

Supporting Statement A
Certification: Mechanics, Repairman, Parachute Riggers
OMB 2120-0022

Summary of Change:

This revision requests the addition of a new information collection instrument for Inspection Authorization (IA) renewal course acceptance, and includes a new form, FAA Form 8610-6. The information collection for IA renewal course acceptance does not contain privacy information and is discussed separately from the airman application forms of this collection. In applicable areas, the following headers were added to identify the information in the collection:

- AIRMEN APPLICATION INFORMATION COLLECTION
- IA RENEWAL COURSE ACCEPTANCE INFORMATION COLLECTION

The information related to Airman Application information collection (approved in March 2022) is updated with new FAA labor costs; 2022 wages were applied to all of FAA burden estimates.

Revised Privacy Act Statements (PASs) were applied to FAA Forms 8610-1, 8610-2, and 8610-3 to correct some errors found on the previous statements. The revised PASs and forms have been uploaded to ROCIS.

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, Sections **44702** and **44703**, empower the Administrator of the Federal Aviation Administration to issue airman certification and to specify the terms, conditions, and limitations, and to authorize the regulations that prescribe the reporting requirement discussed in this supporting statement.

Title 14, Code of Federal Regulations, **part 65** (14 CFR part 65) prescribes, among other things, rules governing the issuance of certificates and associated rating for mechanic, repairman, and parachute riggers certificates, and issuance and renewal of mechanic certificate inspection authorizations (including inspection authorization course acceptance):

Subpart A – General,

65.11, Application and issue.

65.19, Retesting after Failure.

Subpart D – Mechanics, § 65.75 through § 65.95

Mechanics – § 65.75 - § 65.89

Inspection Authorization – § 65.91 through § 65.95

- Section 65.93 prescribes several methods by which a mechanic with an IA can comply with the biennial renewal requirement.

- o Section 65.93(a)(4) specifies that, mechanics with an IA can complete a refresher course(s), acceptable to the Administrator, of not less than 8 hours of instruction for each year of the two-year renewal requirement.

Subpart E – Repairmen, § 65.101 through § 65.107

Repairmen (Air Carrier and Repair Station) – § 65.101 through § 65.103

Experimental Aircraft Builder Repairman – § 65.104 through § 65.105

Light Sport Repairman – § 65.107

Subpart F – Parachute Riggers

This collection of information supports the Department of Transportation's strategic goal for *Safety: Reduce Transportation-Related Fatalities and Serious Injuries Across the Transportation System*.

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.

AIRMEN APPLICATION INFORMATION COLLECTION

14 CFR § 65.11 requires that applications for a certificate or rating under this part be made on a form and in a manner prescribed by the FAA Administrator. The instruments (forms) described below are submitted by the applicant, to the FAA, by way of the local Flight Standards Office. The airman application forms included in this collection are:

- **FAA Form 8610-1**, Mechanic's Application for Inspection Authorization
- **FAA Form 8610-2**, Airman Certificate and/or Rating Application – Mechanic and Parachute Rigger
- **FAA Form 8610-3**, Airman Certificate and/or Rating Application – Repairman¹

Use of the Airman Applicant Information Collected

The information collected on the airman application forms is, and has been, used by the FAA to determine eligibility for a mechanic, repairman, or parachute rigger certificate and/or rating, or a mechanic certificate inspection authorization. Application and certification is necessary to ensure qualifications of the applicant.

Mechanics (Part 65, Subpart D) – Reporting requirement.

Applicants for a mechanic certificate or added rating are required to submit, *FAA Form 8610-2, Airman Certificate and/or Rating Application – Mechanics and Parachute Riggers* to the FAA.

- FAA Form 8610-2 is attached.
 - Refer to the attachment "**Part 65 Forms-Details of IC**", for a summary of the information requested on the form, and the FAA business need for the information.

¹ This collection is requesting approval of a new form to collect repairman applicant information previously collected on FAA Form 8610-2.

- Submission of the form is done on an as-needed basis, when an applicant is making original application for a mechanic certificate, or is requesting an added rating or other change to a previously issued mechanic certificate.
 - Examples of other changes include name, gender, and nationality changes, etc. which must be submitted to the FAA on FAA form 8610-2.
- Respondents are either individuals who have civil/military experience in maintaining aircraft, or are students who have graduated from an Aviation Maintenance Technician School certificated by the FAA under 14 CFR part 147.
- Responding to this collection is required in order to obtain and/or retain a benefit (i.e., a mechanic certificate and/or rating).

Parachute Riggers (Part 65, Subpart F) – Reporting and Recordkeeping requirements.

Reporting Requirement - Applicants for a parachute rigger certificate or added rating are required to submit *FAA Form 8610-2, Airman Certificate and/or Rating Application – Mechanics and Parachute Riggers*, to the FAA.

- FAA Form 8610-2 is attached.
 - Refer to the attachment “**Part 65 Forms-Details of IC**”, for a summary of the information requested on the form, and the FAA business need for the information.
- Submission of the form is done on an as-needed basis, when an applicant is making original application for a parachute rigger certificate, or is requesting an added rating or other change to a previously issued parachute rigger certificate.
 - Examples of other changes include name, gender, and nationality changes, etc. which must be submitted to the FAA on FAA form 8610-2.
- Respondents are individuals who have civil/military experience in maintaining and packing parachutes.

Recordkeeping requirement - Certificated parachute riggers must also keep records, as required by §65.131. This is a mandatory requirement of the certificate holder.

- A record is maintained by the parachute rigger that describes the parachute being packed, maintained, or altered. The record must include a description of the work done to the parachute, and the date and place where the work was performed.
- The records must be kept for at least 2 years after the date each was made.
- Parachute riggers must also attach a record to each parachute packed, to include the date and place of the packing, any defects found, and the riggers name and certificate number.
- Responding to this collection (reporting and recordkeeping) is required in order to obtain and/or retain a benefit (i.e., a parachute rigger certificate and/or rating).

Section 65.19, Retesting after Failure – Reporting Requirement

Mechanic and parachute rigger applicants must pass FAA knowledge and practical tests, with a minimum passing grade of 70%, to be eligible for certificate issuance.

- Applicants may retest 30 days after failing a test.
- If an applicant desires to test prior to 30 days from the test failure, they must present a signed statement from an airman holding the certificate and rating sought by the applicant,

certifying that the airman has given the applicant additional instruction in each of the subjects failed, and that the airman considers the applicant ready for retesting.

- Responding to this collection is required in order to obtain and/or retain a benefit (i.e., do a retest of a failed FAA test, prior to 30 days from the test failure).

Inspection Authorization Application and Renewal (§ 65.91 through § 65.95) – Reporting requirement.

Individuals who hold, and have held, a FAA mechanic certificate for at least 3 years and meet other additional requirements, are eligible to apply for an Inspection Authorization (IA). Applicants for an IA are required to submit *FAA form 8610-1, Mechanic's Application for Inspection Authorization* to the FAA.

- FAA Form 8610-1 is attached. This is a reporting requirement.
 - Refer to the attachment “**Part 65 Forms-Details of IC**”, for a summary of the information requested on the form, and the FAA business need for the information.
- Initial submission of the form is done on an as-needed basis, when an applicant is making original application for an inspection authorization (IA).
- The authorization must be renewed every 2 years (§65.93(a)). In March of each odd year (e.g. March 2021), current holders of an IA must make application for renewal using FAA Form 8610-1.
- Respondents are individuals who hold and have held a FAA mechanic certificate for at least 3 years.
- Responding to this collection is required in order to obtain and/or retain a benefit (i.e., an inspection authorization).

Repairmen (Subpart E) – Reporting requirements.

Applicants for a repairman certificate or added rating are required to submit *FAA Form 8610-3, Airman Certificate and/or Rating Application – Repairman*, to the FAA.

- FAA Form 8610-3 is attached.
 - Refer to the attachment “**Part 65 Forms-Details of IC**”, for a summary of the information requested on the form, and the FAA business need for the information.
- Submission of the form is done on an as-needed basis, when an applicant is making original application for a repairman certificate, or is requesting an added rating or other change to a previously issued repairman certificate.
 - Examples of other changes include name, gender, and nationality changes, etc. which must be submitted to the FAA on FAA form 8610-3.
- There are 3 types of repairman certificates available:
 - 65.101 Repairmen are employed by an FAA certificated Air Carrier or Repair Station.
 - Respondents are individuals with training or experience in conducting specific maintenance tasks on behalf of the air carrier or repair station.
 - 65.104 Repairmen are builders of an experimental aircraft.
 - Respondents are typically owners of the experimental aircraft for which they were the primary builder.
 - 65.107 Repairman maintain light-sport aircraft. There are two ratings available: Inspection Rating and Maintenance Rating.

- Respondents for the Inspection Rating are aircraft owners. The respondent must attend a 16 hour training course acceptable to the FAA and may only exercise the privileges of the rating on the specific light-sport aircraft owned by the certificate holder.
- Respondents for the Maintenance Rating are individuals who will perform maintenance and inspection on other owner's light-sport aircraft. The respondent must complete a training course acceptable to the FAA, on maintaining the particular class of light-sport aircraft for which they intend to exercise the privileges of the rating. Training courses must provide the following minimum hours:

Class of Light-Sport Aircraft	Minimum Hours of Instruction
Airplane	120
Weight-shift Control aircraft	104
Powered Parachute	104
Lighter than Air	80
Glider	80

- Responding to this collection is required in order to obtain and/or retain a benefit (i.e., a repairman certificate and/or rating).

Respondents submit the FAA airmen application forms in this collection to local FAA Flight Standards offices, for review by the FAA, to determine the applicant's eligibility. If all eligibility requirements are met, the FAA issues a temporary certificate to the applicant. All applications, including a copy of the temporary airman certificate, are sent to the FAA's Foundational Business, Airmen Certification Branch.

- The Airmen Certification Branch issues and mails a permanent airman certificate to the airman.
- The Airman Certification Branch maintains the information and safeguards it from improper access, modification, and destruction, consistent with FAA standards for confidentiality, privacy, and electronic information.
- The Airmen Certification Branch makes some information available to the public via a database accessed through [www.faa.gov](https://www.faa.gov/licenses_certificates/airmen_certification/) (https://www.faa.gov/licenses_certificates/airmen_certification/). The database provides limited information including the airman's name, address, and any certificates and ratings issued by the FAA.
- The maintenance and dissemination of the data is described in DOT/FAA System of Records Notice (**SORN**) **847, Aviation Records on Individuals** (attached).

IA RENEWAL COURSE ACCEPTANCE INFORMATION COLLECTION

Section 65.93(a)(4) specifies that, mechanics with an IA can complete a refresher course(s) *acceptable to the Administrator*, of not less than 8 hours of instruction for each year of the two-year renewal requirement. Respondents who are requesting FAA acceptance of an IA renewal course are required to submit *FAA Form 8610-6, IA Refresher Course Acceptance Request* to the FAA.²

² This collection requests approval of a new form to collect information from IA refresher course providers and applicants. Previously, an unapproved submittal form was used.

- FAA Form 8610-6 is attached. This is a reporting requirement.
- Initial submission of the form is on an as-needed basis, when a course provider is requesting initial FAA acceptance of the IA renewal course.
- Course acceptance must be renewed every 4 years, by re-submitting the form.
- If significant changes are made to the course prior to the 4-year renewal, the course provider must re-submit the course for FAA acceptance, using the form.
- Respondents submit their completed and signed form to the FAA's Inspection Authorization Refresher Course Coordinator (IA RCC), in the Flight Standards Aircraft Maintenance Division.
- There is also a recordkeeping requirement for IA renewal course providers, to maintain course completion records for 3 years. The FAA could request to inspect the training records of the course provider to verify the training of IA applicants using the training course to meet the renewal requirements.

The IA Refresher Course Acceptance forms are submitted to the FAA Flight Standards, Aircraft Maintenance Division (AFS-300), who has the administrative responsibilities for the IA refresher course program.

The purpose of the IC is to ensure that IA mechanics receive refresher training appropriate to their job responsibilities, thus qualifying those IA mechanics for renewal under § 65.93(a)(4). The information collection requires reporting to obtain the initial course acceptance including certain information about the course and the course provider.

The following information is collected on FAA Form 8310-6:

- The course providers contact information
- A training course outline (TCO) showing the course curriculum subject areas to be presented, with references to any related technical or regulatory material.
- The TCO includes the length of presentation times for each subject area presented in the course.
- The course should contain one or more of the following subject areas: aircraft maintenance training topics, FAA regulations, policy that directly relates to the maintenance, inspection, repair, or alteration of aircraft products, systems, components, or accessories. Other acceptable topics might be human factors, Safety Management Systems as they relate to aircraft maintenance and could also contain curriculum subjects and course topics taught by 14 CFR part 147 Aviation Maintenance Technician Schools.
- Course providers should also describe how they keep a record of a training attendee's contact information, training completion, and credit awarded for a period of 3 years.

Concurrent with publication of Form 8610-6, the FAA will publish an update of FAA Order 8900.1, Volume 3 Chapter 56 Section 1, Information and Policy for Acceptance and Renewal of Inspection Authorization Refresher Training.

This collection is required to obtain or retain a benefit (i.e., the ability to provide creditable IA refresher training for IA renewals). Respondents are persons or entities desiring to provide IA refresher courses that are creditable for IA renewal.

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.

AIRMEN APPLICATION INFORMATION COLLECTION

FAA Form 8610-1 can be completed either via paper or via the Integrated Airman Certification and Rating Application (IACRA), a web application that facilitates the electronic submission of many information collections related to airman certification. 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. It automatically ensures that applicants meet regulatory and policy requirements.

All forms are available in electronic format and can be downloaded off the FAA's website, here: <https://www.faa.gov/forms/>. Forms are .pdf fillable and can be signed either electronically, or "pen-and-ink". Forms may be submitted via email, regular mail, or in person.

The information collected via IACRA is the same as what is request on the FAA Form, but the respondent enters the information into structured data fields, or by answering questions. The answers are used to fill out the form fields automatically. IACRA improves the airman certification process by checking for data errors that cause rejected applications. The certification processing time is reduced since the applicant, and inspector/examiner can complete the airman application online and can submit the completed application directly to the FAA's airman records office electronically.

The FAA it is working to incorporate the 8610-2 and -3 forms into IACRA. The IACRA website will references this IC. The website can be found here: <https://iacra.faa.gov/IACRA/Default.aspx>

IA RENEWAL COURSE ACCEPTANCE INFORMATION COLLECTION

In response to the Government Paperwork Elimination Act (GPEA), FAA Form 8610-6 is available in electronic format and can be downloaded from <http://www.faa.gov/forms>. The form is electronically fillable, signable, and fileable. The form and substantiating documents, as well as course acceptance notifications, are done via email. Only the courses found acceptable will be listed on the Master IA Refresher Course Database (Refer to question 16 for link to this list).

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.

We have reviewed other FAA public use reports and find no duplication. We know of no other entity collecting similar information for certification of mechanics, repairman, or parachute riggers, for issuing or renewing inspection authorizations or providing IA renewal course acceptance. The information collected is only available from the applicants applying for an airman certificate, rating, or inspection authorization, or IA renewal course provider, under 14 CFR part 65. No similar information is available without the applicants providing it.

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

The airman application information collection does not involve small businesses, only individuals who are required to complete an application form in order to obtain or retain a benefit.

The IA renewal course acceptance information collection is a function of the number of refresher training courses that a course provider wants to offer. Small businesses or individuals compete in this field but typically offer a limited number of courses tailored to a specific region or type of course content and consequently have fewer submissions.

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.

AIRMEN APPLICATION INFORMATION COLLECTION

If the collection of this information were not conducted, the FAA would not be able to determine applicant eligibility and qualifications for issuance of a certificate, rating, or inspection authorization. Without this determination, the appropriate certification or inspection authorization could not be issued.

If parachute records were not required to be kept by parachute riggers, the user of the parachute could not determine the parachutes airworthiness prior to using the parachutes. This could result in an unairworthy and/or unsafe parachute being unintentionally used.

IA RENEWAL COURSE ACCEPTANCE INFORMATION COLLECTION

If the applicants do not submit the information requested by FAA Form 8610-6, the FAA would have no basis to determine if the courses offered by said applicants are acceptable to meet the renewal requirements of § 65.93(a)(4). The FAA estimates that approximately 74 percent of IA renewals are done using the refresher course method, therefore failure to provide the requested information would have a decidedly negative effect on the IA Mechanic 2-year renewal process. The desired outcome of the IC is to ensure that IA mechanics are properly trained and current in their job knowledge to work in the aviation transportation industry.

If the information collection was conducted less frequently the FAA would not be confident of a course's acceptability as aviation technology evolves and regulations sometimes change.

7. Explain any special circumstances.

There are no special circumstances.

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission.

AIRMEN APPLICATION INFORMATION COLLECTION

A 60 day notice was published in the *Federal Register* on August 19, 2020, (85 FR 51144). No comments were received.

A 30 day notice was published in the *Federal Register* on December 18, 2020 (85 FR 82570).

IA RENEWAL COURSE ACCEPTANCE INFORMATION COLLECTION

Initially the FAA was going to request approval for IA renewal course acceptance information collection under a new OMB approval. For this reason, separate 60 and 30 days notices were published in the Federal Register. It was later determined that it would be more appropriate to revise the existing OMB approval (2120-0022) for part 65.

A 60-day Federal Register Notice was published on April 29, 2021, (86 FR 22758). No comments were received.

A 30-day Federal Register Notice was published on March 2, 2022, (87 FR 11803).

Additionally, the FAA requested respondent feedback on the information collection as follows:

Instrument	FAA Form 8610-1		FAA Form 8610-2		FAA Form 8610-3	Failure 65.19	Training 65.107	IA Course Acceptance	
# of Respondents (annually)	1855	10826	11000	360	3280	1136	200	35	28,692
Responses per respondent	1	1	1	1	1	1	1	8	--
Total # of Responses	1855	10826	11000	360	3280	1136	200	280	28,937
	12681		11360						
Time per Response (hours)	.33	.33	.33	.33	.33	.167	55	5	--
Hour Burden (hours)	612	3573	3630	119	1083	190	10960	1400	21,567
	4185		3749						
Cost Burden (\$)	\$270,100		\$244,392		\$46,017	\$12,262	\$399,601	\$151,200	1,123,572

Part 65 Recordkeeping Burden	Parachute Rigger Records 65.131	IA Renewal Course Recordkeeping	Total
# of Respondents (annually)	6800	100	6900
Responses per respondent	35	658	--
Total # of Responses	238,000	65,800	303,800
Time per Response (hours)	.083	.1	--
Hour Burden (hours)	19,754	6,580	26,334
Cost Burden (\$)	\$839,348	\$710,640	1,549,988

Reporting Burden - AIRMEN APPLICATION INFORMATION COLLECTION

Form 8610-1, Mechanic's Application for Inspection Authorization

Annually approximately 1855³ applications are made for a new issuance inspection authorization. Annually approximately 10826⁴ holders of an inspection authorization renew their authorization.

The FAA estimates an average of 20 minutes (.33 hours) is spent by each respondent completing the applications form.

Form 8610-1, Application for Inspection Authorization	# of Respondents (annually)	Responses per respondent (annually)	Time per response (hours)	Hour Burden	Cost/hour (\$/hour)	Cost burden (\$)
New IA applicants	1855	1	0.33 hours (20 minutes)	612	64.54	39,498
IA Renewals 21652/2 ⁵	10826	1	0.33 hours (20 minutes)	3573	64.54	230,601
Totals	12,681	1	55	4185	--	270,100

³ Respondent data source was obtained from a query of the FAA NPTRS Database for 2019 IA original issuances.

⁴ Respondent data source was an FAA Airman Records branch query of the number of March 2019 IA Renewals received by the FAA airman records office.

⁵ Inspection authorization renewals are required biennially. Therefore, the total number of IA renewals was divided by 2 to determine an estimated annual respondents.

Form 8610-2, Airman Certificate and/or Rating Application - Mechanic and Parachute Rigger

Annually approximately 11360⁶ individuals make application for an airmen (mechanic and parachute rigger) certificate, added rating, or other change, and spend an average time of 20 minutes (.33 hours) completing the application form.

Form 8610-2, Application for Mechanic and Parachute Rigger	# of Respondents (annually)	Responses per respondent (annually)	Time per response (hours)	Hour Burden	Cost/hour (\$/hour)	Cost burden (\$)
Mechanic Applicants	11000	1	0.33 hours (20 minutes)	3630	64.54	234,280
Parachute Rigger Applicants	360	1	0.33 hours (20 minutes)	119	42.49	5,056
Totals	11360	1	.33	3749	--	244,392

Form 8610-3, Airman Certificate and/or Rating Application – Repairman

Annually, approximately 3280 individuals make application for a repairman certificate or added rating, and spend an average time of 20 minutes (.33 hours) completing the application form.

- o The FAA estimates 2650⁷ §65.101 repairman applicants annually.
- o The FAA estimates 430⁸ § 65.104 amateur-built repairman applicants annually.
- o The FAA estimates 200⁶ §65.107 light-sport repairman applicants annually.

Form 8610-3, Application for Repairman Certificate	# of Respondents (annually)	Responses per respondent (annually)	Time per response (hours)	Hour Burden (hours)	Cost/hour (\$/hour)	Cost burden (\$)
Repairman -65.101	2650	1	0.33 (20 minutes)	874	42.49	37,179
Amateur Built Repairman - 65.104	430	1	0.33 (20 minutes)	142	42.49	6,034
Light Sport Repairmen - 65.107	200	1	0.33 (20 minutes)	66	42.49	2,804
Total	3280	1	0.33	1082		\$46,017

Section 65.19, Retesting after failure

Of the 11360 mechanic and parachute rigger applicants, the FAA estimates that approximately 10% of applicants fail a mechanic certification test and retest within 30 days, thereby needing a statement of retraining. Respondents spend an estimated 10 minutes in obtaining a statement of retraining.

Retesting after Failure 65.19	# of Respondents (annually)	Responses per respondent (annually)	Time per response (hours)	Hour Burden (hours)	Cost/hour (\$/hour)	Cost burden (\$)
Annual retests within 30 days	1136	1	0.167 (10 minutes)	190	64.54	\$12,263

⁶ Respondent data source for mechanic and parachute rigger applicants was the FAA's 2019 Active Civil Airmen Statistics, Table 16, https://www.faa.gov/data_research/aviation_data_statistics/civil_airmen_statistics/

⁷ Respondent data source for this renewal was the FAA's 2019 Active Civil Airmen Statistics, Table 16, https://www.faa.gov/data_research/aviation_data_statistics/civil_airmen_statistics/

⁸ Respondent data source was an FAA Airman Records branch query of the number of 2019 §65.104 amateur-built repairman applications received by the FAA airman records office.

Section 65.107 – Light-sport repairman training

The FAA receives approximately 200 light-sport repairman applications annually, with the below estimated dispersal among light-sport ratings and classes.

As discussed in question 2, repairman applicants have different training hour requirements depending on the class of light-sport aircraft being requested on the certificate.

Class of Light-Sport Aircraft	Minimum Hours of Instruction
Airplane	120
Weight-shift Control aircraft	104
Powered Parachute	104
Lighter than Air	80
Glider	80

Of the 200 light-sport repairman applicants annually, the FAA annual estimates for each class are 60 airplane, 5 weight-shift, 5 powered parachute, 2 lighter-than-air, and 8 glider.

Light Sport Repairmen Training 65.107		# of Respondents	Responses per respondent	Time per response	Hour Burden	Cost/hour	Cost burden
		(annually)	(annually)	(hours)		(\$/hour)	(\$)
Inspection Rating		120	1	16	1920	36.46	70,003
Maintenance Rating	Airplane Class	60	1	120	7200	36.46	262,512
	Weight Shift Class	5	1	104	520	36.46	18,959
	Powered Parachute class	5	1	104	520	36.46	18,959
	Lighter than Air Class	2	1	80	160	36.46	5,834
	Glider Class	8	1	80	640	36.46	23,334
Total		200	1	55*	10960	--	\$399,601

*Average response time based on the hour burden of all training divided by the # of respondents.

Record Keeping Burden - AIRMEN APPLICATION INFORMATION COLLECTION

The FAA estimates that 6800⁹ parachute rigger certificate holders each make 35 recordkeeping entries per year and spend 5 minutes making each entry.

Parachute Rigger Records – § 65.131	# of Respondents	Responses per respondent	Time per response	Hour Burden	Cost/hour	Cost burden
	(annually)	(annually)	(hours)		(\$/hour)	(\$)
Records	6800	35	0.083 (5 minutes)	19,754	\$42.49	\$839,348

Reporting & Recordkeeping Burden - IA COURSE RENEWAL ACCEPTANCE

⁹ Respondent data source for parachute rigger certificate holders was the FAA's 2019 Active Civil Airmen Statistics, Table 1, https://www.faa.gov/data_research/aviation_data_statistics/civil_airmen_statistics/

The FAA estimates that 35 respondents request IA renewal course acceptance each year, and each year 100 respondents are maintaining IA renewal course records. The FAA estimates a total annual hour burden to respondents of **7,980 hours**, and a total annual cost burden to respondents of **\$861,840**.

The data in the table below reflects annual estimates of submittal (reporting) and recordkeeping burden, based on a four-year course acceptability expiration.

IA Refresher Course Provider Burden			
§65.93(a)(4) burden	Course Acceptance Submittals	Course Record Keeping	Totals
# of Respondents Annually	35	100	135
# Responses per Respondent Annually	8	658	666
Time per Response (hour)	5	0.1	--
Total # of Responses Annually	280	65,800	66,080
Annual Burden (hours)	1,400	6,580	7,980
Cost/Hour (\$)	\$108	\$108	\$108
Annual Cost Burden (\$)	\$151,200	\$710,640	\$861,840

Reporting Burden

The annual number of respondents to this collection is approximately 35, consisting of course providers and course provider applicants. The total estimated annual submission burden under part 65.93(a)(4) as described in this IC includes 35 respondents, submitting 280 responses averaging 5 hours per response @ \$108/hr. for a burden of 1,400 hours, with an estimated cost of \$151,200.

To estimate time spent responding to this IC, the FAA requested refresher course submission burden from eight current course providers. Five of these entities responded with time estimates and four with cost figures; they included one small (6 accepted courses), two medium (15 & 24 courses) and two large (51 & 60 courses) course providers. Their time and cost burdens were summed, averaged, and used in the burden estimates that follow.

There are three occasions that require course providers to make course acceptance submissions: the initial course acceptance, a change to course acceptance, and course renewal acceptances. Based on responses from the survey, the average time burden in each instance is as follows:

- initial course acceptance - 2.6 hrs.,
- prepare a change to course acceptance - 1.1 hrs.
- prepare a course renewal acceptance - .7 hrs.

These figures were summed and averaged to .85 hrs. per response. The FAA revised this to 5 hours per response for the sake of being conservative in the burden determination. Based on a four-year renewal cycle, the FAA expects to receive approximately 250 renewal acceptances, 10 change acceptances, and 20 initial acceptances annually.

Recordkeeping Burden

The total estimated annual recordkeeping burden as described in this IC includes 100 respondents, recording 65,800 training events averaging .1 hour per entry @ \$108/hr. for 6,580 hours, with an estimated cost of \$710,640.

- The FAA National Vital Information System (NVIS) database contained 22,230 mechanics with an active Inspection Authorization as of April 5, 2021. \
- A survey of six Flight Standards offices determined that approximately 74 percent of IA renewals use the refresher course method.
- The FAA estimates that the average IA has taken four courses to meet the eight-hour annual training requirement. Seventy-four percent of 22,230 yields 16,450 IA's taking refresher courses multiplied by four, equals an estimated 65,800 training events to record per year.

Labor Cost Analysis

The labor cost estimates used wage rates for aircraft mechanics and other installation, maintenance and repair workers, to determine a cost burden. For all wages, the FAA multiplied the hourly wage by 2 to account for a fringe benefit rate of 31%¹⁰ and an overhead rate of 69%¹¹.

Aircraft Mechanics and holders of an Inspection Authorization

The wage rate of **\$32.27** per hour came from the Department of Labor, Bureau of Labor Statistics (BLS), May 2019, Aircraft Mechanics and Service Technicians #49-3011.¹² This wage rate is used for initial mechanic applicants, as well as added rating and other change applications. Applicants for an Inspection authorization must hold a mechanic certificate.

Mechanics			
Hourly wage	31% Fringe Benefit	69% Overhead	Total
\$32.27	\$10.00	\$22.27	\$64.54

Parachute Rigger and Repairmen.

The wage rate of **\$21.06** per hour came from the Department of Labor, Bureau of Labor Statistics (BLS), May 2019, Installation, Maintenance, and Repair Workers, All Other, #49-9099.¹³

Parachute Riggers and Repairmen			
Hourly wage	31% Fringe Benefit	69% Overhead	Total
\$21.06	\$6.53	\$14.90	\$42.49

¹⁰ An employee fringe benefit of 31% is added (for benefits such as health benefits, vacation, sick time, etc.), based on the Civilian Workers wages, as reported in BLS release, Employer Costs for Employee Compensation-June 2019.

Source: U.S. DOL/BLS: <https://www.bls.gov/news.release/ecec.nr0.htm>

¹¹ Source: U.S. Department of Health and Human Services, "Guidelines for Regulatory Impact Analysis" (2016), https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf. On page 30, HHS states, "As an interim default, while HHS conducts more research, analysts should assume overhead costs (including benefits) are equal to 100 percent of pretax wages...." To isolate the overhead rate, the Department subtracted the benefits rate of 69 percent from the recommended rate of 100 percent.

¹² U.S. DOL/BLS: <https://www.bls.gov/oes/current/oes493011.htm>

¹³ U.S. DOL/BLS: <https://www.bls.gov/oes/current/oes499099.htm>

IA Renewal Course Providers.

The labor cost estimates used the course providers offered wage rates for their refresher course submissions. The average wage was determined to be \$54/ hour. The FAA multiplied the hourly wage by 2 to account for a fringe benefit rate of 30 percent¹⁴ and an overhead rate of 69 percent¹⁵.

IA Renewal Course Provider Wages			
Hourly wage	31% Fringe Benefit	69% Overhead	Total
\$54	\$16	\$38	\$108

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 startup costs not already covered in question 12.

14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The FAA estimates the total additional agency burden per year is **20,968** hours, at an estimated cost of **\$1,455,580**.

Costs to the Federal government are incurred in reviewing the applications for mechanics, inspection authorization, parachute riggers, repairmen, and for IA renewal course acceptance.

Agency Burden							
	IA Initial 65.91	IA Renew 65.93	Mechanic Subpart D	Parachute Rigger Subpart F	Repairman Subpart E	IA renewal course acceptance	Totals
Instrument	FAA Form 8610-1		FAA Form 8610-2		FAA Form 8610-3		
# of Respondents (annually)	1855	10826	11000	360	3280	35	28,362
Responses per respondent	1	1	1	1	1	8	--
Total # of Responses	1855	10826	11000	360	3280	280	28,607
Time per Response (hours)	.75	.75	.75	.75	.75	1	--
Hour Burden (hours)	1391	8119	8250	270	2460	280	20,968
	9438		8520				
Wages	\$70		\$70		\$70	\$94	--
Cost Burden (\$)	660,660		596,400		172,200	\$26,320	1,455,580

Agency Labor Cost Analysis

¹⁴ An employee fringe benefit of 30 percent is added (for benefits such as health benefits, vacation, sick time, etc.), based on the private industry wages, as reported in BLS release, Employer Costs for Employee Compensation-March 18, 2021.

Source: U.S. DOL/BLS: <https://www.bls.gov/news.release/ecec.nr0.htm>

¹⁵ Source: U.S. Department of Health and Human Services, "Guidelines for Regulatory Impact Analysis" (2016),

https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf. On page 30, HHS states, "As an interim default, while HHS conducts more research, analysts should assume overhead costs (including benefits) are equal to 100 percent of pretax wages...." To isolate the overhead rate, the Department subtracted the benefits rate of 69 percent from the recommended rate of 100 percent.

The salary base rate for this position is from the January 2022 General Schedule (GS) Locality Pay Tables.

Aviation Safety Inspectors in FAA Flight Standards offices who conduct airman applications reviews range from GS-9 to GS-14 positions. The FAA is using the salary base rate for a midpoint (Step 5) GS-13 to estimate labor costs, in the table “Rest of the United States”.

- Using these estimates, the fully burdened FAA aviation safety inspector (ASI) rate is \$70.00.

An Aviation Safety Inspector who works for FAA Flight Standard, Safety Standards conducts the IA course acceptance reviews. The FAA is using the salary base rate for a midpoint (Step 5) GS-14 to estimate labor costs, in the table “Washington-Baltimore-Arlington, DC-MD-VA-WV-PA”.

- Using these estimates, the fully burdened FAA aviation safety inspector (ASI) rate is \$94.00.

An employee benefit overhead of 36.25% has been applied to the base rate to provide the fully funded wage rate for each position¹⁶:

2022 GS	Hourly wage	36.25% Fringe/Overhead Benefit	Total
GS 13 Step 5	\$51.25	\$18.60	\$70.00
GS 14 Step 5	\$68.55	\$24.90	\$94.00

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

This ICR adds the information collected under part 65 for the purposes of IA course renewal acceptance, including FAA Form 8610-6.

Previously, the FAA published inspectors’ guidance for IA fresher course acceptance in December 2018 that contained a submittal form, (Figure 3-164 of FAA Order 8900.1, Volume 3 Chapter 56 Section 1) embedded in the order. Entities desiring to be course providers or request course renewals were required to use this form, and submit the form every 2 years. However the FAA suspended IA renewal course acceptances using this form in February 2020 when the PRA concerns were identified.

The new form (in this IC) does not require information regarding the course instructor, copy of test given, or samples of attendance or training completion forms as did its predecessor. Additionally, increasing the course acceptance renewal from 2 to 4 years is a notable reduction of burden to the course providers.

The increase in burden reflected in this ICR is directly related to the addition of IA course acceptance burden.

The agency burden estimates were recalculated for the entire IC to reflect current wage rates and benefits for FAA personnel. The annual burden to the federal government is lower than what was in the previous IC due to more accurate estimates on FAA personnel conducting the tasks associated with this IC.

The information related to Airman Application information collection (approved in March 2022) is updated with new FAA labor costs; 2022 wages were applied to all of FAA burden estimates.

¹⁶ OMB Memo dated March 11, 2008.

Source: https://www.whitehouse.gov/wp-content/uploads/legacy_drupal_files/omb/memoranda/2008/m08-13.pdf

Revised Privacy Act Statements (PASs) were applied to FAA Forms 8610-1, 8610-2, and 8610-3 to correct some errors found on the previous statements. The revised PASs and forms have been uploaded to ROCIS.

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.

IA refresher courses that have been found acceptable to the FAA will be listed on the Master IA Refresher Course Database List at:

<https://faasafety.gov/WINGS/pub/IATrainingProviders/laUnderMaint.aspx> website under the maintenance tab for a period of four years, plus an additional two years if expired.

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 approval to not display the expiration date.

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

There are no exceptions.