

Supporting Statement A
Federal Aviation Administration
FAA Entry Point Filing Form – International Registry
OMB Control Number 2120-0697

* 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.

On August 9, 2004, the President signed the Cape Town Treaty Implementation Act of 2004 (hereinafter referred to as Cape Town Treaty or Treaty), Public Law 108-297, which requires conforming changes to the regulations concerning registration and deregistration of aircraft. The Convention on International Interest in Mobile Equipment, as modified by the Protocol to the Convention on International Interests in Mobile Equipment on Matters Specific to Aircraft Equipment, provides for the creation of the International Registry.

The primary aim of the Treaty is to resolve the problem of obtaining certain and opposable rights to high-value aviation assets, namely airframes, aircraft engines and helicopters which, by their nature, have no fixed location. This problem arises primarily from the fact that legal systems have different approaches to securities, title retention agreements and lease agreements, which creates uncertainty for lending institutions regarding the efficacy of their rights. This hampers the provision of financing for such aviation assets and increases the borrowing cost. Treaty is intended to reduce risks for creditors, and consequently the borrowing costs to debtors, through the resulting improved legal certainty. This promotes the granting of credit for the acquisition of more modern and thus more fuel-efficient aircraft.

14 CFR 49.61 designates the FAA Civil Aviation Registry (the FAA Registry) as the entry point for authorizing the transmission of information affecting an interest in certain types of eligible U.S. registered aircraft, helicopters and aircraft engines to the International Registry. The information collected is necessary to obtain an authorization code for transmission of interests to the International Registry. The International Registry is an electronic registry system that works in tandem with the current system operated by the FAA Registry for the United States.

To transmit interests to the International Registry, interested parties (referred to as “Respondents”) must file a completed FAA Entry Point Filing Form for the International Registry, AC Form 8050-135 with the FAA Registry. Upon receipt of the completed form, the FAA Registry verifies the accuracy of the submitted data and issues a unique authorization code. The submitter then uses that authorization code to enter their interest into the International Registry.

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.

Respondents wishing to register an interest in certain U.S. aircraft and eligible aircraft equipment must do so through the International Registry, which is operated by Aviareto, a joint-venture between SITA SC and the Irish Government. However, under the Treaty and FAA's implementing regulations, the FAA is responsible for reviewing the information provided for completeness and accuracy. The purpose of this information collection is to allow the FAA to authenticate a claim. Once the FAA assesses the form for completeness and accuracy, the FAA provides the respondent with an authorization code that accompanies the transmission of information to the International Registry. Responding to this collection is mandatory in order to obtain an authorization code; however, submitting the information to the International Registry is voluntary. Respondents are typically financial or leasing institutions but could be individuals or companies. The FAA Registry scans the original paper form to store an image file in the digital administrative records, and enters the party name(s), collateral description(s), and the authorization code into the existing database for recordkeeping. Interested parties may access or request a copy of the completed AC Form 8050-135 by submitting a written request pertaining to a particular authorization code.

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.

The AC Form 8050-135 is available for download via the FAA Forms website. The completed form must be hand delivered or mailed to the Aircraft Registry in conjunction with a recordable security agreement or lease. The security agreement or lease must meet the recording requirements of 14 CFR Part 49. If the security agreement or lease is digitally signed, then the forms may be submitted as an email attachment addressed to: 9-avs-ar-electronic-submittals@faa.gov. An AC Form 8050-135 filed for a prospective interest only (i.e. no security agreement or lease is filed) may be submitted by fax or as an email attachment addressed to: 9-avs-ar-electronic-submittals@faa.gov.

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 respondent, 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 use for the purposes described in Item 2 above.

The FAA Registry is the exclusive U.S. entry point for transmissions to the International Registry. There is no duplication of records or recordkeeping.

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

We have reduced the respondent burden to a minimum. The procedures and information needed to obtain an authorization code 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.

The frequency of the collection is determined by the respondent. Without this collection respondents would not be able to record their interest in certain types of mobile equipment on the International Register.

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 this information collection is determined by the Respondent. The collection is based on the need to record an interest in certain types of mobile equipment, which usually doesn't occur more than once yearly, possibly less frequently. The FAA Registry collects the party name, address, and telephone number, a description of the affected mobile equipment, the type of interest and the submitter's information if different from the interested party, on the AC Form 8050-135. Respondents are only required to submit one copy of the form but may retain a copy for their records. There is no pledge of confidentiality.

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 data elements to be recorded, disclosed, or reported.

A 60-day comment period was published on (June 24, 2025) (90 FR 26900) 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.

Throughout the drafting of the changes to 14 CFR Parts 47 and 49, the changes to 49 U.S.C. Chapter 441, and the creation of the AC Form 8050-135, the FAA Registry, working with the Aeronautical Center Counsel, consulted interested persons outside the agency and obtained their views on the collection of data and the data elements to be recorded, disclosed, or reported. An interested group of attorneys and lawyers, the U.S. State Department, and a representative of the Export-Import Bank (to name a few), were key to making these changes. The FAA has not solicited or received public comments on this collection since the collection began.

9. Explain any decisions to provide any payments or gifts 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.

The FAA Registry does not assure 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.

No information of a sensitive nature is requested nor required to obtain an authorization code.

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.**

There were 20,876 filings during FY2024. The time per response is 0.5 hours. Most companies that file these types of forms are law firms and financial institutions. A technical level person (paralegal or legal assistant) usually completes the form and submits it to the Aircraft Registry for review.

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	20,876		
# of Responses per respondent	1		
Time per Response	0.5		
Total # of responses	20,876		
Total burden (hours)	10,438		

Based upon the U.S. Bureau of Labor Statistics Occupational Handbook the estimated median wage for a Paralegal/Legal Assistant is \$29.31 per hour¹. Using BLS's Employer Costs for Employee Compensation memo released March 14, 2025,² the FAA calculated the mean hourly wage, plus benefits, for the Paralegal/Legal Assistant to be \$43.99 (\$29.31 + \$14.68). The total estimated annual cost burden to the respondents is \$43.99 X 10,438 hours' time for a total annual cost of \$459,168.

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

There is an additional cost to respondents for postage if the form is mailed: \$0.68 X 20,876 = \$14,195.68. The cost would be significantly less if respondents submit the form 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.

The estimated annualized cost burden for the Federal Government is \$270,909.43. The FAA Registry staffs its Cashier's section with full-time employees who, with part of their time, support the FAA Registry's responsibility as the portal to the International Registry both in issuing the code and QA processing of completed work packets. In addition, a very small amount of the Cashier's section supervisor's time is required for this function. Contractors perform the preparation, indexing and scan functions. There were 20,876 filings for FY2024 and only the indexing and QA functions will require accessing the computer network mainframe.

	Driving Item Count		Qty per Item	Unit		Rate	Cost	Annual Cost
Personnel								\$89,525.51
Cashier Supervisor	6	Actions	0.250	Hrs	@	\$43.86	\$65.79	
Legal Assistant IR	20,876	Form Packets	0.083	Hrs	@	\$26.51	\$45,934.09	
Legal Assistant QA	20,876	Form Packets	0.083	Hrs	@	\$25.12	\$43,525.63	
Contract Personnel Time Required								\$75,352.33
Prep	20,876	Form Packets	0.020	Hrs	@	\$26.14	\$10,913.97	
Index	20,876	Form Packets	0.083	Hrs	@	\$26.14	\$45,292.99	
Scan	20,876	Form Packets	0.015	Hrs	@	\$20.38	\$6,381.79	
Store	20,876	Form Packets	0.015	Hrs	@	\$20.38	\$6,381.79	
Dispose	20,876	Form Packets	0.015	Hrs	@	\$20.38	\$6,381.79	
Supplies								\$8,853.51
Portfolio Folders	20,876	Form Packets	1.000	Each	@	\$0.3836	\$8,008.03	

¹ <https://www.bls.gov/ooh/legal/paralegals-and-legal-assistants.htm>

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

Blue Paper	20,876	Form Packets	1.000	Sheet	@	\$0.0324	\$676.38
White Paper	20,876	Form Packets	3.000	Sheets	@	\$0.0081	\$169.10
Computer Time							\$95,612.08
Index	20,876	Form Packets	1.000	Unit	@	\$2.29	\$47,806.04
QA	20,876	Form Packets	1.000	Unit	@	\$2.29	\$47,806.04
Equipment and Maintenance							\$1,566.00
Copier Purchase & Maintenance \$7500/5 yrs						Used for IR 100%	\$750.00
Gov't Computer \$1200/5 yrs							\$240.00
Printer \$2882/5 yrs							\$576.00
Total Annual Cost							\$270,909.43

15. Explain reasons for any program changes or adjustments.

The burden is based on respondent submissions which can fluctuate 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.

No publication is planned for this information.

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.

The Aircraft Registry is not seeking approval to not display the expiration date for OMB approval.

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

There are no exceptions.