

**Justification Statement to Request Emergency Extension of the Expiration Date
of BTS' "Preservation of Air Carrier Records" ICR, OMB Control No. 2138-0051**

BTS' general law division, which covers fiscal law issues, has been consulted for guidance. BTS is operating as usual. BTS is fully funded, does not rely upon appropriations, and has contract authority to obligate the agency. Therefore, it is not needed to show the information collection fits into an excepted activity; all our activities are currently operating normally.

BTS was scheduled to submit the 30-day FR for the "Preservation of Air Carrier Records" ICR on October 15, 2025. Ordinarily, this would have been plenty of time for the notice to publish and for BTS to submit the renewal package to OMB prior to its October 31, 2025, expiration date. However, due to the OFR not accepting IC notices for publication during the government shutdown, BTS was unable to complete this step in the renewal process. ICR FR notices do not fall into the category of allowable publications at the OFR during a lapse in appropriations.

If the ICR expires without an extension, BTS would be legally prohibited from processing any records for preservation, which means that audit and/or validation would not be relevant, and the submission would be impaired since the data could not be verified.

This would have significant operational and industry-wide impacts.

BTS asks that OIRA please extend the expiration date of this ICR either on a monthly basis until the shutdown ends or grant the extension for up to 90-days.