

Supporting Statement A
Federal Aviation Administration
Air Carrier Contract Maintenance Requirements
OMB-2120-0766

This statement is submitted to request a renewal of the three-year approval clearance for the information collection entitled Air Carrier Contract Maintenance Requirements. The changes to this statement involve using up to date labor wage rates when calculating the costs for questions 12 and 14.

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

Air carrier maintenance has evolved from mostly an “in-house” operation to an extended network of maintenance providers that fulfill contracts with air carriers to perform their aircraft maintenance. Any person performing maintenance for an air carrier must follow the air carrier’s maintenance manual.

The FAA has found that, although an air carrier is required to list its maintenance providers and a general description of the work to be done in its maintenance manual, these lists are not always kept up to date, are not always complete, and are not always in a format that is readily useful for FAA oversight and analysis purposes. Without accurate and complete information on the work being performed for air carriers, the FAA cannot adequately target its inspection resources for surveillance and make accurate risk assessments.

Recent rulemaking requirements in 14 CFR Sections 121.368(h) and 135.426(h) require air carriers to provide a list to the FAA of all persons with whom they contract their maintenance. The list must be updated with any changes, including additions or deletions, and the updated list provided to the FAA in a format acceptable to the FAA by the last day of each calendar month.

The FAA expects this information collection of maintenance provider data to enhance the oversight capabilities of both the air carriers and the FAA and contribute to a reduction in aviation accidents.

The FAA’s authority to issue rules on aviation safety is found in Title 49 of the United States Code. Subtitle I, Section 106 describes the authority of the FAA Administrator. Subtitle VII, Aviation Programs, describes in more detail the scope of the agency’s authority.

This rulemaking is promulgated under the authority described in Subtitle VII, Part A, Subpart III, Section 447, Section 44701(a)(2)(A) and (B) and (5). Under that section, the FAA is charged with prescribing regulations and minimum standards in the interest of safety for inspecting, servicing, and overhauling aircraft, aircraft engines, propellers, and appliances, and equipment and facilities for, and the timing of and manner of, the inspecting, servicing and overhauling the FAA finds necessary for safety and commerce.

In addition, Public Law 112-95 (February 14, 2012), the “FAA Modernization and Reform Act of 2012” (the Act), in section 319 (Maintenance providers), requires the FAA to issue regulations “requiring that covered work on an aircraft used to provide air transportation under part 121 . . . be performed by persons in accordance with subsection (b).” Subsection (b), in addition to listing persons authorized under existing regulations, referenced additional terms and conditions in subsection (c) that would apply to persons who provide contract maintenance workers, services, or maintenance functions to a part 121 air carrier for covered work. The Act mandates that the contracting part 121 air carrier be directly in charge of covered work, as defined by the Act, being performed for the carrier under contract, and that the work be done under the supervision and control of the air carrier.

The continued collection of this information supports the FAA’s strategic goal to provide to the next level of safety by achieving the lowest possible accident rate and always improving safety so all users of our aviation system can arrive safely at their destinations.

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 request for renewal reflects requirements necessary under 14 CFR part 121 and part 135 to ensure safety of flight by making certain that air carriers maintain a robust contract maintenance program. This has been accomplished, in part, by providing a list to the FAA that includes the name and physical (street) address, or addresses, where the work is carried out for each maintenance provider that performs work for the certificate holder, and a description of the type of maintenance, preventive maintenance, or alteration that is to be performed at each location. The list is updated with any changes, including additions or deletions, and then provided to the FAA by the last day of each calendar month.

FAA reviews the respondents’ maintenance provider list (MPL) data to adequately target its inspection resources for surveillance and make accurate risk assessments. MPL data is also analyzed at the national level in order to identify negative trends. This statement supports the renewal for this collection of information.

Although the information collected may be not expected to be disseminated directly to the public, results may be used in scientific, management, technical or general informational publications.

Additionally:

- This collection is mandatory;
- Air carriers operating under 14 CFR parts 121 and 135.411(a)(2) must respond;
- This collection is a reporting requirement;
- This collection is required by the last calendar day of each month;

- The information reported is related to maintenance providers that are used by air carriers to perform maintenance on their behalf;
- FAA Aviation Safety Inspectors will receive this information;
- The purpose of this collection is that FAA, in order to perform safety oversight, needs to know who is performing maintenance on an air carrier's aircraft, what type of maintenance is being performed, and each location where the maintenance is to be performed;
- This is not a revision of the previous collection.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

In accordance with the Government Paperwork Elimination Act (GPEA), the FAA encourages the use of automation and electronic media for the gathering, storage, presentation, review, and transmission of all requests, records, reports, tests, or statements required by this collection with the provision that such automation or electronic media has adequate provision for security (i.e., that such submissions may not be altered after review and acceptance by the FAA) and that the systems or applications are compatible with the systems or applications used by the FAA. It is estimated that 90% of air carriers use electronic manuals and 10% use paper manuals.

To reduce the burden on the public, FAA has created a method for electronic submission of this information and is currently working to further improve this technology. The electronic submission is made in the form of an Excel file which air carriers may obtain directly from their respective Flight Standards Office. The basis for the decision to create a method for electronic submission is standardization and consistency.

Additionally, when authorized by FAA, air carriers may also choose to directly manage electronic submission of this information by using the FAA Safety Assurance System (SAS), external portal via the internet. Information for obtaining access to the SAS External Portal can be found at: <https://sas.faa.gov/sas.external.portal/ext/accounts>

The results of this information collection will not be made available to the public via the internet.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

There is no duplicate requirement that would provide the FAA this information. The information sought is particular to each air carrier and not available from any other source.

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

The FAA believes that the collection of information associated with this rule is already minimal to small business or small entities. Therefore, no additional methods to minimize burden is needed.

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

The FAA sees the collection of this information as a means to verify compliance with contract maintenance requirements in 14 CFR part 121 and part 135. If the collection is not conducted, the FAA anticipates an increase in deficiencies in maintenance performed by contract maintenance providers. Accidents and incidents will continue and consistency between contract maintenance and in-house air carrier maintenance will diminish.

If the collection is conducted less frequently, the information will not be up to date, and not always complete. Without accurate and complete information on the work being performed for air carriers, the FAA cannot adequately target its inspection resources for surveillance and make accurate risk assessments. Further, the failure to submit data in the time-frame established by regulation, places certificate holders in a position of operating contrary to the regulations.

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

There are no special circumstances that would cause this collection of information to be conducted in a manner inconsistent with 1320.5(d)(2)(i)-(vii).

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 April 8, 2025 (90 FR 15196), solicited public comment. The public was encouraged to comment but no comments were submitted. There was no other communication received from stakeholders during the comment period.

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

There were 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 respondents have not been given assurance of confidentiality.

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

There are no questions of a sensitive nature.

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

Large air carriers (14 CFR Part 121):

The total burden hours include the time needed to gather the information and complete the response. The hour burden on respondents may vary slightly due to differences in activity and size of each air carrier.

The annual labor cost for these respondents is \$280,339.20.

We used the U.S. Bureau of Labor Statistics, May 2024 National Occupational Employment and Wage Estimates to estimate the annual labor cost for these respondents. Typically, air carriers use management personnel to gather and report this information to FAA.

The median hourly wage for these positions is \$49.50 which includes fringe and overhead.

- $\$49.50 \times 8 \text{ hours per response} = \396.00 for each response
- $\$396.00$ for each response $\times 744$ responses = \$294,624.00

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	62		
# of Responses per respondent	12		
Time per Response	8 hour		
Total # of responses	744		
Total burden (hours)	5,952		

Small air carriers (14 CFR Part 135):

The total burden hours include the time needed to gather the information and complete the response. The hour burden on respondents may vary slightly due to differences in activity and size of each air carrier.

The annual labor cost for these respondents is \$1,089,705.60.

We used the U.S. Bureau of Labor Statistics, May 2024 National Occupational Employment and Wage Estimates to estimate the annual labor cost for these respondents. Typically, air carriers use management personnel to gather and report this information to FAA.

The median hourly wage for these positions is \$47.10 which includes fringe and overhead.

- \$49.50 x 8 hours per response = \$396.00 for each response
- \$396.00 for each response x 2,892 responses = \$1,145,232.00

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	241		
# of Responses per respondent	12		
Time per Response	8 hour		
Total # of responses	2,892		
Total burden (hours)	23,136		

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

The FAA believes there are no additional costs other than what are included 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 has to review each response provided and assess those responses for risk. We estimate the annual cost to the Federal government is \$185,326.92, which includes fringe and overhead.

- 303 small and large air carriers.
- Amount of time to ensure that each response is uploaded to the Safety Assurance System (SAS): 1 hour per response X 12 = 3636 hours (This includes large and small air carriers)
- For the FAA inspector wage we assume that Principal Inspectors (PI) will perform the data upload and risk assessment for each response. Based on OPM.GOV, 2025 General Schedule (GS) Locality Pay Tables, the base hourly rate for paygrade step 1 is \$50.97.

PI hourly wage of \$50.97 x 3636 hours = \$185,326.92.

- There are no other expenses incurred with this collection.

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

There were no adjustments in this statement. However, minor changes were made to update the labor wage rates for calculating the costs in questions 12 and 14.

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.

There is no plan for tabulation or publication.

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.

No such approval is being sought.

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

There are no exceptions.