

Supporting Statement A
Federal Aviation Administration
Dealer's Aircraft Registration Certificate Application
OMB 2120-0024

* Using BLS's Employer Costs for Employee Compensation memo released March 14, 2025.

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

This information collection supports the Department of Transportation's strategic goals on safety and security. Maintaining proper registration of aircraft is fundamental to ensure compliance with operations/airworthiness safety requirements to promote the public health and safety by working toward the elimination of transportation-related deaths, injuries, and property damage. Proper registration of aircraft is necessary to advance the nation's vital security interest in support of national strategies by ensuring that the national transportation system is secure and to ensure personal accountability among all users of the National Airspace System (NAS).

Public Law 103-272 states that all aircraft must be registered before being flown. It sets forth registration eligibility requirements and provides for application for registration as well as suspension and/or revocation of registration.

14 CFR Part 47 Subpart C describes procedures for obtaining and using a dealer's aircraft registration certificate and prescribes procedures that implement Public Law 103-272 which provides for the issuance of a dealer's aircraft registration certificate and for their use in connection with aircraft eligible for registration by persons engaged in manufacturing, distributing or selling aircraft. Dealer's certificates enable such persons to fly aircraft immediately without having to go through the paperwork and expense of applying for and securing a permanent aircraft registration certificate.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the use the agency has made of the information received from the current collection.

This information collection is mandatory to obtain a Dealer's Aircraft Registration Certificate. The Aircraft Registry collects the minimum amount of information necessary (i.e. applicant name, mailing/business address, phone number, email address, signature, title, date, type of business, and type of ownership). The information collected on the Dealer's Aircraft Registration Certificate Application, AC Form 8050-5, is for any individual or company engaged in manufacturing, distributing, or selling aircraft and wants to fly those aircraft with a dealer's registration certificate instead of obtaining a certificate of aircraft registration.

The information collected is maintained in a database for recordkeeping purposes. A conveyance examiner in the FAA Aircraft Registry reviews the application to ensure it is

complete and properly filled out. If the application is correct, the examiner issues the number of dealer's certificates requested and mails them to the dealer. Certificates are valid for one year; therefore, a dealer must reapply each year. As with all information collected by the Aircraft Registry this information is available to the public upon request.

When CARES is fully implemented by December 10, 2025 (this is an estimated date and subject to change), it will streamline the way this form is submitted by providing an online portal for users to submit the form electronically. Alternatively, for public users opting to use a paper-based format, the system will send a mail-based notification to the user via the mailing address provided and anticipate any hardcopy forms be returned in a similar manner. The use of paper forms submitted through the mail will eventually be phased out and all customers will be required to file the forms using CARES. This form has been revised to collect the email address of the public user to help streamline processing in CARES.

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.

Currently, the public user submits information and images through the mail in a paper-based format, where the Aircraft Registry enters this information into a file that is retained in an electronic based records management system. The Aircraft Registry maintains the records and does not affect the collection of information; collection of information must originate from each individual applicant, primarily through the paper-based submission process (i.e. USPS). In 2020, the Aircraft Registry began accepting digitally signed documents through an electronic submission email portal. Documents received through the email portal are printed to a paper-based format and electronically scanned into a work packet for examination and entry into the Aircraft Registry electronic records management system.

CARES utilizes modern Cloud services, which includes an interactive web-based portal, allowing for immediate transmission of information between the public user and the Aircraft Registry processor. This web-based portal streamlines the way the form information is populated and submitted into the Aircraft Registry, while also helping to ensure that correct information is provided in full. A web-based means of submitting information allows for a more guided information exchange process (e.g., pre-populating known data, providing guidance material, client-side data validation techniques, etc.), and is expected to streamline the manner and timeframe in which the full and complete application information is provided by the public user to the Aircraft Registry office for review. Currently CARES has limited capability and allows users to upload their documents for submission. However, the current legacy system is still being utilized until CARES is fully implemented.

CARES utilizes Login.gov to authenticate the identities of public users, ensuring compliance with the Federal Cybersecurity Requirements statutory mandate (6 USC § 1523 — Federal cybersecurity requirements, part (b)(1)(D)). This mandate directs

agencies to implement a single sign-on trusted identity platform for individuals accessing each public website of the agency that requires user authentication. Public users must verify their identity before they are allowed to create a CARES account. Multifactor authentication is also employed during each login session to prevent identity theft. Users who fail ID verification will not be allowed to access functionalities within CARES.

In cases where the public user opts to mail paper-based forms to the Aircraft Registry, the CARES automation process will leverage Optical Character Recognition (OCR) and Intelligent Character Recognition (ICR) technologies to detect, extract, and analyze information provided on the paper forms. This information will then be properly formatted and imported into CARES, where it will be processed automatically, or redirected for FAA Examiner review when necessary.

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

There is only one Aircraft Registry. There is no duplication of records or record-keeping.

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

The Aircraft Registry has reduced the burden on all respondents to the minimum amount necessary to apply for a dealer certificate. The procedures and information required are the same for all respondents.

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.

Dealer's certificates permit short-term operation of an aircraft by a method, which is less restrictive and less time-consuming than obtaining a permanent aircraft registration certificate. Without this information collection, there would be no basis for issuance of a dealer's aircraft registration certificate.

7. Explain any 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.

Anyone applying for a dealer certificate submits the original application to the Aircraft Registry. A dealer's certificate is good for one year from issuance; therefore, the information is collected on an annual basis unless the certificate is not renewed. No proprietary or confidential information is collected.

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 60-day comment period was published on (June 24, 2025) (90 FR 26899) solicited public comment. No comments were received.

The Aircraft Registry has an email portal whereby customers can submit any comments or suggestions at any time. Any comments or suggestions are reviewed and considered for possible improvements to the forms or processes in this collection.

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

No payments or gifts were provided.

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

Information collected is public information. There is no assurance of confidentiality.

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

There are no questions of a sensitive nature.

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

The hour burden information is based on statistical information collected each fiscal year. In FY 2024 the Registry received 3,453 dealer applications. Each dealer should spend approximately 30 minutes completing the application for a total hour burden of 1,727 hours.

Summary (Annual numbers)	Reporting	Recordkeepin g	Disclosure
# of Respondents	3,453		
# of Responses per respondent	1		
Time per Response	.5 hours		
Total # of responses	3,453		
Total burden (hours)	1,727		

Based upon the U.S. Bureau of Labor Statistics Occupational Handbook the estimated median wage for a Manufacturing Sales Representative is \$35.13 per hour.¹ Using BLS's

¹ <https://www.bls.gov/ooh/sales/wholesale-and-manufacturing-sales-representatives.htm>

Employer Costs for Employee Compensation memo released March 14, 2025,² the FAA calculated the mean hourly wage, plus benefits, for these managers to be \$49.81 (\$35.13 + \$14.68). The total estimated annual cost burden to the respondents is 1,727 X \$49.81 for a total annual cost of about \$86,021.87.

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

Additional cost for postage if the form is mailed: \$0.68 X 3,453 = \$2,348.04. The cost would be significantly less if respondents submit the application through the email portal or CARES.

14. Provide estimates of annualized cost 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.

FAA Aircraft Registration Branch Legal Instruments Examiners and contract staff process all incoming documents. Based on workload statistics from FY 2024, the chart below shows a breakout of processing time in hours for both Legal Instruments Examiner (\$31.64 per hour) and contractor (\$33.75 per hour). It's estimated an Examiner spends approximately .5 hours processing a document and a contractor spends approximately .3 hours. The total annualized cost to the Federal government is \$89,607.

Employee	Form Count	Time in Hours	Cost
Examiner	3,453	1,727	\$54,642
Contractor	3,453	1,036	\$34,965

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

The burden is based on customer submissions which fluctuates up or down from year to year. Using BLS's Employer Costs for Employee Compensation memo released March 14, 2025.

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 are no plans for tabulation or publication of the information collected.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons display would be inappropriate.

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

There is no reason not to display.

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

There are no exceptions.