

**Supporting Statement
Aircraft Registration Renewal
OMB 2120-0729**

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 or authorizing the collection of information.

On October 1, 2010, the FAA implemented new requirements for the 1) Re-registration of all aircraft on the Civil Aviation Register over a 39-month period, and after that, 2) Mandatory triennial renewal of aircraft registration. The primary reason for the effort was to verify or update and then maintain previously collected data regarding registered aircraft and their owners. (Rulemaking: Re-registration and Renewal of Aircraft Registration, RIN: 2120-AI89 now 14 CFR 47.40). The re-registration section, 47.40(a), has been completed and the registration certificates (AC Form 8050-3) for all aircraft currently on the U.S. aircraft register now have registration expiration dates and the owners are required to apply for renewal of registration using the Aircraft Registration Renewal Application, AC Form 8050-1B.

The renewal of aircraft registration every third year will help maintain a higher accuracy level of aircraft registration data. The updated and validated information will be more reliable for the FAA and other agencies that operate programs for safety, security, law enforcement or commercial purposes.

The information requested on the Aircraft Registration Renewal Application consists of: the description of the aircraft, the name(s) of the aircraft owner(s), the mailing and physical addresses of the aircraft owner, verification that the aircraft owner still meets citizenship requirements, and that the aircraft is not entered on the registry of another country. The information above will have been provided to the FAA on the last received registration application for the aircraft. Requirements of 14 CFR Section 14.41 are that aircraft owners report any changes in the information. Prior to the re-registration/renewal program, aircraft owners were prompted to report changes by the Triennial Aircraft Registration Report, AC Form 8050-73. Unfortunately, many changes were unreported. With enforcement procedures being slow, expensive and often inconclusive, the decreasing accuracy and reliability of aircraft registration information became an issue for users of the aircraft registration system. The Triennial Aircraft Registration Report program (utilizing the Triennial Aircraft Registration Report, AC Form 8050-73) was replaced by the Aircraft Re-Registration and Renewal program.

ANNEX 7 – Aircraft Nationality and Registration Marks, of the Convention on International Civil Aviation, as published by the International Civil Aviation Organization (ICAO), requires in Section 6 – Register of Nationality, Common and Registration Marks, that signatory countries

maintain a current register showing for each aircraft registered by a country the information recorded in the certificate of registration. Section 7 – Certificate of Registration, provides a sample format that requires a description of the aircraft, the owner’s name and address, and the registration date.

Title 49, U.S.C. Section 44101(a) provides that a person may operate an aircraft only when it is registered under section 44103 of that title. Section 44102(a) establishes as eligible an aircraft not registered under the laws of another country and owned by a person meeting certain U.S. citizenship requirements. Section 44103(a)(1) indicates that an eligible aircraft owner must make application for the aircraft to be registered.

14 C.F.R. Sections 47.5 and 31 prescribe that a person wishing to register an aircraft must submit an Application for Aircraft Registration, AC Form 8050-1. Section 47.7 prescribes that an applicant for aircraft registration must establish their compliance with the applicable citizenship requirement. Section 47.11 requires each applicant to submit their recordable evidence of ownership. Section 47.41(b) requires aircraft owners to timely report events that terminate aircraft registration. Section 47.45 requires address changes to be reported within 30 days.

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 collected on an Aircraft Registration Renewal Application (AC Form 8050-1B) will be used by the FAA to verify and update the aircraft registration information collected for an aircraft when it was first registered.

Aircraft registration information updates become part of the Aircraft Registration database that is used by the FAA to monitor and control U.S. airspace and to distribute safety notices and airworthiness directives to aircraft owners. The data is also used by law enforcement and national security agencies to support drug interdiction and to operate national security programs.

A Register of U.S. Civil Aircraft is provided to ICAO as required by international agreement.

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.

The collection of the required information through the above-mentioned form uses internet filing and electronic automation to the maximum extent possible. Every option has been implemented to minimize the effort and resources expended by both the aviation public and the FAA Aircraft Registry.

Six months before a group of aircraft registrations is due to expire (expirations are on the last day of a month), the Registry’s system generates initial expiration notices that are mailed to the

aircraft owners. The notice contains instructions on the process, directions to the renewal page on the FAA Aircraft Registration website, and a unique identification code the owner can use to renew online if all required information in the Registry database is current. The notice/letter mailed to the registration address on file in the aircraft registration records is itself a test of the validity and current status of the address provided by the applicant.

Upon entering the aircraft's registration number and the unique code provided in the notice, the web page will show aircraft owners the registration information in the system for their aircraft. If their registration information on file is still correct and current, they will be able to certify the information to be accurate and pay the \$5.00 fee by credit card to complete registration renewal for the aircraft. The Registry's document system will automatically place an image of the application form in the aircraft's record and generate a new Certificate of Aircraft Registration to be mailed to the owner.

If the registered owner views the registration information and realizes that a change of information (e.g. address) needs to be reported, then the owner may enter the updated information on the form, print it, sign it and mail it with the fee to the FAA Aircraft Registry. The new address is checked against a USPS address standardization program by a Registry examiner. If all is in order, the aircraft record is updated and a new Certificate of Aircraft Registration is issued and mailed to the owner.

Aircraft owners, without computer access, may contact the FAA Aircraft Registry and request that a Registration Renewal Application be mailed to them.

The Registry anticipates that, after renewing aircraft owners become familiar with the online process, approximately 75% will use the online process to renew the registration for their aircraft. While the FAA Aircraft Registry agrees that a secure way to enable electronic reporting and modification to aircraft records could be advantageous, the high value of many aircraft and the large revenue streams they support contrasted with the potential for nefarious actions that could prevent them from being flown causing their owners significant economic losses argue for prudence in moving forward with changes in this area. For the moment, being able to renew registration online is encouraging aircraft owners to update address and make other changes that have been long overdue.

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 FAA is the only agency identified in statute and regulation that provides for the registration of U.S. Civil Aircraft. Use of the national airspace system is available to eligible U.S. citizens or residents who register and maintain their aircraft registration in accordance with statute and regulations. It is the responsibility of aircraft owners to provide this information upon initial application and to report changes when they occur. Updating a mailing address also serves to confirm that registration is still desired. As such, any change requires contact with the owner.

Compliance with requirements by aircraft owners to notify the FAA of any changes in registration information enables the Registry to provide a reliable and actionable database for use by FAA and others. Aircraft owners are the only source for current data on themselves and their aircraft.

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

Care was taken to minimize the burden of this change for all holders of aircraft registration. Online registration renewal for qualifying parties has proven popular. The triennial program that this program replaces was an entirely manual process. The economic evaluation conducted in developing the new rule determined that small businesses and other small entities would experience little, if any, significant negative impact by this collection of data.

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.

As a matter of record, the new rule is in place and aircraft owners are required by law to renew registration for their aircraft every three years. The consequence of non-compliance is the cancellation of the aircraft registration for the owner and additional work for Registry personnel. Without a periodic mandatory update of aircraft registration information, that data in the U.S. Civil Aircraft Register would become unreliable. This would put the FAA and the United States in violation of its agreement with the International Civil Aviation Organization to maintain a current register of U.S. civil aircraft. Users of the system would lose a reliable information resource that would slow or complicate their aircraft related tasks.

Longer intervals have been considered. However, the resulting error rates calculated for longer intervals were too high to allow characterization of the data as current and accurate. Shorter intervals provide minimal improvement in data quality. Three years was determined to be the best fit for user requirements versus costs and burdens.

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).

There are no circumstances that would cause information collection to be inconsistent with 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) on data elements to be recorded, disclosed, or reported.

To a significant extent, this change was prompted by aircraft registration database users who have long requested greater data accuracy. In a meeting with a small group of government and

industry organizations held in March 2004, the participants agreed that moving the Registry from an essentially voluntary reporting system to a mandatory re-registration and renewal process was the only reasonable method available to ensure a more accurate Aircraft Registry for all users.

A Notice of Proposed Rulemaking was published in the Federal Register on February 28, 2008, page 10701. The comment period ran through May 28, 2008, and comments were accepted for consideration through June 30, 2008.

Comments from the public and their dispositions are more fully addressed in the published rule. Many commenters lauded the FAA for trying to improve the accuracy of the aircraft registration database. However, almost all expressed a preference that we find another way to achieve our goal. The commenters generally did not want to take on the additional cost and responsibility of re-registering their aircraft every three years.

To address commenter concerns the FAA made the following changes. The proposed process was streamlined and further automated to make compliance easier. To lower the possibility of owners missing the filing date, the compliance time was lengthened, and the number of notices sent to owners was increased. Online filing, initially proposed only for renewal was added for re-registration. To assist interested parties with tracking the progress of an aircraft through renewal the FAA posts lists on our web site indicating where aircraft are in the process of re-registration/renewal and if they are approaching expiration of their registration or cancellation of their N-number assignment. Additional time was added in the application processing and certificate delivery step to assure the Registry would be able to send new certificates in advance of expiration and assure timely arrival for timely applicants.

All sectors of the aviation community encouraged the FAA to implement computer and internet technology or automation to the maximum extent possible. They felt that the time they spent completing the requirement could be greatly reduced if they could apply online. Commenters also felt that this would save time and resources for the FAA as well. The FAA agreed and has implemented what electronic processing they could with the information and resources available.

A 60-day notice for public comments regarding this collection was published in the Federal Register on December 22, 2014, vol. 79, no. 245, page 76437. No comments were received.

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

There has not been any payment or gift to respondents.

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

No assurance of confidentiality is made to the public.

Respondents to the information collection are informed in accord with the Privacy Act of 1974 (PL 93-579). Aircraft records maintained by the FAA Aircraft Registry are public records open to inspection in accord with identified routine uses. One of the routine uses reads, “To prepare an Aircraft register in electronic media as required by ICAO agreement containing information on aircraft owners by name, address, N Number, and type aircraft, used for internal FAA safety program purposes and also available to the public (individuals, aviation organizations, direct mail advertisers, state and local governments, etc).” The privacy act and routine uses will be included with each Aircraft Registration Renewal Application.

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. This information should: Provide number of respondents, frequency of response, annual burden, and an explanation of how the burden was estimated.

The FAA estimates that approximately 95,653 aircraft (approximately one third of active registered aircraft) will require registration renewal each year. Registration renewal will not be required for all aircraft as a result of registration changes occurring for many aircraft through the normal course of business. For example, before its scheduled renewal date, an aircraft may be sold and registered to different owner.

The time needed to manually complete the AC Form 8050-1B in this collection is estimated to be 30 minutes. Therefore, the FAA concludes that the manual version of the registration renewal application will take the same amount of time to complete. Thus, the estimated annual hourly burden for individuals who manually complete the form is 11,956 hours (23,912 x .5 hours each). However, for the approximately 75% of respondents that are able to complete registration renewal electronically (due to there being no changes of owner/ownership information), the time required is reduced to 10 minutes per renewal. Approximately 71,740 electronic registration renewals utilizing the electronic version of the form will be processed for an additional annual hourly burden of 11,956 hours for a total annual hourly burden of 23,912 hours.

U.S. Census statistics show a 2013 median U.S. household income of \$51,939 in current dollars for a rate of \$24.97 per hour. Multiplying \$24.97 times the annual hourly burden of 23,912 equals \$597,082 per year. The table below reflects the anticipated burden through 2018 with a 2% increase per annum.

CY	Manual (30 mins)			Electronic (10 mins)			Total for Year		
	Renewals	Hours	Cost	Renewals	Hours	Cost	Renewals	Hours	Cost
'15	23,913	11,957	\$298,554	71,740	11,957	\$298,558	95,653	23,912	\$597,112
'16	24,391	12,196	\$304,525	73,175	12,196	\$304,529	97,566	24,391	\$609,054
'17	24,879	12,440	\$310,615	74,638	12,440	\$310,620	99,517	24,879	\$621,235
'18	25,377	12,688	\$316,828	76,131	12,689	\$316,832	101,508	25,377	\$633,660

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

The average annual cost for mailing manual forms to the FAA for calendar years 2015, 2016, 2017, and 2018 is:

$$24,640 \text{ (average number of manual renewals)} \times \$0.47 \text{ (mailing cost)} = \$11,580.80.$$

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

The FAA estimates that registration renewal will be required for 95-100K aircraft each year. The cost to the FAA to send notices to aircraft owners and then to process the returned Aircraft Renewal Application forms is calculated by adding the estimated federal employee labor costs, contract labor costs, supplies, computer time, postage, and other overhead costs. This totals \$14.65 per paper renewal application. At the current time, approximately 75% of registration renewals are being filed online/electronically. The Aircraft Registry anticipates the level to increase to 80% by CY 2016. Also allowing for an annual cost increase of 4%, the table below reflects projected government costs for processing paper/manual form renewals through CY 2018.

CY	Paper/Manual Process		
	Renewals	Rate	Cost
'15	23,913	\$ 14.65	\$350,325
'16	24,391	\$ 15.24	\$371,625
'17	24,879	\$ 15.85	\$394,220
'18	25,377	\$ 16.48	\$418,189

15. Explain reasons for program changes or adjustments reported in Items 13 or 14 of OMB Form 83-1.

The Re-Registration phase of 14 CFR 47.40 has been completed and only the triennial renewal process remains.

Three sets of numbers change regarding this collection.

1. The eight-month overlap in the usage of the two forms (8050-1A and 8050-1B) in CY 2013 on the previous submittal is removed, thus producing steady annual numbers.
2. With a rising trend of owners completing the applications online, we project that filing of paper applications will continue to decrease, though at a slower pace.
3. For clarity, the government cost is shown for processing only paper form (not online submittals) and then utilizing the percentages above for the total. Due to increase in

estimates of number of annual registration renewals, Government cost is increased. However, public cost is substantially less than on the previous submittal.

16. Outline plans for tabulation and publication for collections of information whose results will be published. Address any complex analytical techniques that will be used.

The information collected on the Aircraft Registration Renewal Application will not be published as an individual project or study. The information will be used to validate or update the information associated with individual aircraft as contained in the U.S. Civil Aircraft Register. The updates will be entered into the register as they are received. The Register is available to the public as both a searchable database and as a downloadable comma delineated (CSV) data file on the FAA web site, at <http://registry.faa.gov/aircraftinquiry/>.

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.

At this time, the Registry has no objection to displaying the expiration date on the data collection form.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-1.

There are no exceptions.