GENERAL AVIATION AND PART 135 ACTIVITY SURVEY
2120-0060

SUPPORTING STATEMENT FOR 2013 – 2015 SURVEY CYCLE

A. JUSTIFICATION

1. Information Requirement:

Title 49, United States Code, empowers the Secretary of Transportation to collect and disseminate information relative to civil aeronautics, to study the possibilities for development of air commerce and the aeronautical industries, and to make long-range plans for, and formulate policy with respect to, the orderly development and use of the navigable airspace, radar installations and all other aids for air navigation. These data are necessary to assess performance of the Department of Transportation in meeting the strategic goal for General Aviation safety as described in the Destination 2025 Strategic Plan.

This collection of information also supports the Department of Transportation's strategic goals of safety and economic growth and trade.

Transportation Information

Section 329 (Title 49, United States Code) "The Secretary of Transportation shall (1) collect and disseminate information on civil aeronautics;…(2) study the possibilities of developing air commerce and the aeronautical industry; and (3) exchange information on civil aeronautics with governments of foreign countries through appropriate departments, agencies and instrumentalities of the Government."

Development Planning

Section 44501 (Title 49, United States Code) "The Administrator of the Federal Aviation Administration shall make long range plans and policy for the orderly development and use of the navigable airspace, and orderly development and location of air navigation facilities, that will best meet the needs of, and serve the interest of, civil aeronautics and the national defense, except for needs of the armed forces that are peculiar to air warfare and primarily of military concern."

Past Information Collection Activities

During the period from 1970 to 1976, the Federal Aviation Administration (FAA) collected general activity information annually under OMB 04 R0185, Aircraft Registration Eligibility, Identification, and Activity Report, AC Form 8505-73. Part 1 of the form provided aircraft registration revalidation information as required by 14 CFR 47.44 and Part 2 provided the activity and avionics information as requested by 14 CFR 91.53. Due to changes in registration revalidation requirements in 1977, the activity-

reporting portion (Part 2 of the form) was separated from Part 1 and an independent survey of aircraft owners was instituted for collecting activity and avionics information. Since 1977, general aviation aircraft data have been collected through the General Aviation and Air Taxi Activity and Avionics Survey, FAA Form 1800-54, OMB No. 2120-0060. The survey covered aircraft used for general aviation as well as commuter air carriers and on-demand air taxis.

Rapid changes are occurring in aviation and avionics technology and in the requirements formulating long-range plans and policies with respect to use of navigable airspace. These changes cause the agency to review its data requirements periodically. A review conducted in 1993 revealed additional requirements and needed changes to the survey. The 13 aircraft types were expanded to 19 to differentiate experimental aircraft and rotorcraft with different engine configurations.

Commuter air carriers, by regulation, are reporting exposure data to the Department of Transportation, using DOT Form 41. To negate this duplication, the collection of commuter air carrier hours flown data was eliminated from the survey. Avionics information for the commuters will, however, continue to be collected since there is no other source. Exposure data for the on-demand air taxis also continue to be collected. To reflect the inclusion of all Part 135 aircraft in the survey, the name of the survey was changed to the "General Aviation and Part 135 Activity Survey."

Over the years additional questions have been added concerning landing gear type, airworthiness certificate information and flight hours in public use.

The survey design and procedures remain largely unchanged. The form was redesigned for the CY1999 Survey to be on one 11 x 17 tabloid sheet (equivalent to 4 8 ½ x 11 pages) to improve legibility and readability and allow for optical scanning of the questionnaires. Appendix B contains all the documents used in the 2009 survey, including the questionnaire for aircraft owners. Minor modifications to phrasing, sequencing, and design may occur.

To minimize the reporting burden, on-demand and fractional operators of large fleets of three or more aircraft receive a single, specially designed summary questionnaire to allow reporting for their entire fleet of aircraft, instead of each aircraft in their fleet.

2. <u>Use of Information:</u>

The following statistics have been derived from past surveys and will continue to be in the future.

- Number of active aircraft by aircraft type;
- Distribution of aircraft by state and FAA region;
- Annual hours flown by aircraft type and by use;
- Annual operations;
- Airframe hours;

- Annual hours flown by day/night;
- Annual hours flown by weather conditions;
- Lifetime airframe hours;
- Fuel consumption;
- Avionics equipment;
- Participation in fractional ownership.

In addition, information relative to aircraft aging, gear type, and the airworthiness certificate are developed from the survey.

Examples of specific uses of the survey statistics include:

- General aviation active aircraft and hours flown are the primary exposure measures used throughout the agency in assessing the safety status of general aviation flying and in determining the impact of general aviation on the National Airspace System.

- The agency and the National Transportation Safety Board (NTSB) use the exposure data, both by itself and in conjunction with aircraft age, to calculate accident rates, which are used to compare safety over time and safety performance among different aircraft types and configurations.

- The agency and the NTSB will use the exposure data for public use aircraft to calculate accident rates for those aircraft. The NTSB is now required to investigate accidents involving public use aircraft. This is a responsibility assigned by Public Law 103-411.

- Lifetime airframe hours are used in aircraft fatigue studies for determining mean time failures and establishing aircraft maintenance cycles.

- Hours flown and active aircraft information by type of flying is used for safety analyses, forecasting and planning. The hours flown by day/night and weather conditions are required for safety analyses of these kinds of flying.

- Fuel consumption data are used for planning, forecasting and for assessing the effect of the agency's energy conservation programs.

- The state in which aircraft are based is used to determine the geographical dispersion of the fleet and to estimate activity by state. Activity by state is also required to support the FAA, and state and local governments for airport master planning.

- Data on avionics capability are used for assessing the ability of the general aviation fleet to use the National Airspace System. The availability of avionics data also allows the FAA to determine at which airports various aircraft can land and in which segments of airspace they can fly. These data are used in assessing the economic impact of proposed regulations on the general aviation fleet.

- In addition to the FAA, NTSB, and the Department of Commerce, other organizations in federal, state and local governments, as well as the aviation industry, use the data collected in this survey for many other purposes.

3. Electronic or Other Technological Data Collection Techniques

In response to the Government Paperwork Elimination Act (GPEA), the collection may be conducted 100% electronically. Since CY2000, an Internet component has been added. This puts no extra burden on the respondents but, in fact, allows them another option with which to answer the survey. Internet response rates are steadily increasing, and in 2012, 60.4% of all completed responses were conducted by Internet. The Internet option is open throughout the survey period. The respondents are also free to respond by company compiled spreadsheets, or by telephone.

4. Describe efforts to identify duplication.

Reviews of various data systems with FAA and the Departments of Transportation and Energy are conducted to identify possible duplicate or similar data. Reviews of data availability with various institutions in the aviation community, including aviation special interest groups and manufacturers are conducted to identify any duplication of data. Once any duplication is discovered, the data is dropped from the survey.

5. Burden on Small Businesses

The information collection requirement has been designed to minimize the burden on all respondents. Small business owners who also are general aviation aircraft owners could be sampled in the survey. However, their probability of being sampled and included in the survey is the same as any aircraft owners. This survey imposes no special burden on small business.

6. Consequences of Less Frequent Reporting

For program evaluation, safety assessment, and accurate forecasting as well as long-range planning, the FAA needs up-to-date aircraft operational as well as avionics information.

7. Special Circumstances

There are no special circumstances inconsistent with 5 CFR 1320.5(d)(2).

8. Consultation Outside of the Agency

The Notice of Intent to Request Renewal from the Office of Management and Budget of this survey was published in the Federal Register December 12, 2013, vol. 78, no. 239, page 75671. The FAA received the following comment via email:

"In response this 'renewal' of authority to collect data, it is impossible to judge whether this data collection program has, in fact, been successful and met the original goals of the program. If it has not then this authorization should be allowed to expire without renewal. There is too much in general that we must respond to. If this is not effective then eliminate it.

"I am an owner of general aviation aircraft and a voter."

The comment asks whether the survey is successful, meets FAA's goals, and is effective. FAA's response to Question 2 (above) details the uses of the information. The GA Survey is extremely successful and essential. There is no other way to obtain this kind of general aviation information.

9. Payments

No payments or gifts are given to the respondents.

10. Confidentiality

Aircraft registration (N-number is used to identify the aircraft; the name and addresses of the aircraft owners are used for mailing. The N-number and owner's name are contained in the Aircraft Registration Master File, which is available to the public upon request. To increase public support, in the survey cover letter, which is signed by the FAA Administrator, and on the questionnaire itself, it is emphasized that the information obtained in the survey will be used for statistical purposes only and will not be published or released in any form that would reveal specific information reported by an individually identifiable respondent.

At the conclusion of the survey cycle, the forms are stored in a secure storage facility. The contract covering the conduct of the survey requires that the contractor maintain the confidentiality of all survey responses.

11. Sensitive Questions

This information collection does not include any questions of a sensitive nature or that would commonly be considered private.

12. Estimate of Information Collection Burden

- **Annual Burden Hours**

  Approximately 39,000 of the sampled aircraft owners respond to the survey. The time for completing the questionnaires averages approximately 20 minutes. Therefore, the average annual reporting burden for the survey is estimated to be:

  Total Annual Burden = (39,000 x 20/60) = 13,000 hours

- **Annual Respondent Cost**

Assuming a cost of $45 per hour[1], the total annual cost is estimated to be

Total Annual Cost = 13,000 hours x $45.00 per hour = $585,000

13. Total Respondent Cost Incurred to Collect Information

Other than the 20 minute burden to complete the survey, the respondent will have no additional capital, start-up or maintenance cost associated with completing the survey questionnaire. The information is in existing records maintained for other purposes such as the aircraft logbooks.

14. Cost Estimate

The estimated costs to the Federal Government are as follows:

Item		Amount
Direct Labor		
Project Manager:	$37,931	
Task Team Leader:	$250,240	
Planning Analyst 1:	$108,438	
Data Collection Coordinator:	$1,549	
Analyst:	$72,399	
Support Staff (1):	$997	
Support Staff (2):	$997	
Total Direct Labor		$472,551
Other Direct Costs		
Materials/Supplies:	$9,083	
Subcontractors:	$66,738	
Employment Agency Labor:	$24,759	
Travel and Related Costs:	$13,923	
Other Direct Cost Total		$114,503
Total Cost		**$587,054**

15. Change of Burden

[1] FAA Report Economic Values For FAA Investment And Regulatory Decisions, A Guide, Revised Oct. 3, 2007, Adjusted for inflation

There is no change in the burden from the previous submission.

16. Information Collection Schedule

Schedule	Completion Date
Internet invitation postcard	Mar 2014
First mailout	Apr 2014
Second mailout	May 2014
Third mailout	Jun 2014
Cut-off for returns	Aug 2014
Survey data processing and analyses	Sep 2014
First Draft of survey final report	Oct 2014
Camera-ready copy of survey final report	Oct 2014
Printing and distribution	Jan 2015

17. Approval Not to Display Expiration Date

The FAA is not seeking that approval.

18. Exception to the Certification Statement

There are no exceptions