

## Supporting Statement A

### Title 14 CFR Part 21 - Certification Procedures for Products and Articles

OMB 2120-0018

**SUMMARY OF CHANGES:** The FAA published a Notice of Proposed Rulemaking (NPRM), 88 FR 47650, July 24, 2023, that proposed amendments of rules related to the certification, maintenance, and operation of light-sport category aircraft. That NPRM also provided notice of amendments to this information collection to align with final rulemaking, including changes to both FAA Form 8130-6 and FAA Form 8130-15.

The specific changes to FAA Form 8130-6 include updated the “LIGHT-SPORT” field to accommodate any aircraft class, Updated the “RESTRICTED” field to add newly codified operations, Experimental number 8 operating light-sport is a single option with new name “operating former light-sport category aircraft,” Updated the “EXPERIMENTAL” field to add new purpose for “operating light-sport category kit-built aircraft,” Updated the “EXPERIMENTAL” field to add new purpose for “operating former-military aircraft.

The specific changes to FAA Form 8130-15 include updated name of form to “Light-Sport Category Aircraft / Kit Statement of Compliance, updated the “Check applicable items” field to change the 14 CFR reference for kits, accommodate any aircraft class, and indicate whether the aircraft meets eligibility requirements in part 61 for a sport pilot. Updated the “FAA Applicable Accepted Standard(s)” and revise statement(s) to remove references to 14 CFR LSA definition and ensure new statements required by this rule are included and updated the certifying statement field to add training/certification credentials for the person signing the form.

In response to the NPRM, FAA received three comments concerning FAA Form 8130-6 and no comments concerning FAA Form 8130-15. Air Tractor, Inc., NAAA, and GAMA asked which uses and special purpose operations may be selected when applying for a special airworthiness certificate for restricted category aircraft. They also asked about the basis for determining eligibility for special purpose operations.

FAA notes that, per § 21.185, FAA issues an airworthiness certificate for restricted category aircraft for aircraft that were type certificated in the restricted category and that, per § 21.25(a), FAA issues “a type certificate for an aircraft in the restricted category for special purpose operations.” That is, FAA Form 8130-6 merely reflects the requirements of these regulations. The revised form includes the uses and special purpose operations included in the NPRM and an applicant may select all uses and special purpose operations included on the applicable type certificate, including any design changes approved per subpart D of part 21.

As with any application for issuance of an airworthiness certificate, it is incumbent on the applicant to provide evidence of compliance with applicable requirements, including, in this case, eligibility issuance of a special airworthiness certificate for a restricted category aircraft for the special purpose operation under the applicable type certificate. FAA has responsibility for reviewing all such records and inspecting the aircraft to verify that the applicant met applicable requirements and that the aircraft is airworthy.

Changes to these forms, including those related to the dispositions of public comments, have no impacts on the burden estimates for paperwork burden for these collections. Therefore, the remainder of this justification is unchanged.

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

The purpose of Title 49 United States Code (USC), Subtitle VII, Aviation Programs, is to encourage and foster the development of civil aeronautics, and to promote safety in air commerce.

Section 40113(a) empowers the Secretary of Transportation (or the Administrator of the Federal Aviation Administration) with respect to aviation safety duties and powers designated to be carried out by the Administrator, to take action he/she considers necessary to carry out this part, including; conducting investigations, prescribing regulations, standards and procedures, and issuing orders.

Section 44701 empowers the Administrator to promote safety by prescribing minimum safety standards and regulations necessary for safety in air commerce. It also empowers the Administrator to grant an exemption from a requirement of a regulation if it is in the public interest.

Section 44702(a) specifies that applications shall be as the Administrator prescribes as to form, content, retention, and manner served.

Section 44702(d) empowers the Administrator to delegate to a qualified private person, or an employee under the supervision of that person, matters related to examination, testing, and inspection necessary to issue a certificate, and issuing the certificate.

Section 44704(a) empowers the Administrator to issue type certificates for aircraft, aircraft engines, propellers, and appliances.

Section 44704(b) empowers the Administrator to issue a type certificate designated as a supplemental type certificate for a change to an aircraft, aircraft engine, propeller, or appliance.

Section 44704(c) empowers the Administrator to issue a production certificate authorizing the production of conforming duplicates of any aircraft, aircraft engine, propeller, or appliance for which a type certificate has been issued.

Title 14 Code of Federal Regulations (CFR) Part 21 - Certification Procedures for Products and Articles, supports the DOT strategic goal on safety. Therein, Title 14 CFR Part 21, implements the provisions of Title 49 USC Sections 40113, 44701, 44702, and 44704, by prescribing –

- (1) The procedural requirements for issuing and changing; design approvals, production approvals, airworthiness certificates, and airworthiness approvals.
- (2) Rules governing applicants for, and holders of, any approval or certificate specified above.
- (3) Procedural requirements for the approval of articles.

Wherein, Title 14 CFR Part 21 defines –

- (1) *Airworthiness approval* means a document, issued by the FAA for an aircraft, aircraft engine, propeller, or article, which certifies that the aircraft, aircraft engine, propeller, or article conforms to its approved design and is in a condition for safe operation, unless otherwise specified.
- (2) *Article* means a material, part, component, process, or appliance.
- (3) *Design approval* means a type certificate (including amended and supplemental type certificates) or the approved design under a PMA, TSO authorization, letter of TSO design approval, or other approved design.
- (4) *Product* means an aircraft, aircraft engine, or propeller.
- (5) *Production approval* means a document issued by the FAA to a person that allows the production of a product or article in accordance with its approved design and approved quality system, and can take the form of a production certificate, a PMA, or a TSO authorization.

Note: PMA refers to a Parts Manufacturer Approval, and TSO refers to a Technical Standard Order. Further, a TSO issued by the FAA is a minimum performance standard for specified articles used on civil aircraft.

**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.**

Purpose of FAA Form 8110-12, Application for a Type Certificate, Production Certificate, or Supplemental Type Certificate: Information collected in this form is to be used by the Aircraft Certification Office Branch in the geographical area of the applicant in order to initiate the certification project and gather FAAA resources to work on the particular certification project. This information is used to (1) collect the name of the party, corporation, or organization to whom the Type Certificate, Amended Type Certificate, Production Certificate, Supplemental Type Certificate, or Amended Supplemental Type Certificate will be issued. This is necessary because the same name will appear on the certificate exactly as it is entered in this form. Also, to obtain the signature of the certifying official which must be the holder or the person duly authorized to sign for the holder, company, or corporation.

Estimate of Actual use the FAA has made of the info. received from the current collection:

FY 2019: Based on the AVS Dashboard, the Aircraft Certification Offices received around 739 applications for TCs, STCs, Amended TCs or Amended STCs.

FY 2020: Based on the AVS Dashboard, the Aircraft Certification Offices received around 763 applications for TCs, STCs, Amended TCs or Amended STCs.

Sources:

AVS Dashboard Controlled by AIR-700:

<https://avsmtdashboard.avs.faa.gov/FocusAreas/AIR/Pages/AIR-700.aspx>

AIR CPN Oversight Dashboard - Specific to projects:

From the application perspective – the entries in the CPN data base are those that come to mind for those pieces of information that are “catalogued” and tracked.

<https://av-info.avs.faa.gov/CPN/Projects/Find.aspx>

The collection of the information referenced herein is based on the applicants need, not a set time or frequency.

Airworthiness Certification:

The purpose of FAA Form 8130-6, Application for U.S. Airworthiness Certificate: This form is used by an applicant of a U.S. registered aircraft to show eligibility of the applicable airworthiness certificate for which the applicant is applying. Information collected on this form is used by FAA Airworthiness Inspectors and designated inspectors to determine whether the aircraft complies with the applicable regulatory requirements, and that the aircraft is in a condition for safe operation.

The purpose of FAA Form 8130-1, Application for Export Certificate of Airworthiness: This form is used by an applicant to attest to the airworthiness of an aircraft, products and articles. Information collected on this form is used by FAA Airworthiness Inspectors and designated inspectors to determine whether the aircraft, products and articles comply with the applicable regulatory requirements, and used to facilitate the acceptance of complete aircraft, products and articles by other importing Civil Aviation Authorities that are ICAO contracting States; and that the aircraft is in a condition for safe operation.

The purpose of FAA Form 8130-12, Eligibility Statement Amateur-Built Aircraft: This form is a notarized declaration used by an applicant to attest that the aircraft was fabricated and assembled for the builder’s own education or recreation and the majority of the build was conducted by them. This form also requires the builder to identify any commercial assistance that may have been used in the construction of the aircraft.

A probable unsafe condition could exist for the owner /operator of the aircraft, product and article and /or the public, if the certification procedures for products and articles required by Title 14 CFR Part 21 were not followed.

The collection of the information referenced herein is based on the applicants need, not a set time or frequency.

The purpose of FAA Form 8130-15, Light-Sport Aircraft/Kit Statement of Compliance: This form is completed by the manufacturer of a Light Sport Aircraft as part of the requirements of section 21.190(c) and serves as a sworn statement to the FAA. This form identifies the aircraft by make and model, class, serial number, and consensus standards used. The manufacturer states that the aircraft meets the provisions of the identified consensus standard and conforms to the manufacturer’s design data utilizing the manufacturer’s quality assurance system. The manufacturer states the aircraft was ground and flight tested successfully and is in a condition for safe operation. The manufacture agrees to monitor and correct safety-of -flight issues through the issuance of safety directives and the manufacturer’s continued airworthiness system to support the aircraft throughout its life. Additionally, at the request of the FAA the manufacturer states they will provide unrestricted access to its facilities, and will make available to any interested

person the aircraft's operating instructions, maintenance and inspection procedures, and flight training supplement. Once signed this form is presented to the FAA designated inspector as a supporting document for the issuance of a special airworthiness certificate for the light sport category.

FAA designated inspectors confirm the appropriate manufacturer's self-certification is presented with the aircraft, and inspects the aircraft to confirm that it is in a condition for safe operation. Those products that comply with the minimum requirement are issued the appropriate airworthiness certificate. The airworthiness certificate indicates to the purchaser of the aircraft that the product was designed and produced in compliance with the referenced industry developed consensus airworthiness standards. This will permit the purchaser of the aircraft to use the aircraft for purposes of flight instruction and rental for pilot proficiency training. This will lead to a higher skill level and resulting higher level of safety for the owners and operators of these aircraft.

This form is filled out by the manufacturer's employee that has received training on how to meet compliance requirements in accordance with the applicable consensus standards and the requirements associated with the issuance of a statement of compliance. This employee is part of the Quality Assurance System. Due to Light sport aircraft having different requirements when compared to someone doing the same job for a typical aircraft manufacturer, this job is not in the BLS. As Light Sport Aircraft manufacturing is such a small industry this occupation on a broader level, is closest to an 11-3051 Industrial Production Manager, with a median wage of \$56.63/hr.

### **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.**

Government Paperwork Elimination Act efforts are ongoing to improve information technology through internal automation systems, such as the recently fielded ASKME Airworthiness Certification (AWC) Application, designed to collect, organize, store, and transmit diverse information. AWC is the online, electronic version of the FAA Form 8130-6, Application for Airworthiness Certificate. There is no requirement for the applicant to print and rescan items. The only requirement for an applicant to scan other documents that may be applicable to the airworthiness certificate applied for. Upon completion of filling in the AWC information, the applicant electronically submits it to the local FAA office.

The applicant can submit the required information entirely electronically to us. The FAA form 8110-12 is already pdf fillable. The applicant fills out the form, saves it as pdf (flattened form), and he can submit it to the geographic Aircraft Certification Office by email in addition to a 3-View drawing of the proposed aircraft or for an engine, the design features, engine operating characteristics, and the proposed engine operating limitations in accordance with 14 CFR 21.15.

Metrics collection reports are posted in the CPN Database and the AVS Dashboard.

**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.**

We have checked our other public reports and are satisfied that no duplication exists. No other agency is responsible for collecting information on the certification of aircraft products and articles.

The information requested by the FAA establishes a record of essential data concerning the applicant and the product(s) and /or articles involved and is available only from the applicant. The information is not available elsewhere.

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

The information required is the minimum needed to determine if an unsafe condition exists and issue the proper certificate. Small businesses /entities are not subject to any burden.

**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 the information referenced herein is based on the applicants need, not a set time or frequency.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

This collection of information is consistent with the guidelines in 5 CFR 1320.5(d)(2).

**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.**

The FAA published a Notice of Proposed Rulemaking (NPRM), 88 FR 47650, July 24, 2023, that proposed amendments of rules related to the certification, maintenance, and operation of light-sport category aircraft.. In response to the NPRM, FAA received three comments concerning FAA Form 8130-6 and no comments concerning FAA Form 8130-15. Air Tractor,

Inc., NAAA, and GAMA asked which uses and special purpose operations may be selected when applying for a special airworthiness certificate for restricted category aircraft. They also asked about the basis for determining eligibility for special purpose operations.

FAA notes that, per § 21.185, FAA issues an airworthiness certificate for restricted category aircraft for aircraft that were type certificated in the restricted category and that, per § 21.25(a), FAA issues “a type certificate for an aircraft in the restricted category for special purpose operations.” That is, FAA Form 8130-6 merely reflects the requirements of these regulations. The revised form includes the uses and special purpose operations included in the NPRM and an applicant may select all uses and special purpose operations included on the applicable type certificate, including any design changes approved per subpart D of part 21.

As with any application for issuance of an airworthiness certificate, it is incumbent on the applicant to provide evidence of compliance with applicable requirements, including, in this case, eligibility issuance of a special airworthiness certificate for a restricted category aircraft for the special purpose operation under the applicable type certificate. FAA has responsibility for reviewing all such records and inspecting the aircraft to verify that the applicant met applicable requirements and that the aircraft is airworthy.

Changes to these forms, including those related to the dispositions of public comments, have no impacts on the burden estimates for paperwork burden for these collections. Therefore, the remainder of this justification is unchanged.

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

No payment or gift is given to any respondents.

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

No assurance of confidentiality is provided or needed.

**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 assurance of confidentiality is provided or needed.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

A section-by-section breakdown of the applicable Title 14 CFR Part 21 regulations below shows the frequency of response and estimated burden for the noted information collected.

Section 21.190 Issue of a special airworthiness certificate for a light-sport category aircraft - FAA Form 8130-15, Light-Sport Aircraft/Kit Statement of Compliance: This form is completed by the manufacturer of a Light Sport Aircraft as part of the requirements of section 21.190(c).

Section 21.190(c)(3) Issue of a special airworthiness certificate for a light-sport category aircraft states that the manufacturer must determine that the aircraft conforms to the manufacturer's design data using an acceptable quality assurance system. This cost applies only to the manufacturer of new aircraft seeking to obtain the special light sport aircraft airworthiness certificate. For the "simple" class aircraft, this is assumed to require two hours for recordkeeping, while for the more complex aircraft, this is multiplied a ratio of 12 equivalent to that used in the preceding cost item ("Complex" is 12 times the burden of "simple"). For the 110 aircraft per year, the average recordkeeping burden will be 11.8 hours per aircraft, which is derived by taking the average of 2 hours for the 26 manufacturers of "simple" aircraft and 24 hours for 21 manufacturers of "complex" aircraft. Costs are calculated using this range of hours assuming that  $\frac{3}{4}$  of the time will be supplied by management and  $\frac{1}{4}$  by a clerical assistant.

# respondents: **110**

Annualized cost burden = 110 aircraft X 11.8 hours X (\$56.62 per hour x  $\frac{3}{4}$  + \$19.00 per hour x  $\frac{1}{4}$ ) = **\$61,278**

Estimated annual aircraft	110
Average hours per aircraft	x <u>11.8</u>
Total annual burden	1298 Hours

Section 21.190(c)(5) - requires manufacturers to monitor and correct safety-of-flight issues, using a continued airworthiness system that meets the identified consensus standard.

Annualized cost burden:

- "simple" class products – 26 manufacturers X 2 hours per model X (\$56.62 per hour x  $\frac{1}{2}$  + \$19.00 per hour x  $\frac{1}{2}$ ) = \$4688

- more complex class aircraft – 21 manufacturers X 24 hours per model X (\$56.62 per hour x  $\frac{1}{2}$  + \$19.00 per hour x  $\frac{1}{2}$ ) = \$19056

- Total cost = \$23,744

Annualized simple class product manufacture	26
Hours per model	x <u>2</u>
Annualized simple class burden	52 Hours
Annualized complex class per aircraft	21



Hours per aircraft	x <u>24</u>
Annualized complex class burden	504 Hours
Total annualized burden for simple/complex class	556 Hours

Section 21.190(c)(7) - states that the manufacturer must have a final acceptance test procedure for evaluation of completed aircraft, and that records for each aircraft produced must show successful completion of the test procedure. This cost applies only to the manufacturer of new aircraft seeking to obtain the special light sport aircraft airworthiness certificate. For this analysis, inspection, test, and documentation for “simple” class aircraft is assumed to require one hour, while the same task for more complex aircraft is assumed to require three hours. Average required recordkeeping time is 1.89 hours, which is derived by taking the average of 1 hours for the 26 “simple” aircraft and 3 hours for 21 “complex” aircraft. Costs are calculated using this range of hours assuming that  $\frac{3}{4}$  of the time will be supplied by management and  $\frac{1}{4}$  by a clerical assistant.

# respondents – 110 aircraft annually

**Total cost** = 110 aircraft X 1.89 hours per aircraft X (\$56.62 per hour x  $\frac{3}{4}$  + \$19.00 per hour x  $\frac{1}{4}$ ) = **\$9,814**

Estimated annual aircraft	110
Average hours	x <u>1.89</u>
Total annual burden	208 Hours

Summary of the part 21 burden:

Section	Cost	Hours
21.190(c)(3)	\$61,278	1298
21.190(c)(5)	\$23,744	556
21.190(c)(7)	\$9,814	208
<b>Total</b>	<b>\$94,836</b>	<b>2062</b>

Section 21.15 Application for type certificate - Requires an applicant for a type certificate to make an application on a form and in a manner prescribed by the FAA.

The FAA has prescribed FAA Form 8110-12, *Application for Type Certificate, Production Certificate, or Supplemental Type Certificate*, for these applications.

(FY2016-2506, FY2017-2708, FY2018-2601, FY2019-1267 = average 2270)

Estimated annual applications received	2270
Average hours per application	x <u>.8</u>
Total annual burden	<u>1816</u> Hours

Section 21.85 Provisional amendments to type certificates - Requires that an applicant must apply for an amendment to the affected type certificate. The FAA has prescribed FAA Form 8110-12 for these applications. The application includes the applicant's documentation for amending its type certificate. The Estimated Annual Burden for these applications is included under Section 21.15 (above).

Section 21.113 Requirement for supplemental type certificate - Requires a person that alters a product, by introducing a major change in type design [that does not require an application for a new type certificate (TC)], to apply to the FAA for a supplemental type certificate (STC). However, if that person holds the TC for the affected product, that person may choose to apply to the FAA to amend the original TC. The application for an STC (or to amend a TC) must be made in the form and manner prescribed by the FAA [FAA Form 8110-12]. The Estimated Annual Burden for these applications is included under Section 21.15 (above).

Section 21.133 Application - Requires that an applicant apply for a production certificate (PC) in a form and manner prescribed by the FAA [FAA Form 8110-12]. The Estimated Annual Burden for these applications is included under Section 21.15 (above).

Section 21.147 Amendment of production certificates - Requires a PC holder desiring to amend a PC to apply in a form and manner prescribed by the FAA [FAA Form 8110-12]. The Estimated Annual Burden for these applications is included under Section 21.15 (above).

Sections 21.53, 21.130 Statement of Conformity - Applicants for a TC (or STC) must provide, in a form and manner acceptable to the FAA, a statement [FAA Form 8130-9, *Statement of Conformity*] that each aircraft engine or propeller presented for type certification conforms to its type design. Applicants must also submit a statement of conformity to the FAA for each aircraft or part thereof presented to the FAA for tests. Further, that statement of conformity must include a statement that the applicant complied with Section 21.33(a), i.e., made all inspections and tests necessary. In addition, each Holder (or licensee) of a TC who manufactures a product (under the TC) must also provide a statement of conformity [FAA Form 8130-9] that the product for which the TC has been issued, conforms to its TC and is in a condition for safe operation.

Estimated annual submittals	7930
Average hours per form	x <u>.8</u>
Estimated annual burden	6344 Hours

Section 21.193 *Experimental certificates: general* - An applicant for an experimental certificate must submit information, including a statement, in a form and manner prescribed by the FAA setting forth the purpose for which the aircraft is to be used.

For those applicants seeking (an experimental certificate) to operate an amateur-built aircraft, they must also submit an FAA Form 8130-12, *Eligibility Statement Amateur-Built Aircraft*, to certify that the major portion of the aircraft was fabricated and assembled by a person(s) who undertook the construction project solely for their own education or recreation.

Estimated annual applications	500
Average hours per application	x <u>.25</u>
Total annual burden	125 Hours

Sections 21.173, 21.177, and 21.199 - Require applicants for an airworthiness certificate, to amend or modify an airworthiness certificate, or a special flight permit (respectively) to apply in a form and manner acceptable to the FAA. FAA Form 8130-6, *Application for U.S. Airworthiness Certificate*, is required for these applications. The Estimated Annual Burden for these applications is included under Section 21.215 (below).

Section 21.215 *Application* - Requires that applications for provisional airworthiness certificates be submitted to the FAA. The application [FAA Form 8130-6] must be accompanied by the pertinent information specified in 14 CFR Part 21, Subpart I – *Provisional Airworthiness Certificates*.

Estimated annual applications for - airworthiness certificates (including provisional)	5000
Average hours per applications	x <u>.7</u>
Estimated annual burden	3500 Hours

Section 21.327 *Application* - States that any person may apply for an export airworthiness approval. Each applicant must apply in a form and manner prescribed by the FAA. The FAA has prescribed that FAA Form 8130-1, *Application for Export Certificate of Airworthiness*, is required for an export airworthiness approval for aircraft, aircraft engines, propellers, and articles.

Estimated annual applications	35000
Average hours per applications	x <u>.2</u>
Total annual burden	7000 Hours

Summary (Annual numbers)	Reporting	Recordkeeping
IC 1; Form 8110-12		
# of Respondents	2270	
# of Responses per respondent		
Time per Response	.8 Hours	1816 Hours
IC 2; Form 8130-9		
# of Respondents	7930	
# of Responses per response		
Time per Response	.8 Hours	6344 Hours
IC 3; Form 8130-12		
# of Respondents	500	
# of Responses per respondent		
Time per Response	.25 Hours	125 Hours
IC 2; Form 8130-6		
# of Respondents	5000	
# of Responses per respondent		
Time per Response	.7 Hours	3500 Hours
IC 3; Form 8130-1		
# of Respondents	35000	
# of Responses per respondent		
Time per Response	.2 Hours	7000 Hours
IC 4; form 8130-15		
# of Respondents	110	
# of Responses per respondent		
Time per Response	.2 Hours	22 Hours

Total number of annual responses: 50810.

Total Reporting and Record Keeping: 18807 Hours.

Total amount - \$824,535.92 (see below spreadsheet)

Form	Annual Responses	Time per form		Hour Total, Annual Burden	Labor cost per hour	Benefits	Labor cost hour with benefits	Cost per response	Labor Cost with Benefits	Where labor cost came from
8110-12	2270	0.8	hour	1816	\$31.57	38.20 %	\$43.63	34.9037920	\$79,232	See <sup>2</sup> below
8130-9	7930	0.8	hour	6344	\$31.74	38.20 %	\$43.86	35.0917440	\$278,278	See <sup>3</sup> below
8130-12	500	.25	hour	125	\$31.74	38.20 %	\$43.86	10.9661700	\$5,483	See <sup>3</sup> below
8130-6	5000	.7	hour	3500	\$31.74	38.20 %	\$43.86	30.7052760	\$153,526	See <sup>3</sup> below
8130-1	35000	.2	hour	7000	\$31.74	38.20 %	\$43.86	8.7729360	\$307,053	See <sup>3</sup> below
8130-15	110	.2	hour	22	\$31.74	38.20 %	\$43.86	8.772	\$964.92	See <sup>3</sup> below
<b>TOTALS</b>									<b>\$824,535.92</b>	

1- News Release, USDL-20-1232, Bureau of Labor Statistics, U.S. Department of Labor, June 18, 2020, table 4

2- Because anyone can apply, the labor cost was taken from the mean of Agricultural workers (\$12.42 per hour) to Industrial Production Managers (\$50.71 per hour) (2019 Median Pay per Bureau of Labor Statics)

3- The majority of these forms are filled out by FAA personal or authorized representatives, for individuals of the general public and their pay range is average of \$31.74 (2019 Median Pay for Aerospace Engineering and Operations Technicians pre Bureau of Labor Statistics)

**13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. – none not already included in number 12**

**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.**

The estimated annual cost to the Federal Aviation Administration for this collection of information is \$546,365.23 per year, based on technical and administrative expenses.

Form	Annual Responses	Time per form	Time	Hour Total, Annual Burden	Labor Cost per hour	Labor Cost	Benefits <sup>1</sup>	Labor Cost with Benefits	Where labor cost came from
All Forms	50810	.25	Hour	12702	\$31.57	\$401,002	36.25%	\$546,365.23	See <sup>4</sup> below

<sup>4</sup> <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2008/m08-13.pdf>

	Median hourly wage	Benefits factor	Fully-burdened wage rate
<b>Aerospace Engineers</b>	\$59.12	1.4493	\$85.68
<b><u>Management Analyst</u></b>	\$44.71	1.4493	\$64.80
<b><u>Economist</u></b>	\$58.09	1.4493	\$84.19

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

The collection now uses electronic systems. The system that the applications are in now make it easier to count and estimate.

The amount of Export Certificates has changed based on activity and economy for aircraft, aircraft engines, propellers and articles.

**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 statistical publications.

**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 FAA is not seeking approval to “not display” the expiration date.

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

There are no exceptions.