

Supporting Statement A
Part 65- Certification: Airmen Other Than Flight Crewmembers
Subpart C - Aircraft Dispatchers and
Appendix A to Part 65 - Aircraft Dispatcher Courses
OMB 2120-0648

- The hourly wages for administrative assistants and technical specialists were updated based on Bureau of Labor Statistics data.
- The number of schools was updated.

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

Under the authority of Title 49 USC, Section 44703, (formerly the Federal Aviation Act of 1958, Section 602) specifically empowers the Secretary of Transportation to issue airmen certificates to properly qualified persons. In keeping with the FAA's policy of reviewing and updating regulations to ensure that they are consistent with changes in the aviation environment, the FAA, with the assistance of the Aviation Rulemaking Advisory Committee (ARAC), the FAA reviewed part 65, subpart C, and appendix A of 14 CFR part 65 regarding aircraft dispatcher certification requirements. In the 30 years preceding the 1999 final rule (64 FR 68923), few changes had been made to the dispatcher certification requirements, although numerous technological advances had occurred in the aviation industry regarding operational practices and training methods. This collection involves the information that each applicant for an aircraft dispatcher certificate or FAA approval of an aircraft dispatcher course must submit to the FAA to comply with 14 CFR part 65, subpart C and Appendix A. These applications, reports and training course materials are provided to the responsible Flight Standards Office of the FAA which oversees the certificates and FAA approvals.

The collection of this information supports the Department of Transportation's strategic goal on safety.

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 applicant for an aircraft dispatcher certificate or FAA approval of an aircraft dispatcher course must comply with Part 65, Subpart C and Appendix A. All submissions are provided to the responsible Flight Standards Office of the FAA that oversees the certificates and FAA approvals. The collection of this information is mandatory due to regulatory intent and the respondents are each applicant for an aircraft dispatcher certificate (individual) and each applicant for FAA approval or renewal of an aircraft dispatcher course (course operator). The collection is conducted initially, annually and on occasion and would include the collection of information from

instructors, students/applicants, and facilities. This collection of information is required to determine whether the course operator and the aircraft dispatcher/applicant meets the regulatory requirements. The FAA uses the collected information to initially approve a course operator and renew on a bi-annual basis to continually ensure that student applicants have been trained properly.

The information collected will not be disseminated to the public. This collection includes both recordkeeping and reporting requirements which are outlined in question 12. The information is collected according to the regulatory requirements. The timeframe required is outlined in question 12. The information is shared with the FAA (DOT).

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 is associated with information and recordkeeping. The FAA has traditionally encouraged, and is receptive to, the use of automation to reduce burden. In response to the Government Paperwork Elimination Act (GPEA), the agency allows 100% of this information to be submitted electronically. There are no forms associated with this collection. The results of this information collection will not be made available to the public over the internet.

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.

We find no duplication. We know of no other agency collecting this information. The information collected is not available from any other source, it is only available from the applicant.

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

Requirements apply to individual applicants for aircraft dispatcher certificates and those who choose to train them. Any small aircraft dispatcher school operating under the provisions of part 65 would have burdens in proportion to the size of their operation. The paperwork burden is scalable. For example, Section 65.65 requires a description of equipment and facilities, and Section 65.63 requires a list of the instructors and their qualifications. An aircraft dispatcher school with little equipment, one facility, and one or two instructors would have much less complexity in terms of paperwork burden than a larger business.

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 collection of information for those course operators who choose to train aircraft dispatcher applicants is to protect the applicants by ensuring that they are properly trained. The frequency of the burden largely depends on the stability of the aircraft dispatcher school and the efficacy of their training. Their burden is increased if they develop inadequate course outlines that need revision often and train students who do not satisfactorily complete the FAA tests.

If the collection is not conducted or is conducted less frequently, the applicant or aircraft dispatcher school may not be meeting regulatory intent for continuing to remain an approved aircraft dispatcher school or may not be able to safely dispatch aircraft.

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.

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 May 22, 2024 (89 FR 45046) solicited public comment. No comments were received.

Stakeholders have the opportunity to engage with the FAA through their Certificate Management Offices or Teams. They routinely communicate and offer feedback to the FAA through these channels.

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

There are no payments or gifts.

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

There have been no such assurances provided to respondents.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

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 total hour burden and the cost burden for the respondents is **5,393.75 hours** and **\$139,630.39**

The calculations of burden are based on the following Information:

- There are currently **54 approved course operators** nationwide.
- Each aircraft dispatcher school conducts an average of 2 classes per year of 50 days each.
- Each class has an average of 7 students. **(756 total students)**
- 90% of the students complete the practical test (ten percent of course graduates never take the test).
- $90\% \times 7 = 5.4 \times 3 = 16.2 \times 54 = \mathbf{680 \text{ students take the test each year.}}$
- The following costs are based on the paperwork burden being done by a Technical Specialist or equivalent staffer earning approximately \$47.39 an hour¹. A 31.4 percent multiplier was then applied to account for fringe benefits which brings the salary to the salary to \$62.27. To account for overhead, a multiplier of 17 percent was applied.² Therefore, the estimated hourly salary for a Technical Analyst is \$73.
- An Administrative Assistant earns approximately \$21.87 an hour³. A 31.4 percent multiplier was then applied to account for fringe benefits which brings the hourly pay to \$28.74.⁴ To account for overhead, a multiplier of 17 percent was applied.⁵ Therefore, the estimated hourly salary for an Administrative Assistant is \$34.
- The burden associated with certification of dispatcher applicants who must submit an 8400-3 Application for an Airmen Certificate and/ or Rating is already addressed in collection 2120-0007.

¹ [Project Management Specialists : Occupational Outlook Handbook: : U.S. Bureau of Labor Statistics \(bls.gov\)](https://www.bls.gov/publications/occupational_outlook_handbook/)

² 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>.

³ [Secretaries and Administrative Assistants, Except Legal, Medical, and Executive \(bls.gov\)](https://www.bls.gov/publications/secretaries_and_administrative_assistants_except_legal_medical_and_executive/)

⁴ <https://www.bls.gov/news.release/ecec.nr0.htm>

⁵ 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>.

FAA estimates **3 new applicants for aircraft dispatcher schools** per year will be the average. An average of 3 aircraft dispatcher schools per year cease operations. On average, **27 aircraft dispatcher schools renew on an annual basis (renewal every two years).**

Each new aircraft dispatcher school applicant must submit:

1. Letter - one page, 30 minutes technical, 20 minutes admin per year
2. Course outline - 30 pages, 8 technical hours, 2.5 admin hours per year
3. Description of equipment and facilities - one page, 1 technical hour, 20 minutes admin per year.
4. List of instructors and their qualifications - one page, 1 technical hour, 20 minutes admin hours per year.

Totals	Technical hours –10.5 x \$73 = \$766.50
	Admin hours <u>3.5 x \$34 = \$119.00</u>
	14 hours \$885.50 per school

14 hours X 3 new schools per year = 42 Hours
\$885.50 X 3 new schools per year = \$2,656.50

Summary (Annual numbers)	Reportin g	Recordkeepin g	Disclosur e
# of Respondents	3		
# of Responses per respondent	1		
Time per Response	14 Hours		
Total # of responses	3		
Total burden (hours)	42 Hours		

Renewals and Cancellations: The aircraft dispatcher school applicant sends another letter.

Revisions - are accomplished in the same way as original applications.

There are no specific forms.

Renewal aircraft dispatcher school applicants (due each 24 months) or aircraft dispatcher school applicants who wish to cancel authority:

Letter - one page, 20 minutes technical, 10 minutes admin per year.

Totals Technical hours – $.34 \times \$73 = \$ 24.82$
Admin hours $.16 \times \$34 = \$ 5.44$
.50 hours \$ 30.26 per renewal

.50 hours X 27 per year = 13.5 hours
\$30.26 X 27 per year = \$817.02

Revisions: Not considered a burden since FAA does not mandate any revisions.

Summary (Annual numbers)	Reportin g	Recordkeepin g	Disclosur e
# of Respondents	27		
# of Responses per respondent	1		
Time per Response	.5 hours		
Total # of responses	27		
Total burden (hours)	14 hours*		

*Rounded Up

\$65.55 Knowledge requirements.

A person who applies for an aircraft dispatcher certificate must pass a knowledge test. 756 students take the test each year. The FAA estimates that it will take 3.0 hours for each applicant to take the test. There is no cost burden associated with the time for an applicant to take the test. There is an average of one test proctor per 8 applicants. The average salary of a technical specialist who must proctor the test is \$73 per hour.

756 divided by 8 = 95 technical specialists x 3 hours at \$73 per hour = **285 hours and \$20,805**

Summary (Annual numbers)	Reportin g	Recordkeepin g	Disclosur e
of Respondents		95	
# of Responses per respondent		1	
Time per Response		3 Hours	

Total # of responses		95	
Total burden (hours)		285 Hours	

65.63 - Aircraft Dispatcher Certification Courses: Application, Duration, And Other General Requirements.

An applicant for approval of an aircraft dispatcher course (an FAA approval is good for 24 months.)

Burden:

New aircraft dispatcher school applicants, renewals and cancellations: Three new aircraft dispatcher school applicants per year at a rate of 42 hours per year (\$73 per hour)

3 new aircraft dispatcher school applicants x 14 hours = **42 hrs** x \$73 per hour = **\$3,066**

Cancellations: Three cancellations per year at a rate of .5 hours per year (\$73 per hour)

3 cancellations x .5 hrs = **1.5 hr** x \$73 per hour = **\$109.50**

Renewals: Twenty-seven renewals per year at a rate of .5 hours per year (\$73 per hour)

27 renewals x .5 hrs = **13.5 hr** x \$73 per hour = **\$985.50**

Notification to the Administrator of changing the ownership, name, location of an approved course:

We do not anticipate any change in aircraft dispatcher school ownership, name, or location of courses.

Total hours/cost:	42 hours	\$3,066
	2 hours	\$109.50
	14 hours	\$985.50
	58 hours	\$4,161

New Schools

Summary (Annual	Reportin g	Recordkeepin g	Disclosur e
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numbers)			
# of Respondents	3		
# of Responses per respondent	1		
Time per Response	14 Hours		
Total # of responses	3		
Total burden (hours)	42 Hours		

Cancellations

Summary (Annual numbers)	Reportin g	Recordkeepin g	Disclosur e
# of Respondents	3		
# of Responses per respondent	1		
Time per Response	.5 Hours		
Total # of responses	3		
Total burden (hours)	2 Hours*		

*Rounded up

Renewals

Summary (Annual numbers)	Reportin g	Recordkeepin g	Disclosur e
# of Respondents	27		
# of Responses per respondent	1		
Time per Response	.5 Hours		
Total # of responses	27		
Total burden (hours)	14 Hours		

* Rounded Up

65.67 – Personnel

The ratio of students per instructor may not exceed 25 students for one instructor. Within the last 24 calendar months at least 80 percent of the students or graduates who applied for testing within 90 days after graduation from the school must have passed the practical test on the first attempt as per Part 65.63.

Burden: Combined with the burden of 65.70 below. This would be recorded in the same student file and a one-line statement would be in the request for renewal letter of 65.63 above.

65.70 - Records

The aircraft dispatcher school must keep a record of each student including chronological log of all instructors, subjects covered, and course examinations and results, for a period of not less than 3 years. The course operator must also prepare, retain, and transmit a report to the Administrator not later than January 31 of each year. The report contains the following information for the previous year: The names of all students graduated, together with the results of their aircraft dispatcher certification course, and the names of all the students failed or withdrawn, together with results or reasons for withdrawal. Each student who successfully completes the approved aircraft dispatcher certification course shall be given a written statement of graduation.

Burden: 54 aircraft dispatcher schools in any given year x 14 students per year per aircraft dispatcher school x 1 record for each student x 1 admin hour per student

$54 \times 14 = 756 \text{ students} \times 1 \text{ record} = 756 \text{ records} \times 1 \text{ hr} = \mathbf{756} \times \$34 \text{ (admin hour)} = \mathbf{\$25,704}$

Update of course curriculum and training outline: Each of the 54 aircraft dispatcher certification course operators/schools is required to update the course curriculum and training outline which will be a one-time occurrence of approximately 80 hours per operator/school at a cost of \$73 per hour.

Burden: 54 operators/schools x 80 hrs = **4,320 hrs.** x \$73 = **\$315,360**

Records

Summary (Annual numbers)	Reportin g	Recordkeepin g	Disclosur e
# of Respondents		756	
# of Responses per respondent		1	
Time per		1 Hour	

Response			
Total # of responses		756	
Total burden (hours)		756 Hours	

Update of Course Curriculum

Summary (Annual numbers)	Reportin g	Recordkeepin g	Disclosur e
# of Respondents		54	
# of Responses per respondent		1	
Time per Response		80 Hours	
Total # of responses		54	
Total burden (hours)		4320 Hours	

SUMMARY OF HOURS AND COST BURDEN BY SECTION:

<u>Section</u>	<u>Hours per Year</u>	<u>Cost per Year</u>
New	42	\$ 2,656.50
Renewals	14	\$ 817.02
65.55	285	\$ 20,805
65.63	58	\$ 4,161.00
65.67	0	\$ 0
65.70	756	\$ 25,704.00
Update of curriculum	<u>4,320</u>	<u>\$ 315,360.00</u>
TOTALS:	5,475	\$369,503.52

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 associated with this collection.

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 an inspector reviewing these courses would be a GS-13. We calculated the pay based on the GS-13, step 5 pay rate in Kansas City, MO who earns \$57.04 per hour. ⁶ A 31.4 percent multiplier was then applied to account for fringe benefits which brings the salary to the salary to \$74.95. To account for overhead, a multiplier of 17 percent was applied. Therefore, the estimated hourly salary for a Dispatch Inspector is \$88 per hour.

The FAA estimates a new school would need approximately 3 weeks to evaluate. Therefore, for the 3 new schools, we estimate 360 hours for evaluation. 360 hours times \$88 per hour is \$31,680. It would take approximately 8 hours for an annual visit. We estimate 408 hours to review those schools. 408 hours times \$88 per hour is \$35,904. Therefore, the total cost to the federal government is \$67,584.

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

The hourly wages for administrative assistants and technical specialists were updated based on Bureau of Labor Statistics data.

The number of schools was updated.

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 of the collected information.

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.

No such approval is being sought.

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

There are no exceptions.

⁶ [SALARY TABLE 2024-KC \(opm.gov\)](#)