

OMB Supporting Statement
Verification of Authenticity of Foreign License, Rating, and Medical
Certification
Collection 2120-0724

Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

Based on the International Civil Aviation Organization (ICAO) convention agreement, airmen may use their foreign license in lieu of an aeronautical knowledge test, experience and a practical test when applying for a restricted or unrestricted U.S. certificate. After the events of September 11, 2001, it was determined that the Federal Aviation Administration (FAA) should verify, with the appropriate Civil Aviation Authority (CAA), that the foreign license and medical being used to obtain a U.S. certificate is in fact current and valid.

A process was established that required a person who is applying for a U.S. certificate and/or rating on the basis of a foreign license to apply for that certificate at least 90 days before arriving at the designated FAA Flight Standards District Office (FSDO) where the applicant intends to receive the U.S. certificate. This allows time for the Airmen Certification Branch to ask for and receive verification from the appropriate CAA that the person's foreign license is current and valid.

The required information to be submitted to the Airmen Certification Branch is:

- The applicant's name and date of birth
- The person's place of birth / citizenship
- Email address and physical address
- Country of foreign license
- Foreign license number, level and ratings
- Statement that the foreign license is not under an order of suspension or revocation
- Medical certificate country and expiration date
- Type of FAA certificate requested
- Statement of English proficiency as required by IACO Annex 1
- Location of the FAA FSDO where the applicant intends to apply for the U.S. certificate
- Indication of the intent of the application

The following statute/regulation mandates/authorizes this collection of information:

General Aviation Operations Inspector's Handbook, Order 8900.1
Volume 5, Ch 2, Section 14. **General Aviation Inspector - Issue a Part 61 U.S. Pilot Certificate on the Basis of a Foreign Pilot License**

5-592 Objective

B. Foreigner Application Process. The FAA and Transportation Security Administration (TSA) require a foreigner who applies for a U.S. pilot certificate/rating, or who holds a U.S. pilot certificate/rating and applies for an additional rating, to go through a background security check and have their foreign pilot and medical licenses verified for validity purposes.

1) The procedures that a foreign person must follow to apply for a U.S. pilot certificate/ratings are described on the FAA's Airmen Certification Branch's (AFS-760) Web site at:

http://www.faa.gov/licenses_certificates/airmen_certification/foreign_license_verification.

2) The TSA's Web site that describes the reporting requirements for giving pilot training and certification for foreign pilots is located at:

https://www.flightschoolcandidates.gov/afsp2/?acct_type=c§ion=WN.

5-600 P - Duties and Responsibilities of AFS-760

AFS-760 is responsible for:

- 1) Verify. Verifying the authenticity of the applicant's foreign pilot license and medical license with the foreign CAA.
- 2) Ensure. Ensuring the applicant's foreign pilot license and medical license has not been surrendered, suspended, revoked, or expired.
- 3) Issue. Issuing the Verification of Authenticity letter to the designated FSDO and a copy to the applicant. (The Verification of Authenticity letter expires 6 calendar-months from the dated month on the letter.)

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.

All airmen wishing to use their foreign license in lieu of an aeronautical knowledge test, experience and a practical test when applying for a restricted or unrestricted U.S. certificate must submit to this information collection. The Airmen Certification Branch will use the required information to properly identify the person for the purpose of requesting foreign license verification from the appropriate CAA and for checking the applicant's information against a list of potential TSA threats.

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 Verification of Authenticity of Foreign License, Rating, and Medical Certification is available for download on the FAA web site. The form must be completed and signed in ink certifying that the information submitted is correct and accurate and giving the agency permission to contact the CAA on their behalf. We accept applications by mail, fax or email. **About 60% of responses are electronic.**

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.

No similar information has been collected from this population. Most of the applicants are airmen who are not currently in FAA's system of records. These are pilots who intend on making application with the FAA to eventually receive an FAA certificate.

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

Collection of this does not impact small businesses or other small entities.

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 the collection of this information is not conducted, the agency would not be able to complete the foreign verification process. We would lose the capability to properly identify the applicants and lose the applicant's permission for our office to request verification from the appropriate CAA.

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 the collection of information to be conducted in a manner 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) and on data elements to be recorded, disclosed, or reported.

A 60-day notice for public comments was published in the Federal Register on 06/19/2017, with the citation: 82 FR 27944, pages 27944-27945 (2 pages). No comments were received.

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

No payment or gifts to respondents were considered.

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

The information collected becomes part of the Privacy Act system of records DOT/FAA 847, General Air Transportation Records on Individuals and is subject to its published routine uses.

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

Date and place of birth as well as nationality are required for the TSA background check.

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.

It should take the average person a maximum of 10 minutes to complete the form. The number of respondents is 7,500 per year based on previous FY figures. The frequency of response is once every time a person wants to use his/her foreign license to obtain a U.S. certificate and/or rating.

Annual number of responses	7,500
Time per form	10 minutes
TOTAL ANNUAL BURDEN	1250 hours

Annual burden =1,250 hours. The estimated annual cost burden to the respondents is \$44,170.67. This result is based on a median salary of \$73,500 per year at 2,080 hours, equals \$35.34 an hour; divided by 6 (10 minutes in an hour), equals \$5.89; multiplied by 7,500 respondents equals **\$44,170.67.**

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

There are no material costs.

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

The estimated annualized cost to the Federal government is \$36,087.44.

15. Explain reasons for program changes or adjustments.

No change is requested. Overall burden is lower based upon actual FY data. Based on previous FY figures less respondents are expected, while the time per response remains the same.

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 planned publication of this information.

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.

Not applicable.

18. Explain each exception to the certification statement.

There are no exceptions.