

## SUPPORTING STATEMENT

OMB -2120-0680

### **Part 60 -- Flight Simulation Device Initial and Continuing Qualification and Use**

#### **Justification**

**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 air carriers 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.

This project also directly supports the following initiatives under the FAA's Corporate Project, Safer Skies:

- a. AFS Strategic Plan – Goal 1: Evolve to a Systems Approach for Safety Oversight.
- b. AFS Business Plan Initiative 2.9: Improve the Requirements Process.
- c. AFS Strategic Plan – Goal 4: Promote Positive, Responsive, and Focused Customer Relations.
- d. AFS Business Plan Initiative 2.13: Continue Efforts Associated with Safer Skies – Commercial Aviation.

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

This request for clearance reflects requirements necessary under Title 14 CFR part 61, part 63, part 91, part 121, part 135, part 141, and part 142, to ensure safety-of-flight by ensuring that complete and adequate training, testing, checking, and experience is obtained and maintained by those who operate under these parts of the regulation and use flight simulation in lieu of aircraft for these functions. The FAA will use the information it collects and reviews to ensure compliance and adherence to regulations and, where necessary, to take enforcement action on violators of the regulations.

**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 will not only allow and accept 100% electronic submission, but encourages the use of automation and electronic media for the gathering, storage, presentation, review, and transmission of all requests, records, reports, tests, or statements required by this proposed rule with the provision 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. Over the course of the first 4 years we anticipate an average of 50% of the material will be submitted electronically. The FAA is working to insure that the process is 100% available to respondents throughout the world.

FAA Estimates of Electronic Responses

<b>Years After Rule</b>	<b>Number of Respondents (Sponsors)</b>	<b>Number of Responses Annual FAA Contacts (Anticipated)</b>	<b>Percent Responses Received Electronically (Anticipated)</b>
1	66	450	20%
2	66	350	40%
3	70	350	60%
4 +	75	350	80%

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose(s) described in 2 above.**

We have reviewed other FAA public-use reports and find no duplication. Also, the FAA knows of no other agency collecting the same information. The information sought is peculiar to a specific flight simulation training device (FSTD), constructed for and delivered to a specific operator, the FSTD sponsor. The information necessary is available from that sponsor only, and is not available from any other source.

**5. If the collection of information has a significant impact on a substantial number of small businesses or other small entities (item 5 of OMB Form 83-I), describe the methods used to minimize burden.**

The FAA believes that this rule will not impact a substantial number of small businesses or other small entities; however, the material published in conjunction with this rule is informative and explanatory with regards to the requirements, and a sponsor applicant will be guided through the administrative requirements by the local principal operations inspector or training center program manager and by representatives of the National Simulator Program staff regarding any FSTD for which the sponsor applicant seeks qualification.

**6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

The frequency of information collection for purposes of part 60 is for original qualification and continuing qualification of FSTDs used for flightcrew member training, evaluation, or flight experience requirements in lieu of the aircraft. If the applicant sponsor does not apply initially, evaluation of the FSTD and subsequent qualification will not occur. If the sponsor does not continue to provide this information, the FAA will not be able to determine if the FSTD continues to meet the required performance and handling qualities necessary for the FSTD to substitute completely and accurately for the aircraft in training, evaluation, or flight experience requirements.

**7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with 5 CFR 1320.5(d)(2)(i)-(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 record keeping, disclosure, or reporting format (if any) and on the data elements to be recorded, disclosed, or reported.**

In order to resolve comments and provide a forum for the FAA and the aviation community to discuss and resolve issues regarding Flight Simulation Training Devices (FSTDs), the FAA established the Flight Simulation Device Aviation Rulemaking Committee (ARC) on July 2, 2003. The ARC provided a forum for the FAA and affected members of the aviation community to discuss issues. The ARC also allowed members of the aviation community to reach consensus on certain recommendations that would be submitted to the FAA and to develop resolutions to facilitate the evolution of FSTDs. After the FAA received recommendations from the ARC the comment period was reopened on February 10, 2004, to permit interested persons to review these recommendations and submit additional comments. The recommendations from the ARC are available online at <http://dms.dot.gov> by searching for entry 84 in docket number FAA-2002-12461. The comment period closed on March 11, 2004. The overwhelming majority of the clarifications and revisions contained in the final rule are consistent with the ARC recommendations.

A 60-day notice for public comment was also published in the Federal Register on December 23, 2008, Volume 73, no. 247, pages 78865-78866. No comments were received. A copy is attached for your convenience.

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

There are no monetary considerations for this collection of information.

**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 such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

There are no questions of a sensitive nature.

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

The estimates for hours are broken down by sections of the proposed rule, below. For a cumulative estimate of the hours burden see the summary table at the end of this document.

#### **§ 60.5 Quality Management System.**

Instead of requiring each sponsor to develop fully a complete, traditional, Quality Management System, this section now calls for a sponsor to develop, review, and have approved by the FAA, a “statement of compliance” indicating the policy, practice, or procedure that they will follow for each of the sections of Part 60. The purpose of this program continues to require the sponsor to systematically plan for and implement the requirements of part 60 and the associated Qualification Performance Standard (QPS). However, the FAA believes that this requirement will take significantly less time than originally proposed.

The quality management system would impose a single type of cost on the industry and the FAA, a set-up, or one-time cost. Because the requirement for a quality management system has been lessened to requiring only a “statement of compliance,” sponsors are not expected to incur any recurrent costs for this section.

For the one-time cost on the industry side:

The calculations for the original requirement for the 66 sponsors at that time, netted a total of 31,680 hours (including the 3,836 hours required under §60.9) for the industry to develop a Quality Management System. The estimates for constructing a “statement of compliance,” for the current 80 sponsors, is 4,650 hours. See Table 1 and the Summary table at the end of this document for calculations.<sup>1</sup>

For the continuing, annual cost on the industry side:

In that the sponsor’s Management Representative would be required to update the “Statement of Compliance” only when the rule changes, or the manner by which the sponsor complies with the rule changes, we anticipate this to be zero hours annually, where the original calculations estimated 924 hours annually.

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<sup>1</sup> Source: Final Regulatory Evaluation, Regulatory Flexibility Determination, International Trade Impact Assessment, And Unfunded Mandates Assessment Of Part 60, Flight Simulation Device Qualification.

### **§ 60.9 Additional Responsibilities of the Sponsor.**

1. Sub-Section (b)(1) of this section sets out a requirement for the sponsor to establish a mechanism for receiving comments from those persons using the FSD. The time and costs involved are accounted for under the discussion under §60.5 Quality Management System, above. Sub Section (b)(2) of this section sets out requirements for the sponsor to examine each comment received under sub-section (b)(1) and to take appropriate action for each comment. The time and costs involved are accounted for under the discussion under §60.5 Quality Management System, above. Together, these requirements totaled 3,836 hours.

2. Sub-Section (b)(3) of this section sets out a requirement for each sponsor to maintain a liaison with the manufacturer of the aircraft being simulated by the FSD. Originally, the time and costs involved calculated to be 264 hours. The requirement to maintain an active liaison with the manufacturer has been eliminated.

See Table 2 and the Summary table at the end of this document for calculations.<sup>2</sup>

However, because existing practices/procedures provide an acceptable mechanism to meet this requirement, sponsors of FSTDs will incur no **additional** time costs from present practice.

### **§ 60.13 FSTD Objective Data Requirements.**

The time and costs involved are addressed in § 60.15, FSTD Initial Qualification Requirements, below.

See Table 3 and the Summary table at the end of this document for specific numbers.<sup>3</sup>

However, because existing practices/procedures provide an acceptable mechanism, sponsors of FSTDs will incur no **additional** time costs from present practice.

### **§ 60.15 Initial Qualification Requirements.**

1. Sub-Section (a) sets out the requirement that a request for evaluation must be submitted. Time and costs are described under Sub-Section (b), below.

2. Sub-Section (b) sets out the requirements for the contents of the request for evaluation.

The original calculations resulted in an estimate of 5, 845 hours. The current estimate, 7,085 hours, is adjusted for the increase in the number of sponsors.

With the exception of the calculation for conversion to electronic format for all QTG documents, existing practices/procedures provide an acceptable mechanism for meeting all other requirements in this section and sponsors of FSTDs will incur no **additional** time costs from present practice.

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<sup>2</sup> Source: Final Regulatory Evaluation, Regulatory Flexibility Determination, International Trade Impact Assessment, And Unfunded Mandates Assessment Of Part 60, Flight Simulation Device Qualification.

<sup>3</sup> Source: Final Regulatory Evaluation, Regulatory Flexibility Determination, International Trade Impact Assessment, And Unfunded Mandates Assessment Of Part 60, Flight Simulation Device Qualification.

**§ 60.16 Additional Qualifications for a Currently Qualified FSD.**

This section sets out the requirements for the sponsor to submit to the National Simulator Program Manager a summary of all modifications to a qualified FSD.

1. For all additional tasks (beyond those originally qualified) that require no qualification test guide modification, the Management Representative or a pilot instructor would spend 0.5 hours in drafting a letter to the NSPM and a clerk would spend 0.5 preparing the letter for mailing.

Assuming the following:

(a) That additional tasks (beyond those originally qualified) will be requested of 25% of all new FSTDs and

(b) That 70 new FSTDs will enter service each year --

The original calculations estimated this requirement to be 9 hours.

2. For each additional task (beyond those originally qualified) that requires qualification test guide modification, the FSTD technician would spend 2.5 hours in developing an appropriate change, a clerk would spend 0.5 hours preparing the proposed change, the Management Representative or a pilot instructor would spend 0.5 hours drafting a letter to the NSPM, and a clerk would spend 0.5 hours preparing the letter for mailing. Assuming the following:

(a) that 2 additional tasks (beyond those originally qualified) will be requested on 5% of new FSTDs;

(b) that 1 additional task will be requested on 20% of new FSTDs and;

(c) original estimates were that 70 new FSTDs will enter service each year; this estimate has been adjusted downward to 40 per year entering service.

The original estimations for the requirements for this section called for 32 hours and 51 hours, for a total of 83 hours. However, with the adjustments for the number of FSTDs from 70 to 40 the estimate has been revised down to a new total of 47 hours.

**§ 60.19 Inspection, Maintenance, and Recurrent Evaluation Requirements.**

1. The first Sub-Section requires sponsors to conduct inspections of each FSTD each calendar quarter, with each such inspection addressing approximately one-fourth of the performance demonstrations and one-fourth of the objective tests required in the appropriate Qualification Performance Standard document. This inspection, conducted automatically, on modern FSTDs would take an FSTD technician 2 hours; and on older FSTDs with more manually controlled functions, this inspection would take an FSTD technician 6 hours to complete. Approximately 60% of the current 500 FSTD inventory are modern FSTDs and 40% are older FSTDs.

The original estimates for this section called for 2,400 hours and 4,800 hours, for a sub-total of 7,200 hours

2. This Sub-section also requires that a functional preflight check be completed prior to use each day and at least once each week when not regularly used. This preflight check would take an FSTD technician 0.5 hours to complete. While it is not possible to predict with any accuracy what the frequency of use might be for any given FSD, the following is offered for consideration: Assume the following:

- (a) That 70% of the qualified FSTDs are used an average of 4 days each week for 42 weeks of the year and are used not more than once each week for the remainder of the 10 weeks each year;
- (b) That 30% of the qualified FSTDs are used an average of 6 days each week for 26 weeks, 3 days each week for 13 weeks, and not more than once each week for the remainder of the 13 weeks each year.

The original estimates for this section called for 29,000 hours and 1,560 hours, for a sub-total of 30,960 hours.

3. This sub-section also requires that when a discrepancy is discovered at any time, the discrepancy and the corrective action taken must remain in the discrepancy log for at least 30 days after the discrepancy has been corrected. While it is not possible to predict accurately the frequency with which discrepancies might occur and the amount of time required to repair any given discrepancy would be directly dependent on the nature of that discrepancy, the following is offered for consideration: Assume the following:

- (a) That there are an average of 2 discrepancies each week on each qualified FSTD, for an average of 104 discrepancies each year on each qualified FSTD;
- (b) That 80% of these discrepancies is a minor discrepancy and will take an FSTD technician an average of one hour to repair;
- (c) That 15% of these discrepancies is moderate and will take an FSTD technician an average of 4 hours to repair; and
- (d) That 5% of these discrepancies is major and will take an FSTD technician an average of 24 hours to repair.
- (e) That it will take an FSTD technician 0.25 hours to record each correction in the discrepancy log.

The original estimates for this section called for a sub-total of 148,000 hours.

4. The second sub-section requires that each FSTD be recurrently evaluated by the NSPM not less than once each year. This evaluation will require the time of a sponsor FSTD technician and a sponsor pilot instructor. Each evaluation will require approximately 4 hours of time from both participants (time spent in the FSD) and approximately 2 additional hours of time from the sponsor's FSTD technician. The FAA estimates that of the 500 FSTDs currently qualified, approximately 30% are sponsored by 10% of the sponsors (large sponsor) and 70% are sponsored by 90% of the sponsors (small sponsor).

The original estimates for this section called for a sub-total of 5,000 hours.

The original estimates totaled (7000 + 30,960 + 148,000 + 5,000) or 191,410 hours; and, using the comments received from the public, the increase in the number of sponsors, and a more careful breakdown of small, medium, and large sized sponsors, the current estimate of recurring maintenance costs, both major and minor is 34,264 hours.

However, because existing practices/procedures provide an acceptable mechanism, sponsors of FSTDs will incur no **additional** time costs from present practice.

#### **§ 60.20 Logging FSTD Discrepancies.**

This Section requires that when a discrepancy is discovered at any time, the discrepancy must be written into the discrepancy log. While it is not possible to predict accurately the frequency with which discrepancies might occur, the following is offered for consideration: Assume the following:

1. That there are an average of 2 discrepancies each week on each qualified FSD, for an average of 104 discrepancies each year on each qualified FSD.
2. That 80% of these discrepancies are recognized by a pilot instructor and
3. That 20% of these discrepancies are recognized by an FSTD technician.
4. That the entry of the discrepancy into the log would take 0.05 hour per entry.

The FAA estimates that of the 500 FSTDs currently qualified, approximately 30% are sponsored by 10% of the sponsors (large sponsor) and 70% are sponsored by 90% of the sponsors (small sponsor).

The original estimate totaled 2,600 hours; and, with the increase in the number of FSTDs available, this total is now 3,151 hours.

However, because existing practices/procedures provide an acceptable mechanism, sponsors of FSTDs will incur no **additional** time costs from present practice.

#### **§ 60.23 Modifications to FSDs.**

This Section describes what must be done in order to modify a qualified FSD. While it is not possible to predict accurately the frequency with which modifications might occur and the amount of time required to make any given modification would be directly dependent on the nature of that modification, the following is offered for consideration: Assume the following:

1. There is an average of three modifications per year to 40% of the currently qualified FSDs;
2. Two of these three modifications are minor in nature requiring review by, but not requiring written approval from, the NSPM;
3. One of these modifications is major and requires both review and written approval from the NSPM; and
4. One-quarter of the major modifications require NSPM on-site evaluation prior to returning the FSTD to service.

The sponsor's FSTD technician would take 2 hours to research and develop each required modification followed by 0.5 hours to draft the notification the NSPM/TPAA. It would take a clerk 0.5 hours to prepare the notification for mailing. After the appropriate time or after receiving approval, it would take an FSTD technician an average of 2 hours to complete each minor modification, and it would take the technician an average of 16 hours to complete each major modification.

While the original estimate totaled 5,900 hours; using the comments received from the public, the increase in the number of sponsors, and a more careful breakdown of small, medium, and large sized sponsors, the current estimate of modification costs, both major and minor has been revised upward to 29,023 hours.

However, because existing practices/procedures provide an acceptable mechanism, sponsors of FSTDs will incur no **additional** time costs from present practice.

**§ 60.25 Operation with Missing, Malfunctioning, or Inoperative Components.**

This Section no longer requires that each missing, malfunctioning, or inoperative (MMI) component in an FSTD be placarded. The requirement is now that each discovered MMI component disallows the use of the FSTD for those maneuvers, procedures, or tasks that require the MMI component to operate properly. While it is still not possible to predict accurately the frequency with which components might become missing, might malfunction, or might not operate correctly, the original estimate assumed the following:

1. That an average of 2 components become missing, malfunctioning, or inoperative on each FSTD each month;
2. That it will take an FSTD technician an average of 0.05 hours to placard each such component.

While the original estimate would have required a total of 50 hours for this section, after considering the comments received from the public, this requirement has been deleted.

**§ 60.31 Recordkeeping and Reporting.**

1. This section requires the sponsor to maintain certain records.
  - (a) The time and costs of developing the Qualification Test Guide (QTG) [later known as the Master QTG] are addressed in the discussion on §60.15. No additional time or costs are involved.
  - (b) The time and costs of completing the quarterly objective tests and performance demonstrations are addressed in the discussion on §60.15. No additional time or costs are involved.
  - (c) The time and costs of completing the recurrent evaluations are addressed in the discussion on §60.19. No additional time or costs are involved.
  - (d) The time and costs of obtaining comments in accordance with §60.9(b)(1) are addressed in the discussion on §60.9.
  - (e) The time and costs of recording discrepancies are addressed in the discussions on §60.20. No additional time or costs are involved.
  - (f) The time and costs of recording modifications to the FSTD are addressed in the discussion on §60.23. No additional time or costs are involved.
2. This section originally required the sponsor to keep a record of each certificate holder using the FSTD and to provide the NSPM with a copy of this record semiannually. This was estimated to take the Management Representative an average of 1.0 hour each six months (2.0 hours annually) to record this list and a clerk would take an average of 0.5 hours to prepare this list for mailing.

The original estimate called for a total 132 hours for this section; however, after considering the comments received from the public this requirement has been deleted.

**For a cumulative estimation summary for Question 12 (hours), please see the Summary table at the end of this document.**

**The total estimated annual burden on the public is 72,072 hours. This is calculated by dividing the initial, one-time burden of 16,902 by 3 (for the 3-year clearance period, 5,634**

hours) and adding it to the 66,438 recurring annual burden hours (5,634 + 66,438 = 72,072).

We approximate that we will receive a total of 6 to 7 requests for evaluation from each of the 80 Flight Simulation Device Operators (FSTD) per year, for an estimated total of 545 responses.

**13. Provide an estimate of 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 the answers to question 12.

**14. Provide estimates of annualized cost to the Federal Government.**

The estimates for hours and costs are broken down by sections of the proposed rule, below, including a section-by-section calculation.

For a cumulative estimate of the hours, see the summary table at the end of this statement.

**§ 60.5 Quality Management System.**

The original estimate for the one-time cost to the FAA was 2, 112 hours; and the estimate for the annual recurring cost was 1,848 hours. However, after considering the comments received from the public the FAA has modified this section to require a “statement of compliance” from the sponsors indicating the policy, practice, or procedure that they will follow for each of the sections of Part 60. The estimate for the newly established requirements is for 800 hours as shown in Table 1 and the Summary table at the end of this statement.<sup>4</sup> In addition, as can be seen in Table 2, there are no recurring costs to the government. At \$47/hour for an FAA FSTD Inspector, the one-time cost to the Federal Government for this section is \$37,600.

**§ 60.15 Initial Qualification Requirements.**

The total, one-time hourly cost to the government for this section was estimated to be 160 hours. There has been no change to this estimate, as shown in Table 3<sup>5</sup> and the Summary table at the end of this statement. At \$47/hour for an FAA FSTD Inspector, the one-time cost to the Federal Government for this section is \$7,520.

**§ 60.19 Inspection, Maintenance, and Recurrent Evaluation Requirements.**

The original estimate for the hourly cost to the government was 250 hours. However, as the number of FSTDs has increased, the estimate has risen commensurately to 400 hours.

The original estimate for the hourly cost to the government for this section was calculated at 3000 hours of FSTD inspector time and 250 hours of clerk time, for a total of 3,250 hours. After reviewing the comments received from the public and re-calculating for the increase in the

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<sup>4</sup> Source: Final Regulatory Evaluation, Regulatory Flexibility Determination, International Trade Impact Assessment, And Unfunded Mandates Assessment Of Part 60, Flight Simulation Device Qualification.

<sup>5</sup> Source: Final Regulatory Evaluation, Regulatory Flexibility Determination, International Trade Impact Assessment, And Unfunded Mandates Assessment Of Part 60, Flight Simulation Device Qualification.

number of sponsors, this estimate has been revised upward to a total of 3,846 (3,550 inspection, 296 clerical) hours as seen in Table 4 and the summary chart at the end of this statement.

At \$47/hour for an FAA FSTD Inspector (3550 hours), and at \$14/hour for an FAA clerk (296 hours) the annual recurring cost to the Federal Government for this section is  $\$166,850 + \$4,144$ , or  $\$170,994$ .

Dividing the one-time costs by three and adding it to the annual recurring cost burden, we estimate that the annual cost burden over the three-year requested clearance period is  $(\$45,120 / 3 = \$15,040)$ .  $\$15,040 + \$170,994 = \mathbf{\$186,034}$

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.**

There have been no changes.

**16. For collections of information whose results are planned to 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 is no plan for tabulation or publication.

**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.**

No such approval is being sought.

**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.

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Table 1, Cost In Hours for §60.5 (One-Time Cost)

Statement of Compliance (SOC)	Small Sponsors	Medium Sponsors	Large Sponsors	Total Hours
<b>Private Sector:</b>				
Pilot Instructor Hours per Sponsor	64	64	64	--
Number of Sponsors	18	53	9	--
Time for Each Type of Sponsor	1152	3392	576	5120
<b>Government:</b>				
Approve SOC per Sponsor				
FSTD Inspector Hours	8	8	8	--
Clerk Hours	2	2	2	--
Number of Sponsors	18	53	9	--
Total Time (Inspector + Clerk) Each Type Sponsor	180	530	90	800

Table 2, Annual Cost In Hours for §60.9 (Recurring Cost)\*

	Small Sponsors	Medium Sponsors	Large Sponsors	Total Hours
<b>Private Sector:</b>				
<b>Sponsors reviews of critiques.</b>				
FSTD technician hours to review each critique.	0.25	0.25	0.25	--
Number of critiques per Sponsor.	17	150	300	--
Number of Sponsors.	18	53	9	--
Total Time Each Type Sponsor	76.5	1987.5	675	4650

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Table 3, Cost of Hours for §60.15 (One-Time Cost)

	Small Sponsors	Medium Sponsors	Large Sponsors	Total Hours
<b>Private Sector:</b>				
<b>Convert QTG to a PDF Format</b>				
<b>Clerk Hours each QTG</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>--</b>
<b>Number of current FSTDs**</b>	<b>1.17</b>	<b>3.58</b>	<b>42.33</b>	<b>--</b>
<b>Number of Sponsors</b>	<b>18</b>	<b>53</b>	<b>9</b>	<b>--</b>
<b>Total Time Each Type Sponsor</b>	<b>21</b>	<b>190</b>	<b>381</b>	<b>592</b>
<b>Government:</b>				
<b>Preparation and delivery of Statement of Qualification</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>--</b>
<b>Number of Sponsors.</b>	<b>18</b>	<b>53</b>	<b>9</b>	<b>--</b>
<b>Total Time Each Type Sponsor</b>	<b>36</b>	<b>106</b>	<b>18</b>	<b>160</b>

\*\* = Assumes 18 small sponsors maintain 21 FSTDs; medium sponsors maintain 190 FSTDs; large sponsors maintain 381 FSTDs.

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**Table 4, Cost of Hours for §60.19 (Recurring Cost)**

	Small Sponsors	Medium Sponsors	Large Sponsors	Total Hours
<b>Private Sector:</b>				
<b>Major maintenance to FSTDs.</b>				
FSTD technician hours.	4	4	4	--
Clerk hours.	0.08	0.08	0.08	--
Current FSTDs <sup>#</sup>	1.17	3.58	42.33	--
Number of Sponsors	18	53	9	--
<b>Total Cost in hours for each type of sponsor.</b>	<b>86</b>	<b>774</b>	<b>1,554</b>	<b>2,414</b>
<b>Minor maintenance to FSTDs.</b>				
FSTD technician hours.	0.8	0.8	0.8	--
Clerk hours.	0.08	0.08	0.08	--
Current FSTDs <sup>#</sup>	1.17	3.58	42.33	--
Number of Sponsors	18	53	9	--
<b>Total Cost in hours for each type of sponsor.</b>	<b>19</b>	<b>59</b>	<b>335</b>	<b>413</b>
<b>Total Recurring Cost in Hours for §60.19</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>31,850</b>
<b>Government:</b>				
FSTD Inspector hours	6	6	6	--
Clerk hours.	0.5	0.5	0.5	--
Current FSTDs <sup>#</sup>	1.17	3.58	42.33	--
Number of Sponsors	18	53	9	--
<b>Total Cost in hours for each type of sponsor.</b>	<b>137</b>	<b>1,233</b>	<b>2,476</b>	<b>3,846</b>

# - Assumes 18 small sponsors maintain 21 FSTDs; medium sponsors maintain 190 FSTDs; large sponsors maintain 381 FSTDs.

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Table 5, Cost of Hours for §60.23 (Recurring Cost)

	<b>Small Sponsors</b>	<b>Medium Sponsors</b>	<b>Large Sponsors</b>	<b>Total Hours</b>
<b>Private Sector:</b>				
<b>Major modifications to FSTDs.</b>				
<b>FSTD technician hours.</b>	<b>40</b>	<b>40</b>	<b>40</b>	<b>--</b>
<b>Clerk hours.</b>	<b>0.5</b>	<b>0.5</b>	<b>0.5</b>	<b>--</b>
<b>Current FSTDs<sup>#</sup></b>	<b>1.17</b>	<b>3.58</b>	<b>42.33</b>	<b>--</b>
<b>Number of Sponsors</b>	<b>18</b>	<b>53</b>	<b>9</b>	<b>--</b>
<b>Total Cost in hours for each type of sponsor.</b>	<b>889</b>	<b>7,685</b>	<b>15,419</b>	<b>23,993</b>
<b>Minor modifications to FSTDs.</b>				
<b>FSTD technician hours.</b>	<b>8</b>	<b>8</b>	<b>8</b>	<b>--</b>
<b>Clerk hours.</b>	<b>0.5</b>	<b>0.5</b>	<b>0.5</b>	<b>--</b>
<b>Current FSTDs<sup>#</sup></b>	<b>1.17</b>	<b>3.58</b>	<b>42.33</b>	<b>--</b>
<b>Number of Sponsors</b>	<b>18</b>	<b>53</b>	<b>9</b>	<b>--</b>
<b>Total Cost in hours for each type of sponsor.</b>	<b>179</b>	<b>1,613</b>	<b>3,238</b>	<b>5,030</b>
<b>Total Recurring Cost in Hours for §60.23</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>29,023</b>

**Summary  
Paperwork Reduction<sup>1</sup>  
Cost to the Sponsor and the Government  
(Presented in Hours. There are 80<sup>2</sup> Sponsors.)**

Relevant Section of Part 60	Initial Cost in Hours						Annual Recurring Cost in Hours					
	To Sponsors			To Government			To Sponsors			To Government		
	2002	Now	Change	2002	Now	Change	2002	Now	Change	2002	Now	Change
§60.5	27,844	5,120	(-22,724)	2,112	800	(-1,312)	924	0	(-924)	1,848	0	(-1,848)
§60.9 <sup>2,3,4</sup>	3,836	4,650	+814	0	0	0	264	0	(-264)	0	0	0
§60.13 <sup>5</sup>	0	0	0	0	0	0	0	0	0	0	0	0
§60.15 <sup>6,9</sup>	5,845	7,085	+1240	160	160	0	-----Not Applicable-----					
	[488]	[592]	[+104]				-----Not Applicable-----					
§60.16 <sup>2,7</sup>	83	47	-36	0	0	0	-----Not Applicable-----					
§60.19 <sup>6,8</sup>	-----Not Applicable-----						191,410	34,264	(-157,146)	3,250	3,846	+596
§60.20 <sup>6</sup>	-----Not Applicable-----						2,600	3,151	+551	0	0	0
§60.23 <sup>6,8</sup>	-----Not Applicable-----						5,900	29,023	+22,423	0	0	0
§60.25	-----Not Applicable-----						50	0	(-50)	0	0	0
§60.31 <sup>5</sup>	0	0	0	0	0	0	132	0	(-132)	0	0	0
<b>Totals</b>	<b>37,608</b>	<b>16,902</b>	<b>(-20,706)</b>	<b>2,272</b>	<b>960</b>	<b>(-1,312)</b>	<b>201,280</b>	<b>66,438</b>	<b>(-134,842)</b>	<b>5,098</b>	<b>3,846</b>	<b>(-1,252)</b>

- 1 Gray-shaded areas indicate those rule sections where Sponsors have been, and are currently, producing the documentation required by this rule, except for §60.5, as noted by the absence of the shaded area. Sponsors will not be incurring an additional paperwork burden as a result of this rulemaking (except where noted); however, the FAA had not acknowledged these requirements previously, and, therefore, are acknowledged here.
- 2 Original calculations were based on 66 sponsors. This number has been revised up, and is now 80 sponsors.
- 3 Original calculations were included and remain within the calculations for §60.5.
- 4 The requirement for maintaining liaison with the manufacturer of the aircraft (originally calculated to be 264 hours) has been deleted.
- 5 Original calculations were included and remain within the calculations for §60.15.
- 6 Original calculations based on 500 FSTDs. Current number of FSTDs is 700.
- 7 Original assumptions based on 70 new FSTDs entering service each year. This number has been revised down, and is now 40.
- 8 Original assumptions revised on the basis of comments received from the public regarding time involved in modifications to FSTDs.
- 9 Original calculations included cost for conversion of existing QTGs to electronic format. Current calculations also include this function. Entries enclosed in brackets [ ] are included in the numbers present in the row immediately above, but are new requirements with this rule and are, therefore, presented without shading.

Attachment List:

1. Supporting Statement
2. 30 Day Notice
3. 60 Day Notice
4. 49 USC 44701
5. 49 USC 44702