the laser, and did the laser cause physical inability to perform crewmember duties. There has been about a decrease in the number of responses received. This could be for several reasons to include: more outreach (public announcements/news reports), education and as a result more participation from pilots in reporting the laser events.

**16. For collections of information whose results are planned to 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.**

The report is published on the FAA laser website.

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

We are not seeking approval.

**18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.**

There are no exceptions.

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<sup>1</sup> Source: Congressional Budget Office, "Comparing the Compensation of Federal and Private-Sector Employees, 2011 to 2015" (April 2017), <https://www.cbo.gov/publication/52637>. The wages of Federal workers averaged \$38.30 per hour over the study period, while the benefits averaged \$26.50 per hour, which is a benefits rate of 69 percent.

<sup>2</sup> Source: U.S. Department of Health and Human Services, "Guidelines for Regulatory Impact Analysis" (2016), [https://aspe.hhs.gov/system/files/pdf/242926/HHS\\_RIAGuidance.pdf](https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf). On page 30, HHS states, "As an interim default, while HHS conducts more research, analysts should assume overhead costs (including benefits) are equal to 100 percent of pretax wages...." To isolate the overhead rate, the Department subtracted the benefits rate of 69 percent from the recommended rate of 100 percent.