

Supporting Statement A
QSA Customer Feedback Report

Justification

SUBJECT: Aircraft Certification Systems Quality System Audit (QSA)
Customer Feedback Report, FAA Form 8100.7

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

The Aircraft Certification Systems Quality System Audit (QSA) is a component of certificate management and includes, as one of its key features, a structure for continuous improvement. Means for collecting information from both the agency customers and industry customers relative to continuous improvement have been implemented, as well as a process to review the information received and to take appropriate action when required. The existing method for collecting information from industry is through an attachment to a letter notifying a specific facility of a forthcoming Quality Systems Audit. This specific information collection process has been subsequently adopted by the agency for reporting as a Customer Service Standard in fulfillment of Executive Order 12862, Setting Customer Service Standards, dated September 11, 1993. In addition, the DOT Strategic Plan-Organizational Excellence Goal supports this data collection as a method to identify, trends, opportunities and performance gaps to target areas needing improvement. (DOT Strategic Plan, 2000-2003, paragraph 11.2.2)

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.*

Production Approval Holders (PAH) are recognized by the Federal Aviation Administration as having the authority to produce products, articles and parts for use on U.S. civil aircraft. The customer feedback report is a voluntary survey, sent to FAA production approval holders (PAH) prior to the QSA audit conducted by the FAA at their production facility.

Individual PAH facilities are subject to the QSA audit every 24, 36, or 48 months depending on the complexity and criticality of the aircraft product or article that they manufacture. The customer feedback survey is voluntarily reported to FAA on occasion, which is predicated on the revolving due date of that audit.

The survey seeks to obtain information that is voluntarily disclosed by the PAH and used by the FAA to invoke continuous improvement of the QSA process. The survey offers the PAH the opportunity to divulge issues or concerns regarding the preparation, timeliness, communication, coordination and professionalism regarding the completed QSA. The information provides transparency to the FAA managing offices with regard to the effectiveness of the conduct of the audit and the collaborative exchange of information between industry and government regulatory policy. The feedback information is generally not technical in nature, but identifies potential gaps in training and opportunities to adjust the QSA administrative protocols to adopt changes as the PAH certificate management process and automation tools to support that process evolve.

Most PAHs are subject to a QSA every two to four years depending on the complexity of their product. The feedback information submitted by the PAH on the 8100-7 form at the conclusion of the QSA is a voluntary survey. It is collected and reviewed by FAA offices including the local field offices, manufacturing inspection offices and the surveillance and oversight policy section of AIR-600 in order to improve the administration and conduct of the QSA at the local and national levels. The FAA has typically used the feedback to clarify the information provided in the QSA briefing presentations and to improve the overall audit presentation and experience. Improvements to FAA Order 8120.23, Certificate Management of Production Approval Holders, have been and will continue to be incorporated as a result of the on-going collection of data.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques of other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

In accordance with the provisions of the Government Paperwork Elimination ACT (GPEA), the feedback report is 100% available electronically.

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 information to be collected is not currently available elsewhere since the information is unique to the Certificate Management Quality System Audit.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods use to minimize burden.

The collection of information has no impact on small business 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 obstacle to reducing burden.

Firstly, the Aircraft Certification Quality System Audit would be deprived of a valuable input from the facilities that are audited under the certificate management agenda, and any efforts to improve the program would be biased in the government's favor. Secondly, we would be unable to meet our commitment in reporting Customer Service Standards in fulfillment of Executive Order 12862, Setting Customer Service Standards, dated September 11, 1993.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with the guidelines in Title 5 Code of Federal regulations (CFR) 1320.5(d)(2)(i)(viii).

There are no special circumstances.

8. *If applicable, provide a copy and identify the date and page number of publication in the Federal Register. Provide the following response:*

A Federal Register Notice published on August, 15, 2018 (83 FR 40619) solicited public comment. No comments were received.

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

We do not provide any payment or gifts.

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

We do not assure 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 information is requested, and any steps to be taken to obtain their consent.*

There are no sensitive questions in this collection of information.

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

There are a total of 621 PAH facilities that are subject to a periodic QSA conducted by the managing office of the FAA. On average, approximately **190 respondents** are subject to Quality System Audits annually based on the most recent three year average. As PAH facilities are classified by various levels of complexity, their QSA interval may vary between 24 and 48 months. QSA totals may vary between approximately 160 and 220 in a given year based on the schedule and float dates that are built in to the QSA scheduling agenda. Submission of the feedback information to be collected is voluntary, and is requested to be accomplished within 30 days after the completion of QSA. The submittal may be considered on occasion.

The data used in this calculus was derived by averaging the cost per hour of those individuals in government and industry that would typically prepare, process and analyze the form. The baseline cost averaged the standard wage of information clerks, administrative assistants, technicians, and aerospace engineers.

“The total estimated information collection burden for FAA Form 8100.7 is 95 hours. The annual cost burden to respondents is estimated to be \$2,875 per year. The figure is based on 190 respondents requiring .5 hours each to complete FAA Form 8100.7 at \$30.26 per hour. It should be noted that the calculus for the respondents cost burden mimic the hourly and annual burden of the cost to the Federal government. This is based on the per hour cost of median pay average of representative positions as categorized from public data provided from the US Bureau of Labor Statistics. Those positions are: clerks, administrative assistants, aerospace engineering technicians and aerospace engineers. This grouping is representative of persons that may

typically: interview, prepare, document and forward the feedback report to the appropriate FAA managing office. Disparity in wage scale differences between federal and industry data is mitigated by the variance of time each report is handled by the individuals in the public sector positions and their counterparts in the private sector positions. For more specificity, refer to BLS news release USDL-18-1941 dated December 14, 2018. Table A shows that the distribution between straight salary and fringe benefits for private industry is 69.7% and 30.3%, so the markup is $30.3/69.7 = .4347$ or 43.47%. The fringe benefits for federal government is the 2008 OMB memo. Apparently the latest source, the DOT is advised to use the markup shown there, which is 36.25%.

Estimated number of annual respondents	190
Estimated reporting burden hours per submission	.5 hours
Estimated annual reporting burden	95 hours
Estimated respondent cost per hour	\$30.26
Estimated annual cost burden	\$2,875

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

There is no calculated cost burden in addition to the estimates of the previous question. Submission of the form by the PAH is voluntary and a return envelope with prepaid postage is provided to PAH as specified the QSA notification letter for respondents who choose not to submit electronically.

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

The annual cost to the Federal government to analyze and process the feedback information received is estimated to be \$2,875 per year. This estimate is based on 190 FAA Form(s) 8100.7 received per year which take federal employees an average of .5 hours dedicated to analysis and disposition at a cost of \$30.26 per hour. The 2018 GS Base Payscale table at federalpay.org can be used to derive the hourly cost. This calculus is predicated on the median pay of representative positions of individuals who typically collect, analyze, process, communicate and document the feedback data within the appropriate FAA offices.

The FAA does not expect any additional incremental overhead costs to result

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

The total number of respondents was adjusted downward from 200 to 190. This was based on the latest three year average.

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. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of reports, publications dates, and other actions.

The feedback report information is not published.

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.

We are not requesting approval to not display the expiration date for OMB approval of the information collection.

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.