

Federal Aviation Administration
Supporting Statement A
OMB CONTROL NUMBER: 2120-0774
Safety Assurance System (SAS) External Portal

Introduction

This Information Collection is submitted to the Office of Management and Budget (OMB) to request a renewal to an existing Information Collection currently under OMB control number 2120-0774, Safety Assurance System (SAS) external portal that includes 14 CFR parts 121, 135 145, 141, 142 and 147.

Estimated Burden Table 1 and Table 2 updated for;

- Number of respondents to reflect current utilization
- Burden Hours per Respondent to reflect accurate time
- Cost burden to reflect current labor rates

Part A Justification

1. Explain the circumstances that make the collection of information necessary.

Flight Standard's authority to collect this information is derived generally from 49 U.S.C. § 106(f) which establishes the FAA Administrator's responsibilities with respect to aviation safety. The collection of this information is consistent with the Administrator's authority under 49 U.S.C. 44701(c). The following requirements in 49 U.S.C. are also applicable to SAS; § 44702, Issuance of Certificates, § 44705, Air Carrier Operating Certificates, and §44707, Examining and Rating Air Agencies.

SAS contains an internal and external portal. The internal portal is a web-based tool used by the Federal Aviation Administration (FAA) Flight Standards Service (FS) employees to conduct initial certification, surveillance, and certificate management for certificate holders and applicants (CH/A) under 14 CFR parts 121, 135, 141, 142, 145 and 147. SAS is not a separate safety standard and does not impose additional requirements on the CH/A. SAS policy and procedures provide Principal Inspectors (PIs), Certification Project Managers (CPMs), Training Center Program Managers (TCPMs) and other FS employees with standardized tools to evaluate, approve or accept initial certification applications and certificate holder programs required by regulations.

The external portal is a web-based tool developed for the CH/A to exchange information with FS employees, primarily the CPMs, PIs and TCPMs. The SAS external portal provides the ability for CH/As to collaborate and communicate with their FS counterparts in the execution of the following functions:

- Submitting a Preapplication Statement of Intent (PASI) Form (FAA Form 8400-6) (14 CFR parts 121, 135 and 141);
- Submitting an Application for Repair Station (FAA Form 8310-3) (14 CFR part 145);

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- Submitting an Application for Aviation Maintenance School Certificate and Ratings Application (FAA Form 8310-6) (14 CFR part 147);
- Submitting a Letter of Intent (14 CFR part 142);
- Submitting Element Design (ED) data collection tools (DCTs); and,
- Sharing of other documentation as needed.

Use of the SAS external portal is optional for the CH/A. If a CH/A decides to use the SAS external portal, they will enter their request for access on the “SAS Registration” page. An automated email containing a registration link will be sent from the FAA to the email address provided. Once the requestor submits all required information, the request for external portal access is routed to the requestor’s responsible FS office that was provided in the registration. Benefits to the CH/A to use the external portal include:

- Ease of submission and expedited processing and tracking of documents/requests;
- Documents/requests are sent directly to the FS employees, which eliminates wait time for the entry of information by the PI/CPM; and,
- Access to DCTs.

2. Indicate how, by whom, and for what purpose the information is to be used.

How and by whom and for what purpose application information is collected:

Entities that currently hold certificates or wish to hold certificates under Title 14 CFR parts 121, 135, 141, 142, 145 and 147 can voluntarily report information to this collection site on occasion. The application information varies by certification type but typically collects information on the location of the operations, management personnel, type of operation or agency rating, and aircraft data is collected using a web-based portal that contains the application in an electronic fillable form, the application information is sent to the FS office using the web-based portal. FS employees communicate with the applicant through the external portal to:

- Assist the CH/A with the application process;
- Review the application package for accuracy and completeness; and,
- Accept or reject the submission.

How and by whom and for what purpose DCT information is collected:

Element Design Data Collection Tools (ED DCTs) are electronic tools that are exchanged between FS employees and the CH/A. They contain the regulatory and other requirements for the FS employees to approve or accept procedures and programs.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques.

The external portal is a web-based tool developed for the CH/A to exchange information with FS employees, primarily the Certification Project Managers (CPM), Principal Inspectors (PIs) and Training Center Program

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Managers (TCPMs). The SAS external portal provides the ability for the CH/A to collaborate and communicate with their FS counterparts in the execution of the following functions:

- Submitting a Preapplication Statement of Intent (PASI) Form (FAA Form 8400-6) (14 CFR parts 121, 135 and 141);
- Submitting an Application for Repair Station (FAA Form 8310-3) (14 CFR part 145);
- Submitting an Application for Aviation Maintenance School Certificate and Ratings Application (FAA Form 8310-6) (14 CFR part 147);
- Submitting a Letter of Intent (14 CFR part 142);
- Submitting Element Design (ED) data collection tools (DCTs); and,
- Sharing of other documentation as needed.

Use of the SAS external portal is optional for all CH/As. If a CH/A decides to use the SAS external portal they will enter their request for access on the “SAS Registration” <https://sas.faa.gov/sas.external.portal/ext/accounts> page. An automated email containing a registration link will be sent from the FAA to the email address provided. Once the user submits all required information, the request for external portal access is routed to the user’s responsible FS office that was provided in the registration.

4. Describe efforts to identify duplication.

We have reviewed other FAA public reports and find no duplication. In addition, the FAA knows of no other agency collecting the same information. The information sought is required information regarding certification and other activities for a specific CH/A. The information necessary is available from that CH/A only, and is not available from any other source.

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

FS developed the SAS external portal to ease the burden associated with this information collection and to better facilitate efficient certification, surveillance and certificate management activities. Additionally, the SAS external portal is accessible to all CH/As via the internet, regardless of geographical location, thus making it easier for small entities in remote locations to collaborate with FS employees.

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 a CH/A applies for a certificate or collaborates with the FAA about an existing certificate, the external portal provides an efficient method for an external user to enter data or collaborate and communicate with FS employees. Without this information collection, FS will be unable to efficiently facilitate initial certification activities, process other program requests and document certificate management activities.

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7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with 5 CFR 1320.5(d)(2)(i) through (viii).

This collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2)(i)-(viii).

8. Describe 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 data elements to be recorded, disclosed, or reported.

The FAA issued a 60-day notice in the Federal Register on December 20, 2024, to announce its intention to seek renewal of OMB approval for this data collection initiative. We received input from three individual commenters.

All three expressed interest in expanding functionality of the external portal. One commentor requesting addition of operations specifications. We are actively working on developing operations specifications functionality for the external portal, but the timeline for deployment has not yet been finalized.

Two of the three commenters raised concerns about slow response times from FAA offices requiring additional communication outside of the external portal. We want to clarify that our internal portal users receive automated notifications and individual work items for all submissions made through the external portal. However, in certain cases, communication outside of the portal may still be necessary.

One commenter was frustrated by the availability of the external portal due to both scheduled and unscheduled outages. We strive to schedule outages at times that minimize disruption. Unplanned outages, however, require careful troubleshooting, repair, and testing to ensure a reliable fix is implemented.

We value all feedback received and are committed to improving our systems and processes.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payment nor gift will be made to operators or air agencies who provide information regarding SAS data through the SAS external portal.

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

The respondents have been given no assurance of confidentiality.

11. Provide additional justification for any questions of a sensitive nature.

There are no questions of a sensitive nature.

12. Provide estimates of hour burden of the collection information.

FS estimates the hour burden information to respondents based on statistical information collected each fiscal year. In addition, to estimate the annualized costs to the respondents, we note the following:

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- The FAA uses a two percent discount rate for calculating present values of costs as prescribed by OMB in Circular A-4.
- Estimates are provided in fiscal year 2024 dollars.
- The FAA uses the Bureau of Labor Statistics (BLS) mean hourly wage for Civilian Workers, Occupational Group - Professional, and related.
- The FAA believes that one to three respondents would be required to enter the Application or Certificate holder information into the SAS External Portal. For this analysis the FAA uses the average two respondents $((1 + 3) / 2)$ to enter the Application or Certificate holder information.
- The FAA estimates that it will take approximately 15 minutes to 30 minutes to complete the Pre-Application Form and Letter of Intent in the SAS External Portal. For this analysis the FAA uses the average time of 22.5 minutes $((15 + 30)/2)$ multiplied by two respondents for a total of 67.5 minutes per applicant.
- The FAA estimates that it will take approximately 30 minutes to 60 minutes to complete the Element Data Collection Tool in the SAS External Portal. For this analysis the FAA uses the average time of 45 minutes $((30 + 60)/2)$ multiplied by two respondents for a total of 135 minutes per applicant.

Since the identity of the respondent completing the application or program request varies widely from the owner or operator of a small business to managers for a large business, we use the hourly rate from the BLS Civilian Workers Table, Occupational Group - Professional, and related. We believe this BLS category most closely matches the industry respondent. Using BLS's Employer Costs for Employee Compensation memo released March 14, 2025,¹ the FAA calculated the mean hourly wage, including benefits, for these respondents to be \$69.80.

We calculated the annual cost by multiplying the number of respondents by the burden hours per respondent for the Total Burden hours. The FAA then multiplies the Total Burden hours by the mean hourly rate plus benefits for the annual cost. The following tables shows the results for Applicants, Certificate holders, and total cost.

Table 1 – Estimated Burden for Applicant Information Collection

Collection Instrument	# of Respondents A	Burden Hours Per Respondent B	Total Burden Hours (A*B) C	Mean Hourly Rate Plus Benefits D	Annual Cost (C*D)
	A	B	C	D	(C*D)
Application Form (14 CFR parts 121, 135, 141, 142, 145, 147)	958	.75	719	\$69.80	\$50,186
Letter of Intent (14 CFR part 142 only)	102	.75	77	\$69.80	\$5,375
Element Data Collection Tools (ED DCTs) (applicants only)	1061	1.5	1,592	\$69.80	\$111,122
Total:			2388		\$166,683

¹ <https://www.bls.gov/news.release/pdf/ecec.pdf>
5 (updated Feb 24, 2022)

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Table 2 – Estimated Burden for Certificate Holders Information Collection

Collection Instrument	# of Respondents A	Burden Hours Per Respondent	Total Burden Hours (A*B)	Mean Hourly Rate Plus Benefits	Annual Cost
	A	B	C	D	(C*D)
Element Data Collection Tools (ED DCTs) (certificate holders)	9,076	1.5	13,614	\$69.80	\$950,257
Total:			13,614		\$950,257

We then summed the costs from Table 1 and Table 2 for a total cost over the three-year period of analysis. We calculated the annualized costs over a three-year period of analysis using a financial function that returns the periodic payment. The following table shows we estimate the total cost to respondent to be about \$3.2 million dollars with an annualized cost of about \$1.1 million at a 2 percent discount value over the three-year period of analysis.

Table 3 – Total Estimated Burden and Annualized Cost

Year	Annual Cost (Applicant) (A)	Annual Cost (Certificate Holder) (B)	Total Annual Cost (A+B)	2 % Present Value
Fiscal Year 1	\$166,683	\$950,257	\$1,116,940	\$1,094,601
Fiscal Year 2	\$166,683	\$950,257	\$1,116,940	\$1,072,262
Fiscal Year 3	\$166,683	\$950,257	\$1,116,940	\$1,049,924
Total Cost			\$3,350,820	\$3,216,787
Annualized Cost				\$1,072,262

13. Provide estimates of the total annual cost burden to respondents or record-keepers resulting from the collection of information.

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There are no costs associated with this collection that have not already been identified in the responses to item Numbers 12 and 14.

14. Provide estimates of annualized cost to the Federal government.

There is no cost to maintain the external Portal since no additional equipment or people will be required to maintain those tools.

Flight Standards Training Costs

The training to support the external portal consists of two courses both are web-based courses that have no cost associated with them. This information was provided by the Workforce Development Division.

IT Costs

IT operations and maintenance (O&M) costs for the external portal are contained within the cost to maintain the internal portal and are not broken out as a separate cost. The costs are estimated to be range from 1% to 2% per year of the total costs of \$4.22M for the external portal. We calculate the O&M costs range from \$42,200 to \$84,400 per year ($0.01 * \$4.22M$ and $0.02 * \$4.22M$) or an average of \$63,300 per year $((42,200 + 84,400) / 2)$ with an annualized cost of \$63,300 at a 2 percent discount value over the three-year period of analysis. The table below provides the projected O&M costs for the SAS external portal.

Year	Annual Cost	2 % Present Value
Fiscal Year 1	\$63,300	\$62,034
Fiscal Year 2	\$63,300	\$60,768
Fiscal Year 3	\$63,300	\$59,502
Total Cost	\$189,900	\$182,304
Annualized Cost		\$60,768

15. Explain reasons for program changes or adjustments reported in Items 13 or 14 of OMB Form 83–I.

Changes for this renewal include updated respondent numbers and updated labor rates.

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.

Results of this information collection will not be published.

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17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The FAA is not seeking approval to eliminate display of the expiration date for OMB approval of the information collection.

18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.

There are no exceptions to the certification statement identified in item No. 19 of OMB F

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