

**Supporting Statement
Service Difficulty Report
OMB #2120-0663**

RIN 2120-AL82

- Updated to include service difficulty report burden that would be created by proposed 14 CFR § 108.45(d).
- The changes in this collection are from the rulemaking titled “Normalizing Unmanned Aircraft Systems Beyond Visual Line of Sight Operations.” This current Office of Management and Budget (OMB) Control Number accounts for the information collected as part of a service difficulty report (SDR).
- Under proposed § 108.45(d), certificated operators would have to report to the unmanned aircraft manufacturer any failure, malfunction, or defect in an unmanned aircraft system that causes momentary or permanent loss of control or communication of the unmanned aircraft if it has endangered, or may endanger, the safe operation of the unmanned aircraft.
- While the Federal Aviation Administration (FAA) estimates that each part 108 SDR would take 0.667 hours, there is not yet sufficient data for the FAA to estimate the number of respondents. The FAA therefore seeks comments from the public on the expected number of Part 108 certificated operators.

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, Section 44701 outlines the responsibilities of The FAA Administrator to promote safe flight and reduce the possibility of accidents in air transportation. This section empowers the FAA Administrator to prescribe necessary regulations and minimum safety standards for various aspects of civil aviation, including the design, construction, and maintenance of aircraft, as well as the operation of airports. Evaluation of previous accident and incident data suggests the collection of certain malfunctions and defects could be early indicators of future accidents. By collection and analysis, the Administrator can systematically assess the circumstances and conditions leading to these events and determine if corrective actions are necessary. This process forms the foundation of the Service Difficulty Reporting (SDR) Program.

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 Service Difficulty Reporting Program currently requires air carriers, repair stations, and would require certificated part 108 UAS operators¹ disclose occurrences of detections of failures, malfunctions, or defects. Information is collected and made available to internal and external stakeholders. The FAA uses SDR data to improve

¹ As defined in proposed Part 108 of Title 14 of the Code of Federal Regulations; see, *Normalizing Unmanned Aircraft Systems Beyond Visual Line of Sight Operations* notice of proposed rulemaking, XX FR XXXX (2025).

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safety and reliability of products and articles. Aviation Safety Inspectors, Engineers and Analysts use SDR data to identify trends and problems that could affect aviation safety and share this information with the aviation community and FAA personnel to help mitigate safety risks. Manufacturers use SDR data to help identify issues that could cause safety hazards. Automated data service providers would use SDR data to identify trends in service failures and make timely software updates. The public can access SDR data through the SDRS database and may use this data for research and analysis. The FAA may also use this data to create new regulations or issue Airworthiness Directives (AD's) that address a specific problem, as the data may identify mechanical failures, malfunctions, and defects that indicate a hazard to the operation of an aircraft. It may also identify trends on airworthiness related concerns.

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 compliance with the Government Paperwork Elimination Act, information collection is fully digitized. For respondents who are required to send their SDRs to the FAA, 100% of submissions are currently electronic via the [FAA Service Difficulty Reporting System \(SDRS\)](#). Two paper-forms are however available via download and may be used. Under proposed part 108, certificated operators would send their SDRs directly to the manufacturer (or service provider).

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 are no other FAA collections that duplicate this data nor other government agencies collecting this same data. The FAA provides this information as source data to other government agencies, regulatory authorities, and the public upon request and as permitted.

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

This collection is a minimal burden to small businesses. Requirements for collection are focused on air carriers, repair facilities (large organizations), and certificated part 108 UAS operators; SDRs from other entities are voluntary.

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.

But for this policy, the FAA would have no means of collecting information on incidents and occurrences known to be precursors to unsafe conditions and which may lead to accidents or incidents in the national airspace. Likewise, without requiring that part 108 certificated operators provide SDRs to manufacturers, manufacturers of UAS would not

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have data on unsafe conditions that may also lead to accidents or incidents. The frequency of collection is variable and dependent on reportable service difficulties. If there are no issues, no report is required.

7. Special circumstances:

There are no special circumstances that would cause the FAA to conduct information collection in a manner inconsistent with the OMB guidance on the Paperwork Reduction Act compliance.

8. Compliance with 5 CFR 1320.8.

The FAA is publishing a proposed rule titled, "Normalizing Unmanned Aircraft Systems Beyond Visual Line of Sight Operations." Due to a lack of data, the FAA is not currently estimating the number of respondents. The FAA seeks comment on the expected number of SDRs under the proposed policy.

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

There are no monetary or gift considerations for submission of information.

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

Respondents are given 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.

Factors	Amt/Vol	Comments
Responses (R)	57,938	Count based on 10-year average.
Time per submission (T)	0.0833	Based on sample submissions. Unit=hours.
Time per submission Part 108 (T108)	0.667	Based previous estimates for SDRs and breadth of data requested. Unit = hours.
Total burden (B)	4,826*	R x (T+T108). Unit=hours. *Calculation omits T108 because of lack of data.
Labor Cost (C) ²	\$153,515*	B x C. Unit=USD. *Calculation omits T108 because of lack of data.

² Labor cost calculations are based on [Bureau of Labor Statistics, Employer Cost for Employee Compensation – March 2024](#) and taken from the median private industry worker total compensation category.

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The respondent universe is primarily three entities: Carrier certificate holders, certificated repair stations, and certificated UAS operators under Part 108. Due to a lack of data, the FAA is not yet estimating the number of such responses for the certificated UAS operators but will update this Information Clearance Request (ICR) if sufficient data is submitted to the FAA in the form of comments to the proposed rule. FAA also requests comment on how long prospective operators think that it will take to fill out a SDR based on the information requested in proposed § 108.45(d).

Comp Component	USD/Hr
Wages & Salaries	\$22.60
Total Compensation	\$31.81

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 material costs required to facilitate submission.

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 the Federal Government results from the maintenance of the SDR system, review of data submissions, and helpdesk escalations. For information technology and infrastructure concerns, the amount varies depending on the number of bugs, security upgrades, and software/hardware replacement. For FY24, the amount was \$150,000. It is reasonable to expect that amount for subsequent years. For personnel cost associated with data review and helpdesk matters, two full-time-equivalent employees are utilized. Annualized cost is approximately \$262,000. This includes benefits at a rate of 31.1% according to the 2023 Bureau of Labor Statistics.

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

The changes in this collection are from the rulemaking titled “Normalizing Unmanned Aircraft Systems Beyond Visual Line of Sight Operations.” This current OMB Control Number accounts for the information collected as part of a service difficulty report. Under proposed § 108.45(d), certificated operators would have to report to the unmanned aircraft manufacturer any failure, malfunction, or defect in an unmanned aircraft system that causes momentary or permanent loss of control or communication of the unmanned aircraft if it has endangered, or may endanger, the safe operation of the unmanned aircraft. The FAA does not have sufficient data to develop an estimate of the number of SDRs that would be created as result of this proposed policy and therefore seeks comments from the public on the expected number of Part 108 certificated operators and the expected frequency of submitting SDRs.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that

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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.

Publication of data is not performed per se. The Service Difficulty Reporting web site allows for query and data download. The depth and type of analyses is dependent on factors specific to each individual analyst.

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 this approval.

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

There are no exceptions.