

## **SUPPORTING STATEMENT**

Airman Certificate and/or Rating Application  
OMB 2120-0021

### CHANGES:

The FAA establishes a Special Federal Aviation Regulation for alternate eligibility requirements to safely certificate initial groups of powered-lift pilots, as well as determine which operating rules apply to powered-lift on a temporary basis to enable the FAA to gather additional information and determine the most appropriate permanent rulemaking path for these aircraft. Powered-lift will be type certificated as special class aircraft under the existing regulations. Currently, there is not an established path for the initial group of civilian powered-lift pilots to obtain the required experience to earn a pilot certificate and the general and commercial operating regulations do not contemplate operation of powered-lift.

### **Justification:**

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

The paperwork burden associated with the collection of information for the application certificate and/or rating application supports the Department of Transportation Strategic Goal on Safety. Specifically, the goal is to promote public safety by working towards the reduction of transportation related fatalities, injuries, and property damage across the transportation system.

The Federal Aviation Administration (FAA) is an operating mode of the United States (U.S.) Department of Transportation (DOT). One of the FAA's many responsibilities includes issuing airmen certificates to properly qualified persons in accordance with Title 14 of the Code of Federal Regulations (14 CFR) part 61. FAA Form 8710-1, *Airman Certificate and/or Rating Application*, is necessary for the FAA to collect information for the certification of pilots, ensuring these airmen meet the minimum acceptable training standards as prescribed by part 61. Section 61.3, *Requirements for certificate ratings, and authorizations*, requires a person who seeks to serve as a required pilot flight crewmember of a civil aircraft of the United States to have in their physical possession or readily accessible in the aircraft when exercising the privileges of that pilot certificate authorization.

On previous renewals, the title of this information collection was "Certification: Pilots, Flight Instructors, and Ground Instructors". The name of this information collection is revised to the actual name of FAA Form 8710-1, *Airman Certificate and/or Rating Application*, for this renewal collection.

**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.**

The Airman certificate and/or Rating Application form and the required records, logbooks and statements required by 14 CFR part 61 are submitted to Federal Aviation Administration (FAA) Flight Standards District Offices or its representatives to determine qualifications of the applicant for issuance of a pilot or instructor certificate, or rating or authorization.

As of December 31, 2021, there are approximately 1,171,405 active certificated pilot airmen. This includes student, private, commercial, airline transport pilot certificate holders, as well as ground and flight instructors. Approximately 25% of these pilots are providing data on an annual basis. Instructor certificates must be renewed every 24 months to remain effective. Student pilot certificates must be renewed every 60 months.

Applicants for the various general aviation pilot, ground, and flight instructor certificates are required to submit a completed FAA Form 8710-1, Airman Certificate and/or Rating Application. If the information collection was not conducted, the FAA would be unable to issue the appropriate certificates and ratings.

The information collected becomes a part of the FAA's official records and is only used by the FAA for certification, compliance, enforcement, and when accidents, incidents, reports of noncompliance, safety programs, or other circumstances requiring reference to records. The requirements of part 61 include reporting and recordkeeping.

**Section 61.13, Issuance of airmen certificates, ratings, and authorizations.** This section requires an application for an airman certificate, rating, or authorization to make an application on a form and in a manner acceptable to the Administrator. FAA Form 8710-1 contains key element fields, which an applicant for a pilot certificate or rating populates when applying for a FAA pilot certificate and rating.

**Section 61.5, Certificate and rating issued under this part.** Section 61.5 states what certificates and rating can be issued under part 61. The certificates and ratings include (a) (1) pilot certificates, (i) student pilot, (ii) sport pilot, (iii) recreational pilot, (iv) private pilot, (v) commercial pilot, (vi) airline transport pilot, (2) flight instructor certificates, (3) ground instructor certificate. Furthermore, rating issued under this part include (b) aircraft category, (i) airplane, (ii) rotorcraft, (iii) glider, (iv) lighter than air, (v) powered lift, (vi) powered parachute (vii) weight shift control, (2) airplane class ratings, (i) single engine land. (ii) multi engine land, (iii) single engine sea, (iv) multiengine sea, (3) rotorcraft class ratings (i) helicopter, (ii) gyroplane (4) lighter than air class rating (i) airship) (ii) balloon (5) weight shift control aircraft class ratings (i) weight shift control aircraft land, (ii) weight shift control aircraft sea, (6) powered parachute class ratings (i) powered parachute land, (ii) powered parachute sea, (7) aircraft type ratings (i) large

aircraft other than lighter than air, (ii) turbojet powered airplanes (iii) other aircraft type ratings specified by the Administrator through the aircraft type certification procedures, (8) instrument ratings, (c) flight instructor certificate, (d) ground instructor certificate.

**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 or information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection.**

The information is collected without the use of paper to the greatest extent possible. Currently, pilot application and pilot information is collected and entered into the Flight Standards electronic data collection system called the Integrated Airman Certification and Rating Application (IACRA). IACRA is a secure web-based application that uses online validation and digital signatures to complete the airman certification documents. IACRA interfaces with multiple FAA databases such as knowledge testing and airman records for data validation and verification. IACRA automatically ensures applicants meet regulatory and policy requirements.

IACRA improves the airman certification process by checking for data errors that cause rejected applications. The certification processing time is reduced since the applicant, recommending instructor (if required), and inspector/examiner can complete the airman application online and can submit the completed application electronically using digital signatures. OMB has used IACRA as an example of FAA's compliance with the Government Paperwork Elimination Act.

The FAA had made the use of IACRA mandatory by its inspectors and designated pilot examiners. The FAA pilot airman certification application process is paperless process with few exceptions. Though the use of IACRA does not reduce the time it takes for an applicant to complete and submit the information required by the 8710-1 form versus its paper version, IACRA serves to reduce the FAA's clerical review time, and serves the public by a standardized pilot application process.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available can used for the purpose described in Item 2 above.**

We have reviewed other FAA public-use reports and find no duplication. Furthermore, we know of no other agency collecting information from pilots and flight instructors prescribing the terms, conditions, and limitations of their operating certificates. This information is required under part 61. All records and information gathered are compiled for a specific reason, from a specific source. The information collected only relates to a unique and specific requirement and situation. Our other public information collection methods do not contain the required information.

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

The collection of information is obtained only when necessary to fulfill the requirements of Title 14 CFR, part 61. Completion of the required items is of minimal burden to an applicant due to the simplistic format of the document. Many local FAA

offices further reduce this burden by assisting the applicant with FAA Form 8710-1. This assistance can greatly reduce the amount of time needed for an airman to study and understand the information requirements.

**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.**

Applicants seeking pilot certification who submit applications determine the frequency of information collection. While no technical or legal obstacles are anticipated, we do not presently foresee any public burden reduction. The consequence to FAA's program activities if the collection of information were not conducted would be the inability to determine whether or not an applicant met the criteria for a part 61 pilot certificate or pilot ratings.

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

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2)(i)-(viii), and there are no special circumstances.

**8. 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.**

On June 14, 2023, the FAA published the notice of proposed rulemaking (NPRM), Integration of Powered-Lift: Airman Certification and Operations; Miscellaneous Amendments Related to Rotorcraft and Airplanes (88 FR 38946) (RIN 2120-AL72). The FAA discussed the proposed revision of this information collection in that NPRM. The FAA solicited public comments as part of the rulemaking.

The FAA did not receive any comments in response to the proposed revision of this information collection.

Further, the FAA submitted this information collection to the Office of Management and Budget for its review during the NPRM comment period. OMB did not provide any comments in its notice of action for this information collection.

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

There is no payment involved in this collection.

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

The information collected will become part of the Privacy Act system of records DOT/FAA 847, General Aviation Records on Individuals, and afforded the protection offered under the Privacy Act and that particular system.

**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.**

The Airman Certificate and/or Rating Application requires the applicant to respond to questions concerning a conviction under Federal or State statutes pertaining to narcotic drugs, marijuana, and/or stimulant drugs or substances. This information is necessary to determine whether the applicant is in compliance with appropriate 14 CFR part 61 certification requirements.

**12. Provide estimates of the hour burden of the collection of information.**

A section-by-section breakdown of the applicable sections of part 61 is listed showing the number of respondents, frequency of response, annual hour burden, and how the burden has been estimated.

To calculate the economic burden on respondents, the FAA uses an hourly rate of **\$15.40**. This is an all-purpose travel-time rate, which is appropriate for this ICR because respondents represent a wide array of occupations and are often performing their reporting or recordkeeping activities on their own time. The travel-time rate is derived from Department of Transportation guidance ([https://www.faa.gov/regulations\\_policies/policy\\_guidance/benefit\\_cost/](https://www.faa.gov/regulations_policies/policy_guidance/benefit_cost/)), modified by a CPI-U value calculated by the Minneapolis Fed ([https://www.faa.gov/regulations\\_policies/policy\\_guidance/benefit\\_cost/](https://www.faa.gov/regulations_policies/policy_guidance/benefit_cost/)). The FAA is not applying a load factor for overhead or benefits, because, as noted, these activities are typically not performed as part of a respondent's job or occupation.

**Section 61.13, Application and Qualification** – As indicated (in Item #2 of this report), applicants for a pilot certificate and/or flight instructor certificate must submit FAA Form 8710-1 to the FAA or its representatives to determine qualifications of the applicant for issuance of a pilot or flight instructor certificate, or rating or authorization. We now estimate 100,171 new applications for pilots and/or flight instructor certificates at 0.1 hours each.

We estimate an additional 171 new applications, for a total of 100,171 new applications for pilot/instructor certificates at 0.1 hours each = 10,017.1 hours

$$10,017.1 * \$15.40 = \$154,263$$

**Section 61.39, Prerequisites for flight tests.** This section states that to be eligible for a practical test for a certificate or rating, an applicant must present a written statement from an authorized flight instructor. The statement must certify the applicant has received specified instruction and has shown competency for the rating sought. We estimate 100,000 applicants are annually subject to this requirement. Practical tests are not required for ground instructor certificates and ratings. Flight instructor written statements are 100,000 annually at .05 hours each.

We estimate an additional 171 new applications, for a total of 100,171 applicants x .05 hours each = 5008.6 hours

$$5008.6 * \$15.40 = \$77,132$$

**Section 61.49 retesting after failure.** The numbers and hours required for reporting required by this section are included in the numbers for section 61.13. The flight instructor statements required by this section for reapplication for original airman certificates are about 2,200 individual applicants annually at .05 hours each. Reapplication for pilot certificates after failure is estimated to be 11,400 at .05 hours each.

We estimate that the proposed rule, when finalized, will result in one additional retest per year, for a total of 2,201 statements x .05 hours each = 110 hours

11,401 statements x .05 hours each = 570 hours

Total = 680 hours

$$680 * \$15.40 = \$10,472$$

**Section 61.51, Pilot logbooks.** This section requires pilots to enter flight time that is to be credited toward experience or training requirements for certificates, ratings, or operating privilege in a reliable record. We estimate that of the total active certificated pilot population (700,000), an additional 44 pilots, or 181,906 pilots, must log flight time annually to meet this requirement at a total average of 1.0 hours each for entering the required records.

We estimate 181,906 pilots x 1.0 hours each = 181,906 hours

$$181,906 * \$15.40 = \$2,801,352$$

**Section 61.56(a), Flight Review.** This section provides that except for certain exceptions for pilots required under other operating rules to have periodic proficiency checks, and certified flight instructors who pass a practical test for the issuance or renewal of a certificate, or the addition of a rating, each pilot who exercises pilot-in-command privileges must have completed a flight review within the previous 24 months. The pilot must maintain an endorsement of satisfactory completion in a logbook. We estimate that, of the total active pilot population of 700,000, this rulemaking will require an additional 44 pilots, or a total of 181,906 pilots, to complete a flight review per year with an average time of 0.1 hours each necessary for the flight instructor to record the flight review.

We estimate 181,906 pilots x 0.1 hour each = 18,190.6 hours

18,190.6 \* \$15.40 = \$280,135

**Section 61.57, Pilot-in-Command.** This section states for recent flight experience a pilot-in-command, except for certain exceptions, no person may act as pilot-in-command of an aircraft carrying passengers or of an aircraft certificated for more than one pilot flight crewmember unless that person is current in accordance with the requirements of section 61.57. We estimate that this rulemaking will subject an additional 171 pilots, or a total of 290,171 pilots, to these recordkeeping requirements at an average of 0.1 hours each.

We estimate 290,171 pilots x 0.1 hour each = 29,017.1 hours

29,017.1 \* \$15.40 = \$ 446,863

**Section 61.63, Additional Aircraft Ratings.** This section provides authority for the addition of category, class, and type rating to an existing certificate. Recordkeeping requirements are included under Section 61.39.

**Section 61.85, Applications.** This section requires applicants for an original student pilot certificate must submit FAA Form 8710-1 to the FAA or its representatives to determine qualifications of the applicant for issuance of a student pilot certificate. We estimate 38,700 applications for new and replacement student pilot certificates are submitted annually, and FAA Form 8710-1 takes 0.5 hours to complete. Therefore, the student airman certification program imposes a 19,350 hours reporting burden per year. The following equation provides the basis for 19,350 hours.

We estimate 38,700 applications for new and replacement student pilot certificates x 0.5 hours = 19,350 hours

19,350 \* \$15.40 = \$297,990

**Section 61.87, Requirements for Solo Flight.** Under this section, endorsements are required by an authorized flight instructor on student pilot certificates and in student pilot logbooks for competency and currency. We estimate that an additional 171 pilots, for a total of 80,171 student pilots, will be subject annually to these recordkeeping requirements and that .05 hours is the average time required for record entries.

We estimate 80,171 student pilots x .05 hour each = 4,008.6 hours

4,008.6 \* \$15.40 = \$61,732



**Section 61.93, Cross-Country Flight Requirements (student pilot).** This section requires flight instructor endorsements in pilot logbooks certifying the competence for cross-country flight operations. We estimate that an additional 171 student pilots, or 80,171 student pilots, will annually obtain these endorsements and that 0.1 hours are required for each student pilot.

We estimate 80,171 student pilots x 0.1 hours each = 8,017.1 hours

8,017.1 \* \$15.40 = \$123,463

**Section 61.105, Aeronautical Knowledge.** This section requires the logging of specified ground instruction by trainees for private pilot certification. The number estimates are included under Section 61.51.

**Section 61.107, Flight Proficiency.** This section requires logging specified flight instruction for private pilot trainees. Number estimates are included under Section 61.51.

**Section 61.115, Glider Rating: Aeronautical Experience.** This section requires logging of flight time required for the rating. Number estimates are included Section 61.51.

**Section 61.125, Aeronautical Knowledge.** This section requires applicants for commercial pilot certificates must log specified ground instruction or use other options. We estimate that 9,500 pilots annually use this option to meet aeronautical knowledge requirements and those average 0.2 hours each to log the instruction.

We estimate 9,500 pilots x 0.2 hours each = 1,900 hours

1,900 \* \$15.40 = \$29,260

**Section 61.127, Flight Proficiency.** This section requires logging specified flight instruction for commercial pilot certificate trainees. Number estimates are included under Section 61.51.

**Section 61.185, Aeronautical Knowledge.** This section states s applicants for flight instructor certificates must log specified ground instruction. We estimate that 5,829 pilots annually comply with this requirement and that they spend an average of 0.1 hour each making logbook entries for a combined total of 582.9 hours.

We estimate\_ 5,829 pilots x 0.1 hour each = 582.9 hours

582.9 \* \$15.40 = \$8,977

**Section 61.187, Flight Proficiency.** This section requires logging specified flight instruction for applicants for a flight instructor certificate. Number estimates are included under Section 61.51.

**Section 61.189, Flight Instructor Records.** This section requires each certificated flight instructor to sign the logbook of each pilot to whom he/she gives instruction, and to maintain a separate record of the instruction given to each pilot regarding solo flight as well as a record of knowledge/practical test endorsements. We estimate that an additional 29 certificated flight instructors, or 30,029, will average 1.0 hour each complying with these recordkeeping requirements.

We estimate 30,029 flight instructors x 1.0 hour each = 30,029 hours  
30,029 \* \$15.40 = \$462,447

**Section 61.197, Renewal of Flight Instructor Certificates.** This section states holders of flight instructor certificates may have their certificates renewed for an additional period of 24 months providing they- 1) pass an appropriate practical test, 2) attend an approved flight instructor refresher clinic/course, 3) endorse at least 5 applicants to take the practical test in which at least 80% passed the first time, or 4) serve as an air carrier check airman or flight instructor in the previous 24 calendar months. FAA Form 8710-1 is used to support the application for renewal. We estimate that 40,029 flight instructors will annually apply for renewal.

We estimate an additional 29 applications, or 40,029 total, 8710-1 applications x 0.1 hour each = 4,002.9 hours

4002.9 \* \$15.40 = \$61,645

**Part 107, Subpart C.** This section prescribes requirements for the issuance of a remote pilot certificate under part 107. Persons applying for a remote pilot certificate with a small UAS rating under part 107, are mandated to report information using the FAA Form 8710-13, Remote Pilot Certificate and/or Rating Application. For applicants who do not hold a pilot certificate under part 61, the Remote Pilot Certificate and/or Rating Application is submitted along with a documentation demonstrating that the applicant passed an aeronautical knowledge test. For applicants who hold a pilot certificate under part 61 and meet the flight review requirements of § 61.56, the Remote Pilot Certificate and/or Rating Application is submitted with evidence of completion of the training course. While most applications are made electronically using FAA's DroneZone portal or IACRA (see above), the collection is based on Form 8710-13, which is also included in this collection.

We estimate 50,000 8710-13 applications x 0.25 hours each = 12,500 hours

### Summary

We estimate the airman certification program imposes a **325,209** hours reporting and recordkeeping burden on the public (69,749 hours reporting and 255,461 hours recordkeeping). The total burden breaks down as follows:

Section	Reporting (hours)	Recordkeeping (hours)	Responses	Hours per response
61.13	10,017.1		100,171	.1
61.39	5,008.6		100,171	.05
61.49	680		13,602	.05
61.51		181,906	181,906	1
61.56(a)	18,190.6		181,906	.1
61.57		29,017.1	290,171	.1
61.85	19,350		38,700	.5
61.87		4,008.6	80,171	.05
61.93		8,017.1	80,171	.1
61.125		1,900	9,500	.2
61.185		582.9	5,829	.1
61.189		30,029	30,029	1
61.197	4,002.9		40,029	.1
Part 107 subpart C	12,500		50,000	.25
TOTALS	<b>69,749</b>	<b>255,461</b>	<b>1,202,356</b>	
	<b>325,209 hours</b>			
<b>COST: 325,209*\$15.40 = \$5,008,232</b>				

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

There are no additional start-up costs associated with this collection not already included in question number 12.

**14. Provide estimates of annualized cost to the Federal government. Also provide a description of the method used to estimate cost, which 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. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

Estimated annual cost to the Federal Government is \$9,509,873. This cost is determined by estimating the time required for FAA personnel to review and process FAA 8710-1 and 8710-13 Airman Certificate and/or Rating Application forms. Even though the FAA has begun IACRA implementation, no significant change in the time required to review this form has occurred. We estimate that 181,862 forms are submitted for these certificates and ratings at an average file processing time by a legal instrument examiner, GS-13, Step 5, RUS locality. The wage rate for FAA examiners is based on the 2022 General Schedule, for a GS-13, Step 5, Rest of U.S. Locality. That salary, \$106,955, divided by 2,080, results in an hourly wage of \$51.42. The fully loaded wage rate is **\$81.97** [ $\$51.42 + (\$51.42 * .3625)$ ] \* 1.17 = **\$81.97**.<sup>1</sup>

**181,862 + 171 for a total of 182,033** 8710-1 Applications x **0.5 hours** x **\$81.97 per hour** = **\$7,460,623**

**50,000** 8710-13 Applications x **0.5 hours** x **\$81.97** = **\$2,049,250**

TOTAL FAA COSTS: **\$7,460,623 + \$2,049,250 = \$9,509,873**

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**15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of the OMB Form 83-1.**

The FAA proposed a Special Federal Aviation Regulation for alternate eligibility requirements to safely certificate initial groups of powered-lift pilots, as well as determine which operating rules apply to powered-lift on a temporary basis to enable the FAA to gather additional information and determine the most appropriate permanent rulemaking path for these aircraft. Powered-lift will be type certificated as special class aircraft under the existing regulations. Currently, there is not an established path for the initial group of civilian powered-lift pilots to obtain the required experience to earn a pilot certificate and the general and commercial operating regulations do not contemplate operation of powered-lift. The FAA did not receive any comments to the proposed revisions to this information collection. The FAA is revising this information collection as proposed.

**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 this collection of information, completion of report, publication dates, and other actions.**

There are no plans to publish this information for statistical or other purposes.

<sup>1</sup> <https://obamawhitehouse.archives.gov/sites/default/files/omb/memoranda/fy2008/m08-13.pdf>. A fringe benefit factor of 36.25 percent is multiplied by wages for a fully-loaded wage. The fully-loaded wage is increased by an overhead multiplier of 1.17. <https://www.regulations.gov/document/EPA-HQ-OPPT-2014-0650-0005>

**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.**

The FAA is not seeking such approval.

**18. Explain each exception to the certification statement identified in item “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-1.**

There are no exceptions to the certification statement.