

**SUPPORTING STATEMENT
AIRCRAFT OPERATOR SECURITY
49 C.F.R. Part 1544**

**OMB Control No. 1652-0003
Exp: April 30, 2024**

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information. (Annotate the CFR parts/sections affected).***

The Transportation Security Administration (TSA) has broad regulatory authority to carry out its transportation security functions. See 49 U.S.C. 114(l). This information collection is related to TSA's aircraft operator security standards regulations, codified at 49 CFR part 1544, which are a critical part of the regulatory framework for aviation security. These regulations, consistent with TSA's authorities, require aircraft operators to perform criminal history record checks (CHRCs) on individuals with unescorted access to secured areas. See 49 U.S.C. 44936; 49 CFR parts 1544.229 through 230. Individuals who have convictions for certain crimes within the preceding 10 years are not eligible for unescorted access to the airport secured areas.

TSA's regulations in 49 CFR part 1544 require aircraft operators to maintain certain records of compliance and to provide this information to TSA or make it available for inspection. The records include: (1) obtaining, maintaining and implementing a full and current Aircraft Operator Security Program (AOSSP), or a Twelve-Five Standard Security Program (TFSSP), or a Private Charter Standard Security Program (PCSSP) as applicable. (2) development of security program amendments or TSA required security program amendments and temporary changed conditions, or security directives, voluntary information circulars, including submission to TSA, and implementation; (3) aircraft operator response to TSA updates and requests to change its TSA-approved security program; (4) collection of data necessary to complete a CHRC for aircraft operator employees and to complete Security Threat Assessment (STA) of individual with unescorted access at airports to secured areas, Security Identification Display Areas (SIDAs), sterile areas, and air operations areas; (5) recordkeeping requirements associated with compliance with the regulation, security programs, CHRCs, STAs, screening equipment maintenance, training, recording Air Cargo Screening Facilities Address, Checklist on First Flight, employees who have access privileges to secure areas of the airport, Security Directives (SDs) issued pursuant to the regulation, and other recordkeeping requirements; (6) matching of employees subject to TSA's regulatory requirements against government watch lists; and (7) incident and suspicious activity reporting (specifics are discussed in the response to Question 12). TSA is extending the collection with a small reduction in burden.

- 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.***

TSA Principal Security Inspectors (PSIs) and Transportation Security Inspectors (TSIs) frequently review the records required by 49 CFR part 1544 to ensure that requirements to ensure the safety and security of the public are being implemented and that this safety and security is not compromised. When necessary, the records are critical support for corrective enforcement actions as they frequently provide proof of non-compliance.

- 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, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.***

Aircraft operators have the latitude and flexibility to maintain the required information in a manner that best meets their particular operational needs, to include electronic maintenance. Thus, this collection is in compliance with the Government Paperwork Elimination Act (GPEA) for recordkeeping; electronic signatures are not applicable to this program. It is estimated that 70 percent of aircraft operators currently maintain these records electronically. Additionally, a portion of the collection of information is of immediate importance and TSA must handle this via telephonic communication. These are limited instances, but at times TSA needs immediate personal contact with aircraft operators to address issues pertaining to the vetting of passengers, crew members, and other aircraft operator personnel. The urgency pertains to whether or not an individual (passenger or aircraft operator employee, including a crewmember) matches a government watch list and will be permitted to enter or depart from the United States. In light of fiscal concerns, it is to the aircraft operator's advantage to have that decision made prior to the carrier's aircraft entering and departing U.S. airspace.

Usability Requirements: A test on the usability of the instructions for each collection was conducted. The purpose for the test was twofold; determine if the instructions were easy to comprehend and to navigate. The test included six participants. Each participant reviewed and found the instructions readable, clear and in plain language. As no participants found any issues with understanding or following the instructions, TSA made no changes to the instructions.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose(s) described in Item 2 above.***

TSA is the sole Federal agency responsible for civil aviation security. TSA is not aware of any duplication of information related to this collection as it relates to these authorities and TSA's regulations.

There may be some duplication of information collected under this ICR and by U.S. Customs and Border Protection (CBP), which requires CHRCs of individuals with unescorted access to CBP's designated airport Federal Inspection Service (FIS) area. See 10 CFR 122.182-83. As a result, some individuals working at the airport may need access to the airport secured areas regulated by TSA and the FIS area controlled by CBP. Because a CHRC would be

required by both agencies for the same applicant, it is optimal and consistent with the government's view that applicants' fingerprints and associated FBI fees should be collected once rather than twice, and any resulting rap sheets shared among the airport and CBP where the applicant is seeking access.

To minimize duplicate collections, TSA continually strives to work with and identify other entities that have a need to know the information in performance of their official duties pursuant to the Privacy Act, 5 USC 552a(b)(1), to reduce redundancy of information collection processes.

5. *If the collection of information has a significant impact on a substantial number of small businesses or other small entities (Item 5 of the Paperwork Reduction Act submission form), describe the methods used to minimize burden.*

The amount of information required by this collection is proportional to the size of each aircraft operator's organization and therefore does not create a significant impact on a substantial number of small businesses.

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.*

TSA is responsible for ensuring the security of persons and property traveling within, to, and from the United States. Title 49 CFR part 1544 requires aircraft operators seeking to provide air travel within, into, or out of the United States, as well as between foreign locations, to adopt and implement an aircraft operator security program to prevent the introduction of unauthorized explosives, incendiaries, persons, or destructive substances/items on commercial aircraft. In the absence of this information collection, TSA would not have the records necessary to ensure these requirements are being met. A failure to meet the requirements could result in a catastrophic terrorism-related event.

TSA's regulations include procedures for aircraft operators to seek alternatives to TSA's requirements to the extent those alternatives provide a commensurate level of security and are in the interest of public safety. TSA handles such requests on a case-by-case basis. This information collection is necessary for TSA to process these requests.

To protect against the insider threat, aircraft operators are required to conduct a comparison of their employees against the TSA No Fly and Selectee Lists and report any matches to TSA. Absent this collection, the comparison of names would not be possible. Without the information necessary to conduct CHRCs, aircraft operator employees who were convicted of disqualifying criminal offenses deemed threatening to aviation security could gain access to secured areas of an airport or obtain security-sensitive positions.

If this collection was not conducted, TSA would not be in compliance with its statutory mandate and the security of aircraft operators and safety of passengers would be compromised. The collected information is subject to review during the TSA inspection process.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5(d)(2).

TSA imposes reporting of aircraft search checklists, training recordkeeping, and cargo-related recordkeeping in the interest of aviation security and trend analysis. In addition, pursuant to 49 CFR 1544.229(k)(4), all records must be maintained at least 180 days after the termination of an individual's authority to perform a covered function. This may require airport and aircraft operators to maintain records of employees for over three years as described in 5 CFR 1320.5(d)(2)(iv). Finally, in the interest of transportation security, aircraft operators must maintain records of compliance associated with the security program requirements and related Federal regulations indefinitely. Otherwise, the collection is conducted in accordance with 5 CFR 1320.5(d)(2).

8. Describe efforts to consult 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. If applicable, provide a copy and identify the date and page number of publication in the *Federal Register* of the agency's notice, required by 5 CFR 1320.8(d) soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

TSA is in continuous dialogue with aircraft operator stakeholders and public comments were sought via a 60-day notice in the *Federal Register* on July 20, 2023 (88 FR 46805), and a 30-day notice on June 20, 2024 (89 FR 51894). TSA received no comments.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

TSA will not provide any payment or gift to respondents.

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

TSA does not provide any assurances of confidentiality. Information provided by individuals will be protected from disclosure to the extent appropriate under the applicable provisions of the Freedom of Information Act and the Privacy Act of 1974. Personally identifying information will be collected and transmitted in accordance with the Privacy Act. However, to the extent that the information collected is Sensitive Security Information (SSI) as defined in 49 CFR part 1520, Protection of Sensitive Security Information, such information is protected from public disclosure.

Also, in 49 CFR 1542.209(k)(4) and 1544.229 (k)(3) and a related Security Directive require aircraft operators to maintain records in a manner that protects confidentiality of the individual and is acceptable to TSA.

TSA’s procedures for requesting amendments requires the aircraft operators to submit their requests directly to TSA. TSA reviews those requests and works directly with the aircraft operator. This process ensures that aircraft operators can seek alternatives from TSA without compromising proprietary information.

This collection is covered by the System of Records Notice (SORN), DHS/TSA-002 Transportation Security Threat Assessment Systems. See 79 FR 46862 (August 11, 2015). The collection is also covered by a Privacy Impact Assessment (PIA), DHS/TSA/PIA-020 Security Threat Assessment for Airport Badge and Credential Holders (December 1, 2008).

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

The collection does not include questions of a sensitive or private nature.

12. Provide estimates of hour and cost burden of the collection of information.

TSA estimates 42 aircraft operators currently have regularly scheduled flights and maintain a full Aircraft Operator Standard Security Program (AOSSP). These aircraft operators generally provide scheduled passenger and public charter service and tend to be larger companies. TSA estimates approximately three new start-up AOSSP aircraft operators annually.

There are 586 aircraft operators that provide on-demand charter businesses or operate flights under the Private Charter Standard Security Program (PCSSP) or Twelve-Five Standard Security Program (TFSSP). These aircraft operators typically provide on-demand air service and tend to be smaller companies. The total number of respondents is 634 per year, as depicted in Table 1.

Table 1: Respondents

Respondent Category	Annual Respondents
AOSSP	48 ¹
TFSSP/PCSSP	586
Total Respondents	634

TSA has identified nine separate information collections under this ICR. These collections will affect an estimated 634² unique respondents annually over the three years of the Paper Reduction Act (PRA) analysis.

¹ 42 current AOSSP respondents plus 3 additional respondents each year = $((42 + 3) + (45 + 3) + (48 + 3)) \div 3 = 48$ average respondents per year

² 634 = 48 AOSSP annual respondents + 586 TFSSP/PCSSP annual respondents

AOSSP Population and Hour and Burden Cost Estimate

The AOSSP hour burden estimate is comprised of maintaining security programs, CHRC applications, STA applications, maintaining records of compliance, and Incident and Suspicious Activity reporting. TSA estimates an average annual total hour burden of 542,632 hours to AOSSP operators and a total annual hour burden cost of \$27,821,343 (\$83,464,030 over three years). Table 2 summarizes these calculations.

Table 2: AOSSP Hour Burden Estimate

Information Collection	Average Annual Responses	Hour Burden Per Response	Average Annual Hour Burden	Average Hourly Loaded Wage	Annual Hour Burden Cost
	A	B	C = A × B	D	E = C × D
<u>Security Programs</u>					
New	3	120	360	\$103.20	\$37,151
Updates	288	4	1,152	\$103.20	\$118,882
Amendments, Security Directives, and Information Circulars	192	1	192	\$103.20	\$19,814
Requests to Change	120	1	120	\$103.20	\$12,384
<u>CHRC Applications</u>	74,880	0.50	37,440	\$98.32	\$3,681,282
<u>STA Applications</u>	74,880	0.25	18,720	\$98.32	\$1,840,641
<u>Recordkeeping</u>					
Security Programs	48	4	192	\$36.85	\$7,075
CHRCs/STAs	48	520	24,960	\$36.85	\$919,735
Training	48	24	1,152	\$36.85	\$42,449
Air Cargo Screening Addresses	30	2	60	\$36.85	\$2,211
First Flight Checklist	2,588,645	0.17	431,441	\$46.74	\$20,165,327
Employees at Airports	17,800	0.08	1,483	\$36.85	\$54,658
Other				\$36.85	\$919,735

	48	520	24,960		
<u>Incident and Suspicious Activity Reporting</u>	1,200	0.33	400	\$54.40	\$21,762
Total			542,632		\$27,821,343

Security Programs

New

TSA estimates approximately three new start-up operators annually. These start-up aircraft operators will use the AOSSP, which takes approximately 120 hours to complete. The average annual hour burden for new security programs is estimated to be 360 hours (3 operators x 120 hours). TSA uses the national average hourly loaded wage rate³ of \$103.20⁴ for General and Operations Managers to estimate the total annual hour burden cost of the new security program process. The total annual hour burden cost due to the application process is estimated to be \$37,151 (\$ x 360 hours).

Updates

TSA estimates the time burden associated with security program updates to be an average of 4 hours per update. The average annual hour burden for AOSSP security program updates is estimated to be 1,152 hours (6 updates x 48 operators x 4 hours). TSA uses the national average hourly loaded wage of \$103.20 for General and Operations Managers to estimate the total annual hour burden cost of the updates to the security program. The total annual hour burden cost due to the updates to the security programs is estimated to be \$118,882 (\$103.20 x 1,152 hours). See Table 2.

Amendments or Security Directives or Information Circulars

If necessary for safety and the public interest, TSA may issue a program amendment, emergency amendment or a security directive. The aircraft operator may request an amendment to the TSA-approved security program via email or in writing. Each of the aircraft operators would be required to respond for each amendment, at an estimated 1 hour per amendment. TSA estimates an annual burden of 192 hours (48 operators x 4 amendments x 1 hour). TSA uses the national average hourly loaded wage of \$103.20 for General and Operations Managers to estimate the total annual hour burden cost of the amendments to the security programs. The total annual hour burden cost due to the

³ TSA calculates a compensation factor in order to load the wage to account for benefits and other non-salary compensation costs. TSA calculates the compensation factor by dividing total compensation by wages and salaries (1.4582 = \$33.13 ÷ \$22.72). BLS. Employer Costs for Employee Compensation News Release. Table 4: Employer costs per hour worked for employee compensation and costs as a percent of total compensation: private industry workers, by major occupational group and bargaining unit status, June 2023. Production, transportation, and material moving. Last modified June 16, 2023 (accessed August 9, 2023). https://www.bls.gov/news.release/archives/ecec_06162023.htm.

⁴ \$103.20 = (1.4582 x \$70.77) BLS. May 2022 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 481000 - Air Transportation. OCC 11-1021 General and Operations Managers. Last modified April 25, 2023 (accessed August 9, 2023).

amendments to the security programs is estimated to be \$19,814 (\$103.20 x 192 hours). See Table 2.

Requests to Change

An aircraft operator may submit a request to TSA to change its TSA-approved security program or to adopt other means to meet the TSA-issued amendments. Based on past requests, TSA estimates it will receive 120 requests annually. TSA estimates 1 hour to prepare documentation for each request, for an annual burden of 120 hours (120 requests x 1 hour). TSA uses the national average hourly loaded wage of \$103.20 for General and Operations Managers to estimate the total annual hour burden cost of the requests to change the security programs. The total annual hour burden cost due to the requests to change the security programs is estimated to be \$12,384 (\$103.20 x 120 hours).

CHRC Applications

TSA requires the aircraft operators to collect information from employees that the Federal Bureau of Investigation (FBI) needs to conduct a CHRC. The aircraft operator is required to collect information from prospective employees that contain the following: ID verification, statement that the individual has not been convicted of any of the 28 disqualifying crimes, signature verification, fingerprint disposition from the FBI, and for those who do not perform electronic fingerprint submission, fingerprint cards which are required recordkeeping. The information passes through TSA, goes to the FBI, and the FBI returns any rap sheets that correspond to the biographic information that TSA submitted. TSA posts those rap sheets on a secure web board that the aircraft operators then access, in order to adjudicate the results based on a list of disqualifying criminal offenses.

Each CHRC takes roughly 30 minutes. TSA estimates a typical AOSSP employee will work on approximately 1,560 per year (20 per week x 52 weeks x 1.5 for recurrent CHRCs). For all AOSSPs, the total annual hour burden is 37,440 (1,560 CHRCs per year x 48 AOSSPs x 0.5 hours per CHRC). TSA uses an average hourly blended loaded wage rate of \$98.32⁵ for Airline Pilots, Co-Pilots, and Flight Engineers and Reservation and Transportation Ticket Agents to estimate the total annual hour burden cost of the new security program process. The total annual hour burden cost due to the application process is estimated to be \$3,181,232 (\$98.32 x 37,440 hours). See Table 2.

Security Threat (STA) Assessments

For the STA requirement, TSA estimates 1,560 annual responses (20 per week x 52 weeks x 1.5 for recurrent CHRCs). TSA estimates that each STA takes approximately 15 minutes, and the average annual burden will be 18,720 hours (1,560 CHRCs per year x 48 AOSSPs x 0.25 hours per CHRC). TSA uses an average hourly blended loaded wage of \$98.32 for

⁵ TSA uses a weighted average blended wage rate of Airline Pilots, Co-Pilots, and Flight Engineers and Reservation and Transportation Ticket Agents. $((\$110.21 \times 77,280) + (\$23.51 \times 75,270)) \div (77,280 + 75,270) \times 1.4582$. BLS. May 2022 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 481000 - Air Transportation. OCC 43-4181 Reservation and Transportation Ticket Agents and Travel Clerks. Last modified April 25, 2023 (accessed April 25, 2023). https://www.bls.gov/oes/2022/May/naics3_481000.htm#43-0000. BLS. May 2022 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 481000 - Air Transportation. OCC 53-2011 Airline Pilots, Copilots, and Flight Engineers. Last modified April 25, 2023 (accessed April 25, 2023). https://www.bls.gov/oes/2022/May/naics3_481000.htm#43-0000.

Airline Pilots, Co-Pilots, and Flight Engineers and Reservation and Transportation Ticket Agents to estimate the total annual hour burden cost of the application process. The total annual cost burden due to the application process is estimated to be \$1,840,641 (\$98.32x 26,520 hours). See Table 2.

Recordkeeping

Security Programs

Upon request of TSA, each aircraft operator must provide evidence of compliance with its security program, including copies of records. Accordingly, TSA estimates that an average of four hours is required for each aircraft operator to maintain copies (hard copies at corporate offices and electronic copies maintained at stations) and to make their security programs available for review. TSA estimates an annual burden of approximately 192 hours (48 operators x 4 hours). TSA uses the national average hourly loaded wage of \$36.85⁶ for Administrative Assistants to estimate the total annual hour burden cost of recordkeeping of security programs. The total annual hour burden cost due to recordkeeping of security programs is estimated to be \$7,075 (\$36.85 x 192 hours). See Table 2.

CHRC/STA

TSA estimates AOSSP aircraft operators devote approximately 10 hours per week, or 520 hours per year, to recordkeeping associated with CHRCs and STAs. TSA estimates an annual burden of approximately 24,960 hours (48 operators x 520 hours). TSA uses the national average hourly loaded wage of \$36.85 for Administrative Assistants to estimate the total annual hour burden cost of CHRC/STA recordkeeping. The total annual hour burden cost due to CHRC/STA recordkeeping is estimated to be \$919,735 (\$36.85 x 24,960 hours). See Table 2.

Training Recordkeeping

Aircraft operators are required by their security programs to provide their crewmembers and other individuals performing security-related functions with initial training and recurrent training covering a number of subjects. Depending on the subject matter, the training is delivered by several methods, such as web-based training, classroom training, hands on training, and home study. The aircraft operators must retain the records for varying specified periods of time. TSA estimates that the average annual hour burden per carrier associated with this recordkeeping requirement is 24 hours, resulting in an annual burden of 1,152 hours (48 operators x 24 hours). TSA uses the national average hourly loaded wage of \$36.85 for Administrative Assistants to estimate the total annual hour burden cost of training recordkeeping. The total annual hour burden cost due to training recordkeeping is estimated to be \$42,449 (\$36.85 x 1,152 hours). See Table 2.

Recording Air Cargo Screening Facilities' Address

Aircraft operators are required by their security programs to record the air cargo screener's address. TSA estimates 30 aircraft operators, recording the air cargo screener's address, will

⁶\$36.85 = (1.4582 x \$25.27) BLS. May 2022 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 481000 - Air Transportation. OCC 43-6010 Secretaries and Administrative Assistants. Last modified April 25, 2023 (accessed April 25, 2023). https://www.bls.gov/oes/2022/May/naics3_481000.htm#43-0000. To obtain the loaded wage rate, TSA multiplies the unloaded wage rate of \$25.27 by the compensation factor of 1.4582 to get the loaded wage rate of \$36.85.

each take 2 hours annually to complete this record, or 60 hours annually (30 operators x 2 hours). TSA uses the national average hourly loaded wage of \$36.85 for Administrative Assistants to estimate the total annual hour burden cost of recordkeeping. The total annual hour burden cost due to recordkeeping is estimated to be \$2,211 (\$36.85 x 60 hours). See Table 2.

Checklist on First Flight

TSA estimates 2,588,645 first flights per year using the Federal Aviation Administration's Aviation System Performance Metrics⁷ to find the number of U.S. aircraft operator departures for January 1, 2022 through December 31, 2022, beginning at 5:00 a.m. and ending at 10:00 a.m. TSA estimates that it takes 10 minutes (0.1667 hours) to conduct the checklist on each of these flights, or 431,441 hours annually (2,588,645 flights x 0.1667 hours). TSA uses a weighted average hourly loaded wage of Cleaners of Vehicles and Equipment and Flight Attendants of \$46.74⁸ to estimate the total annual hour burden cost of conducting and recording the checklist. The total annual hour burden cost due to recordkeeping is estimated to be \$54,658 (\$46.74 x 431,441 hours). See Table 2.

Employees at Airports

U.S. aircraft operator employees at foreign airports are required to provide a one-time information collection verifying employees have been subjected to a background investigation. TSA estimates this information collection will take 5 minutes per employee and that this will affect 100 employees in each of the 178 foreign airports with AOSSP aircraft operators. TSA estimates the annual hour burden to be 1,483 hours (178 airports x 100 employees x 5 minutes). TSA uses the national average hourly loaded wage of \$36.85 for Administrative Assistants to estimate the total annual hour burden cost of recordkeeping. The total annual hour burden cost due to recordkeeping is estimated to be \$54,658 (\$36.85 x 1,483 hours). See Table 2.

Other Recordkeeping

TSA estimates AOSSP aircraft operators devote approximately 10 hours per week, or 520 hours per year, for other required recordkeeping under 49 CFR part 1544. These recordkeeping requirements include maintaining and creating records such as checklists or screening locations, in accordance with the approved security program. TSA estimates an annual burden of 24,960 hours (48 operators x 520 hours). TSA uses the national average hourly loaded wage of \$36.85 for Administrative Assistants to estimate the total annual hour burden cost of recordkeeping. The total annual hour burden cost due to recordkeeping is estimated to be \$919,735 (\$36.85 x 24,960 hours). See Table 2.

Incident and Suspicious Activity Reporting

⁷ <https://aspm.faa.gov/fsds/sys/>.

⁸ TSA uses a weighted average blended wage rate of Cleaners of Vehicles and Equipment and Flight Attendants. $((\$18.74 \times 1,950) + (\$32.30 \times 106,000)) \div (1,950 + 106,000) \times 1.4582$. BLS. May 2022 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 481000 - Air Transportation. OCC 53-7061 Cleaners of Vehicles and Equipment. Last modified April 25, 2023 (accessed April 25, 2023). https://www.bls.gov/oes/2022/May/naics3_481000.htm#43-0000. BLS. May 2022 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 481000 - Air Transportation. OCC 53-2031 Flight Attendants. Last modified April 25, 2023 (accessed April 25, 2023). https://www.bls.gov/oes/2022/May/naics3_481000.htm#43-0000.

TSA requires aircraft operators to immediately report to the Transportation Security Operations Center (TSOC) all incidents, suspicious activities, and threats that could affect the security of U.S. civil aviation. It takes an average of 20 minutes (0.33 hours) to file an incident and suspicious activity report. TSA estimates approximately 1,200 reports will be filed annually, for an annual burden of approximately 400 hours (1,200 matches x .33 hours). TSA uses the national average hourly loaded wage of \$54.40⁹ for Business Operations Specialists to estimate the total annual hour burden cost of suspicious activity reporting. The total annual hour burden cost due to reporting is estimated to be \$21,762 (\$54.40 × 400 hours). See Table 2.

TFSSP/PCSSP Population and Hour and Cost Burden Estimate

As stated above, approximately 586 aircraft operators hold either a Twelve-Five Standard Security Program (TFSSP) or a Private Charter Standard Security Program (PCSSP). The TFSSP/PCSSP hour burden estimate is comprised of maintaining security programs, CHRC applications, STA applications, and maintaining records of compliance. TSA estimates an average annual total hour burden of 11,251 to TFSSP/PCSSP operators and a total annual hour burden cost of \$1,068,495 (\$3,205,484 over three years).

Table 3 TFSSP/PCSSP Hour Burden Estimate					
Information Collection	Average Annual Responses	Hour Burden Per Response	Total Annual Burden Hours	Average Hourly Loaded Wage	Total Annual Hour Burden Cost
	A	B	C=AxB	D	E=CxD
Security Programs	1,172	8	9,376	\$103.20	\$967,564
CHRC Applications	2,250	0.50	1,125	\$55.72	\$62,681
STA Applications	2,250	0.25	563	\$55.72	\$31,340
Recordkeeping	2,250	0.08	188	\$36.85	\$6,909
Total	7,922		11,251		\$1,068,495

Security Programs

Corresponding to the scope of their operations, TSA has established less burdensome security program requirements for TFSSP and PCSSP aircraft operators. On average, these 586 respondents only incur a recordkeeping burden when they need to amend their security programs. TSA estimates each amendment requires 8 hours of operator time and that operators process 2 amendments per year, resulting in an estimated annual burden of 9,376

⁹ \$54.40 = (1.4582 × \$37.31) BLS. May 2022 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 481000 - Air Transportation. OCC 13-1000 Business Operations Specialists. Last modified April 25, 2023 (accessed April 25, 2023). https://www.bls.gov/oes/2022/May/naics3_481000.htm#43-0000.

hours (586 operators x 2 amendments x 8 hours). TSA uses the national average hourly loaded wage of \$103.20¹⁰ for General and Operations Managers to estimate the total annual hour burden cost of the new security program process. The total annual hour burden cost due to the application process is estimated to be \$967,564 (\$103.20 x 9,376 hours). See Table 3.

CHRC Applications

TSA estimates that approximately 2,250 employees will need CHRCs each year for this group of respondents. This number includes recurrent vetting of employees. The length of time required to process and adjudicate each CHRC would require each respondent in this category to spend approximately 30 minutes (0.5 hours) of time per employee. TSA estimates an annual burden of approximately 1,125 hours (2,250 employees x 0.5 hours). TSA uses a weighted average hourly loaded wage of Commercial Pilots and Flight Attendants of \$55.72¹¹ to estimate the total annual hour burden cost of conducting and recording the checklist. The total annual hour burden cost due to CHRC applications is estimated to be \$62,681 (\$55.72 x 1,125 hours). See Table 3.

STA Application

For the STA requirement, based on a 15 minute (0.25 hours) estimate for each of the average 2,250 annual responses, TSA estimates that the average annual burden will be 563 hours (2,250 responses x 0.25 hours). TSA uses a weighted average hourly loaded wage of \$55.72 for Commercial Pilots and Flight Attendants to estimate the total annual hour burden cost of the application process. The total annual cost burden due to the application process is estimated to be \$31,340 (\$55.72 x 563 hours). See Table 3.

Recordkeeping

All TFSSP and PCSSP operators are required to maintain records of compliance. TSA estimates a recordkeeping burden of 5 minutes (0.083 hours) annually per employee who is required to have a CHRC to file security programs, training records, CHRC/STA records, and other records of compliance. TSA estimates an annual burden of approximately 188 hours (2,250 employees x 0.083 hours). TSA uses the national average hourly loaded wage of \$36.85 for Administrative Assistants to estimate the total annual hour burden cost of recordkeeping. The total annual hour burden cost due to recordkeeping is estimated to be \$6,909 (\$36.85 x 188 hours). See Table 3.

Total Hour Burden Estimate

TSA estimates the 48 AOSSP aircraft operators devote approximately 542,632 hours per year to maintain their security programs, perform CHRCs, and maintain records of compliance, and report incidents of suspicious activity. TSA estimates the 586 TFSSP and PCSSP

¹⁰ BLS. May 2022 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 481000 - Air Transportation. OCC 11-1021 General and Operations Managers. Last modified April 25, 2023 (accessed April 25, 2023). https://www.bls.gov/oes/2022/May/naics3_481000.htm#43-0000.

¹¹ TSA uses a weighted average blended wage rate of Commercial Pilots and Flight Attendants. $((\$65.32 \times 23,110) + (\$32.30 \times 106,000)) \div (23,110 + 106,000) \times 1.4582$. BLS. May 2022 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 481000 - Air Transportation. OCC 53-2012 Commercial Pilots. Last modified April 25, 2023 (accessed April 25, 2023). https://www.bls.gov/oes/2022/May/naics3_481000.htm#43-0000. BLS. May 2022 National Industry-Specific Occupational Employment and Wage Estimates. NAICS 481000 - Air Transportation. OCC 53-2012 Flight Attendants. Last modified April 25, 2023 (accessed April 25, 2023). https://www.bls.gov/oes/2022/May/naics3_481000.htm#43-0000.

aircraft operators devote approximately 11,251 hours per year to perform CHRCs, maintain their security programs, and maintain records of compliance.

In total, TSA estimates the 634 respondents have an average annual hour burden of 553,883 hours (1,661,650 over 3 years). The annual hour burden cost is estimated at \$28,889,838 (\$86,669,514 over 3 years). These totals are depicted in Table 4.

Table 4: Total AOSSP, TFSSP, and PCSSP Hour Burden and Cost Estimate

Respondent Category	Total Annual Hour Burden	Total Annual Hour Burden Cost
AOSSP	542,632	\$27,821,343
TFSSP/PCSSP	11,251	\$1,068,495
Total	553,883	\$28,889,838

Note: Totals may not sum due to rounding.

13. Provide an estimate of annualized capital and start-up costs..

Separate from the hour burden estimates provided in the response to question 12 above, aircraft operators incur other costs resulting from the collection of information. TSA estimates that the fee for fingerprinting is \$52. TSA estimated each AOSSP operator will require an average of 1,560 new CHRCs for employees annually (20 CHRCs per week × 52 weeks × 1.5 recurrent CHRCs). Based on a fee of \$52, the annual cost to process CHRCs for respondents holding an AOSSP will be approximately \$3,893,760 (48 operators × 1,560 CHRCs × \$52).

TSA estimates approximately 2,250 employees will need CHRCs each year for TFSSP/PCSSP respondents. Based on a fee of \$52 for fingerprinting required by a CHRC, TSA estimates the annual cost to respondents holding a PCSSP or TFSSP to process CHRCs will be approximately \$117,000 (2,250 CHRCs × \$52).

Thus, TSA estimates the total average annual cost to all respondents as a result of fingerprinting fees will be approximately \$4,010,760 (\$12,032,280 over three years).

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, and other expenses that would not have been incurred without this collection of information.

TSA verifies that holders of a Security Program comply with the requirements of that program. An average verification is completed by a H band-level TSA TSI inspector, with a loaded salary of \$63.65¹² per hour.

Verification is estimated to take an average of 25 hours per respondent holding an Aircraft Operator Standard Security Program. TSA estimates the hour burden to TSA to verify the

¹² TSA, Finance and Administration, Personnel Modular Cost Data (FY22).

information required of AOSSP respondents is 1,200 hours (48 respondents x 25 hours), and \$76,375 annually (1,200 hours x \$63.65 loaded hourly wage).

Verification is estimated to take an average of four hours per year per respondent holding a TFSP or PCSSP. The hour burden to TSA to verify the information required of these respondents is 2,344 hours (586 respondents x 4 hours), and \$149,185 (2,344 hours x \$63.65 loaded hourly wage).

Based on the 15 minutes (0.25 hours) it takes to review of the Incident and Suspicious Activity Reports, TSA estimates the hour burden to TSA for reviewing reports is 300 hours (1,200 annual reports x 0.25 hours). Verification is completed by a J-band level TSA employee, with a loaded salary of \$87.11¹³. Cost burden is estimated to be \$26,133 annually (300 hours x \$87.11 loaded hourly wage).

The total annual cost to the Federal Government for this program is estimated to be approximately \$251,693 annually (\$755,080 over three years).

Table 5: Federal Government Hour Burden and Cost

Collection Activity	Annual Respondents	Hour Burden Per Respondent	Total Annual Hour Burden	Loaded Hourly Wage	Total Annual Cost Burden
	A	B	C = A × B	D	E=C × D
AOSSP Verification	48	25	1,200	\$63.65	\$76,375
TFSP/PCSSP Verification	586	4	2,344	\$63.65	\$149,185
Review Incident and Suspicious Activity Reports	1,200	0.25	300	\$87.11	\$26,133
Total			3,844		\$251,693

Note: Totals may not sum due to rounding.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

There were no changes to the collection, but TSA added clarifying language to better represent the information being collected as prescribed by part 1544.

At the last approval of the ICR, TSA reported that it had assumed from aircraft operators the responsibility for preflight screening of passengers and certain non-traveling individuals against the Federal Government watch list as required by section 4012(a) of the Intelligence Reform and Terrorism Prevention Act,¹⁴ and consolidation of the aviation passenger watch list matching function within one agency of the Federal Government. TSA no longer

¹³ TSA, Finance and Administration, Personnel Modular Cost Data (FY22).

¹⁴ Pub. L. 108-458, 118 Stat. 3638, 3714, Dec. 17, 2004.

requires aircraft operators to compare passenger names to the watch lists during a Secure Flight outage. Airlines will instead apply vetting results determined by TSA. However, TSA included in the 2019 ICR, 40 burden hours for AOSSP operators who continue to perform employee matching to the watch lists, and 40 hours for TFSSP or PCSSP operators who often submit watch list matching data to TSA on a voluntary basis. TSA is correcting the current ICR, removing the 80 burden hours from the collection.

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.

TSA will not publish the results of this collection.

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.

TSA is not seeking such approval.

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

TSA is not seeking any exceptions.