Supporting Statement A Unmanned Aircraft Systems (UAS) Integration OMB #2120-0800

"The drone¹ industry is revolutionizing the future of aviation, expanding [the Federal Aviation Administration's] FAA's roles and responsibilities and sparking increased collaboration between the federal government and industry."² The FAA's lines of business (LOBs) are collaborating to collect the same flight data from proponents. The submissions are not statistical in nature but are designed to supply data that will help inform policy and standards related to drone pilots flying their aircraft beyond their visual line of sight. The data will be supplied by proponents who are flying complex operations beyond visual line of sight (BVLOS) of the pilot in command (PIC). The reporting requirements will be included in the conditions and limitations (C&Ls) of their operational approvals (e.g., certifications, exemptions, or waivers). The collection instruments include:

- (1) Unmanned Aircraft System (UAS) Monthly Flight Report
- (2) UAS Exemption Monthly Flight Report
- (3) UAS Automated Data Service Provider (ADSP) Monthly Report

The purpose of the UAS Integration Office's BEYOND program is for the FAA to team with selected state, local, tribal, and territorial (SLTT) governments to work toward full, safe integration of drones into the national airspace system (NAS). There are eight SLTT governments in the BEYOND program currently. The FAA Reauthorization Act of 2024 states the FAA Administrator shall consider expanding the BEYOND program to include additional SLTT governments.

In addition to submitting the appropriate monthly flight report required of all proponents with the C&L in their operational approvals, BEYOND program participants will submit additional operations data. The data submissions will provide both quantitative and qualitative information about the program participants' off-nominal events. The submissions are not statistical in nature but are designed to supply data that will help inform policy and standards related to drone pilots flying their aircraft beyond their visual line of sight. The collection instruments include:

(4) UAS Flight Anomaly Report

This revision includes the following changes:

1. The Partnership for Safety Plan (PSP) program was removed from the scope. The PSP program is no longer active.

¹ This document uses the term "drone" in place of "unmanned aircraft system" or "UAS" wherever feasible, in accordance with the principles and recommended practices contained in the *Gender-Inclusive Language Policy Statement* signed by the FAA Administrator and Deputy Administrator on November 4, 2021.

² Federal Aviation Administration. (2023). *Federal Aviation Administration Drone Integration Strategy and Roadmap* [2023-2028]. U.S. Department of Transportation, Federal Aviation Administration. 4.

- 2. The total number of information collections was reduced from 25 to 6.
- 3. Within the remaining 6 information collections:
 - a. The burden increased due to updated salary information from the U.S. Bureau of Labor Statistics' National Occupational Employment and Wage Estimates.
 - b. The burden decreased due to expecting fewer responses annually based on the number of responses received annually in the past two years.

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

Drones are new entrants into the NAS. The FAA needs to collect data about drone system performance to inform future rulemaking. From a more immediate, tactical perspective, the operational flight data serves as an indicator of whether the flights beyond the pilots' visual line of sight are safe, viable and/or scalable to broader geographic areas. The FAA collects flight data for complex drone operations being conducted under the following regulatory approvals:

- 49 U.S.C. §44807 exemptions
- 49 U.S.C. §40102(a) or 49 U.S.C. §40125 Certificates of Authorization (COAs)
- 14 CFR Part 107 waivers deemed to be medium or high risk
- 14 CFR Part 135 certificates

The purpose of the BEYOND program is for the FAA to work with SLTT governments to work toward full, safe integration of drones into the NAS. To fulfill this purpose, the FAA needs to collect operational data from the program participants to identify trends in the reliability of detect and avoid (DAA) systems, communication links, and navigation links. The flight data and anomaly data combined will identify potential hazards and the level of risk associated with those hazards.

The memoranda of agreement (MOAs) with the BEYOND participants will be entered into under the authority of 49 U.S.C. § 106(I) and (m), which authorizes agreements and other transactions on such terms and conditions as the FAA determines necessary.

- 49 U.S.C. § 106(I)(6) states, "The Administrator is authorized to enter into and perform such contracts, leases, cooperative agreements, or other transactions as may be necessary to carry out the functions of the Administrator and the Administration. The Administrator may enter into such contracts, leases, cooperative agreements, and other transactions with any Federal agency (as such term is defined in section 551(1) of title 5) or any instrumentality of the United States, any State, territory, or possession, or political subdivision thereof, any other governmental entity, or any person, firm, association, corporation, or educational institution, on such terms and conditions as the Administrator may consider appropriate."
- 49 U.S.C. § 106(m) states, "With the consent of appropriate officials, the
 Administrator may, with or without reimbursement, use or accept the services,

equipment, personnel, and facilities of any other Federal agency (as such term is defined in section 551(1) of title 5) and any other public or private entity. The Administrator may also cooperate with appropriate officials of other public and private agencies and instrumentalities concerning the use of services, equipment, personnel, and facilities. The head of each Federal agency shall cooperate with the Administrator in making the services, equipment, personnel, and facilities of the Federal agency available to the Administrator. The head of a Federal agency is authorized, notwithstanding any other provision of law, to transfer to or to receive from the Administration, with or without reimbursement, supplies, personnel, services, and equipment other than administrative supplies or equipment."

- 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.
 - A. The FAA requires proponents operating under complex operational approvals to submit monthly flight data reports.
 - (1) UAS Monthly Flight Report
 - (2) UAS Exemption Monthly Flight Report

The monthly flight reports will be required if the reporting requirement is a condition and limitation of the operational approval. Proponents will submit data about each operational, flight check, and training flight that they launched during the month.

To date, the FAA has used the information from the flight reports to determine the rate of off-nominal events, to assess the repeatability and scalability of the drone operations, and to evaluate the effectiveness of different types of mitigations.

- B. The FAA requires ADSPs to submit operational data reports.
 - (3) UAS ADSP Monthly Report

If, when completing a monthly flight report, a proponent indicates that they used the services of an ADSP, the identified ADSP will complete a UAS ADSP Monthly Report to confirm that their service met the requirements specified in the service level agreement with the proponent. The FAA will use the data to monitor the reliability of the ADSP services. This is a new instrument. The FAA has not collected this ADSP data yet.

(4) UAS Flight Anomaly Report

Proponents will submit a UAS Flight Anomaly Report when there is an off-nominal event during a flight that does not meet the reporting criteria of an accident, incident, or occurrence but requires a mitigation strategy or the aircraft exceeds its operational boundaries.

To date, the FAA has used the information from the UAS Flight Anomaly Report to determine the rate of off-nominal events, identify the most prevalent types of

anomalies, and monitor the effects of the anomalies on the planned flights.

The proliferation of drones in the NAS in recent years has been extraordinary and is unprecedented. Congress is focused on UAS matters, has recently legislated on the topic, and is expected to do so again. The applications of both commercial and "hobbyist" UAS, or "drones", are numerous, as are the concerns and interests of the various stakeholders. The FAA is managing these new entrants through our activities to further UAS integration into the nation's airspace, which includes developing new regulations, engaging UAS stakeholders through groups such as the Drone Safety Team, and evaluating UAS detection technology in support of UAS mitigation interests within the safety and security purview of the U.S. Government. The Defense Department and other Federal agencies, including the Federal Communications Commission, are also actively engaged in UAS integration and management efforts.

As these efforts continue to be front of mind for State, Local, and Federal Agencies, the FAA anticipates that aspects of the information collected as part of this effort will be disseminated to the public or used to support publicly disseminated information through reports to Congress, the White House, or other agencies as appropriate. The UAS Integration Office (AUS) 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 in accordance with 5 CFR Subpart C 930.301, Information Security Responsibilities for Employees who Manage or Use Federal Information Systems, and FAA information systems rules and procedures.

The final purpose of collecting information in each area is to potentially compile final reports for the BEYOND program including each of the aspects listed individually for each area. See the 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.

No part of any of the data collections will have questions regarding race or ethnicity.

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.

All information collections will be submitted electronically to the FAA's Aeronautical Data Exchange (ADX). Electronic collection instruments will also be provided within ADX for proponents and the BEYOND program participants to download and use in submitting their data.

Because the collection instruments are dynamic and applicable only to specific proponents and the BEYOND program participants, they will not be available for public printing off the Internet.

The results of the information collections may be made available to the public over the Internet, but all confidential or proprietary information will be protected as required by law and in line with requirements in the Freedom of Information Act.

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.

To determine the operational data needed to support UAS policymaking, the UAS Integration Office (AUS) collaborated with representatives from the exemption team and the rulemaking team to identify their specific data needs and whether the information has already been collected or is being collected.

- The AUS team will collect the aircraft manufacturer and model information from the FAADroneZone (OMB Control Number 2120-0765) for UAS weighing less than 55 pounds or AC Form 8050.1 (OMB Control Number 2120-0042) for UAS weighing more than 55 pounds.
- 5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

To determine the operational data needed to support UAS policymaking, the UAS Integration Office (AUS) collaborated with representatives from the exemption team and the rulemaking team to identify their specific data needs and whether the information has already been collected or is being collected. The teams agreed that the participants need only to provide aggregated flight reports each month. In other words, they will report all flights under a particular approval document or by a particular drone as a monthly total rather than listing each flight individually.

The AUS team will standardize the data to its preferred format upon receipt of the data. Instead of using an online form to submit flight data one flight at a time, the AUS team developed an Excel form to enable the program participants to bulk upload all the flight data at once. When participants need to report an anomalous flight, they will use a dynamic form that limits the questions to the anomaly (or anomalies) that they select.

In addition, all efforts will be made to ensure that the requested data is collected and submitted electronically, further reducing the time and burden of the compliance.

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 frequency of the operational flight and ADSP reports is monthly. If the collection is less frequent, safety or performance issues that need to be addressed will go unidentified. In addition, the FAA activities to integrate UAS into the NAS are ongoing. If teams must wait for data, it will slow their progress.

- (1) UAS Monthly Flight Report
- (2) UAS Exemption Monthly Flight Report
- (3) UAS ADSP Monthly Report

The trigger to submit a flight anomaly report is an off-nominal event that requires a

mitigation or an event in which the aircraft exceeds its operational boundaries. If this report is eliminated, the FAA loses a valuable opportunity to identify safety concerns that should be addressed to ensure the continued safety of the NAS.

(4) UAS Flight Anomaly Report

In summary, the frequency of reporting chosen is meant to provide a balance between burdening the program participants and providing the FAA with needed data to inform its policy and decision-making. The UAS industry evolves quickly and there is impetus to integrate these operations into the NAS as quickly as possible.

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

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document; requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

The frequency of the UAS Monthly Flight Report, UAS Exemption Monthly Flight Report, and UAS ADSP Monthly Report submissions is set at monthly to align with the reporting frequency in documents such as waivers and exemptions. This data is important to assess the safety of each participants' flight operations and provides important information about the reliability of the ADSP.

All other data collections will be conducted in a manner consistent with guidelines in 5 CFR 1320.5 (d)(2).

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.

The Federal Register Notice (FAA-2024-2158) received no public comments.

Participants in the BEYOND program are consulted throughout the process of developing their MOA with the FAA. These agreements describe the program data collections, requirements, and frequency of reporting in detail. The participants are given multiple opportunities to object to or suggest changes to any parts of the agreements that they feel will be an excess burden or if they will be unable to collect or report specific data elements.

The operational data went through extensive, months-long processes to gather input from internal FAA stakeholders and program participants regarding the data needs of FAA, concerns about collection burdens, the format and instructions of the collection instruments, how data would be used, and privacy concerns. Program participants also have ample opportunity during the programs to raise any concerns that may arise and work with the FAA to resolve them.

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

There will be no payments or gifts to respondents.

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

The MOAs detail specific actions that the FAA and participants must take to protect proprietary, privileged or otherwise confidential information that may come into their possession as a result of the agreements.

"The parties agree to protect from release information that is proprietary, privileged, or otherwise confidential to the extent permitted by law. The FAA will protect data and or information in its possession in accordance with requirements and procedures set forth under the Freedom of Information Act, 5 U.S.C. § 552, and any other applicable law, including but not limited to the Trade Secrets Act, 18 U.S.C. § 1905. Each party agrees to mark data as prescribed in Article 6, Section f, and other information as "proprietary" or

"confidential," in a manner that is immediately apparent. Each party shall maintain, and to the extent necessary reproduce, any and all restrictive markings set forth on, applied to, and/or associated with, the information provided by the other party."

Additionally, the FAA has taken the following steps to protect the information.

- 1. Only authorized AUS staff have direct access to the program participants' folders in the UAS Community on the Aeronautical Data Exchange (ADX).
- 2. No raw data from ADX is shared internally within FAA, outside the AUS staff except that which is required in accordance with waivers, authorizations, or exemptions. With the exception just noted, only data that has been processed to omit records with data quality errors and remove the proponents' names is made available, upon request, to other FAA offices. All responses to the internal requests are marked with "Proprietary Information—Internal FAA Use Only."
- 3. The AUS team refers Freedom of Information Act (FOIA) requests from outside entities to the appropriate FOIA staff and the applicant. If information is a trade secret or confidential commercial/financial information, it will be treated as such. The FAA will protect what proponents consider proprietary unless it determines that no legal basis exists for withholding the information. This applies even if not marked proprietary/confidential. The proponents have two opportunities to protect data during a FOIA request response. The FAA will send the information to the proponents for "submitter review" before releasing. At this point, the proponents can notify the FAA of information that is to be withheld if any documents were not marked proprietary/confidential. If the FAA disagrees and still plans to release the information, the FAA will notify the proponents at least ten days before releasing the information.
- 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 will be no questions of a sensitive nature.

- 12. Provide estimates of the hour burden of the collection of information. The statement should:
 - Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices. * If this request

- for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under item 13.

Total Burden

Report/ Form	Affected Public	Frequency	Number of Respondents	Total Number of Responses	Estimated Average Burden Per Response (hours)	Estimated Total Annual Burden (hours)
Operational Dat	ta					
UAS Monthly Flight Reports	Proponents with approval documents that include flight reporting C&Ls and BEYOND participants	Monthly	15.00	180.00	1.00	180.00
UAS ADSP Monthly Reports	ADSPs that have service level agreements with proponents that submit UAS Monthly Flight Reports	Monthly	10.00	120.00	1.50	180.00
UAS Anomaly Reports	Proponents with approval documents that include event reporting C&Ls and BEYOND participants	On Occasion - Assuming 5 annually per proponent	15.00	75.00	1.00	75.00
		Totals	40.00	375.00	1.16	435.00

A. OPERATIONAL DATA REPORTS

(1) UAS Monthly Flight Reports

Proponents with approval documents that include flight reporting C&L and BEYOND participants and their team members will submit these reports. Based on current numbers, there will be an estimated 15 total respondents. It typically takes between 30 and 50 minutes to complete flight data reports using the electronic system. Upload times

typically take from 3 to 5 minutes. To ensure we calculate the maximum burden, we used 1 hour each for the flight reports. As the data is submitted monthly, each proponent will submit flight data 12 times annually at maximum. This calculates to a maximum burden of 180 hours annually. Recordkeeping was not calculated as the reported data should be collected by the participants as a normal course of business. The respondents will be employees of the proponents and the BEYOND participants and are likely to be in roles like a Management Analyst³ or Project Management Specialist⁴ role, whose average salaries are \$55.54 and \$50.44/hour respectively. Assuming the higher cost brings the total maximum cost burden for this data collection to \$9,997.20.

15 respondents x 12 responses per respondent = 180 responses 180 responses x 1 hour = 180 hours 180 hours x \$55.54 per hour = \$9,997.20

Summary (Annual numbers)	Reporting	Recordkeeping
# of Respondents	15	
# of Responses per respondent	12	
Time per Response	1 hour	
Total # of responses	180	
Total burden (hours)	180	

(2) UAS ADSP Monthly Reports

Automated Data Service Providers (ADSPs) that have service level agreements with proponents that submit UAS Monthly Flight Reports will submit these reports. Based on current numbers, there will be an estimated 10 total respondents. It typically takes between 60 and 90 minutes to complete ADSP reports using the electronic system. Upload times typically take from 3 to 5 minutes. To ensure we calculate the maximum burden, we used 1.5 hours each for the ADSP reports. As the data is submitted monthly, each ADSP will submit data 12 times annually at maximum. This calculates to a maximum burden of 180 hours annually. Recordkeeping was not calculated as the reported data should be collected by the participants as a normal course of business. The respondents will be employees of the ADSPs and are likely to be in roles like a Management Analyst⁵ or Project Management Specialist⁶ role, whose average salaries are \$55.54 and \$50.44/hour

³ Salary information taken from the U.S. Bureau of Labor Statistics, May 2023 National Occupational Employment and Wage Estimates United States at https://www.bls.gov/oes/current/oes131111.htm

⁴ Salary information taken from the U.S. Bureau of Labor Statistics, May 2023 National Occupational Employment and Wage Estimates United States at https://www.bls.gov/oes/current/oes131082.htm

⁵ Salary information taken from the U.S. Bureau of Labor Statistics, May 2023 National Occupational Employment and Wage Estimates United States at https://www.bls.gov/oes/current/oes131111.htm

⁶ Salary information taken from the U.S. Bureau of Labor Statistics, May 2023 National Occupational Employment and Wage Estimates United States at https://www.bls.gov/oes/current/oes131082.htm

respectively. Assuming the higher cost brings the total maximum cost burden for this data collection to \$9,997.20.

10 respondents x 12 responses per respondent = 120 responses 120 responses x 1.5 hours = 180 hours 180 hours x \$55.54 per hour = \$9,997.20

Summary (Annual numbers)	Reporting	Recordkeeping
# of Respondents	10	
# of Responses per respondent	12	
Time per Response	1.5 hours	
Total # of responses	180	
Total burden (hours)	180	

(3) UAS Anomaly Reports

Proponents with approval documents that include event reporting C&Ls and BEYOND participants could complete these reports, so there will be up to 15 respondents combined. The number of responses per respondent depends on the number of anomalies that occur each year. To ensure calculation of the maximum burden, we estimated the annual number of responses per respondent will be 5 per year. The time per response depends on the type of anomaly that occurred and the impact of the anomaly. At a minimum, the respondent would be required to answer 8 questions. For an anomaly involving multiple system failures, the respondent would be required to answer up to 25 questions. Each question should take 1-2 minutes to answer. Using the maximum burden of 25 questions and 2 minutes per question, it should take 50 minutes to complete the form. Upload times typically take from 3 to 5 minutes. Therefore, to ensure we calculated the maximum burden, we used 1 hour. Recordkeeping was not calculated as the reported data should be collected by the participants as a normal course of business. The respondents will be employees of the proponents and BEYOND participants and are likely to be in roles like a Management Analyst or Project Management Specialist⁸ role, whose average salaries are \$55.54 and \$50.44/hour respectively. Assuming the higher cost brings the total maximum cost burden for this data collection to \$4,165.50.

15 respondents x 5 responses per respondent = 75 responses

⁷ Salary information taken from the U.S. Bureau of Labor Statistics, May 2023 National Occupational Employment and Wage Estimates United States at https://www.bls.gov/oes/current/oes131111.htm

⁸ Salary information taken from the U.S. Bureau of Labor Statistics, May 2023 National Occupational Employment and Wage Estimates United States at https://www.bls.gov/oes/current/oes131082.htm

75 responses x 1 hour = 75 hours 75 hours x \$55.54 per hour = \$4,165.50

Summary (Annual numbers)	Reporting	Recordkeeping
# of Respondents	15	
# of Responses per respondent	5	
Time per Response	1 hour	
Total # of responses	75	
Total burden (hours)	75	

Total Cost

The total cost of the data collections for the respondents is estimated to be \$97,472.70 based upon the assumptions cited.

Data Collection	Cost
(1) UAS Monthly Flight Reports	\$9,997.20
(2) UAS ADSP Monthly Reports	\$9,997.20
(3) UAS Anomaly Reports	\$4,165.50
TOTAL	\$24,159.90

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

The costs to the proponents and BEYOND participants to store the data and submit it to the FAA would be virtually \$0. The information will be housed on systems the participants already own, and uploaded using software and internet services for which they already pay and use for their own purposes. The FAA has provided the Aeronautical Data Exchange (ADX) system to house the forms and templates to be completed, and to act as the data repository for the participants to relieve any potential burden.

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 UAS Integration Office (AUS) includes federal and contract employees responsible for review, analysis, and interpretation of information collected in these data collections. This work is expected to consume, at most, 10% of annual work time for the following staff: seven federal project managers, with an average expected salary no more than \$192,056 per year⁹ and two contractor analysts, with an average expected salary no more than \$115,530 per year¹⁰. There will also be one federal data analyst, with an average expected salary no more than \$91,135 per year¹¹, who will spend approximately 50% of their time reviewing, analyzing, interpreting, developing reports and other data-related tasks related to the flight and anomaly data.

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7 federal project managers x $192,056 per year = $1,344,392 (10% = $134,439) 2 contract analysts x $115,530 per year = $231,060 (10% = $23,106) 1 federal data analyst x $91,135 per year = $91,135 (50% = $45,568)
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This comes to a maximum total of \$203,113 per year.

Project managers and contractor analysts may be required to travel to meet with the BEYOND participants to discuss their operations, future plans, and data submissions. We estimate that each employee will travel once or twice per year, so average that to 1.5 trips per staff member per year. At an average cost of \$2,000 per trip multiplied by 9 staff members, that will cost approximately \$27,000 per year. As the trips will not primarily be for the purpose of discussing data collection requirements and submissions, we will assume that only half the cost will be related to the data collection elements of the BEYOND program, which calculates to \$13,500 per year.

In total, the data collections are expected to cost the Federal Government \$216,613 per year.

The estimated costs to the Federal Government are as follows:

Direct Labor Costs

Project managers: \$134,439
Contract analysts: \$23,106
Data analyst: \$45,568

Total Direct Labor: \$203,113

⁹ Salary based on the maximum salary for an FAA J-Band employee using the 2024 pay levels and the Washington, DC locality. https://my.faa.gov/employee_services/pay_perf/pay/pay-tables

¹⁰ Salary information taken from the U.S. Bureau of Labor Statistics, May 2023 National Occupational Employment and Wage Estimates United States at https://www.bls.gov/oes/current/oes131111.htm. Salary based on Management Analyst annual mean wage.

¹¹ Salary based on the maximum salary for an FAA F-Band employee using the 2024 pay levels and the Washington, DC locality. https://my.faa.gov/employee_services/pay_perf/pay/pay-tables

Other Direct Costs

Travel and Related Costs: \$13,500

Other Direct Cost Total: \$13,500

<u>Total Cost:</u> \$216,613

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

The collection no longer includes the Partnership for Safety Plan (PSP) program participants. The current memoranda of understanding (MOUs) for the program participants do not include reporting requirements. The narrative reports have been removed from the collection. The UAS Integration Office will develop new narrative reports for the expansion of the BEYOND program. When the new narrative reports are ready, an amendment to this collection will be submitted. The collection includes new respondents: proponents that receive operational approvals that contain reporting requirements in the C&Ls, particularly the exemption holders. The reason for adding this group of respondents is for the FAA to be able to monitor the effectiveness of the mitigations required in the C&Ls using a common form. Based on the change in respondents and current data analysis needs, the number of instruments has been reduced from 19 to 6. This reduces the total annualized cost for the respondents from \$608,300.68 to \$24,159.90. It reduces the total annualized cost for the Federal government from \$366,764.33 to \$216,613.

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 collection of information will not be published.

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.

Not seeking approval to not display the expiration date for the OMB approval.

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

No exceptions.