

## SUPPORTING STATEMENT

Federal Aviation  
Administration

OMB-2120-0552

### Suspected Unapproved Parts Report--FAA Form 8120-11

#### ***Summary of Changes from previous Supporting Statement:***

- *Minor non-substantive editing in accordance with updated formatting guidance.*
- *Minor non-substantive editing for additional clarity.*
- *Adjustments were made to the estimates provided in questions 12 and 14 based on updated averages for the number of forms received, hours to complete/process, estimated dollars per hour, etc. These adjustments were not based on new collections or changes in requirements.*
- *References for data in questions 12 and 14 were updated.*

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

49 USC, Section 44701 empowers the Administrator of the Federal Aviation Administration (FAA) to provide reasonable rules and regulations for minimum standards governing the design, materials, construction, and performance of aircraft, engines, and propellers as may be required to ensure safety in air transportation. Submission of the Suspected Unapproved Parts Report, FAA Form 8120-11, is necessary to ensure that only FAA approved parts are installed on type certificated aircraft, and that continued airworthiness is maintained. Attached are copies of Section 44701 and FAA AC-21-29D, Detecting and Reporting Suspected Unapproved Parts.

#### **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 information collected on the FAA Form 8120-11 is reported voluntarily by manufacturers, repair stations, aircraft owner/operators, air carriers, and the general public who wish to report suspected unapproved parts to the FAA for review. The report information is received by the FAA's Safety Hotline, and is used to determine if an unapproved part investigation is warranted. If the investigation confirms that the part is unapproved, and additional unapproved parts exists on other products, aircraft, or designs, the information is used as a basis for an aviation industry alert or notification. Alerts are used to inform industry of situations essential to the prevention of accidents. If the information had not been collected, the consequence to the aviation community would be the inability to determine whether or not unapproved parts are being offered for sale or use for installation on type-certificated products.

Procedures and processes relating to the SUP program and associated reports are found in FAA Order 8120.16A, Suspected Unapproved Parts Program, and AC 21-29D,

Detecting and Reporting Suspected Unapproved Parts. When unapproved parts are identified, the FAA notifies the public by published Field Notifications (FN), disseminated using Unapproved Parts Notifications (UPN), Aviation Maintenance Alerts, Airworthiness Directives (AD), entry into an issue of the Service Difficulty Reporting Summary, a Special Airworthiness Information Bulletin, a display on an Internet site, or direct mailing.

Specifically:

- The collection of information on the report is voluntary.
- The entities that may voluntarily submit a report are manufacturers, repair stations, aircraft owner/operators, air carriers, and the general public who wish to report suspected unapproved parts to the FAA for review.
- The collection is reporting.
- There is no collection frequency as it is a voluntary report.
- The report asks for information to assist the FAA in determining if an unapproved part investigation is warranted, such as the part identification, location of part, source of part, etc.
- FAA Aviation Safety Inspectors will receive the information to support investigations.
- The purpose of the collection is used to determine if an unapproved part investigation is warranted.
- Hourly wage estimates have been updated to reflect current wage rates for the public respondents.

**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 Form 8120-11 can be returned to FAA 100% electronically, meeting the requirements of the Government Paperwork Elimination Act. The form is available electronically online through FAA Web Site at:

<https://www.faa.gov/aircraft/safety/programs/sups/>

Paper copies of copies of the form can also be faxed or mailed. Forms may be reproduced locally. The form is available to the public, and may be found on 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.**

The information requested on FAA Form 8120-11 is not available from any other source. There is no duplication of reported information.

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

Reporting of information is strictly voluntary. The information is requested from any individual or facility suspecting an unapproved part. Any burden is minimized by requesting only necessary information to warrant an investigation.

**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 collection of this information is conducted under the authority of the Administrator found in Section 44701, and is necessary in pursuance of aviation safety. Reports are voluntarily submitted only when a suspected unapproved part is identified by an individual; therefore, notification frequency is not prescribed or controllable.

**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.**

There are no special circumstances that would cause this information collection to be conducted in a manner inconsistent with 5 CFR 1320.5(d)(2)(i)-(viii).

**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 May 22, 2025 (90 FR 21983), solicited public comment. No comments were received. The form currently includes detailed completion instructions. The FAA routinely meets with industry and industry associations on aviation safety topics such as the Suspected Unapproved Parts Program. Additionally, the FAA is available to discuss any form related concerns and issues that the public may have.

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

No payment or gratuities are involved in this program.

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

Release of the initiator's identity, if confidentiality was requested, or any document which could reveal an initiator's identity is covered under the Freedom of Information Act's Sixth Exemption (5 USC 552(b) (6)).

**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 is no information of a sensitive nature requested or collected.

**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.

Summary (Annual numbers)	Reporting	Recordkeeping*	Disclosure*
Number of Forms Submitted	30	N/A	N/A
Hours per Form to Complete	.20	N/A	N/A
Total Hour Burden	6	N/A	N/A
Estimated Dollars per Hour (wage)	39.31	N/A	N/A
Fringe Dollars per Hour	24.63	N/A	N/A
Total Dollars per Hour	63.94	N/A	N/A
<b>Total Burden in Dollars</b>	<b>383.64</b>	N/A	N/A

Average (FY22-FY-24) FAA Form 8120-11 submitted per year is 30  
 Hours to complete form is .20  
 Total hours is 6 (30 x .20)  
 Estimated dollars per hour (wage) is \$39.31\*\*  
 Fringe dollars per hour is \$24.63\*\*  
 Total dollars per hour is \$63.94 (39.31 + 24.63)  
 Total burden in dollars is \$383.64 (6 x 63.94)

\*Submittal of the form is voluntary so there are no recordkeeping or disclosure burdens.

\*\*U.S. Department of Labor, Bureau of Labor Statistics, Employer Costs for Employee Compensation – June 2025:  
<https://www.bls.gov/news.release/pdf/ecec.pdf>

**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. Equipment is already in place.

**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.**

Cost to Federal Government	Collection
Number of Forms Received/Collected	30
Hours per Form to Process	1.0
Total Hour Burden	30
Estimated Dollars per Hour (wage)	39.31
Fringe Dollars per Hour	15.31

Total Dollars per Hour	63.94
<b>Total Burden in Dollars</b>	<b>1918.20</b>

Average (FY22-FY-24) FAA Form 8120-11 received/collected per year is 30  
Hours to process form is 1.0 (involves three different organizations in FAA)  
Total hours is 30 (30 x 1.0)  
Estimated dollars per hour (wage) is \$39.31\*  
Fringe dollars per hour is \$24.63\*  
Total dollars per hour is \$63.94 (39.31 + 24.63)  
Total burden in dollars is \$1918.20 (30 x 63.94)

\*U.S. Department of Labor, Bureau of Labor Statistics, Employer Costs for Employee Compensation – June 2025:  
<https://www.bls.gov/news.release/pdf/ecec.pdf>

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

The data for the number of responses decreased.

**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.**

Information is only used for initiating suspected unapproved parts investigations. Results and reports are for FAA use and not for national publication.

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

This is a recurring program and the requirements and forms used have been standardized, thus no further changes are sought.

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

There is no exception.