

Supporting Statement A
Federal Aviation Administration
Pilot Certification and Qualification Requirements for Air Carrier Operations
2120-0755

Changes in this submission:

- The wage rates were updated to current rates.
- The number of respondents and total burden hours have increased due to increase in size of affected population.

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

Title 49 U.S.C., Section 44702 empowers and requires the Secretary of Transportation to issue operating certificates and to establish minimum safety standards for the operation of pilots and those to whom such certificates are issued. Also, Title 49 U.S.C., Section 44701 empowers and requires the Administrator of the Federal Aviation Administration (FAA) to prescribe standards applicable to the accomplishment of the mission of the FAA.

This project is in direct support of the Department of Transportation's Strategic Plan – Strategic Goal – SAFETY, i.e., to promote the public health and safety by working toward the elimination of transportation-related deaths and injuries.

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.

Although additional details are being provided, there is no change in what reporting and recordkeeping information is being collected or how it is being used by the FAA. There are two distinct collections described here. First, Training providers that want to and are eligible to deliver the Airline Transport Pilot (ATP) Certification Training Program (CTP) submit a course for approval. This includes curriculum information, training resources, flight simulation training devices and other training aids to be used, instructor training information, and course and testing materials. FAA aviation safety inspectors review all the information to determine if the program complies with the applicable requirements of Title 14, Code of Federal Regulations (14 CFR) §61.156. The programs that comply with the minimum requirements receive approval and are issued an operation specification (OpSpec), training specification (TSpec), or letter of authorization (LOA), as appropriate to the applicant, to begin offering the course for applicants that seek an ATP certificate with airplane category rating and multiengine class or multiengine type rating. The OpSpecs and TSpecs are tracked in the FAA SAS Operations Approval (SAS OA) and SAS Operations Safety System (SAS OPSS), previously known as the FAA's Web-Based Operations Safety System (WebOPSS) so principal inspectors can manage what their certificate holder is authorized to train. Principal inspectors of pilot schools also track LOAs issued to their certificate holder. Continuing to allow training providers to seek approval for the ATP CTP is necessary because this specific course of training is required for any person who applies for a knowledge test for an ATP certificate with an airplane category and multiengine

class ratings or multiengine type rating concurrently with an ATP certificate. This is a one-time submission for initial course approval. Any program revisions are accomplished through the existing course revision processes and do not apply to this collection.

Second, institutions of higher education that seek the authority to certify their graduates meet the minimum requirements of 14 CFR §61.160 will submit an application for approval in accordance with 14 CFR §61.169. The collection requires the applicant to provide its pilot school certificate number as well as the pilot school certificate number that is being contracted to perform flight training. The application also requires an aviation degree and course information to determine if the coursework is designed to improve or enhance the knowledge and skills of a person seeking a career as a professional pilot. The applications are received and reviewed by the General Aviation and Commercial Division of the Office of Safety Standards. If the application meets the requirements, the institutions of higher education receive a LOA for its degree program(s) and are then authorized to place a certifying statement on the transcripts of eligible graduates indicating the graduate is eligible for an ATP certificate with restricted privileges under 14 CFR § 61.160(b) and/or §61.160(c). There is a one-time submission of information for the authorization. Additional submissions are only required if there are significant changes in the program or the institution of higher education seeks to add eligible courses or degree programs to its authorization.

If an institution of higher education is applying for an LOA in accordance with 14 §CFR 61.169, then a degree program is required, and coursework information is required as part of the application for the LOA.

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 accordance with the Government Paperwork Elimination Act (GPEA), the FAA allows, accepts, and encourages the use of automation and electronic media for the gathering, storage, presentation, review, and transmission of all ATP CTP requests as well as applications for authority to certify graduates by institutions of higher education required by this collection activity. The submission of this collection is available 100% electronically. If the ATP CTP cannot be sent via email, Flydrive and Huddle are recommended to send media to the FAA. The FAA will ensure that such automation or electronic media has adequate provision for security (i.e., that such submissions may not be altered after review and acceptance by the FAA) and that the systems or applications are compatible with the systems or applications used by the FAA. One hundred (100) percent of the rule is available electronically.

FAA Form 8700-1, with OMB control number 2120-0755 is associated with this collection. The result of this collection consists of proprietary data and is, therefore, not made available to the public. There are no plans to make this information available to the public as it includes proprietary information such as courseware.

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 reviewed other FAA public-use reports and found no duplication. Also, the FAA knows of no other agency collecting the same information. The information sought is particular to the

proposed ATP Certification Training Program training offered by providers certified under Part 121, 135, 141 or 142. The information necessary is available from the certificate holders only and is not available from any other source. The information sought from institutions of higher education seeking the authority to certify their graduates is particular to their degree program(s) and associated aviation coursework required by 14 CFR § 61.160; this information can only be provided by them and is not available from any other source.

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

The FAA believes this will not impact a substantial number of small businesses or other small entities; however, the guidance material is informative and explanatory with regards to the requirements. Certificate holders seeking to obtain approval to offer or provide the ATP CTP are guided through the administrative requirements by the local principal operations inspector/training course program manager using published guidance material. The local FAA representative forwards an ATP CTP for approval to a representative from the Office of Safety Standards. Institutions of higher education seeking the authority to certify graduates of their degree program can contact the General Aviation and Commercial Division of the Office of Safety Standards for assistance with the application and any other questions concerning the process.

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.

If the collection for original certification and review and approval of an ATP CTP is not conducted, training provider/s will not receive approval to conduct the training that is required for pilots applying for a knowledge test for an ATP certificate with multiengine class rating or multiengine airplane type rating concurrently with an ATP certificate. This is a one-time application; therefore, it cannot be accomplished less frequently. Any program revisions are accomplished through the existing course revision processes and do not apply to this collection.

If an institution of higher education is unable to submit an application to receive approval to certify graduates for an ATP certificate with restricted privileges, no pilot will be able to take advantage of the time credits afforded to them in the regulations. This is a one-time application; therefore, it cannot be accomplished less frequently. Any revisions to the authorization to certify graduates are submitted on an ad hoc basis for adding additional courses or degree programs or for any significant changes in the program.

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.*

This collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2)(i)-(viii) and there are no special circumstances.

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 60-day notice was published in the Federal Register on February 13, 2026 (91 FR 6976). No comments were received. The FAA engaged in no additional outreach in relation to this reinstatement.

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

No payment or gifts will be provided to respondents.

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

There is 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. 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.**

The FAA uses the Bureau of Labor Statistics (BLS)¹ to determine a mean hourly wage of \$40.35 for a Transportation Inspectors. \$11.70² is applied to account for overhead and fringe benefits per the Bureau of Labor Statistics document titled “Employer Cost for Employee Compensation – March 2025”. The estimated wage for a Transportation Inspector including overhead and fringe benefits is \$52.05.

The FAA notes that BLS does not have a separate category for Training Center Instructors. The FAA uses a mean hourly wage of \$38.80³ for a Teacher and Instructors closely matches the salary and function of a training center instructor. \$11.25⁴ is applied to account for an averaged total compensation cost per hour worked for private industry workers, which brings the estimated mean hourly wage for a training center instructor is \$50.05.

¹ <https://www.bls.gov/oes/2023/may/oes536051.htm#ind>

² [Employer Costs for Employee Compensation - September 2023 \(bls.gov\)](#)

³ [Training and Development Specialists](#)

⁴ [Employer Costs for Employee Compensation Summary - 2025 Q01 Results](#)

The FAA uses a mean hourly wage of \$40.55⁵ for Postsecondary Teachers. \$11.76⁶ is applied to account for an averaged total compensation cost per hour worked for private industry workers, which brings the estimated mean hourly wage for a Postsecondary Teacher is \$52.31.

Airline Transport Pilot (ATP) Certification Training Program (CTP)

The rule levies requirements that must be met by part 121, 135, 141, or 142 certificate holders who choose to offer or provide the ATP CTP. The estimates for hours and costs are broken down by initial development and approval of an ATP CTP, followed by pilot training record keeping.

While requiring the gathering and maintaining of information and, in certain cases, the reporting of some of that information to the FAA, these sections require no additional burden on the certificate holders beyond what is currently required by rule or currently borne by certificate holders in regular practice. Exceptions to this are the following:

- a. One time development and submission of an ATP CTP to the FAA for approval. It requires one Training Center Instructor 120 hours for each certificate holder who initially would offer the course.
- b. Requires one instructor 0.1 hours for course completion record keeping for each applicant for an ATP certificate with an airplane category multiengine class rating.

Assumptions for Cost Burden to Respondents

120 hours	Instructor time for course development and submission
\$50.05	Training Center Instructor hourly rate
\$4,791.60	Cost to develop an ATP CTP (120 hours x \$50.05 hourly rate)
1	Annual increase in no. of certificate holders offering ATP CTP
0.1	One-time per pilot record keeping instructor hours for records on course completion

Table 1. Burden to Develop and Submit an ATP CTP

⁵ [Postsecondary Teachers : Occupational Outlook Handbook: : U.S. Bureau of Labor Statistics](#)

⁶ [Employer Costs for Employee Compensation Summary - 2025 Q01 Results](#)

Year	Course Development Hours	Course Development Costs	Estimated No. of ATP Applicants	Record Keeping Hours	Record Keeping Costs	Total Hours	Total Costs
2026	120	\$4792	4,009	401	\$20,808	521	
2027	120	\$4792	4,033	403	\$20,912	523	
2028	120	\$4792	4,057	406	\$21,067	526	
Total	360	\$14,376	12,099	1,210	\$62,787	1,570	\$77,163
Average Annual Burden	120	\$4792	4,033	403	\$20,929	523	\$25,721

The average annual hour burden to respondents is 523 and the average annual cost burden is \$25,721.

Course Development

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	1		
# of Responses per respondent	1		
Time per Response	120 Hours		
Total # of responses	1		
Total burden (hours)	120 Hours		

Recordkeeping

Summary (Annual numbers)	Reportin g	Recordkeepin g	Disclosur e
# of Respondents		4030	
# of Responses per respondent		1	
Time per Response		.1 Hours	
Total # of responses		4030	
Total burden (hours)		403 Hours	

Application for Authority to Certify Graduates for a Restricted Privileges ATP Certificate

The rule provides a method for an institution of higher education to seek the authority to certify its graduates of a degree program with an aviation major for an ATP certificate with restricted privileges. The rule requires the institution to hold a part 141 pilot school certificate from the FAA to provide pilot training within the degree program. The estimates for hours and costs are broken down by the assumed number of institutions applying for this authority and the initial aviation coursework mapping that needs to be documented by the institution of higher education, as this information is not typically collected from them.

While requiring the gathering and maintaining of pilot training information and, in certain cases, the reporting of some of that information to the FAA, these sections generally require no additional burden on the part 141 certificate holders beyond what is currently required by rule or what is currently borne by certificate holders in regular practice. Exceptions to this are the following:

- a. One-time application to the FAA by an institution of higher education that seeks this authority. Requires one individual from the institution of higher education 8 hours to review the instructions in Advisory Circular 61-139, obtain part 141 pilot school information as well as degree and coursework details, and complete the application.
- b. Requires an academic advisor (post-secondary teacher) 0.5 hours to review the transcript of each graduate to determine eligibility for a restricted privileges ATP certificate.
- c. During the part 141 certificate holders' renewal every 24 calendar months, the chief instructor (training center instructor) will review the letter of authorization with an FAA inspector. The associated costs are minimal additional recurring because the review is included as part of existing duties for approved pilot training and record keeping.

Assumptions for Cost Burden to Respondents

8 Initial application: Post-Secondary Teacher from the institution of higher education (hours)

0.5 Academic advisor (Post-Secondary Teacher) one-time per graduate for record keeping to review their transcript for eligibility for a restricted privileges ATP certificate

\$52.31 Post-Secondary Teacher/Academic advisor hourly rate

2 Estimated number of institutions of higher education applying annually.

Table 2. Burden to Certify Graduates for an ATP

Year	Number of Schools Applying Annually	School Application for FAA Approval--Hours	School Application for FAA Approval--Costs	Estimated No. of Graduates	Review of Transcripts--Hours	Review of Transcripts--Costs	Total Hours	Total Costs
2026	2	8 (16 total)	\$418	1451	726	\$37,977	734	\$38,395
2027	2	8 (16 total)	\$418	1461	731	\$38,239	739	\$38,657
2028	2	8 (16 total)	\$418	1469	735	\$38,448	743	\$38,866
Total		24	\$1,254	4,381	2,192	\$114,664		\$115,918
Average Annual Burden		8	\$418	1,460	731	\$38,221	739	\$38,639

The average annual hour burden to respondents is 739 and the average annual cost burden is \$38,639.

School Application

Summary (Annual numbers)	Reportin g	Recordkeepin g	Disclosur e
# of Respondents	2		
# of Responses per respondent	1		
Time per Response	8 Hours		
Total # of responses	2		
Total burden (hours)	16 Hours		

Summary (Annual numbers)	Reportin g	Recordkeepin g	Disclosur e
# of Respondents		1460	
# of Responses per respondent		1	
Time per Response		.5 hours	
Total # of responses		1460	
Total burden (hours)		731 Hours	

Revision Application for Authority to Certify Graduates for an ATP Certificate with Restricted Privileges

For those institutions of higher education that have received the Letter of Authorization (LOA) from the FAA to certify graduates for an ATP certificate with restricted privileges that would like to add degree programs or additional coursework to the authorization, they must submit an application for revision. FAA will review the revised application and amend the LOA accordingly.

a. An application for revision to the FAA by an institution of higher education that seeks to amend its authority. Requires one individual from the institution of higher education 2 hours to review the instructions in Advisory Circular 61-139, obtain part 141 pilot school information as well as any new degree and coursework details as needed for the revision, and complete the

applicable sections of the application. A revision uses the same application form (FAA form 8700-1) as the initial application.

Assumptions for Cost Burden to Respondents

2 Initial application: College professor from the institution of higher education (hours)

\$52.31 College professor / Academic advisor hourly rate

30 Number of institutions of higher education that will send a revised application

Table 3. Burden to Review the Revised Application

Year	School Revision Application for FAA Approval-- Hours	Total Costs
2026	60	\$3,139
2027	60	\$3,139
2028	60	\$3,139
Total	180	\$9,417
Average Annual Burden	60	\$3,139

The average annual hour burden to respondents is 60 and the average annual cost burden is \$3,139.

Summary (Annual numbers)	Reportin g	Recordkeepin g	Disclosur e
# of Respondents	30		
# of Responses per respondent	1		
Time per Response	2 Hours		
Total # of responses	30		
Total burden (hours)	60 Hours		

Combining the average annual burden for the ATP CTP, Application for Authority to Certify Graduates for an ATP Certificate with restricted privileges, and Revision Application for Authority to Certify Graduates for an ATP Certificate with restricted privileges for 2026-2028 produces a total annual hourly burden of 1,329 hours and \$67,499

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 costs not already included in Item 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 FAA updated the hourly rates in 2025 with the most current data available at the time.

ATP CTP

The estimates for hours and costs are for the FAA to issue initial approval and then ultimately final approval of an ATP Certification Training Program. After final approval, there are minimal additional recurring costs for the Federal Government because an ATP Certification Training Program would be included as part of current FAA certificate management duties for approved pilot training and record keeping.

The Office of Personnel Management (OPM) reports GS pay scales for Aviation Safety Inspectors/Technicians/Assistants. The FAA estimates that an Aviation Safety Inspector at the GS-14 pay rate would perform many of the duties listed below. The hourly rates are based off a GS-14 pay grade, Step 5 in Kansas City, MO which is the midpoint for the country. The GS-14, Step 5 hourly rate is \$68.73 an hour⁷. To account for fringe benefits and overhead, a 31% multiplier was applied.⁸ Therefore, the estimated hourly salary for a Transportation Inspector is \$90.04.

OPM reports GS pay scales for FAA Aviation Safety Assistants (clerical). The FAA estimates that an Aviation Safety Assistant would be at a GS-6, Step 5 pay rate. The GS-6, Step 5 hourly wage is \$24.81 an hour.⁹ To account for fringe benefits and overhead, a 31% multiplier was applied.¹⁰ Therefore, the estimated hourly salary for a Transportation Inspector is \$46.11.

⁷ [SALARY TABLE 2025-KC](#)

⁸ [Employer Costs for Employee Compensation - March 2025](#)

⁹ [SALARY TABLE 2025-KC](#)

¹⁰ [Employer Costs for Employee Compensation - March 2025](#)

Assumptions for Cost to the Federal Government

\$90.04	FAA Aviation Safety Inspector average hourly rate
\$46.11	FAA Aviation Safety Assistant/Clerical average hourly rate
156	Inspector time (hours) to review an ATP CTP submitted for approval
0.5	Clerical Assistant time (hours) to type approval letter

- a. Requires one FAA inspector (Field Inspector) 30 hours, one FAA inspector (Safety Standards Inspector) 30 hours, and two additional FAA inspectors (Safety Standards Inspector) 25 hours each to review each ATP Certification Training Program submitted for initial approval. This initial approval permits the certificate holder to deliver the ATP Certification Training Program for one year.
- b. Requires two FAA inspectors 20 hours of review and 6 hours of travel, for one FAA inspector (Safety Standards Inspector) for final approval. Final approval will be granted after review of the certificate holder's training program performance measures, site visit and FAA inspector (Safety Standards Inspector) observation of the program.

Table 4. Cost Burden to Federal Government to Issue and Approve an ATP Program

Year	Review of ATP Training Program Course-- Hours	Review of ATP Cert. Training Program Course— Costs	Approval Letter Hours	Approval Letter Costs	Total Hours	Total Costs
2026	156	\$14,046	0.5	\$23	157	\$14,069
2027	156	\$14,046	0.5	\$23	157	\$14,069
2028	156	\$14,046	0.5	\$23	157	\$14,069
Average Annual Burden	156	\$14,046	1	\$23	157	\$14,069

The total annual cost to the Federal Government to Issue and Approve an ATP Program for 2026-2028 is \$14,069.

Application for Authority to Certify Graduates for an ATP Certificate with Restricted Privileges

The estimates for hours and costs are for initial application processing and issuance of a letter of authorization to an institution of higher education. After initial approval, there will be 2 hours of time added to an already scheduled event for a part 141 certificate holder with an Aviation Safety Inspector (Operations). The additional recurring costs for the Federal Government are minimal because a part 141 pilot school is included as part of current FAA certificate overall management duties for approved pilot training and record keeping.

Requires one FAA inspector 6 hours to review each initial application by an institution of higher education for authority to certify graduates.

Assumptions for Cost to the Federal Government

6 Inspector time (hours) to process and issue letter of authorization
 \$90.04 FAA Aviation Safety Inspector average hourly rate

Table 5. Cost Burden to Federal Government for Letter of Authorization

Year	Review & Approval of Course-- Hours	Review & Approval of Course-- Costs
2026	6	\$540
2027	6	\$540
2028	6	\$540
Average Annual Burden	6	\$540

The total annual cost to the Federal Government to issue a letter of authorization for 2026-2028 is \$540.

Revision Application for Authority to Certify Graduates for a Restricted Privileges ATP Certificate

For those institutions of higher education that have received the Letter of Authorization (LOA) from the FAA to certify graduates for a restricted privileges ATP certificate that would like to add degree programs or additional coursework to the authorization, they must submit an application for revision. FAA will review the revised application and amend the LOA accordingly.

Requires one FAA inspector 3 hours to review each initial application by an institution of higher education for authority to certify graduates.

Assumptions for Cost to the Federal Government

3 Inspector time (hours) to review and issue a letter of authorization (LOA) for a submitted application
 \$90.04 FAA Aviation Safety Inspector average hourly rate.

Table 6. Cost Burden to Federal Government to Review and Amend an LOA

Year	Review & Approval of Revision-Hours	Review & Approval of Revision-Costs
2026	90	\$8103
2027	90	\$8103
2028	90	\$8103
Average Annual Burden	90	\$8103

The total annual cost to the Federal Government to review and amend a letter of authorization for 2026-2028 is \$8,103.

This is an annual cost of \$22,712.

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

The wage rates were updated to current rates. Additionally, the number of respondents and total burden hours have increased due to increase in size of affected population.

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.

FAA publishes a list of approved ATP CTP providers and a list of authorized institutions of higher education on its Web site: <http://www.faa.gov/pilots/training/atp/>

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.

No such approval is being sought.

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

There are no exceptions.