

**Supporting Statement  
Service Difficulty Report  
OMB #2120-0663**

- Updated burden estimate.
- Submission volume data and time to completed revised.
  
- Rewrites to various sections to provide better clarity.

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

Title 49, United States Code, Section 44701 outlines the responsibilities of The FAA Administrator to promote safe flight and reduce the possibility of accidents in air transportation. This section empowers The FAA Administrator to prescribe necessary regulations and minimum safety standards for various aspects of civil aviation, including the design, construction, and maintenance of aircraft, as well as the operation of airports. Evaluation of previous accident and incident data suggests the collection of certain malfunctions and defects could be early indicators of future accidents. By collection of analysis, the Administrator can systematically assess the circumstances and conditions leading to these events and determine if corrective actions are necessary. This process forms the foundation of the Service Difficulty Reporting (SDR) Program.

**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 Service Difficulty Reporting (SDR) Program requires air carriers and repair stations to disclose occurrences of detections of failures, malfunctions, or defects. Information is collected and made available to internal and external stakeholders. The Federal Aviation Administration uses Service Difficulty Report data to improve safety and reliability of products and articles. Aviation Safety Inspectors, Engineers and Analysts uses SDR data to identify trends and problems that could affect aviation safety and share this information with the aviation community and FAA personnel to help mitigate safety risks. Manufacturers use SDR data to help identify issues that could cause safety hazards. The public can access SDR data through the SDRS database and may use this data for research and analysis. The FAA may also use this data to create new regulations or issue Airworthiness Directives (AD's) that address a specific problem, as the data may identify mechanical failures, malfunctions, and defects that indicate a hazard to the operation of an aircraft. It may also identify trends on airworthiness related concerns.

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- 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.**

In compliance with the Government Paperwork Elimination Act, information collection is fully digitized. 100% of submissions are currently electronic via the [FAA Service Difficulty Reporting System \(SDRS\)](#). Two paper-forms are however available via download and may be used.

- 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.**

There are no other FAA collections that duplicate this data nor other government agencies collecting this same data. The FAA provides this information as source data to other government agencies, regulatory authorities, and the public upon request and as permitted.

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

This collection is a minimal burden to small businesses. Requirements for collection are focused on air carriers and repair facilities (large organizations), other entities are strictly voluntary.

- 6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

The FAA would have no means of collecting information on incidents and occurrences known to be precursors to unsafe conditions and which may lead to accidents and incidents in the national airspace. The frequency of collection is variable and dependent on reportable service difficulties. If there are no issues, no report is required.

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- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner that ... (8 sub-bullets on this question that essentially refer to how collection is conducted, i.e. timing, format, proprietary info, etc.):**

The goal of Service Difficulty Reports is to provide The FAA with timely, accurate, and complete information to improve air safety and the National Aviation System. The frequency of reporting depends on the type of entity and the nature of the issue. Certificate holders must submit reports for each 24-hour period on any failure, malfunction, or defect that could endanger the safe operation of an aircraft.

Certificated repair stations must report within 96 hours after discovering a serious failure, malfunction, or defect. Each report of occurrences during a 24-hour period shall be submitted to the FAA within the next 96 hours. This is not anticipated to be a burden, as the existing rule requires certificate holders to report occurrences during a 24-hour period within the next 72 hours. This reporting requirement is consistent with the rest of the guidelines in 5 CFR 1320.5(d)(2).

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**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.**

Federal Register Notice was published on July 2, 2024, soliciting public comment. No comments received. No communication with any stakeholders.

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

There are no monetary or gift considerations for submission of information.

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

Respondents have given no assurance of confidentiality.

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

There are no questions of a sensitive nature.

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

<b>Factors</b>	<b>Amt/Vol</b>	<b>Comments</b>
Submissions (S)	57,938	Count based on 10-year average.
Time per submission (T)	0.0833	Based on sample submissions. Unit=hours.
Total burden (B)	4,826	S x T. Unit=hours.
Labor Cost (C) <sup>1</sup>	\$153,515	B x C. Unit=USD.

The respondent universe is primarily two entities. Carrier certificate holders and certificated repair stations. Separating these for burden calculation is not relevant since a submission is a submission regardless of which entity performs - there is no difference in the burden.

<sup>1</sup>Labor cost calculations are based on [Bureau of Labor Statistics, Employer Cost for Employee Compensation – March 2024](#) and taken from the median private industry worker total compensation category.

<b>Comp Component</b>	<b>USD/Hr</b>
Wages & Salaries	\$22.60
Total Compensation	\$31.81

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**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 material costs required to facilitate submission.

**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.**

Cost to the Federal Government results from the maintenance of the SDR system, review of data submissions, and helpdesk escalations. For information technology and infrastructure concerns, the amount varies depending on the number of bugs, security upgrades, and software/hardware replacement. For FY24, the amount was \$150,000. It is reasonable to expect that amount for subsequent years. For personnel cost associated with data review and helpdesk matters, two full-time-equivalent employees are utilized. Annualized cost is approximately \$262,000. This includes benefits at a rate of 31.1% according to the 2023 Bureau of Labor Statistics.

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

There have been no program changes. Adjustments have been made to data found in question 12. The adjustments are associated with line-item categories. Previously they were broken out but are now consolidated. The reason is that submissions are fungible. Also, it appears the previous analysis most likely double counted submissions or grossly overestimated what might occur. The amount of time required to submit a report was also grossly overestimated. The updated data is based on analysis of actual submission occurring over a considerable timeframe. Previous analysis also included non-required submissions, i.e. those that are made voluntarily. The resulting burden therefore is considerably less.

**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.**

Publication of data is not performed per se. The Service Difficulty Reporting web site allows for query and data download. The depth and type of analyses is dependent on factors specific to each individual analyst.

**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.**

We are not seeking this approval.

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

There are no exceptions.