GENERAL AVIATION AND PART 135 ACTIVITY SURVEY 2120-0060

SUPPORTING STATEMENT FOR 2024 – 2027 SURVEY CYCLE

An up to date/current wage and salary table is being used which results in a change to the burden cost. Every three years an average of respondents is calculated. Since the last three-year execution period the number of respondents has decreased. As a result, there is less burden hours and burden cost to conduct the survey.

A. JUSTIFICATION

1. <u>Information Requirement:</u>

Title 49, United States Code (U.S.C.), empowers the Secretary of Transportation to collect and disseminate information relative to civil aeronautics, to study the possibilities for development of air commerce and the aeronautical industries, and to make long-range plans for, and formulate policy with respect to, the orderly development and use of the navigable airspace, radar installations and all other aids for air navigation. These data are necessary to assess performance of the Department of Transportation in meeting the strategic goal for General Aviation safety as described in the Destination 2025 Strategic Plan.

This collection of information also serves to support the Department of Transportation's strategic goals of safety and economic growth and trade.

Transportation Information

49 U.S.C. § 329

"The Secretary of Transportation shall (1) collect and disseminate information on civil aeronautics;...(2) study the possibilities of developing air commerce and the aeronautical industry; and (3) exchange information on civil aeronautics with governments of foreign countries through appropriate departments, agencies and instrumentalities of the Government."

Development Planning

49 U.S.C. § 44501

"The Administrator of the Federal Aviation Administration shall make long range plans and policy for the orderly development and use of the navigable airspace, and orderly development and location of air navigation facilities, that will best meet the needs of, and serve the interest of, civil aeronautics and the national defense, except for needs of the armed forces that are peculiar to air warfare and primarily of military concern."

Overview

The Federal Aviation Administration is preparing to conduct the 48th annual General Aviation (GA) and Part 135 Activity Survey. This is an aircraft-level survey that seeks input from owners/primary operators on the activity of aircraft on behalf of all persons who operated it. This is accomplished by implementing mixed-mode data collection methods, predominately

administered through web-based processes, with mail augmentation and telephone follow-up to nonresponding fleets to meet the reporting needs of individual and fleet aircraft owners/operators.

There are two data collection tracks in execution of the GA and Part 135 Survey. This includes small fleet and large fleet forms to obtain detailed data on as many aircraft as possible and facilitate participation by owners/operators of multiple aircraft for whom detailed, individual-aircraft reporting presents a significant burden.

The GA Survey is an important source of information on the size, activity, and characteristics of the GA fleet and serves as a primary source in supporting critical FAA objectives. Meeting these objectives requires data collection procedures that obtain participation from a high proportion of sampled aircraft and accurately represent the population of civilian aircraft that are potentially active in the US between January 1 and December 31 of a calendar year.

The survey design and procedures remain largely unchanged. No changes in data collection method, nor definition of survey population have taken place since 2014. The GA Survey Appendix B contains all distributed documents used in conducting the survey, including the questionnaire for aircraft owners. Minor modifications to phrasing, sequencing, and design may occur.

2. <u>Use of Information:</u>

The following statistics have been derived from past surveys and will continue to be in the future.

- Number of active aircraft by aircraft type;
- Distribution of aircraft by state and FAA region;
- Annual hours flown by aircraft type and by use;
- Annual operations;
- Airframe hours;
- Annual hours flown by IFR/IFR flight plans;
- Lifetime airframe hours;
- Fuel consumption;
- Avionics equipment;
- Participation in fractional ownership.

In addition, information relative to aircraft aging, gear type, and the airworthiness certificate are developed from the survey. The survey is voluntary. The voluntary responses are collected from the General Aviation aircraft community on an annual basis.

Examples of specific uses of the survey statistics include:

- General aviation active aircraft and hours flown are the primary exposure measures used throughout the agency in assessing the safety status of general aviation flying and in determining the impact of general aviation on the National Airspace System.
- The agency and the National Transportation Safety Board (NTSB) use the exposure data, both
 by itself and in conjunction with aircraft age, to calculate accident rates, which are used to
 compare safety over time and safety performance among different aircraft types and
 configurations.

- The agency and the NTSB will use the exposure data for public use aircraft to calculate accident rates for those aircraft. The NTSB is now required to investigate accidents involving public use aircraft. This is a responsibility assigned by Public Law 103-411.
- Lifetime airframe hours are used in aircraft fatigue studies for determining mean time failures and establishing aircraft maintenance cycles.
- Hours flown and active aircraft information by type of flying is used for safety analyses, forecasting and planning.
- Fuel consumption data are used for planning, forecasting and for assessing the effect of the agency's energy conservation programs.
- The state in which aircraft are based is used to determine the geographical dispersion of the fleet and to estimate activity by state. Activity by state is also required to support the FAA, and state and local governments for airport master planning.
- Data on avionics capability are used for assessing the ability of the general aviation fleet to use
 the National Airspace System. The availability of avionics data also allows the FAA to
 determine at which airports various aircraft can land and in which segments of airspace they
 can fly. These data are used in assessing the economic impact of proposed regulations on the
 general aviation fleet.
- In addition to the FAA, NTSB, and the Department of Commerce, other organizations in federal, state and local governments, as well as the aviation industry, use the data collected in this survey for many other purposes.
- As listed above, this information is used as a general survey by which its results are used in reporting and providing a basis for additional analytics to be performed by a large swath of federal entities as well as external industries.

3. Electronic or Other Technological Data Collection Techniques

In response to the Government Paperwork Elimination Act (GPEA), the collection may be conducted 100% electronically. Since CY2000, an Internet component has been added. This puts no extra burden on the respondents but, in fact, allows them another option with which to answer the survey. Internet response rates are steadily increasing, and in 2022 was 71.1% of all completed surveys. The Internet option is open throughout the survey period. The respondents are also free to respond by company compiled spreadsheets, or by telephone. Additional tabulation details surrounding the 2022 GA Survey completions can be found on A-17 of Appendix A.

4. <u>Describe efforts to identify duplication.</u>

To minimize the reporting burden, on-demand and fractional operators of large fleets of three or more aircraft receive a single, specially designed summary questionnaire to allow reporting for their entire fleet of aircraft, instead of each aircraft in their fleet.

Once any duplication is discovered, such as multiple survey submissions for a single aircraft identification number, the data are removed from the survey.

Commuter air carriers, by regulation, are reporting exposure data to the Department of Transportation, using DOT Form 41. To negate this duplication, the collection of commuter air carrier hours flown data was eliminated from the survey. Avionics information for the commuters will, however, continue to be collected since there is no other source. Exposure data for the ondemand air taxis also continue to be collected. To reflect the inclusion of all Part 135 aircraft in the survey, the name of the survey was changed to the "General Aviation and Part 135 Activity Survey."

As supported in the previous section, *Use of Information*, estimates derived from this collection serve as a primary resource to a variety of agencies and industry studies and reduces burden from external information collection efforts on the flying public.

5. Burden on Small Businesses

The information collection requirement has been designed to minimize the burden on all respondents. Small business owners who also are general aviation aircraft owners could be sampled in the survey. However, their probability of being sampled and included in the survey is the same as any aircraft owners. This survey imposes no special burden on small business.

6. Consequences of Less Frequent Reporting

Because it provides the foundation for GA-related metrics within FAA, program evaluation, safety assessment, and accurate forecasting as well as long-range planning, the FAA needs up-to-date aircraft operational data as well as avionics information to continue to perform these tasks.

7. **Special Circumstances**

There are no special circumstances inconsistent with 5 CFR 1320.5(d)(2).

8. Consultation Outside of the Aircraft

The Notice of Intent to Request Renewal from the Office of Management and Budget of this survey was published in the Federal Register on June 24, 2024 (89 FR 52533). Respondents are to remain confidential. There is no contact via outreach to voluntary participants of the survey. No public comments were received.

9. Payments

No payments or gifts are given to the respondents.

10. <u>Confidentiality</u>

Aircraft registration (N-number is used to identify the aircraft; the name and addresses of the aircraft owners are used for mailing. The N-number and owner's name are contained in the Aircraft Registration Master File, which is available to the public upon request. To increase public support, in the survey cover letter, which is signed by the FAA Administrator, and on the questionnaire itself, it is emphasized that the information obtained in the survey will be used for statistical purposes only, and will be kept private to the extent permitted by law. FAA will not publish any reports or tables that would reveal specific information reported by an individually identifiable respondent.

At the conclusion of the survey cycle, the forms are stored in a secure storage facility. The contract covering the conduct of the survey requires that the contractor maintain the confidentiality of all survey responses.

11. <u>Sensitive Questions</u>

This information collection does not include any questions of a sensitive nature or that would commonly be considered private.

12. Estimate of Information Collection Burden

Annual Burden Hours

An average eligible sample of 84,000 respondents are contacted on an annual basis to conduct the survey. 31,280 completed survey responses were received in 2022 when combining the questionnaires for both single aircraft (20,958) and large fleet (1,184 distinct fleet numbers that contribute to those remaining 10,322 aircraft). It is estimated that approximately 11 minutes are required to complete the single aircraft questionnaire and 14 minutes for the large fleet questionnaire. Therefore, the average annual reporting burden for the survey is estimated to be:

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Total Annual Burden = \underline{4,118 \text{ hours}}
Single Aircraft = (20,958 \times 11/60) = 3,842 hours
Large Fleet = (1,184 \times 14/60) = 276 hours
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Annual Respondent Cost

Assuming a cost of \$82.31 per hour¹, the total annual cost is estimated to be:

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Total Annual Cost = $338,569
Single Aircraft = 3,842 hours x $82.31 per hour = $315,851
Large Fleet = 276 hours x $82.31 per hour = $22,718
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13. Total Respondent Cost Incurred to Collect Information

¹ Bureau of Labor Statistics, U.S. Department of Labor, *Occupational Outlook Handbook*, Airline and Commercial Pilots,

at https://www.bls.gov/ooh/transportation-and-material-moving/airline-and-commercial-pilots.htm (2024).

Other than the burden in time to complete the survey, the respondent will have no additional capital, start-up or maintenance cost associated with completing the survey questionnaire. The information is in existing records maintained for other purposes such as the aircraft logbooks.

14. Cost Estimate

Based on current option year program cost, the estimated financial impact to the Federal Government are as follows:

Labor Category	Hourly Rate	Labor Hours	Extended Amount
Project Manager	\$280.50	600	\$168,300.00
Task Team Leader	\$234.60	600	\$140,760.00
Planning Analyst (1)	\$173.40	320	\$55,488.00
Planning Analyst (2)	\$142.80	40	\$5,712.00
Principal Analyst	\$173.40	200	\$34,680.00
Consultant	\$326.40	70	\$22,848.00
Data Collection Coordinator (1)	\$163.20	200	\$32,640.00
Senior Analyst	\$214.20	400	\$85,680.00
Research Analyst	\$132.60	400	\$53,040.00
Administrator	\$127.50	200	\$25,500.00
Support Staff (1)	\$66.30	600	\$39,780.00
Support Staff (2)	\$45.90	2,140	\$98,226.00
	Total Labor	5,770	\$762.654.00
Travel			\$8,000.00
Other Direct Costs (ODC)			\$96,000.00
		TOTAL	\$866,654.00

15. Change of Burden

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There is a myriad of variables that could contribute to the decline in response rates, including but not limited to lower large fleet responses which can dominate some aircraft types, survey fatigue within the fleets surveyed at 100% every year, and insufficient program outreach. Program coordinators continue attempts to identify factors which would explain annual response rate fluctuations and continue to explore different avenues of outreach to target the collection audience.

16. <u>Information Collection Schedule</u>

SCHEDULE OF DATA COLLECTION ACTIVITIES

The table below presents a data collection timeline.

Data Collection Activity Small Fleet	Date
Advance postcard	February 2
Email invitation	February 5
Reminder email 1	February 12
Reminder email 2	February 19
Mail 1	March 15
Thank you/Reminder postcard	April 12
Mail 2	April 19
Cooperator postcard	May 17
Mail 3	May 31
Large Fleet Mail 1	March 22
Non-response calling begins	Wk of April 1
Reminder letter	April 26
Mail 2	May 3
Mail 3	May 31
Non-response calling ends	June 28
Field period closes	June 28
Duration (weeks)	21

SCHEDULE OF ANALYSIS AND REPORTING ACTIVITIES

The table below presents the timeline for data analysis and statistical reporting.

Analysis/Reporting Activity	Date	
Project Initiation		
Draft Work plan	March 22	
Work plan review with FAA	March 25-29	
Revised work plan	April 5	
Sampling Methodology Report	February 29 (complete)	
Data Collection	February 2–June 28	
Data Processing and Analysis	July 11–November 22	
Statistical Reporting		
Preliminary activity estimates (Ch 1–7, no charts)	August 30	
FAA review of preliminary estimates	September 3–September 13	
Tetra Tech receives reviewers' comments	September 16	
Summary and assessment of review	September 27	
Revised activity estimates (Ch 1–7, with charts)	October 18	
Avionics estimates	November 15	
Estimates of cargo-only activity	November 22	
Make-model estimates	November 22	
Technical Reporting		
Final response rate report	December 2	
Appendix A – Methodology	December 13	
Appendix B – Survey materials	December 13	
508-compliant statistical reports	December 20	

17. Approval Not to Display Expiration Date

The FAA is not seeking that approval.

18. <u>Exception to the Certification Statement</u>

There are no exceptions.