Supporting Statement A
Reduction of Fuel Tank Flammability on Transport Category Airplanes
OMB 2120-0710

Abstract

Summary of major changes from previous supporting Statement A:

1. The FAA regulations 25.981(b)(2) and Appendix M 25.5 are specified as the regulations requiring the information or data collection – see item 1. The FAA Advisory Circular (AC) 25.981-2A specifies the design approval holders (DAH) applicable to the OMB 2120-0710 fuel tank flammability reduction component reliability data collection.
2. FAA received two public comments from the January 27, 2026 Federal Register Notice (91 FR 3626), supporting the FAA OMB 2120-0710 data collection effort to ensure aircraft fuel tank safety for the passengers, crew, and the flying public – see item 8.
3. This Statement A uses current 2025 BLR rates for cost estimates – see items 12 and 14.
4. This Statement A updates the number of respondents to 16, based on review of FAA Dynamic Regulatory System (DRS) database of current active aircraft Type Certificate (TC) Holders and Parts Manufacturers Approval (PMA) Holders with applicable aircraft fuel tank flammability reduction components under FAA oversight offices - see items 12 and 15.

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

The collection of Flammability Reduction Means (FRM) component reliability data by design approval holders (DAH) is to assure the fleet-wide flammability exposure of certain high flammability fuel tanks remains within requirements. Manufacturers of auxiliary fuel tanks are also required to conduct a flammability assessment as well as develop FRMs, if required. They are required to report FRM component data in accordance with Title 14, CFR 25.981(b)(2) and part 25 Appendix M M25.5. Suppliers of non-OEM FRM components must report reliability data for the FAA to utilize in assessing the impact of the performance of any FRM.

DAH who provide an FRM on transport category airplanes are required to provide a report to the FAA that contains reliability data for the FRM components. Continued reporting is necessary because the safety of the fleet depends upon the reliability of the FRM and, if the reliability does not meet that predicted at system certification, airworthiness directives may be needed. Note: there is no specific reporting requirement for operators because operators submit the data through normal business agreements between themselves and the manufacturers. Operators and the manufacturers already have agreements to gather data, such as warranty claims and engine and airplane reliability data submitted to the DAH for extended twin operations. DAH as specified in

AC 25.981-2A is the holder of any design approval, including type certificate, amended type certificate, supplemental type certificate, amended supplemental type certificate, Parts Manufacturer Approval (PMA), Technical Standard Order (TSO) authorization, letter of TSO design approval, and field approvals.

This collection of information supports the Department of Transportation's strategic goal of safety.

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 or data collection is mandatory from the DAHs as required by the FAA regulations as specified in item 1. The main purpose of the data collection is for the review by FAA oversight offices of the transport aircraft fuel tank safety level as required by the FAA regulations. The DAHs are required to provide semi-annual reliability reports.

The FAA safety oversight offices have reviewed the collected data in order to assess mandatory action to correct any unsafe conditions resulting from poor reliability of the fuel tank flammability reduction means (FRM) and the resulting increased flammability of the fuel tanks on transport category airplanes. This is because high flammability fuel tanks are susceptible to catastrophic fuel tank explosions. These collected data are the fuel tank FRM component reliability reports as specified in item 1.

In summary, the FAA requires the DAHs to collect and provide the fuel tank FRM component reliability results for FAA safety review. This is to ensure the fuel tank safety level meets the regulatory requirements specified in item 1.

1. **Whether responding to the collection is mandatory, voluntary, or required to obtain or retain a benefit.** The information or data collection is mandatory from the DAHs as required by the FAA regulations as specified in item 1.

2. **Describe the entities who must respond (e.g., class 1 railroads, operators of natural gas transmission lines, etc.).** DAHs who provide an FRM or FRM component on transport category airplanes are required to provide a report to the FAA that contains reliability data for the FRM components, as specified in item 1.

3. **Whether the collection is reporting (indicate if a survey), recordkeeping, and/or disclosure.** The collection is a reporting disclosure.

4. **Indicate collection frequency (e.g., bi-annual, annual, monthly, weekly, as needed.** The collection frequency per the regulation is 2 times per year.

5. **Describe the information that would be reported, maintained in records, or disclosed (e.g., information about a hazardous materials incident including**

location, type of hazardous material , extent of consequences, etc.). The information reported is the DAH FRM component reliability data.

6. **Describe who would receive the information – DOT, first responders, the general public, etc.** The DOT receives the data.

7. **Succinctly describe the purpose of the collection.** The purpose of the data collection is for FAA oversight offices' review of the transport aircraft's fuel tank safety level as required by the FAA regulations, as specified in item 1.

8. **If a revision, succinctly describe the revision in the Abstract and in question 15 of the Justification document.** See summary of the revisions in the Abstract.

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.

Design approval holders (DAH) receive reliability data from operators through electronic means. The FAA accepts electronic submissions of the required reports from the DAH. In addition, the FAA has issued approvals of FRM components manufactured by non-DAH suppliers of parts to airlines. The FAA also requires reliability reporting from these suppliers as a condition of the approvals. Emails are the means to collect electronic data.

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 DAH develop reporting documents to comply with this collection. There is no evidence of duplication as this information is not currently available elsewhere.

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

The certification of FRM components requires reporting component reliability. A small business or small entity would be aware of the requirement and the collection method can be through electronic means to minimize the 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.

If the collection was not conducted or was conducted less frequently, then it would be impossible for the FAA to monitor compliance with the reliability requirements of the rule

and possibly mandate safety improvements if the system reliability drops below that required by the regulation.

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; None.**
- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; None.**
- **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; None.**
- **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; None.**
- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB; None.**
- **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. None.**
- **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. The FAA oversight offices have procedures to protect the respondents' proprietary or confidential information.**
- **Explain the need for any inconsistencies in your collection. None.**

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 January 27th, 2026 (91 FR 3626) solicited public comment. Two anonymous public comments were received on March 9th 2026, FAA-2025-5436-0002 and FAA-2025-5436-0003.

These two comments appeared to be the same and supported FAA data collection. The second public comment is documented below:

"I support this renewal for fuel tank flammability safety. Tracking the reliability of fuel tank flammability reduction components is crucial to maintaining safety of aircraft fleets, especially if aircraft remain in service longer than originally expected. This reporting allows the FAA to identify potential degrading occurring, monitor performance more closely, and take proactive steps to mitigate risks before incidents occur. Requiring design approval holders to provide this data ensures that safety standards remain aligned with the original certifications and strengthens the FAA's safety management system by providing data to support hazard identification and risk reduction. Overall, this information collection is a vital tool for preserving aircraft fuel tank safety and protecting passengers, crew, and the flying public."

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

Not applicable.

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

The FAA oversight offices have procedures to protect the respondents' proprietary or confidential information.

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:

The collection for the next Statement A data collection period (2026-2029) is estimated to result in an annual reporting burden of approximately 1200 hours. This burden is based on fifteen (15) respondents submitting 30 total reports per year requiring an average of 40 hours to complete each report. The following provides details of response and burden hours to industry.

Table 1: Industry Annual Burden Hours

Summary of Annual numbers	**Reporting**	**Recordkeeping**	**Disclosure**
# of Respondents	16	0	0
# of Responses per respondent	2	0	0
Time per Response	40	0	0
Total # of responses	32	0	0
Total burden (hours)	1280	0	0

Based on the hour burden estimates, the total annual cost burden estimate is $121,116. The FAA multiplied the fully-burdened wage rate for aerospace engineers at $94.62 by the total annual burden hours of 1280 hours as shown in the table below.

Table 2: Industry Annual Cost Burden

Industry	**Hourly Wage (2025)[1]**	**Benefits Factor[2]**	**Fully-burdened Wage Rate[3]**	**Total Burden Hours**
Aerospace Engineers (17-2011)	$66.63	1.42	$94.62	1280
Total Burden Cost				$121,116

1. Bureau of Labor Statistics, May 2024 (SOC Code 17-2011) https://www.bls.gov/oes/current/oes172011.htm. To express the hourly cost in FY 2025 dollars, the FAA uses the implicit Gross Domestic Price (GDP) Deflator of 2.8%. Therefore, the hourly wage rate expressed in 2025 dollars ($64.82 hourly median wage X 1.028 GDP deflator = hourly wage of $66.63).
2. Wages and benefits information available at: Employer Costs for Employee Compensation Summary - 2025 Q04 Results
3. In addition, FAA adds a benefit overhead, which is based on the percentage of total compensation for transportation employees (1.42) to obtain a fully burdened wage cost per hour of $94.62.

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.

No other cost than labor as indicated in question 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.

FAA estimates the annual burden and cost to FAA is 148 hours and $15,811, respectively. The following provides details of response, burden, and cost estimates to the FAA.

FAA oversight office's aerospace engineer hours are estimated to review and archive reports, assumes no corrective actions are required and are based on past data collection periods. The burden is 4 hours X 32 reports for a total of 128 hours. The total burden cost equals $13,674.

FAA policy office's aerospace engineer hours are estimated to review and draft the federal register notices, make updates to statement A, and coordinate with other FAA oversight offices. The burden is 20 hours for a total burden cost of $2,137.

Adding the above, the total annual cost to the Federal government is $15,811. The following provides details of response, burden, and cost estimates to the FAA.

FAA Office / Role	**Annual Salary**	**Load Factor**[1]	**Fully-Loaded Hourly Wage**[2]	**Reduction of Fuel Tank Flammability on Transport Category Airplanes**	
				Labor Hours	*Labor Cost*
Aerospace Engineer (J band)	$163,090	36.25%	$106.83	128	$13,674
Aerospace Engineer (J band)	$163,090	36.25%	$106.83	20	$2,137
Total Burden Cost					**$15,811**

711.Civilian position full fringe benefit cost factor: https://www.whitehouse.gov/wp-content/uploads/legacy_drupal_files/omb/memoranda/2008/m08-13.pdf

2. Fully-Loaded Hourly Wage is calculated by multiplying the annual salary X (1+0.3625)/2080 (number work hours per year)

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

There are no program changes or adjustments as 14 CFR 25.981 establishes the reporting requirements. The FAA has received reports of premature failure of components on some airplane models resulting in the need to mandate safety improvements. Based on the review of current DAHs in the FAA DRS database, there are currently seven (7) TC design approval holders (DAH) and nine (9) parts manufacturer approval (PMA) holders subjected to the reporting requirements.

For this current Statement A of 2026, the applicable FAA oversight offices have also reviewed and confirmed the above TC and PMA holders.

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.

Not applicable. The FAA will not publish the information collected.

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.

Approval to not display the expiration date is not requested.

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

There are no exceptions.