

**Pilot Certification and Qualification Requirements for Air Carrier Operations
2120-XXXX**

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating and authorizing the collection of information.

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.

FAA aviation safety inspectors will review the Airline Transport Pilot (ATP) Certification Training Program (CTP) submittals to determine that the program complies with the applicable requirements of 14 CFR 61.156. The programs that comply with the minimum requirements will receive approval to begin offering or providing the course to applicants for an ATP certificate with a multiengine class rating or an ATP certificate obtained concurrently with an airplane type rating.

FAA aviation inspectors will review an institution of higher education's application (new form) for the authority to certify its graduates meet the minimum requirements of 14 CFR 61.160. The institutions of higher education that receive a letter of authorization for their degree program(s) will be authorized to place a certifying statement on a graduates' transcript indicating he or she is eligible for a restricted privileges ATP certificate.

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, e.g. permitting electronic submission of responses and the basis for the decision for adopting this means of collection.

In accordance with the Government Paperwork Elimination Act (GPEA), the FAA will not only allow and accept, but 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 final rule. 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) % of the final rule is available electronically. The FAA is working to insure that the process maintains this 100% availability to respondents throughout the world.

4. Describe efforts to identify duplication. Show specifically why any similar information already available can be used for the purpose described in Item 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 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 this final rule and can only be provided by them 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.

The FAA believes that this rule will not impact a substantial number of small businesses or other small entities; however, the guidance material that will be published regarding this rule is informative and explanatory with regards to the requirements. Certificate holders seeking to obtain approval to offer or provide the ATP CTP will be guided through the administrative requirements by the local principal operations inspector/training course program manager using published guidance material. The local FAA representative will then forward an ATP CTP for approval by a representative of the Washington headquarters staff. Institutions of higher education seeking the authority to certify graduates of its degree program can contact the General Aviation and Commercial Division at the Washington headquarters office 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.

The reason for information collection is for original certification and review and approval of the ATP CTP. It is also for the initial review and approval of an institution of higher education's application for the authority to certify its graduates through issuance of a letter of authorization. Additional submittals by the certificate holder for the ATP CTP would only be required if there

is a desired program change. Additional application submittals by an institution of higher education will only be required if there is a change in what was originally approved or if the institution of higher education wants to add a degree program.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with 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 recordkeeping, disclosure, or reporting format (if any) and on data elements to be recorded, disclosed, or reported.

For the ATP CTP, the proposal was published in the Federal Register in its entirety on February 29, 2012, vol. 77, no 40, pages 12374-12406. The FAA received public comment on the program and has made adjustments to it based on those comments. The process for an institution of higher education to obtain the authority to certify its graduates was not initially proposed but developed as a result of public comment to the requirements for obtaining a restricted privileges ATP certificate based on academic coursework.

9. Explain any decision to provide any payment or 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.

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden to respondents or record keeper from the collection of information from respondents or record keepers.

ATP CTP

The proposed 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 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
\$32.55	Instructor hourly rate
\$3,906	Cost to develop an ATP CTP
20	Initial number of certificate holders offering the ATP CTP
1	Annual increase in no. of certificate holders offering the ATP CTP
0.1	One-time per pilot record keeping instructor hours for records on course completion

Note: Instructor salary adjusted for 1.302 benefits factor (Employee Benefit Research Institute, www.ebri.org (Benefit FAQs))

Table 1. Burden to Respondents

Year	Course Development Hours	Course Development Costs	Estimated No. of ATP Applicants	Record Keeping Hours	Record Keeping Costs	Total Hours	Total Costs
2014	2400	\$ 78,120	3731	373	\$ 12,145	2773	\$ 90,265
2015	120	\$ 3,906	3754	375	\$ 12,218	495	\$ 16,124
2016	120	\$ 3,906	3776	378	\$ 12,291	498	\$ 16,197
2017	120	\$ 3,906	3799	380	\$ 12,365	500	\$ 16,271
2018	120	\$ 3,906	3821	382	\$ 12,439	502	\$ 16,345
2019	120	\$ 3,906	3844	384	\$ 12,514	504	\$ 16,420
2020	120	\$ 3,906	3867	387	\$ 12,589	507	\$ 16,495
2021	120	\$ 3,906	3891	389	\$ 12,664	509	\$ 16,570
2022	120	\$ 3,906	3914	391	\$ 12,740	511	\$ 16,646
2023	120	\$ 3,906	3938	394	\$ 12,817	514	\$ 16,723
2024	120	\$ 3,906	3961	396	\$ 12,893	516	\$ 16,799
2025	120	\$ 3,906	3985	398	\$ 12,971	518	\$ 16,877
2026	120	\$ 3,906	4009	401	\$ 13,049	521	\$ 16,955
2027	120	\$ 3,906	4033	403	\$ 13,127	523	\$ 17,033
2028	120	\$ 3,906	4057	406	\$ 13,206	526	\$ 17,112
2029	120	\$ 3,906	4081	408	\$ 13,285	528	\$ 17,191
2030	120	\$ 3,906	4106	411	\$ 13,365	531	\$ 17,271
2031	120	\$ 3,906	4131	413	\$ 13,445	533	\$ 17,351
2032	120	\$ 3,906	4155	416	\$ 13,526	536	\$ 17,432
Total	4,560	\$ 148,428	74,853	7,485	\$243,646	12,045	\$392,074
Average Annual Burden	228	\$ 7,421	3743	374	\$ 12,182	602	\$ 19,604

As the table shows, the first year hourly burden will be **2,773 hours** and the first year cost will be **\$90,265**. The average annual hour burden to respondents is 602 and the average annual cost burden is \$19,604.

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

The final 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 a restricted privileges ATP certificate. The final rule will require 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 the 61-School Advisory Circular, obtain part 141 pilot school information as well as degree and coursework details, and complete the application.
- b. Requires an academic advisor 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 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 hours	Initial application: College professor from the institution of higher education
0.5	Academic advisor (college professor) one-time per graduate for record keeping to review their transcript for eligibility for a restricted privileges ATP certificate
\$53.33	College professor / Academic advisor hourly rate
150	Initial number of institutions of higher education that will apply for FAA recognition
1	Annual increase in no. of institutions of higher education applying authority

Table 2. Burden to Respondents

Year	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
2013	1200	\$ 64,000	648	324	\$ 17,277	1524	\$ 81,277
2014	8	\$ 427	652	326	\$ 17,381	334	\$ 17,808
2015	8	\$ 427	656	328	\$ 17,485	336	\$ 17,912
2016	8	\$ 427	660	330	\$ 17,590	338	\$ 18,017
2017	8	\$ 427	664	332	\$ 17,696	340	\$ 18,123
2018	8	\$ 427	668	334	\$ 17,802	342	\$ 18,229
2019	8	\$ 427	672	336	\$ 17,909	344	\$ 18,336
2020	8	\$ 427	676	338	\$ 18,016	346	\$ 18,443
2021	8	\$ 427	680	340	\$ 18,124	348	\$ 18,551
2022	8	\$ 427	684	342	\$ 18,233	350	\$ 18,660
2023	8	\$ 427	688	344	\$ 18,343	352	\$ 18,769
2024	8	\$ 427	692	346	\$ 18,453	354	\$ 18,879
2025	8	\$ 427	696	348	\$ 18,563	356	\$ 18,990
2026	8	\$ 427	700	350	\$ 18,675	358	\$ 19,101
2027	8	\$ 427	705	352	\$ 18,787	360	\$ 19,213
2028	8	\$ 427	709	354	\$ 18,899	362	\$ 19,326
2029	8	\$ 427	713	356	\$ 19,013	364	\$ 19,440
2030	8	\$ 427	717	359	\$ 19,127	367	\$ 19,554
2031	8	\$ 427	722	361	\$ 19,242	369	\$ 19,668
2032	8	\$ 427	726	363	\$ 19,357	371	\$ 19,784
Total	1,352	\$ 72,107	13,724	6,862	\$ 365,973	8,214	\$438,079
Average Annual Burden	68	\$ 3,605	686	343	\$ 18,299	411	\$ 21,904

As the table shows, the first year hourly burden will be **1,524 hours** and the first year cost will be **\$81,277**. The average annual hour burden to respondents is 411 and the average annual cost burden is \$21,904.

The total annual burden for the first three years will be **4,297 hours** and **\$171,542**.

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 Item 12.

14. Provide estimates of annual cost to the Federal Government.

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.

Assumptions for Cost to the Federal Government

\$61.50	FAA Aviation Safety Inspector, GS14--Hourly rate (average)
\$24.67	FAA Clerk/Secretary, GS07--Hourly rate
44 hours	Inspector time to review an ATP CTP submitted for approval (includes 6 hours of travel)
0.5	Clerk/Secretary time (hours) to type approval letter

Note: FAA hourly rates adjusted for 1.3245 benefits factor.

- a. Requires one FAA inspector (Field Inspector) 4 hours and one FAA inspector (Headquarters Inspector) 2 hours 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 16 hours of review and 6 hours of travel for one FAA inspector (Headquarters 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 (Headquarters Inspector) observation of the program.

Table 3. Cost Burden to Federal Government

Year	Review of ATP Cert. Training Pgm Course-- Hours	Review of ATP Cert. Training Pgm Course— Costs	Approval Letter Hours	Approval Letter Costs	Total Hours	Total Costs
2014	880	\$ 54,120	10	\$ 247	890	\$ 54,367
2015	44	\$ 2,706	0.5	\$ 12	44.5	\$ 2,718
2016	44	\$ 2,706	0.5	\$ 12	44.5	\$ 2,718
2017	44	\$ 2,706	0.5	\$ 12	44.5	\$ 2,718
2018	44	\$ 2,706	0.5	\$ 12	44.5	\$ 2,718
2019	44	\$ 2,706	0.5	\$ 12	44.5	\$ 2,718
2020	44	\$ 2,706	0.5	\$ 12	44.5	\$ 2,718
2021	44	\$ 2,706	0.5	\$ 12	44.5	\$ 2,718
2022	44	\$ 2,706	0.5	\$ 12	44.5	\$ 2,718
2023	44	\$ 2,706	0.5	\$ 12	44.5	\$ 2,718
2024	44	\$ 2,706	0.5	\$ 12	44.5	\$ 2,718
2025	44	\$ 2,706	0.5	\$ 12	44.5	\$ 2,718
2026	44	\$ 2,706	0.5	\$ 12	44.5	\$ 2,718
2027	44	\$ 2,706	0.5	\$ 12	44.5	\$ 2,718
2028	44	\$ 2,706	0.5	\$ 12	44.5	\$ 2,718
2029	44	\$ 2,706	0.5	\$ 12	44.5	\$ 2,718
2030	44	\$ 2,706	0.5	\$ 12	44.5	\$ 2,718
2031	44	\$ 2,706	0.5	\$ 12	44.5	\$ 2,718
2032	44	\$ 2,706	0.5	\$ 12	44.5	\$ 2,718
Total	1672	\$ 102,828	19	\$ 469	1691	\$103,297
Average Annual Burden	83.6	\$ 5,141	0.95	\$ 23	84.6	\$ 5,165

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

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.

Total Federal costs through 2016 (first three years): \$115,989.

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

This is a new collection, therefore it constitutes a program change.

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.

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.