

Supporting Statement A
REPORT OF INSPECTION REQUIRED BY
AIRWORTHINESS DIRECTIVES

Title 14, CFR Part 39

OMB No. 2120-0056

Extension with no change

ADD External Alternative Methods of Compliance (AMOC)

Summary of Changes:

- Annualized cost to the respondents – Q12
- Annualized cost to the Federal government – Q14

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, Subtitle VII - Aviation Programs encourages the development of civil aeronautics and promotes safety in air commerce. Sections 44701 and 40113(a) of the Code empower the Secretary of Transportation, or the Administrator of the Federal Aviation Administration (FAA) to issue the rules and regulations they think necessary to carry out this Act. The Secretary or Administrator issue regulations and minimum standards governing the:

- (a) Inspection, servicing, and overhaul of aircraft, aircraft engines, propellers and appliances;
- (b) Equipment and facilities for such inspection, servicing and overhaul. This includes examinations and reports by qualified private persons. The Secretary of Transportation may accept their examinations and reports instead of those made by Department of Transportation (DOT) or FAA officers and employees.

Section 44702 of the Code empowers the Secretary of Transportation or FAA Administrator to issue an airworthiness certificate when the FAA finds that an aircraft conforms to the type certificate and is in condition for safe operation. An airworthiness directive (AD) amends an airworthiness certificate.

Title 14 CFR part 39, Airworthiness Directives (AD), authorized by §§ 40113(a), 44701, and 44702 of the Code, prescribes how we issue ADs. One of the FAA's primary functions is to require resolve an unsafe condition discovered in a product. Each aircraft coming off the assembly line must receive an airworthiness certificate indicating that it is safe for civil use.

The FAA issues ADs when an unsafe condition is discovered on a specific aircraft type. If the condition is serious enough and we need more information to develop corrective action, we may require specific information from aircraft owners/operators.

We may also require reports to determine the scope of the problem and how adequate the manufacturer's corrective actions are. Each reporting situation is unique.

This information supports the Department of Transportation's strategic goal – to promote the public health and safety by working toward eliminating transportation-related deaths and injuries.

The Airworthiness Directive Development (ADD) External Portal automates the process of submitting an AMOC request to the FAA. Instead of submitting a paper request to the FAA, the submitter can complete the AMOC request online by means of the ADD External Portal and submit it to the FAA for processing. Once submitted, the request can be accessed and processed using the Airworthiness Directive Development (ADD) software application. The FAA will make an acceptance or denial decision and issue a letter to the applicant within 30 days of receipt of the completed request.

In addition to this AMOC request and submission process, the ADD External Portal allows users to search for information regarding existing AMOCs that have been approved by the FAA and for Airworthiness Directives that have associated AMOCs.

Alternative Methods of Compliance (AMOC) are submitted to the FAA by the general public. While anyone may submit an AMOC there is no standard form to use. From Order 8110.103B Alternative Methods of Compliance (AMOC), Section 3-2:

3-2. AMOC Proposal. 14 CFR 39.19 states in part that “anyone may propose to FAA an alternative method of compliance or a change in the compliance time, if the proposal provides an acceptable level of safety.”

a. Although a letter is preferred, AMOC proposals may be submitted by other means, such as email, fax, or telephone. AMOC proposals received by telephone must be documented.

An AMOC Response Letter is written by an internal FAA user and sent to the AMOC Requester. The template may be generated from the ADD Dashboard and follows the latest Order. There is not an FAA or OMB number on this template.

A member of the public may submit an AMOC request to the FAA by using the AMOC external website. Registration is not needed to use this website. External users must consent to the “Terms of Use” statement before proceeding to the AMOC proposal webpage. An AMOC is required if an owner/operator of aircraft cannot comply with an AD or finds a different method to comply with the actions specified in an AD, as mandated by title 14 CFR Part 39.

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 Administrator uses ADs to notify aircraft owners and operators that an unsafe condition exists. ADs prescribe the conditions, limitations, or both, under which the product may continue to be operated.

Occasionally, aircraft owners and operators are mandated to report information concerning their aircraft regarding an unsafe condition. The Aircraft Certification Office (ACO) initiating the AD analyzes the reports and determines if the AD's corrective action will resolve the unsafe condition. If not, the ACO issues a new AD to correct the unsafe condition.

To date, we have no other method for collecting this information. If we do not collect it by issuing an AD, we must conduct a directed safety investigation. This is a burden on both the FAA and the owner/operator.

It is anticipated that the information collected will be used to support publicly disseminated information. FAA ACO will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with FAA standards for confidentiality, privacy, and electronic information. See response to Question 10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines.

A member of the public may submit an AMOC request to the FAA by using the ADD External AMOC website. Registration is not needed to use this website. However, when the public user accesses the ADD External AMOC website, the following information will be collected on the AMOC Requester Information page.

- Company Name
- First Name
- Last Name
- Address1
- Address2
- City
- State
- Country
- Zip Code
- Phone
- Email
- Fax Number

On the subsequent page, the user enters their AMOC proposal. This includes:

- Whether this is a Global AMOC
- Principal Inspector and/or Flights Standard Office (if needed)
- Text of their AMOC Proposal
- Supporting Documents (as needed)
- Details of one or more Airworthiness Directive(s) relevant to the AMOC.

The user may also enter any additional documents or enter additional information not captured on the first page as needed and capture the following information.

- Title/Description
- Revision
- Document Date
- Additional Information or substantiation

After the user submits the AMOC request, the system generates a message to the user, which includes an AMOC Request Identifier. The Identifier is a sequential number, which resets to one (YYYY-FAA-00001) at the beginning of each year.

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.

Following the Government Paperwork Elimination Act (GPEA), we use e-mail and the Internet for corresponding with industry, accepting their 100% electronic submission of information. How to send the information to us, however, is up to owners and operators. We cannot mandate electronic submission of reports, because some of the affected parties are small businesses and/or individuals lacking electronic/Internet communication. Each AD with a reporting requirement will specify what information is required to be reported (e.g., inspection results), when the report must be submitted, and the address(es) where the report should be sent.

The specific results of the information collection will not be made available to the public. The FAA ACO uses the information to determine if the corrective action will resolve the unsafe condition (see response to question 1 above).

Alternative Methods of Compliance (AMOC) are submitted to the FAA by the general public. While anyone may submit an AMOC there is no standard form to use. A member of the public may submit an AMOC request to the FAA by using the ADD External AMOC website. Registration is not needed to use this website. When the public user accesses the ADD External AMOC website, a user is required to complete AMOC Requester Information on the External AMOC screen of the website and save it. Following this step, the user will need to complete the AMOC Information and Additional Information not captured on the AMOC Information page as needed, review and submit to FAA. After the user submits the AMOC request, the system generates a message to

the user, which includes an AMOC Request Identifier. The Identifier is a sequential number, which resets to one (YYYY-FAA-00001) at the beginning of each year. An AMOC Response Letter is written by an internal FAA user and sent to the AMOC Requester. The template may be generated from the ADD Dashboard and follows the latest Order.

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.

14 CFR 39.19 allows “anyone” to request an AMOC if they can’t or don’t want to comply with an AD as written. This could include owners/operators, maintenance personnel, parts manufacturers, design approval holders, or general members of the public. We have systems that contain information about some of these groups (e.g., aircraft registry), but in general, those systems contain only a part of the information we need as well as containing additional information that we do not need for AMOC purposes. To utilize existing information would require the ability to interface with multiple systems and being able to differentiate the correct one based on who is requesting the AMOC. The complexity and security necessary for such a system makes it impractical. Therefore, we designed the AMOC external portal to be stand-alone. The information that potentially currently exists is limited to contact information and aircraft make/model. None of the information that we will collect via the AMOC external portal is new in that requesters currently provide that information to us in paper (or email) format when requesting an AMOC today.

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

While we cannot predict exactly who will be affected by an AD, only a portion of ADs include a reporting requirement, and that happens only when we need more information to determine if the corrective action is adequate. We make every effort to minimize the burden on small businesses or other small entities, including our preparation of a Regulatory Flexibility Act analysis for non-emergency ADs.

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.

We keep the information collection requirement to a minimum because we search our own databases and work with the manufacturer first before issuing an AD. We ask for reports only when we need more information. The technical and legal obstacles to reducing the burden are:

- (1) We will not obtain needed technical data in an emergency when safety is at risk, and,
- (2) We cannot carry out our responsibilities under Title 49 §§ 40113(a) and 44701.

As we stated previously, the only other way to collect information is through a directed safety investigation, at a substantial cost to us and an increased burden on the owner/operator.

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

We collect information following Title 5 CFR §1320.5(d)(2)(i)-(viii) with one exception: the time a record is maintained. In our procedure, airworthiness directives are regulations issued under 14 CFR Part 39, and no person may operate a product unless all applicable ADs have been complied with. Compliance with ADs must be recorded in the aircraft maintenance log. The aircraft maintenance log shows proof of compliance with ADs and is retained and transferred with the aircraft at the time the aircraft is sold.

For ADs issued as “Final rule; request for comment,” we may require information to be reported 10 days after the effective date of the AD. These types of ADs are issued when an unsafe condition presents an immediate risk to safety of flight or requires immediate action by owners/operators.

The ADD External Portal collection of information is consistent with the guidelines in AMOC Proposal in 14 CFR 39.19. From Order 8110.103B Alternative Methods of Compliance (AMOC), Section 3-2:

3-2. AMOC Proposal. 14 CFR 39.19 states in part that “anyone may propose to FAA an alternative method of compliance or a change in the compliance time, if the proposal provides an acceptable level of safety.”

a. Although a letter is preferred, AMOC proposals may be submitted by other means, such as email, fax, or telephone. AMOC proposals received by telephone must be documented.

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.

A Federal Register Notice published on (October 21, 2024), the Federal Register citation (FRN 2024–24309), solicited public comment. No comments were received.

Apart from the Federal Register Notice, we haven't taken any measures because the information we will be collecting with this electronic portal is information we are already collecting today with paper or email submissions.

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

We do not provide any payment or gifts to respondents.

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

We give respondents 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 sensitive questions.

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

We estimate that 25 ADs yearly will require reports of information and findings. The average AD affects about 1,120 owners/operators. Therefore, 25 ADs times 1,120 owners/operators per year equal 28,000 reports. These reports, requiring an average of 1 hour each to prepare, consume 28,000 reporting hours.

The estimated fully loaded hourly rate for an aircraft mechanic is \$83.27/hour. The FAA used the mean hourly wage for aircraft mechanics and technicians of \$36.25/hour¹. Adding a fringe of 29.7 percent² equals \$10.77/hour and an overhead of 100 percent per direct labor hour this total hourly rate is \$83.27 [\$36.25 + \$10.77 + \$36.25].

¹ <https://www.bls.gov/ooh/installation-maintenance-and-repair/aircraft-and-avionics-equipment-mechanics-and-technicians.htm>

² <https://www.bls.gov/news.release/pdf/ecec.pdf>

The total annualized cost to respondents is \$2,331,455. We base this on the 28,000 reporting hours times an estimated hourly rate of \$83.27/hour per respondent. The average cost to the respondents per AD per year is \$83.27 (\$2,331,455 divided by 28,000).

The information collection burden is a reporting burden only. AD record keeping is covered as follows: Title 14 §§ 43.9, 43.11, and 91.417 require each registered owner/operator to keep records regarding the work performed on each aircraft. The records must include the current status of applicable ADs including, for each, the method of compliance, AD number, and the revision date. If the AD requires future actions, the owner/operator must record the time and date the next action is required. The record-keeping burden of ADs is covered and approved in reports 2120-0005 (14 CFR part 91), and 2120-0020 (14 CFR part 43).

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	1,120		
# of Responses per respondent	25		
Time per Response	An average of 1 hour each to prepare		
Total # of responses	28,000		
Total burden (hours)	28,000 reporting hours		

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 Item 12 above.

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.

The total estimated annual cost to the Federal government is \$574,111.36. We determined this cost based on time required by FAA aviation safety engineers (ASE) to review the inspection reports. The typical ASE is an I-band, having an hourly wage listed in the table below dependent on the location of their aircraft certification office (ACO):

FAA ACO Office	I-Band Salary with Locality ³	Mean Salary per Hour
Anchorage	\$99,372 - \$154,013	\$60.91
Atlanta	\$92,964 - \$144,081	\$56.98
Boston	\$99,380 - \$154,025	\$60.91
Chicago	\$98,205 - \$152,204	\$60.19
Denver	\$97,806 - \$151,586	\$59.95
Fort Worth	\$95,570 - \$148,119	\$58.58
Los Angeles	\$102,294 - \$158,542	\$62.70
New York	\$103,349 - \$160,176	\$63.35
Seattle	\$98,506 - \$152,671	\$60.38
Wichita (Rest of US)	\$87,971 - \$136,343	\$53.92
Average Salary/hour		\$59.79

The annual estimate of 28,000 reports requires an average of 15 minutes each to review, totaling 7,000 total hours. For this ICR, the FAA is using the average pay over all ACOs of \$59.79 calculated based on the I-Band Salary with Locality³. For Federal salaries, the FAA uses a multiplier of 31.2² percent to account for benefits, resulting in an hourly rate of \$78.44/hour [\$59.79 + \$18.65]. The total annual salary cost to the Federal government is \$549,111.36 (\$78.44 x 7,000 hours). The estimated annual operational and support cost to review the report is \$25,000. Adding this, the total annual cost to the Federal government is \$574,111.36.

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

There was an adjustment in the costs to the respondents and Federal government. The annualized cost to the respondent and annualized cost to the Federal government have been updated with 2024 data available from the U.S. Bureau of Labor Statistics and FAA Pay Calculator.

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

³ https://my.faa.gov/sites/default/files/content/myfaa_pay_calculator/core_salary_with_conversion.xlsx

and ending dates of the collection of information, completion of report, publication dates, and other actions.

We have no plans for statistical use, and/or publication of this information. The results of the collection will not be made available to the FAA web pages because it is used only to determine if the corrective action will eliminate the unsafe condition or whether additional action must be mandated in another AD (see response to question 1 above).

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 do not seek approval to not display the expiration date of the OMB approval.

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

There are no exceptions.