**Supporting Statement A**

**Pilot Records Improvement Act of 1996/Pilot Records Database**

**OMB 2120-0607**

**There have not been any major changes to the Collection Instruments, other than those two items listed in (a), (b) and (c). There were minor edits to this document and information added where more clarity and accuracy could be achieved. A reduction in burden hours was realized by way of the following collection instruments being removed:**

**(a)The MyAccess Registration input form (Web based collection instrument #9) has been removed because it is now being addresses under OMB Control Number 2120-0808.**

**(b)Form 8060-10 (FAA Records Request (PRIA)) is no longer being used and therefore removed as a collection instrument. As of December 7, 2021, operators are required to use the PRD in lieu of this form.**

**(c)FAA form 8060-10a, 8060-11 and 8060-11a have been identified as being effective until October 1, 2024, after this date, they will no longer be used as a collection instrument. This is occurring due to PRIA Termination under 49 USC 44703.**

**Added** **Table 3 which highlights the reportable information that must be entered** **more frequently than quarterly by a respondent.**

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

1. Title 49 United States Code (49 U.S.C.) § 44703(h): Records of Employment of Pilot Applicants, which was established by the Pilot Records Improvement Act of 1996 (PRIA), mandates that air carriers who have been issued a part 119 air carrier certificate and are authorized to conduct operations under Title 14 of the Code of Federal Regulations (14 CFR) part 121 or part 135 as well as part 125 and 135 operators, request and receive FAA records, air carrier and other operator records, and the National Driver Register records before allowing an individual to begin service as a pilot. Additionally, fractional ownerships operating in accordance with subpart K of part 91 are required to complete a pilot safety background check before allowing an individual to begin service as a pilot (reference § 91.1051). Furthermore, air tour operators operating in accordance with § 91.147 are required to obtain an individual’s previous drug and/or alcohol testing records before allowing an individual to begin service as a pilot. All requestors are heretofore referred to as “operators.”
2. Title 49 U.S.C. § 44703(h)(8) also requires the Administrator to promulgate standard forms for use by the air carrier in order to: request the records; inform the individual who is the subject of the request; obtain the individual’s written consent; and, inform the individual of the individual right of that individual to receive a copy of any records furnished in response to the request. A summary of the PRIA/PRD form numbers, titles, and purpose is provided in Table 1.
3. Section 203 of the Airline Safety and Federal Aviation Administration Extension Act of 2010 (Pub. L. 111-216, 124 Stat. 2348) (the Act), codified at 49 United States Code 44703(i) require the FAA to establish an electronic pilot records database. The Act requires air carriers to access the database and evaluate any relevant records maintained therein pertaining to an individual before allowing that individual to begin service as a pilot. In addition, the database must be populated with records maintained by the FAA as well as records maintained by air carriers and other employers of pilots. At a minimum, air carriers and operators employing pilots must report “records that are generated by the air carrier or other person after [August 1, 2010]” as well as “records that the air carrier or other person [was] maintaining, on [August 1, 2010],” pursuant to § 44703(h)(4). In order to meet this mandate, the FAA developed a phased approach to implementing the PRD.   
   The FAA Extension, Safety, and Security Act of 2016 (Public Law 114-190), Section 2101 requires the FAA to establish the Pilot Records Database no later than April 30, 2017. Therefore, a subsequent phase of PRD was expedited and deployed prior to April 30, 2017 that included several enhancements and permits proxies to access the application on behalf of an air carrier. The final phase of PRD, the air carrier portion of the database, was implemented via rulemaking which was published in January 2021.

Table 1: Summary of PRIA/PRD Forms and other Data Collection Tools

|  |  |  |  |
| --- | --- | --- | --- |
| **FAA Form Number or identifier** | **FAA Form Title** | **Purpose** | **Active Period** |
| **8060-11\*** | Air Carrier and Other Records Request | FORM NOT COLLECTED BY FAA. A hiring air carrier requests to receive a copy of the current and/or previous employer’s records on the consenting individual’s performance as a pilot. | Present – Oct 1, 2024 |
| **8060-11A\*** | Airman Notice and Right to Receive Copy – Air Carrier and Other Records | FORM NOT COLLECTED BY FAA. An airman requests to receive a copy of the records provided by current and/or previous employer’s to a hiring air carrier in response to FAA Form 8060-11. | Present – Oct 1, 2024 |
| **8060-12\*\*** | Authorization for Release of DOT Drug and Alcohol Testing Records Under PRIA and Maintained Under Title 49 of the Code of Federal Regulations (49 CFR) Part 40 | FORM NOT COLLECTED BY FAA. A hiring air carrier requests to receive a copy of the current and/or previous employer’s records on the consenting individual’s drug and alcohol testing. | Indefinitely |
| **8060-13** | National Driver Register Records Request (PRIA) | FORM NOT COLLECTED BY FAA. A hiring air carrier requests the National Driver Register to search state driving records on a consenting individual. | Indefinitely |
| **8060-14** | Pilot Consent/Revocation for Air Carrier Access to Pilot Records Database | In cases where a pilot cannot access the Pilot Record Database themselves, the pilot may use this form to release their records to an air carrier via the PRD. | Indefinitely |
| **8060-15** | PRD Pilot Record Dispute | This form is used by pilots to dispute non-FAA records found in the PRD when the pilot is unable to dispute the record themselves via the web site. | Indefinitely |
| **Web based collection instrument #1** | Drug and Alcohol Records input form | A web page on the PRD web site which allows authorized users to enter Drug and Alcohol Records into the PRD. | Indefinitely |
| **Web based collection instrument #2** | Training, Qualification, and Proficiency Records input form | A web page on the PRD web site which allows authorized users to enter Training, Qualification, and Proficiency Records into the PRD. | Indefinitely |
| **Web based collection instrument #3** | Final Disciplinary Action Records input form | A web page on the PRD web site which allows authorized users to enter Final Disciplinary Action Records into the PRD. | Indefinitely |
| **Web based collection instrument #4** | Verification of Motor Vehicle Driving Record Search and Evaluation input form | A web page on the PRD web site which allows authorized users to enter Verification of Motor Vehicle Driving Record Search and Evaluation into the PRD. | Indefinitely |
| **Web based collection instrument #5** | Date of Hire input form | A web page on the PRD web site which allows authorized users to enter the Date of Hire into the PRD. | Indefinitely |
| **Web based collection instrument #6** | Assignment to Duty Records input form | A web page on the PRD web site which allows authorized users to enter Assignment to Duty Records into the PRD. (optional) | Indefinitely |
| **Web based collection instrument #7** | Separation of Employment Records input form | A web page on the PRD web site which allows authorized users to enter Separation of Employment Records into the PRD. | Indefinitely |
| **Web based collection instrument #8** | Previous Employers input form | A web page on the PRD web site which allows pilots to enter their previous aviation employers into the PRD. | Indefinitely |
| **Web based collection instrument #9** | REMOVED(MyAccess Registration input form) | REMOVED | Discontinued as of Sep 18, 2022  (Ref. OBM # 2120-0808) |
| **Web based collection instrument #10** | Pilot Consent form | A web page on the PRD web site which allows pilots to grant consent to reviewing entities. | Indefinitely |
| \*Alternate form to be completed by the hiring air carrier before allowing an individual to begin service as a pilot if the records are not available via the PRD.  \*\* Required form to be completed by the hiring air carrier before allowing an individual to begin service as a pilot. | | | |

**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.**

With the exception of Form 8060-14 and -15, an operator utilizes the various 8060 series forms to report a request for the applicable records of all applicants for the position of pilot with their company as needed under PRIA. The information collected on these forms will be used only to facilitate search and retrieval of the requested records, and submission is mandatory until PRIA sunsets on Oct 1, 2024. Operators then “may use such records only to assess the qualification of the individual in deciding whether or not to hire the individual as a pilot.” (49 U.S.C. § 44703(h)(11)). Form 8060-14 is used by pilots who cannot access the PRD themselves in order to release records to an operator, and its use is voluntary. While the FAA expects most pilots will access the PRD web-based application themselves and release records to operators for review, there will be cases when pilots cannot access the PRD application. In those cases, the pilot will complete the Form 8060-14 and submit to the FAA. The form instructs the FAA to access the PRD on behalf of the pilot and release the records to the specified operator(s). The form may also be used to revoke consent to the records, and update the pilot’s employment history if needed. The information is collected on an as needed basis. The Form 8060-15 will also be used also used by pilots who cannot access the PRD themselves. This form allows a pilot to mark a record as disputed and to initiate the correction process for non-FAA forms.

The remaining “web-based” data collection tools are used by operators to enter various records into the PRD as required by part 111 by use of the online user interface (UI) or Application Programming Interface (API). Pilots also use the PRD web site to enter their previous aviation employers. The information entered is associated with a pilot, which is then made available to a hiring operator after the pilot grants consent allowing the records to be viewed. The hiring operator then uses the information to help them perform a comprehensive assessment of the pilot prior to making a hiring decision, as required by the Act. Unless supported by 49 USC 44703(i)(9)(B)(ii) Exception Clause, the FAA does not disseminate or disclose the information collected to the public or across governmental agencies.

This submission extends use of the previous collection instruments needed to facilitate part 111 and the associate record collections as well as the various administrative functions.

*Is the response mandatory, voluntary or other?*

Responding to this information request is mandatory as described in part 111 and the underlying statute for both PRIA and the PRD.

*Who must respond to this collection?*

The users of both PRIA and the PRD include pilots who hold commercial, airline transport, or remote pilot certificates; operators who have employed those pilots; and air carriers and operators who intend to hire those pilots. The following table shows which groups will be entering information using each collection instruments:

Table 2: Groups Entering Collection Instruments

|  |  |  |  |
| --- | --- | --- | --- |
| Collection Instrument | Pilots | Previous and current employers of pilots | Air carriers and operators intending to hire the pilots |
| 8060-10 [Discontinued] |  |  |  |
| 8060-10a [Until Oct 2024] | ✓ |  |  |
|  |  |  |  |
| 8060-11 [Until Oct 2024] | ✓ |  | ✓ |
| 8060-11A [Until Oct 2024] | ✓ |  |  |
| 8060-12 | ✓ |  | ✓ |
| 8060-13 | ✓ |  | ✓ |
| 8060-14 | ✓ |  |  |
| 8060-15 | ✓ |  |  |
| Web based collection instrument #1 |  | ✓ |  |
| Web based collection instrument #2 |  | ✓ |  |
| Web based collection instrument #3 |  | ✓ |  |
| Web based collection instrument #4 |  |  | ✓ |
| Web based collection instrument #5 |  | ✓ |  |
| Web based collection instrument #6 |  | ✓ |  |
| Web based collection instrument #7 |  | ✓ |  |
| Web based collection instrument #8 | ✓ |  |  |
| Web based collection instrument #9 [Discontinued] |  |  |  |
| Web based collection instrument #10 | ✓ |  |  |

*Is this collection reporting, recordkeeping, or disclosure?*

This information collection is primarily for third party disclosure as the information submitted is stored for later release to members of the public. There is also information collection for reporting which is for administrative functions within PRIA and PRD such as requesting information from the FAA or other functions performed with the system.

*What is the frequency of the collection?*

All of the collections occur on an as-needed basis.

*What information is reported?*

Primarily, the information reported includes relevant facts from the various types of pilot records[[1]](#footnote-2). This includes the following types of records:

* Training, Qualification, and Proficiency Records
* Drug and Alcohol Records
* Final Disciplinary Records
* Employment History Records (provided by current and previous employers) which includes Assignment to Duty
* Employment History (provided by pilots)
* Verification of Motor Vehicle Driving Record Search and Evaluation

Additionally, various administrative information is reported such as when a pilot grants consent for a hiring employer to access the records.

*Who receives the information?*

The information reported from the previous and current employers into the PRD by the various web forms is maintained until at some point in the future when the pilot grants consent for a hiring employer to see the information. Information from the 8060-14, and -15 is submitted to the FAA to have the requests fulfilled. Information from the -11, -11A, and -12 is seen by the previous employers and instructs them to complete various administrative functions. Information collected via the -13 is received by the appropriate state department of motor vehicles. The remaining administrative web forms are used by the PRD system to perform various internal actions such as allowing a hiring employer to have access to certain records.

*Describe the purpose of the collection?*

Before allowing an individual to begin service as a pilot, an air carrier and other operators shall access and evaluate information, that has been collected, pertaining to the individual from the PRD database and PRIA forms for each pilot candidate prior to making a hiring decision.

*If a revision, describe the revision:*

Not Applicable, no collection was revised.

**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 8060 forms are available for downloading from the FAA’s website for use by an operator and pilot. These forms are accepted through the United States postal service, mail carriers, facsimile, and electronic mail to receive requests from operator and third party customers. Once the FAA processes the forms, replies are returned to the requestor in the same manner as the request was received unless otherwise noted.

The FAA deployed a web-based online application called the Pilot Records Database (PRD) in December 2016 which benefits hiring operators and pilots required to comply with PRIA. This application automates the current PRIA process and provides an operator with immediate access to a consenting pilot’s records. An operator would receive the following information that an individual has viewed and provided the FAA an electronic consent to release:

* previous employers that the individual served as a pilot;
* current airman certificates, associated ratings, and any limitations to the certificate or ratings;
* date and certificate grade sought for any failed attempt to pass a practical test required to obtain a certificate or type rating under part 61 of Title 14, Code of Federal Regulations (since August 2010);
* current medical certificate including its class and any limitations;
* closed enforcement information;
* accident and/or incident;
* drug and alcohol records entered by the FAA if applicable; and
* other records entered by previous employers related to that pilot.

A hiring operator is still required to obtain drug and alcohol records from certain current and/or previous employers, as well as search and evaluate the National Drivers Register using the consent to release records forms from Table 1.

The 8060 series printable forms are available at: <https://www.faa.gov/forms/>

Web based collection is available at: <https://prd.faa.gov/>

The results of information collected is Not available to the public at large, however, all information which affects the operator or airmen directly is accessible to those parties through 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.**

The collection of certain pilot records is within the purview of the FAA. Title 49, United States Code, 44703(h) requires the FAA to establish standard forms for use by the operator in order to: request the records; inform the individual who is the subject of the request; obtain the individual’s written consent; and, inform the individual of the individual right of that individual to receive a copy of any records furnished in response to the request. Additionally, Title 49, United States Code, 44703(i) requires the FAA to establish an electronic Pilot Records Database and phase-out PRIA. No other Federal agency has similar requirements.

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

This collection could impact small businesses; however, the burden is reduced by a provision which allows some operators who are required to report records to the PRD to only report those records when they have actually been requested by a hiring operator or other operator. This is different from operators who must report records within 30 days regardless ~~of~~ if a request has been received or not.

**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.**

Implementation of the information collection process, as facilitated by the PRIA/PRD forms, is statutorily mandated. Failure to collect and use the information collected may have a significant impact on air safety. Consequently, several NTSB recommendations related to air carrier accidents were issued to the FAA to facilitate the sharing of pilot records among operators. This information collection responds to those NTSB recommendations.

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

Title 49 U.S.C. § 44703(i)(5) requires the Administrator to maintain pilot records described in 49 U.S.C. § 44704(i)(2) for the life of the pilot.

Additionally, 49 United States Code 44703(i) requires the FAA to establish an electronic pilot records database containing “records that are generated by the air carrier or other person after [August 1, 2010]” as well as “records that the air carrier or other person [was] maintaining, on [August 1, 2010],” pursuant to §44703(h)(4). In order to meet this mandate, operators are currently maintaining pilot records dating from August 1, 2005 until the records have been entered into the PRD.

The following table outlines the obligation of respondents to report information that is more often than quarterly. These timeframes are codified in CFR Title 14 Part 111:

Table 3: Information that is reportable more than quarterly

|  |  |  |  |
| --- | --- | --- | --- |
| **Record Type** | **121, 125, 135** | **125M, 91, 91K, Air Tour, PAO** | **PAC Exception** |
| **(Certificate holders)** | **(Air Tour, PAO, 125M, 91)** |
| **PRD Hire Date** | On PRD Hire Date | On PRD Hire Date | On PRD Hire Date |
| **111.205(b)(3)** | 111.205(a) | 111.205(a) | 111.205(a) |
| **Drug & Alcohol** | Within 30 days of occurrence | Within 30 days of occurrence | Within 30 days of occurrence |
| **111.22** | 111.215(a), 111.220(c) | 111.215(a), 111.220(c) | 111.215(a), 111.220(c) |
| **Training, Qualification & Proficiency Records** | Within 30 days of creation | Within 30 days of creation | Within 14 days of receiving request |
| **111.225** | 111.215(a), 111.225(e)(1) | 111.215(a), 111.225(e)(1) | 111.215(b)(1), 111.225(e)(2) |
| **Final Disciplinary Action Records** | Within 14 days of receiving request. | Within 14 days of receiving request. | Reply within 14 days of receiving request if no record exists. |
| **111.23** | 111.230(g)(2) | 111.230(g)(2) | 111.230(f)(2) |
|  |  |  |  |
|  | Within 30 days of final | Within 30 days of final | Within 14 days of receiving request. |
|  | 111.215(a), 111.230(f)(1) | 111.215(a), 111.230(f)(1) | 111.230(f)(2) |
|  |  |  |  |
|  |  |  | Within 30 days of final for action records which resulted in permanent or temporary removal of the pilot from aircraft operations |
|  |  |  | 111.215(b)(1)(i), 111.230(e) |
| **Final Employment Separation Record** | Within 14 days of receiving request. | Within 14 days of receiving request. | Reply within 14 days of receiving request if no record exists. |
| **111.235** | 111.235(g)(2) | 111.235(g)(2) | 111.235(f)(2) |
|  |  |  |  |
|  | Within 30 days of final | Within 30 days of final | Within 14 days of receiving request. |
|  | 111.215(a), 111.235(f)(1) | 111.215(a), 111.235(f)(1) | 111.235(f)(2) |
|  |  |  |  |
|  |  |  | Within 30 days of final for action records resulting from a termination. |
|  |  |  | 111.215(b)(1)(ii), 111.235(e) |
| **Verification of Motor Vehicle Driving Record** | Within 45 days of Pilots PRD Hire Date | N/A | N/A |
| **§ 111.240** | 111.240(a) | 111.110(d) | 111.110(d) |

**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.**

Comments have not been received since a notice of intent to request renewal of the forms was published on pages 20749 and 20750 of the Federal Register, March 25, 2024, Vol. 89, No. 58 (89 FR 20749). No comments on the information collection were received.

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

No gifts or payments are provided for the reporting of records or access for purposes of evaluation of records through PRIA or in the PRD.

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

Title 49 U.S.C. § 44703(h)(11) and (i)(9) provides that an air carrier may use such records only to assess the qualifications of the individual in deciding whether or not to hire the individual as a pilot. The air carrier is directed to take such actions as may be necessary to protect the privacy of the pilot and the confidentiality of the records. This holds true with the one exception of the FAA inspectors who, during the course of their normal duties for the FAA, cannot be denied access to the PRIA-related records of any operator for the purpose of surveillance or inspection. Additionally, regarding PRD, 49 USC 44703(i)(9)(B)(ii) contains an Exception Clause which allows the FAA to use the information collected when these specific circumstances arise:

* (I) deidentified, summarized information to explain the need for changes in policies and regulations;
* (II) information to correct a condition that compromises safety;
* (III) information to carry out a criminal investigation or prosecution;
* (IV) information to comply with section 44905, regarding information about threats to civil aviation; and
* (V) such information as the Administrator determines necessary, if withholding the information would not be consistent with the safety responsibilities of the Federal Aviation Administration.

**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.**

This information collection does not collect information of a sensitive nature.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

The following wage assumptions apply to the analysis. These are based on the approved Regulatory Impact.

Employee benefit factor

* + Private sector: 29.80% [[2]](#footnote-3)

Calculations will use the following wage rates.

* + Human Resource Manager [[3]](#footnote-4)
    - Wage rate: $74.39
    - Fully-burdened wage rate : $105.97
  + Training and Development Manager [[4]](#footnote-5)
    - Wage rate: $66.56
    - Fully-burdened wage rate : $94.81
  + Pilot (non-flying) [[5]](#footnote-6)
    - Wage rate: $34.60
    - Fully-burdened wage rate: $49.29

Number of active operators and pilots. The following information was obtained from the National Vital Information System (NVIS) and other sources and represents the total number of operators required to comply with PRD.

Table 4: Entities Required to Comply with PRD

|  |  |
| --- | --- |
| Part 121 | 76 |
| Part 135 | 2053 |
| Part 125 | 70 |
| Part 91K | 7 |
| Part 91.147 (Air Tour) | 1091 |
| Public Aircraft Operators | 323 |
| Corporate Flight Departments | 1413 |
| Pilots | 17586 |
| Total | 22619 |

**Pilot Records Database**

The following tables present the burden to register for access to, and report records to the pilot records database. The principal sources for the following tables are the Regulatory Impact Analysis for the Pilot Records Database, Regulations.gov, Docket No: FAA-200-0246-0810 (PRD RIA) and the previous two immediately preceding Supporting Statements (Concluded dates 6/10/2021 and 12/12/2023).

Table 5: Pilot Burden to Apply for Database Access

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Users Expected to Apply /Register** | **Number of Respondents (1)** | **Hourly Rate** | **Time to Register in hours** |  | **Average Hours per year** | **Average Costs per Year** |
| Pilots | 17,586 | $49.29 | 1/3 |  | 5,862 | $288,938 |
|  |  | | | | | |
|  | Note: 1. The (Concluded 6/10/2021) Supporting Statement also has initial (Year 1-2021) entries for Responsible Persons, Authorized Individuals, and Proxies Users. These users are defined in PRD RIA, p. 84, footnotes 81-83.  Sources: 1. No. of Respondents: The annual average number of pilots estimated to seek employment with a company over a 10-year period (PRD RIA, p. 85.).  2. Hourly Rate: Section 12, this Supporting Statement.  3. Time to Register: PRD RIA, p. 85. | | | | | |

Table 6: Cost of Electronic Reporting of Present and Future Records

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Operator Type**  (1) | **No. of Respond-ents**  (2) | **Initial Hours per operator respondents**  (3) | **Total Initial Hours**  (4 )=(2)x(3) | **Initial Hourly Rate**  (5) | **Initial Cost for Electronic Reporting** (6) | **Annual Hours**  (7) = (2) x 20 hrs | **Annual Cost**  (8) = (2) x $1500 |
| Small 121 | 51 | 20 | 1020 | $120 | $122,400 | 1,020 | $76,500 |
| Mid-size 121 | 13 | 35 | 455 | $75 | $34,125 | 260 | $19,500 |
| Large 121 | 4 | 400 | 1600 | $89 | $142,400 | 80 | $6,000 |
| **Total 121** | **68** | 455 | 3075 |  | $298,925 | **1360** | **$102,000** |
| Small 135 | 234 | 20 | 4680 | $120 | $561,600 | 4,680 | $351,000 |
| Mid-size 135 | 2 | 35 | 70 | $75 | $5,250 | 40 | $3,000 |
| **Total 135** | **236** | 55 | 4750 |  | $566,850 | **4720** | **$354,000** |
| Small 125 | 18 | 20 | 20 | $120 | $43,200 | 360 | $27,000 |
| **Total 125** | **18** | 20 | 20 |  | $43,200 | **360** | **$27,000** |
| Part 91K | 4 | 1897 | 7588 | $95 | $720,800 | 80 | $6,000 |
| **Total 91K** | **4** | 189**7** | 7588 |  | $720,800 | **80** | **$6,000** |
| **Total** | **326** | 2427 | 15433 |  | $1,629,775 | **6,520** | **$489,000** |
| Notes: 1. Operator size is by no. of employees: Small <1000, Mid-size 1000-5000, Large >5000.  2.Initial Cost (Col. 6) is Year 1 (2021) one-time cost, so the burden of this cost is not included in the totals for this Supporting Statement.  3. Annual Cost (Col, 8) is based on a $1500 estimate of monitoring, troubleshooting, and modifying costs provided by a mid-size operator, used for all operators.  4. Annual Hours is based on the $75 hourly rate for mid-size Part 135 and Part 121 operators divided into the $1500 operator annual cost estimate. This assumption was first made in the preceding Supporting Statement (Concluded 12/12/2023).  5. Row and column totals may not sum due to rounding.  Sources: PRD RIA, pp. 38, 42-43. | | | | | | | |

Table 7: Manual Record Entry Activity by Type Operator

|  |  | **Number of Events per Pilot** | | | | | | |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Manual Record Entry Activity** | **Time per event (minutes)** | **Part 121** | **Part 135** | **Part 125** | **Air Tours** | **91K** | **PAO** | **Corp. Flight Dept.** |
| **Training/checking events - per year (web- based collection instrument #2)** | 4.0 | 2.6 | 2.7 | 2.5 | 1 | 2.7 | 2.5 | 0.75 |
| **Ground training - per year (web-based collection instrument #2)** | 4.0 | 1 | 1 |  |  | 1 |  | 1 |
| **Drug and Alcohol per year (web-based collection instrument #1)** | 4.0 | 0.01 | 0.01 |  | 0.01 | - | - |  |
| **Verification of NDR Search (web-based collection instrument #4). See note (1)** | 0.5 | 0.031 | 0.031 | 0.031 |  | 0.031 |  |  |
| **Separation events not including termination per year (web-based collection instrument #7)** | 4.0 | 0.0305 | 0.0305 | 0.0305 | 0.0305 | 0.0305 | 0.0305 | 0.0305 |
| **Termination – per year (web-based collection instrument #7)** | 10.0 | 0.0005 | 0.0005 | 0.0005 | 0.0005 | 0.0005 | 0.0005 | 0.0005 |
| **Disciplinary – per year (web-based collection instrument #3** | 10.0 | 0.01 | 0.01 | 0.01 | 0.005 | 0.01 | 0.005 | 0.005 |
| **Disciplinary – per year resulting in removal (web-based collection instrument #3)** | 4.0 | NA | NA | NA | 0.005 | NA | 0.005 | 0.005 |
| **Initial train/check (one time event for new pilots) (web-based instrument #2)** | 4.0 | 0.186 | 0.248 | 0.155 | 0.031 | 0.248 | 0.155 | 0.155 |
| **Total number of events** | 44.5 | 3.868 | 4.030 | 2.727 | 1.082 | 4.02 | 2.696 | 1.946 |
| Notes: Public aircraft operators (PAO), air tour operators, and corporate flight departments are referred to as “PAC Operators.” Of this group only air tour operators are required to report drug and alcohol records, and none of them are required to report NDR verification. (See PRD RIA, p. 21.)  Source: PRD RIA, pp. 44-52. The data in this table reflect corrections and additions to the corresponding table in the Supporting Statement (Concluded 6/10/2021), made in Supporting Statement (Concluded 12/12/2023) using the same PRD RIA source. | | | | | | | | |

Table 8: Manual Record Entry Activity by Job Classification

| **Manual Record Entry Activity** | **Web-Based Collection Instrument Number** | **Job Classification** | **Fully Burdened Hourly Wage Rate** |
| --- | --- | --- | --- |
| Training/checking events - per year | #2 | Training & Development Manager | $94.81 |
| Ground training - per year | #2 | Training & Development Manager | $94.81 |
| Drug and Alcohol - per year | #1 | Human Resources Manager | $105.97 |
| Verification of NDR Search | #4 | Human Resources Manager | $105.97 |
| Separation events not including termination per year | #7 | Human Resources Manager | $105.97 |
| Termination - per year | #7 | Human Resources Manager | $105.97 |
| Disciplinary - per year resulting in removal | #3 | Human Resources Manager | $105.97 |
| Disciplinary - per year | #3 | Human Resources Manager | $105.97 |
| Initial train/check (one time event for new pilots) | #2 | Training & Development Manager | $94.81 |

Source of wage rates: Section 12 this Supporting Statement

Table 9: Manual Record Entry Burden by Event (per pilot)

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Operator Type** | **135** | | **121** | | **125** | | **Air Tour** | | **91K** | | **PAO** | | **Corp. Flt Dept** | |
| **Manual Record Entry Activity** | **Time** | **Cost** | **Time** | **Cost** | **Time** | **Cost** | **Time** | **Cost** | **Time** | **Cost** | **Time** | **Cost** | **Time** | **Cost** |
| Training/checking events - per year | 10.800 | 17.066 | 10.400 | 16.434 | 10.000 | 15.802 | 4.000 | 6.321 | 10.800 | 17.066 | 10.000 | 15.802 | 3.000 | 4.741 |
| Ground training - per year | 4.000 | 6.321 | 4.000 | 6.321 | 0.000 | 0.000 | 0.000 | 0.000 | 4.000 | 6.321 | 0.000 | 0.000 | 4.000 | 6.321 |
| Drug and Alcohol per year | 0.040 | 0.071 | 0.040 | 0.071 | 0.000 | 0.000 | 0.040 | 0.071 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 |
| Verification of NDR Search | 0.016 | 0.027 | 0.016 | 0.027 | 0.016 | 0.027 | 0.000 | 0.000 | 0.016 | 0.027 | 0.000 | 0.000 | 0.000 | 0.000 |
| Separation events not including termination per year | 0.122 | 0.215 | 0.122 | 0.215 | 0.122 | 0.215 | 0.122 | 0.215 | 0.122 | 0.215 | 0.122 | 0.215 | 0.122 | 0.215 |
| Termination - per year | 0.005 | 0.009 | 0.005 | 0.009 | 0.005 | 0.009 | 0.005 | 0.009 | 0.005 | 0.009 | 0.005 | 0.009 | 0.005 | 0.009 |
| Disciplinary - per year resulting in removal | 0.100 | 0.177 | 0.100 | 0.177 | 0.100 | 0.177 | 0.050 | 0.088 | 0.100 | 0.177 | 0.050 | 0.088 | 0.050 | 0.088 |
| Disciplinary - per year |  |  |  |  |  |  | 0.020 | 0.035 |  |  | 0.020 | 0.035 | 0.020 | 0.035 |
| Initial train/check (one time event for new pilots) | 0.992 | 1.568 | 0.744 | 1.176 | 0.620 | 0.980 | 0.124 | 0.196 | 0.992 | 1.568 | 0.620 | 0.980 | 0.000 | 0.000 |
| Time cost burden per pilot (per year) | 16.075 | 25.453 | 15.427 | 24.429 | 10.863 | 17.210 | 4.361 | 6.935 | 16.035 | 25.382 | 10.817 | 17.129 | 7.197 | 11.409 |

Notes: 1. Time is in minutes.

2. Column totals may not sum due to rounding.

3. Calculation for Time: “Time per Event” (from Table 7) multiplied by the “Number of Events per Pilot” (from Table 7).

4. Calculation for Cost: “Fully Burdened Wage Rate” (from Table 8) divided by 60 minutes, and then multiplied by “Time” (from Table 7).

Table 10: Manual Entry of Present and Future Records by Operator Type

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Type Operator** | **Year** | **No. Respond-**  **ents** | **No. Pilots** | **Time to Enter Pilot Records per Pilot (minutes)** | **Cost to Enter Pilot Records (per Pilot)** | **Total Hours** | **Total Cost** |
| Part 121 | 4 | 8 | 277 | 15.43 | $24.43 | 71.2 | $6,767 |
| Part 121 | 5 | 8 | 278 | 15.43 | $24.43 | 71.5 | $6,792 |
| Part 121 | 6 | 8 | 281 | 15.43 | $24.43 | 72.3 | $6,865 |
| Part 135 | 4 | 1817 | 13122 | 16.07 | $25.45 | 3514.5 | $333,955 |
| Part 135 | 5 | 1817 | 13168 | 16.07 | $25.45 | 3526.8 | $335,126 |
| Part 135 | 6 | 1817 | 13211 | 16.07 | $25.45 | 3538.3 | $336,220 |
| Part 125 | 4 | 52 | 528 | 10.86 | $17.21 | 95.6 | $9,087 |
| Part 125 | 5 | 52 | 528 | 10.86 | $17.21 | 95.6 | $9,087 |
| Part 125 | 6 | 52 | 526 | 10.86 | $17.21 | 95.2 | $9,052 |
| Part 91K | 4 | 3 | 398 | 16.03 | $25.38 | 106.3 | $10,101 |
| Part 91K | 5 | 3 | 398 | 16.03 | $25.38 | 106.3 | $10,101 |
| Part 91K | 6 | 3 | 397 | 16.03 | $25.38 | 106.1 | $10,076 |
| Totals - Part 121 |  |  |  |  |  | 215.0 | $20,423 |
| Totals - Part 135 |  |  |  |  |  | 10579.7 | $1,005,300 |
| Totals - Part 125 |  |  |  |  |  | 286.3 | $27,226 |
| Totals - Part 91K |  |  |  |  |  | 318.7 | $30,278 |

Notes: 1. Calculation for Total Hours: (“No. Pilots” multiplied by “Time to Enter Pilot Records per Pilot”)/60 minutes.

2. Calculation for Total Cost: “No. Pilots” multiplied by “Cost to Enter Pilot Records per Pilot.”

3. Row and column totals may not sum due to rounding.

4. Years 4-6 are 2024-2027 beginning 2024 mid-year.

Sources: 1. No. of Respondents: PRD RIA, Table 8, Count of Air Carriers/Operators/Pilots by Status of Electronic Database. p. 40.

2. No. Pilots: PRD RIA--Part 121, p. 55; Part 135, p. 56; Part 125, p. 58; Part 91K, p. 62. These figures are forecasted updates of figures in Table 8. “Count of Air Carriers/Operators/Pilots by Status of Electronic Database”.

3. Time and Cost to Enter Pilot Records per Pilot: Table 9 this Supporting Document.

Table 11: Manual Entry of Present and Future Records for “PAC” Operators

| **(Air Tour Operators, Public Aircraft Operators, and Corporate Flight Departments)** | | | | | | | | | | | | | |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Col. 1 | Col. 2 | Col. 3 | Col. 4 | Col. 5 | Col. 6 | Col. 7 | Col. 8 | Col. 9 | Col. 10 | Col. 11 | Col. 12 | Col. 13 | Col. 14 |
| Type Operator | Annual  (Years 4-6) | No. Re-spond-ents | No. Pilots | Time to enter Upon Request Records per Pilot (minutes) | Time to enter Disci-plinary Records per Pilot (minutes) | Cost to Enter Upon Request Records (per Piot) | Cost to Enter Disci-plinary Records (per Pilot) | Total Time to enter Upon Request Records (Hours) | Total Time to enter Disci-plinary Records (Hours) | Total Cost to Enter Upon Request Records | Total Cost to Enter Disci-plinary Records | Total Hours to enter Records | Total Cost to Enter Records |
| Air Tour | 4-6 | 1091 | 4772 | 4.266 | 0.095 | $6.199 | $0.145 | 2.198 | 4.894 | $192 | $447 | 7.092 | $639 |
| PAO | 4-6 | 329 | 2069 | 10.762 | 0.055 | $15.622 | $0.084 | 5.060 | 2.586 | $441 | $236 | 7.646 | $677 |
| Corp. Flt Depts | 4-6 | 1403 | 8570 | 7.142 | 0.055 | $10.371 | $0.084 | 33.639 | 2.591 | $2,931 | $237 | 36.229 | $3,167 |
| Table Notes: Row totals may not sum due to rounding.  Calculations by column number are shown below:  Col. 5: From the “Time” column in Table 9 (by Type Operator): Row 10 - (Row 3 + Row 6 + Row 7).  Col. 6: From the “Time” column in Table 9 (by Type Operator): Row 3 + Row 6 + Row 7.  Col. 7: From the “Cost” column in Table 9 (by Type Operator): Row 10 - (Row 3 + Row 6 + Row 7).  Col. 8: From the “Cost” column in Table 9 (by Type Operator): Row 3 + Row 6 + Row 7.  Col. 9 and Col. 11: Air Tour Operators and PAOs only: The FAA assumes that each year 1% of pilots working for an air tour operator or a PAO will apply for employment as a pilot with an air carrier. Thus, the calculation is (Col. 4 ×. 01 × Col 5)/60 minutes. The calculation for corporate flight departments is the same except that each year 10% of pilots working for a corporate flight department will apply for employment as a pilot with an air carrier.  Col.10: (Col. 4 × Col. 6)/60 minutes.  Col. 12: (Col. 4 × Col. 8)  Col. 13: (Col. 9 + Col. 10)  Col. 14: (Col. 11 + Col. 12) | | | | | | | | | | | | | |

Table 12: Manual Entry of Present and Future Records for All Operators

*(Table 10 + Table 11)*

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Type of Operations** | **Annual Hours** | **Annual Cost** | **Respond-ents** | **Average No. Pilots** |
| Part 121 | 71.7 | $6,808 | 8 | 278.7 |
| Part 135 | 3526.6 | $335,100 | 1817 | 13,167.0 |
| Part 125 | 95.6 | $9,087 | 52 | 527.3 |
| Part 91K | 106.3 | $10,101 | 3 | 397.7 |
| Air Tours | 7.1 | $639 | 1091 | 3091 |
| PAO | 7.6 | $677 | 323 | 2821 |
| Corporate Flights | 36.2 | $3,167 | 1413 | 2826 |
| **Totals** | **3851.1** | **$365,579** | **4707** | **23,108.7** |

Table 13: Annual Hourly Burden and Cost for Reporting Pilot Employment History

|  |  |  |  |
| --- | --- | --- | --- |
| **Number of Pilots** | **Hourly Rate** | **Time to Complete Employment History** | **Cost to Complete Employment History** |
| 17,586 | $49.29 | 2 minutes | $28,894 |
| Sources: 1. No. of Pilots: Annual average number of pilots estimated to seek employment with a company over a 10-year period (PRD RIA, p. 85.). Normally collected via web-based instrument #8.  2. Hourly Rate: See Section 12 of this Supporting Statement.  3. Time to Complete Employment History: PRD RIA, P. 86. | | | |

Table 14: Annual PRD Burden

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Section** | **No. Respond--ents** | **No. Pilots** | **Annual** | |
| **Ave.**  **Hours** | **Ave. Cost** |
| **§ 111.15 - Annual Registration Burden** | 17,586 | 17,586 | 5,862 | $28,894 |
| **§ 111.205 (a) Reporting Present and Future Records** |  |  |  |  |
| ***Electronic Reporting*** | 326 | 94,580 | 6,520 | $489,000 |
| ***Manual Data Entry*** | 4707 | 23,008.3 | 3,851.1 | $223,093 |
| **111.310 Written Consent (Employment History)** | 17,586 | 17,586 | 5,862 | $28,894 |
| **Total** | **40,205** | **152,760.3** | **22,095.1** | **$769,881** |
| Note: Row and column totals may not sum due to rounding.  Sources--1. Annual Registration Burden: Table 5 of this Supporting Statement.  2. Electronic Reporting: No. of Respondents--Table 6 of this Supporting Statement, except number of pilots is from PRD RIA, Table 8. Count of Air Carriers/Operators/Pilots by Status of Electronic Database, p. 40.  3. Manual Data Entry: Table 12 of this Supporting Statement.  4. Written Consent: Table 13 of this Supporting Statement. | | | | |

*Table 15: RESERVED*

**Summary of All Information Collections**

The following table summarizes the paperwork burden for the PRIA and PRD.

Table 16: Summary of Associated Information Collections (average/year over 3 years)

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Title** | **No. of Respondents** | **Ave. Annual Hours** | **Cost/hr** | **Total Cost** |
| Form 8060-11 Air carrier records request | 2129 | 15,660.47 | $49.29 | $771,905 |
| Form 8060-11A Airman Notice and Right to Receive Copy | 2129 | 10,213.35 | $49.29 | $503,416 |
| Form 8060-12 DOT Drug Request | 2129 | 13,617.80 | $105.97 | $1,443,078 |
| Form 8060-13 NDR | 2199 | 13,617.80 | $105.97 | $1,443,078 |
| Form 8060-14 Pilot Consent | 17586 | 416.00 | $105.97 | $44,084 |
| Form 8060-15 Dispute form | 17586 | 2.50 | $105.97 | $265 |
| Drug and Alcohol records reporting form (web #1) | 2129 | 106.62 | $105.97 | $11,299 |
| Training, qualification, and proficiency records reporting form (web #2) | 5033 | 280,958.46 | $66.56 | $18,700,595 |
| Final Disciplinary Action records reporting form (web #3) | 5033 | 61.08 | $105.97 | $6,473 |
| NDR records reporting form (web #4) | 2199 | 544.71 | $105.97 | $57,723 |
| Date of Hire reporting form (web #5) | 5033 | 20,532.00 | $105.97 | $2,175,776 |
| Assignment to Duty records reporting form (web #6) | 2199 | 13,146.27 | $105.97 | $1,393,110 |
| Date of Separation reporting form (web #7) | 5033 | 4,136.10 | $105.97 | $438,303 |
| Employment History records reporting form (web #8) | 17586 | 2,163.26 | $49.29 | $106,627 |
| Pilot Consent form (web #10) | 17586 | 10,191.50 | $49.29 | $502,339 |
| **Totals** | **105,589** | **385,367.92** |  | **$27,598,070** |
| Sources—  1. Wage rates: Supporting Statement, p, 11, | | | | |

**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 not already included in question 12.

**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.**

Table 17: Federal Government Financial Burden\*

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Work Tasks** | **Annual Hours Federal Employee** | **Annual Wages** | **Fully Burdened Annual Wages** | **No. Empl- oyees** | **% Of Time** | **Total Hours** | **Total Cost** |
| Receiving & Sorting | 2080 | $50,810 | $69,229 | 3 | 25% | 1560 | $51,921 |
| Examining & Processing | 2080 | $50,810 | $69,229 | 3 | 25% | 1560 | $51,921 |
| Printing & Mailing | 2080 | $50,810 | $69,229 | 3 | 25% | 1560 | $51,921 |
| Filing & Archiving | 2080 | $50,810 | $69,229 | 3 | 25% | 1560 | $51,921 |
| Program Management | 2080 | $66,447 | $94,622 | 2 | 50% | 2080 | $94,622 |
| Program Plans & Policy | 2080 | $66,447 | $94,622 | 1 | 50% | 1040 | $47,311 |
|  |  |  |  |  | **Totals** | 9360 | $349,618 |
| Sources: 2024 FAA Core Compensation, average of minimum and maximum annual E and G bands | | | | | | | |
| the District of Columbia |  |  |  |  |  |  |  |
| (https://www.faa.gov/jobs/working\_here/benefits/pay/core\_salary\_with\_conversion.xlsx), | | | | | | | |
| adjusted for benefits as a percentage of basic pay (36.25% per OMB Guidance | | | | | |  |  |
| (https://www.whitehouse.gov/omb/information-for-agencies/memoranda/#memoranda-2008) | | | | | | | |

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

Removed MyAccess Registration input form (Web based collection instrument #9). As of September 18, 2022, the MyAccess Registration form is now being handled under OMB Control Number 2120-0808. Therefore, all references to that Information Collection (IC) has been entirely remove from this document.

Form 8060-10 (FAA Records Request (PRIA)) is no longer being used and therefore removed as a collection instrument. As of December 7, 2021, operators are required to use the PRD in lieu of this form.

FAA form 8060-10a, 8060-11 and 8060-11a have been identified as being effective until October 1, 2024, after this date, they will no longer be used as a collection instrument. This is occurring due to PRIA Termination under 49 USC 44703.

Added **Table 3** to illustrate the obligation of respondents to report information that is more often than quarterly. Those timeframes are codified in CFR Title 14 Part 111 and needed to be included.

**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.**

The results of this information collection will be provided to hiring operators with the consent of the individual seeking employment.

**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.**

The FAA is not seeking approval not to display the date of expiration of this information collection.

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

There are no exceptions to the certification statement for this information collection.

1. The PRD does not contain actual pilot records submitted via the collection instruments. The PRD instead receives specific facts contained within the original records such as pilot name, date, training event, etc. These facts are entered by the previous and current employers using the appropriate collection instrument. [↑](#footnote-ref-2)
2. Employer cost of total employee compensation as a percentage of total compensation: News Release, March 24, 2024. Bureau of Labor Statistics, Employer Costs for Employee Compensation. p. 2, Private Industry Costs (https://www.bls.gov/news.release/pdf/ecec.pdf). [↑](#footnote-ref-3)
3. Occupational Employment and Wages, May 2023, 11-3121, Human Resources Managers, Bureau of Labor Statistics, Mean Hourly Wage Rate. https://www.bls.gov/oes/2023/may/oes113121.htm. [↑](#footnote-ref-4)
4. Occupational Employment and Wages, May 2023, 11-3121, Training and Development Managers, Bureau of Labor Statistics, Mean Hourly Wage Rate. https://www.bls.gov/oes/2023/may/oes113131.htm. [↑](#footnote-ref-5)
5. The FAA used a ground Instructor hourly wage rate as a proxy for the pilot non-flying wage rate.

   Occupational Employment and Wages, May 2023, 13-1151, Training and Development Specialists, Bureau of Labor Statistics, Mean Hourly Wage Rate. <https://www.bls.gov/oes/2023/may/oes131151.htm>. [↑](#footnote-ref-6)