

**Supporting Statement A**  
**Representatives of the Administrator, 14 CFR part 183**  
**2120-0033**

**Summary of Changes:**

The FAA has now fully implemented the use of the Designee Management System (DMS) web-based application (described in question 3) for the designee application process. This IC has been updated to describe that process and remove reference to any paper forms previously used in the designee application process.

The respondent burden estimates in this collection have changed due to the following:

- The collection now reflects 3 instruments by collection type, rather than 7 instruments reflecting the different designee types: (1) initial designee application, (2) Applicant yearly application updates, and (3) appointed designee reporting of arrests, indictments, and convictions. These changes more accurately reflect the burden on respondents to this collection.
- The number of respondents has lowered to reflect current applicants in DMS, which in turn reflects a lower overall burden.
- The estimated time for each response is updated to reflect the previous 6-hour estimate for initial applicants, and an additional 2 hours per response are now estimated for updating existing applications yearly. Previously the time needed to complete the yearly application update was included in the overall time per response for each designee type.
- A new IC for designee reporting of arrests, indictments, and convictions has been added to the ICR to comply with Section 408(a)(3) of the FAA Reauthorization Act of 2024.

The FAA burden estimates in this collection have changed due to the following:

- The FAA underestimated the number of designee appointments that are made each year. For example, in 2023 alone, the FAA appointed 839 new designees (combined number across all designee types).
- The FAA uses a 2-3 ASI review panel to review applicant information, therefore, the estimates in this ICR are based on 3 ASIs time instead of just a single ASI.

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

Title 49, United States Code, **Section 44702** states that the Secretary of Transportation may, subject to such regulations as he may prescribe, delegate to any properly qualified private person, the examination and testing necessary for the issuance of certificates under Title VI of the Federal Aviation Act.

Section 408(a)(3) of the FAA Reauthorization Act of 2024, **Pub. L. No. 118-63** (May 16, 2024) (the Act) directs the Federal Aviation Administration (FAA) to revise its orders and policies to clarify that certain individual designees of the FAA Administrator are obligated to report arrests, indictments, or convictions for violation of local, State, or Federal law within a period of time specified by the FAA Administrator. Section 408(b) of the Act defines affected designees as aviation medical examiners, pilot examiners, and technical personnel examiners, however, FAA policy requires all designees to report any arrest, indictment, or conviction for violation of local, State, or Federal law to the FAA within 30 days of such arrest, indictment, or conviction.

Title 14, Code of Federal Regulations, **part 183** (14 CFR part 183), Representatives of the Administrator, implements the provisions of section 314 of the Federal Aviation Act. 14 CFR part 183 (part 183) describes the requirements for delegating to any properly qualified private person, the examination and testing necessary for the issuance of airmen certificates.

In addition to the regulatory basis, the purpose of this information collection is to make designated examiners readily available to the public, especially in those areas where Federal Aviation Administration (FAA) inspector resources are limited. The information collected is used for internal FAA purposes, to determine the eligibility and

qualifications of interested candidates, to appoint designated representatives of the Administrator from a pool of qualified applicants, and to conduct FAA surveillance and oversight of those appointed for continued eligibility.

This collection of information supports the Department of Transportation's strategic goal for *Safety: Reduce Transportation-Related Fatalities and Serious Injuries Across the Transportation System*.

**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.**

Response to this collection of information is required to obtain a benefit, specifically, to obtain a FAA designation as a representative of the Administrator. Designee applicants come from private industry. They are experts in the aviation and medical communities who are familiar with the regulations and certification requirements necessary to issue an FAA certificate or certain other FAA approvals. Only highly experienced aviation professionals are expected to respond to the collection. The collection is for reporting of an individual's eligibility and qualifications and occurs on an as needed basis for initial applicants. However, if an individual is not selected as a designee, their application must be updated whenever information changes (as needed) and at least every 12 calendar months (annually), if the individual wishes to continue to be considered for a designation.

The collection of information is for the purpose of obtaining essential information concerning the applicant's professional and personal qualifications. The FAA uses the information provided to screen, select, and maintain continued eligibility of designees who will act as representatives of the FAA Administrator in performing various certification and examination functions under Title VI of Federal Aviation Act.

Information on each FAA designee type is available to applicants and the public at [https://www.faa.gov/other\\_visit/aviation\\_industry/designees\\_delegations/about](https://www.faa.gov/other_visit/aviation_industry/designees_delegations/about)

The collection of information involves individuals requesting to be delegated for one or more designee type, as follows:

**Aviation Medical Examiner, § 183.12.**

Aviation Medical Examiners (AME) are licensed physicians who issue medical certificates to people involved in the operations of aircraft. They serve the Federal Aviation Administration (FAA) and the flying community by medically certifying pilots.

**Designated Engineering Representative, § 183.29.**

Designated Engineering Representatives (DER) are responsible for finding that engineering data complies with the appropriate airworthiness standards. DERs fall into one of the following subgroups:

- DER-Y
- DER-T

**Designated Manufacturing Inspection Representatives, § 183.31.**

A Designated Manufacturing Inspection Representatives (DMIR) conducts conformity inspections during the manufacturing process. DMIRs also issue certificates such as airworthiness certificates for aircraft, export certificates for aircraft and parts, and special flight permits. DMIR must also be employed by a Production Approval Holder (PAH) or a PAH's approved supplier.

**Designated Airworthiness Representative – Manufacturing, § 183.33.**

Designated Airworthiness Representative – Manufacturing (DAR-F), are individuals who perform examination, inspection, and testing services necessary to the issuance of airworthiness certificates. These designees perform mostly the same functions as DMIRs but work as individual consultants.

**Designated Airworthiness Representative – Maintenance, § 183.33.**

Designated Airworthiness Representative – Maintenance (DAR-T), are individuals who perform examination, inspection, and testing services necessary to the issuance of airworthiness certificates.

**Pilot Examiners, § 183.23.** Pilot Examiners (DPE) are individuals who test and certificate applicants for a pilot certificate under part 61. DPEs fall into one or more subgroups below:

- Air Transportation Designated Examiners. These designees are employees of an air carrier, and do work on behalf of the FAA, conducting FAA functions only on employees of their air carrier employer.
  - Aircrew Program Designee (APD)
  - Training Course Evaluator (TCE)
  - Designated Aircraft Dispatch Examiner (DADE)
- General Aviation Pilot Examiners
  - Designated Pilot Examiner (DPE)
  - Specialty Aircraft Examiner (SAE)
  - Administrative Pilot Examiner (Admin-PE)

**Designated Mechanic Examiner, § 183.25.**

Designated Mechanic Examiner (DME) are technical personnel examiners who test and certificate applicants for a mechanic certificate issued under 14 CR part 65.

**Designated Parachute Rigger Examiner, § 183.25.**

Designated Parachute Rigger Examiner (DPRE) are technical personnel examiners who test and certificate applicants for a parachute rigger certificate under 14 CFR part 65.

In addition to the reporting by applicants, all appointed designees, regardless of designation type, must report any arrest, indictment, or conviction for violation of local, State, or Federal law to the FAA within 30 days of such arrest, indictment, or conviction. The designee must report such events to the FAA in writing.

**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.**

Existing designees must report any arrest, indictment, or conviction for violation of local, State, or Federal law to the Administrator. The designee must report such events to the FAA, in writing, and may use electronic methods.

The FAA has fully implemented the Designee Management System (DMS), a web-based application (<https://dms.avs.faa.gov/>) which replaced all paper forms previously used to collect designee applicant information from the public. DMS must be used by all designee applicant types.

- With DMS fully implemented, all previously approved paper forms referenced within this information collection are no longer be used as DMS supports a fully electronic application process.
- DMS is a web-based tool designed to standardize the management of designees. The FAA's Designee Management Policy (see FAA Order 8000.95) establishes the process and procedures for managing all aspects of designee administration including registration, application, selection, appointment, orientation, training, oversight, suspension and termination.
- The description within this IC regarding DMS is limited to information collected for the purposes of registration, application, selection, and appointment, since these purposes involve collection of information from the public (i.e., designee applicants).
  - There are other aspects of DMS which are used to manage individuals who have been appointed as representatives of the FAA Administrator and who are conducting work on behalf of the FAA Administrator. These other aspects are not included in this collection as they do not apply to the public and constitute actions that the designee performs while doing work on behalf of the FAA Administrator.

- Reporting of arrests, indictments, and convictions is not done in DMS and is not work done on behalf of the FAA Administrator and is therefore burden included separately in this IC.
- The DMS tool is a web application. Users must register for access to DMS prior to having the ability to submit requested application information. Applicants will be required to have access to a computer with internet access to the DMS webpage located at the following url: <https://dms.avs.faa.gov/>. Additionally, applicants must have a valid email address in order to initially and continually access DMS.
- DMS provides users a link to a user guide, accessible on the DMS login page at <http://designee.faa.gov/>, with instructions on how to register for an external account.
- Applicants are required to upload either a current resume and/or a supplemental information sheet that provides information in the following areas, as required by FAA Order 8000.95, Volume 1, Chapter 2, Application Process:
  - Qualifications, including a description of applicable education, training, or certification
  - Technical experience. The applicant must describe their up-to-date extensive knowledge and experience that is pertinent to the designation being sought.
  - FAA History/interaction. The applicant must describe any previous working relationship the applicant had with the FAA.
  - References. The applicant may provide: (1) Three verifiable character references to substantiate that the applicant possesses integrity and sound judgment. (2) Three verifiable technical references to substantiate that the applicant possesses the required technical expertise for the designation sought. These references may be the same individuals used as character references.
- DMS provides the Paperwork Reduction Act Statement on the login page. The Privacy Act Statement<sup>1</sup> is provided to applicants within the application's signature page, where the applicant applies their electronic signature using their established DMS password.

DMS collects the following general information on individuals applying for a designation:

- User Registration
  - First Name, Last Name
  - Email
  - Username, Password
- Application/Selection/Appointment
  - Designee "Yes/No" questions on knowledge, certifications held, work experience, and training.
  - First Name, Middle Name, Last Name, Suffix
  - Date of Birth
  - Gender
  - Country of Citizenship
  - Contact Phone, Email, Personal Address, Mailing Address
  - Eligibility/Background "Yes/No" questions. Questions determining applicant eligibility based on FAA established Designee Policy for each designee type.
  - Requested Designation Function Codes
  - Resume and/or Supplemental Information sheet listing the applicant's applicable FAA certificates held, relevant education, training, work experience, history working with the FAA, and applicable references for character and technical experience.

The decision to use DMS for fully electronic submissions is based on benefits to the FAA, applicants, and designees. Benefits to applicants include a new simplified application process which results in a better user experience, allowing the application process to be completed quickly, with a logical series of steps.

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<sup>1</sup> FAA Privacy office verified the Privacy Act statement displayed on the DMS home page at the time of this renewal is current and correct.

For designee applicants, none of the results of the information collection are made available to the public, either over the internet or by other means. The information collected from applicants is for internal FAA use, only for determining eligibility and qualifications of potential designated representatives of the FAA Administrator, and continued eligibility of those appointed. Currently the instructions for such reporting are put forth in FAA Notice N8000.385. However, the information from the Notice will be incorporated into FAA Order 8000.95, Designee Management Policy, prior to the Notice expiration date of 07/31/2025.

4. With the exception of DER-Y designees, once appointed, the contact information for each designated representative is available at <https://designee.faa.gov/designeeLocator> to allow the public to contact a designee to perform various work functions on behalf of the FAA. DER-Y designees only work for a specified company, and therefore their contact information is not made available to the public. **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.**

We find no duplication relating to information requested for designee applicants. The information collected as described in this submission are not duplicative since they request information from designee applicants with varied technical/professional backgrounds and areas of responsibility. We know of no other agency collecting this information.

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

The collection of information involves individuals only.

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.**

Collection frequency is on an as-needed basis; the information is initially collected only when an applicant wishes to apply for a designee position. Applicant information is required to be updated and submitted in DMS whenever the information changes. Applicants with no changes to information must log into DMS and sign/resubmit their application information at least every 12 months. Applicants receive an email reminder notification stating they must that update/validate their application. Additionally, if the applicant logs into DMS, the automation has internal messaging which is sent to the applicant's DMS message inbox 60 days prior to the 12-month deadline, regarding the need for application validation. An application that is updated at least every 12 months will remain active in DMS until the applicant is selected or cancels the application. A designee applicant may cancel an application at any time in DMS.

If this frequency of collection was less than as needed/12 months, applicant information may not be current and valid, thus resulting in inaccurate data used for selection of designees.

If the collection were not conducted, FAA would not have the information needed to determine if applicants are qualified to be representatives of the FAA Administrator. Therefore, the FAA would not be able to support public demand for certifications services, and the aviation public and industry would be adversely impacted economically.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner:**

This collection of information is conducted in a manner consistent with 5 CFR section 1320.5 (d) (2) (i) (viii).

8. **Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the 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 the data elements to be recorded, disclosed, or reported.**

A 60-day notice was published in the *Federal Register* (FR) on May 29, 2024 (89 FR 46571). No comments were received.

A 30-day notice will be published in the Federal Register regarding this information collection. The 30-day notice will include additional reporting burden (as shown in this supporting statement) for designee reporting of arrests, indictments, and convictions, which was not included in the 60-day notice.

Additionally, the FAA specifically requests comments regarding the burden estimate or any other aspect of the collection of information in the Paperwork Reduction Act Burden Statement on the DMS homepage here: <https://designee.faa.gov/>.

Although the FAA has not contacted individual respondents to the collection to request feedback on the burden estimates, the FAA has numerous methods for individuals to contact the FAA for feedback on the information collected, to include collection burden, such as:

- DMS support and feedback: [https://www.faa.gov/other\\_visit/aviation\\_industry/designees\\_delegations/dms/support](https://www.faa.gov/other_visit/aviation_industry/designees_delegations/dms/support)
- Flight Standards Designee Feedback: [9-AMC-AFS-650@faa.gov](mailto:9-AMC-AFS-650@faa.gov)
- Aircraft Certification Designee Feedback: [9-avs-air-designee-feedback@faa.gov](mailto:9-avs-air-designee-feedback@faa.gov)

The FAA has not received any comments regarding the estimated information burden for this collection at the time of this renewal<sup>2</sup>.

**9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.**

Respondents do not receive any payments or gifts in return for submitting the requested information described in this collection.

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

Respondents have not been given any assurance of 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.**

There are no sensitive questions within the DMS application process. Questions asked are only used for determining the eligibility and qualifications of designee applicants.

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<sup>2</sup> Comments were received by OMB and addressed by the FAA during the previous renewal, in response to the 30-day notice, 85 FR 6012, February 3, 2020.

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

**Burden Summary**

The total burden for **2145** respondents, 2145 responses, taking on average 3 hours per response, is **4,620 hours** and **\$ 617,510** annually.

Summary	All Designee Types Initial Application <sup>3</sup>	All Designee Types Applicant Yearly Update <sup>2</sup>	All Designee Types <sup>4</sup> , Designee Reporting of Arrests/Indictments/Convictions	Total
# of Respondents (annually)	100	1975	70	2145
Responses per respondent	1	1	1	1
Total # of Responses	100	1975	70	2145
Time per Response (hours)	6	2	1	3
Hour Burden	600	3,950	70	4620
Cost Burden (\$)	80,220	529,100	8190	617,510

**Initial Application Burden**

The FAA estimates it takes 1.5 hours to complete the initial application in DMS, and an average of 4.5 hours to create/obtain and attach required application attachments, for a total of 6 hours per response.

The number of annual initial applicants was estimated to be 5% of the total current applicants found in the DMS database.

Initial Application								
Initial Application	AME	DMIR/DAR-F	DME/DAR-T	DPRE	GA DPE/SAE/Admin-PE	Air Transport DPE	DER	Totals
# of Respondents (annually)	15	5	5	9	50	8	8	100
Responses per respondent	1	1	1	1	1	1	1	1
Total # of Responses	15	5	5	9	50	8	8	100
Time per Response (hours)	6	6	6	6	6	6	6	6
Hour Burden	90	30	30	54	300	48	48	600
Cost/Hour (\$)	232	73	73	46	133	133	129	n/a
Cost Burden (\$)	20,880	2,190	2,190	2,484	39,900	6,384	6,192	80,220

**Application Update Burden**

Designee applicants must update their application in DMS whenever information changes (as needed) and at least every 12 calendar months (annually) if the individual wishes to continue to be considered for a designation.

The FAA estimates it takes 2 hours, on average, to complete the application update in DMS each year. This includes time needed to update DMS information and any application attachments.

Application Update
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<sup>3</sup> The respondents are designee applicants, not individuals already appointed a designation. Appointed designees also use DMS but are not included in this DMS related burden estimates of this collection since once designated they are performing their work on behalf of the FAA Administrator. These estimated numbers for respondents are based on the number of applicants registered in DMS as of April 31, 2024.

<sup>4</sup> These respondents are appointed designees who are required to report arrests, indictments, and convictions to the FAA.

Designee Type	AME	DMIR/ DAR-F	DME/ DAR-T	DPRE	GA DPE/SAE/ Admin-PE	Air Transport DPE	DER	Total
# of Respondents (annually)	300	100	100	175	1000	150	150	1975
Responses per respondent	1	1	1	1	1	1	1	1
Total # of Responses	300	100	100	175	1000	150	150	3,950
Time per Response (hours)	2	2	2	2	2	2	2	2
Hour Burden	600	200	200	350	2,000	300	300	3,950
Cost/Hour (\$)	232	73	73	46	133	133	129	n/a
Cost Burden (\$)	139,200	14,600	14,600	16,100	266,000	39,900	38,700	529,100

### Burden for Reporting Arrests, Indictments, and Convictions

Section 408(a)(3) of the FAA Reauthorization Act of 2024, **Pub. L. No. 118-63** (May 16, 2024) (the Act) directs the Federal Aviation Administration (FAA) to revise its orders and policies to clarify that certain individual designees of the FAA Administrator are obligated to report arrests, indictments, or convictions for violation of local, State, or Federal law within a period of time specified by the FAA Administrator. Section 408(b) of the Act defines affected designees as aviation medical examiners, pilot examiners, and technical personnel examiners, however, FAA policy requires all designees to report any arrest, indictment, or conviction for violation of local, State, or Federal law to the FAA within 30 days of such arrest, indictment, or conviction. The FAA published Notice N8000.385, effective 07/31/2024, which supplements FAA Order 8000.95C, Designee Management Policy, and notifies designees and FAA personnel of new policy for designee reporting of arrests, indictments, or convictions and implementing instructions to FAA managing offices. The information from the notice will be incorporated into Order 8000.95 prior to the Notice expiration date of 07/31/2025.

The FAA estimates that annually, approximately 70 designees will take 1 hour each to report an arrest, indictment, or conviction, resulting in an annual burden of 70 hours and \$ 8190.

Reporting Arrests, Indictments, Convictions								
Designee Type	AME	DMIR/ DAR-F	DME/ DAR-T	DPRE	GA DPE/SAE/ Admin-PE	Air Transport DPE	DER	Total
# of Respondents (annually)	10	10	10	10	10	10	10	70
Responses per respondent	1	1	1	1	1	1	1	1
Total # of Responses	10	10	10	10	10	10	10	70
Time per Response (hours)	1	1	1	1	1	1	1	1
Hour Burden	10	10	10	10	10	10	10	70
Cost/Hour (\$)	232	73	73	46	133	133	129	--
Cost Burden (\$)	2320	730	730	460	1330	1330	1290	8190

See question 15 for a discussion on the change in burden from estimates from the previously approved ICR.

### Labor Cost Analysis

The burden of this ICR falls on various aviation professionals, to include doctors, engineers, pilots, and mechanics. Accordingly, the labor cost estimates vary greatly depending on the applicants' profession related to the designation sought.

For all wages, the FAA multiplied the hourly wage by 2 to account for a fringe benefit rate of 29%<sup>5</sup> and an overhead rate of 69%<sup>6</sup>.

AME Applicant Labor Cost:

With respect to these applicants, the FAA believes that doctors will perform most of the reporting requirements, with an estimated fully burdened wage of **\$ 232/hour**. The hourly wage of \$115.77/hour came from the Department of Labor, Bureau of Labor Statistics (BLS), May 2023, Family Medicine Physicians #29-1215.<sup>7</sup>

AME Applicants			
Hourly wage	31% Fringe Benefit	69% Overhead	Total
\$115.77	\$35.89	\$79.88	\$232

DER Applicant Labor Cost:

With respect to these applicants, the FAA believes that highly experienced aerospace engineers will perform most of the reporting requirements, with an estimated fully burdened wage of **\$ 129/hour**. The hourly wage of \$64.58/hour came from the Department of Labor, Bureau of Labor Statistics (BLS), May 2023, Aerospace Engineers #17-2011.<sup>8</sup>

DER Applicants			
Hourly wage	31% Fringe Benefit	69% Overhead	Total
\$64.58	\$20.02	\$44.56	\$129

DPE, SAE, and Admin-PE Applicant Labor Cost:

With respect to these applicants, the FAA believes that highly experienced general aviation pilots will perform most of the reporting requirements, with an estimated fully burdened wage of **\$ 133/hour**. Wage estimates are derived from the Department of Labor, Bureau of Labor Statistics (BLS), May 2023, Commercial Pilots #53-2012.<sup>9</sup> The hourly wage rate was calculated by dividing the mean annual wage by 52 weeks and then by 40 hours per week, to obtain \$ 66.35/hour.

DPE, SAE, and Admin-PE Applicants			
Hourly wage	31% Fringe Benefit	69% Overhead	Total
\$66.35	\$20.57	\$45.78	\$133

DMIR, DAR-F, DAR-T, and DME Applicant Labor Cost:

With respect to these applicants, the FAA believes that aircraft mechanics will perform most of the reporting requirements, with a fully burdened wage of **\$ 73/hour**. The hourly wage of \$36.66/hour came from the Department of Labor, Bureau of Labor Statistics (BLS), May 2023, Aircraft Mechanics and Service Technicians #49-3011.<sup>10</sup>

DMIR, DAR-F, DAR-T, and DME Applicants			
Hourly wage	31% Fringe Benefit	69% Overhead	Total
\$36.66	\$11.36	\$25.30	\$73

<sup>5</sup> An employee fringe benefit of 31% is added (for benefits such as health benefits, vacation, sick time, etc.), based on the Civilian Workers wages, as reported in BLS release, Employer Costs for Employee Compensation-June 2019.

Source: U.S. DOL/BLS: <https://www.bls.gov/news.release/eccec.nr0.htm>

<sup>6</sup> Source: U.S. Department of Health and Human Services, "Guidelines for Regulatory Impact Analysis" (2016), [https://aspe.hhs.gov/system/files/pdf/242926/HHS\\_RIAGuidance.pdf](https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf). On page 30, HHS states, "As an interim default, while HHS conducts more research, analysts should assume overhead costs (including benefits) are equal to 100 percent of pretax wages...." To isolate the overhead rate, the Department subtracted the benefits rate of 69 percent from the recommended rate of 100 percent.

<sup>7</sup> Source: U.S. DOL/BLS: <https://www.bls.gov/oes/current/oes291215.htm>

<sup>8</sup> Source: U.S. DOL/BLS: <https://www.bls.gov/oes/current/oes172011.htm>

<sup>9</sup> Source: U.S. DOL/BLS: <https://www.bls.gov/oes/current/oes532012.htm>

<sup>10</sup> U.S. DOL/BLS: <https://www.bls.gov/oes/current/oes493011.htm>

DPRE Applicant Labor Cost:

With respect to these applicants, the FAA believes that individuals currently employed as parachute riggers will perform most of the reporting requirements, with a fully burdened wage of **\$ 46/hour**. The wage rate of \$ 24.27/hour came from the Department of Labor, Bureau of Labor Statistics (BLS), May 2023, Installation, Maintenance, and Repair Workers, All Other, #49-9099.<sup>11</sup>

DPRE Applicants			
Hourly wage	31% Fringe Benefit	69% Overhead	Total
\$24.27	\$7.52	\$16.75	\$45.96

**13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.**

No additional costs have been identified for respondents to this information collection.

**14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.**

The FAA estimates that the total estimated annual cost to the Federal Government is **\$524,736**.

The FAA will have ASI's performing the application reviews of designee applicants, with a fully burdened wage of **\$ 72.88/hour**. The FAA aviation safety inspector (ASI) hourly wage rate of \$ 53.49/hour was obtained from the 2023 General Schedule Salary Table<sup>12</sup> as published by the U. S. Office of Personnel Management, Salary Table for the Rest of the U.S. The base hourly salary for a GS 13 Step 5, which is the mid-range salary for this position, was used. The base wage is multiplied by the FAA fringe benefit salary multiplier<sup>13</sup> of 1.3625 to yield the fully burdened rate.

$$\text{\$ } 53.49/\text{hour} \times 1.3625 = \text{\$ } 72.88/\text{hour}$$

Once an FAA office determines a need for a designee, an ASI will review the application information provided in DMS. Applicants are interviewed to further determine their eligibility and qualifications to be appointed a designated representative of the FAA Administrator.

- The FAA estimates that approximately **20** individuals are appointed as designees (includes all types) each year. For each designee appointed, it is estimated that an average of 2 other applicants had their information reviewed to determine eligibility and qualifications; therefore, the number of applications reviewed, on average, is **3** applicants for each designee appointment. Therefore, the FAA estimates the using **3** ASIs, the FAA conducts approximately 180 reviews total.  
**800** designee appointments/year x **3** applicants per appointment = **2400** information reviews.
- It is estimated that three ASIs spends **1** hour evaluating each applicant's information to determine eligibility for appointment of a particular designation.  
**2400** reviews x **3** ASIs x **1** hour of ASI time x **\\$72.88/hour** = **\\$ 524,736**

**15. Explain the reasons for any program changes or adjustments.**

Program changes are described below:

<sup>11</sup> U.S. DOL/BLS: <https://www.bls.gov/oes/current/oes499099.htm>

<sup>12</sup> <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/19Tables/html/RUS.aspx>

<sup>13</sup> <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2008/m08-13.pdf>

The FAA has now fully implemented the use of the Designee Management System (DMS) web-based application (described in question 3) for the designee application process. This IC has been updated to describe that process and remove reference to any paper forms previously used in the designee application process.

The respondent burden estimates in this collection have changed due to the following:

- The collection now reflects 3 instruments by collection type, rather than 7 instruments reflecting the different designee types: (1) initial designee application, (2) Applicant yearly application updates, and (3) appointed designee reporting of arrests, indictments, and convictions. These changes more accurately reflect the burden on respondents to this collection.
- The number of respondents has lowered to reflect current applicants in DMS, which in turn reflects a lower overall burden.
- The estimated time for each response is updated to reflect the previous 6-hour estimate for initial applicants, and an additional 2 hours per response are now estimated for updating existing applications yearly. Previously the time needed to complete the yearly application update was included in the overall time per response for each designee type.
- A new IC for designee reporting of arrests, indictments, and convictions has been added to the ICR to comply with Section 408(a)(3) of the FAA Reauthorization Act of 2024.

The FAA burden estimates in this collection have changed due to the following:

- The FAA underestimated the number of designee appointments that are made each year. For example, in 2023 alone, the FAA appointed 839 new designees (combined number across all designee types).
- The FAA uses a 2-3 ASI review panel to review applicant information, therefore, the estimates in this ICR are based on 3 ASIs time instead of just a single ASI.

**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 report, publication dates, and other actions.**

There are no plans to publish this information for statistical or other purposes.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.**

FAA is not seeking such approval.

**18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."**

No exception to the certification statement of OMB Form 83-I is requested.