

Supporting Statement A
Federal Aviation Administration
Operations Specifications, Part 129 Application
2120-0749

- The adjustment in estimated new applicant and existing operator
- Inclusion of updated indirect costs to the FAA, using FAA AC 187U.

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

14 CFR part 129 was revised in 2011 and prescribes rules governing foreign air carrier operations within the United States (U.S.) and the operations of U.S.-registered aircraft outside the U.S. in common carriage. 14 CFR section 129.7 governs the application process.

This renewal is issued under the authority described in Title 49 of the United States Code, Subtitle VII, Part A, Subpart III, Section 44701(a)(5). Under that section, the Administrator is charged with promoting safe flight of civil aircraft in air commerce by prescribing regulations and minimum standards for practices, methods, and procedures the Administrator finds necessary to ensure safety in air commerce.

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 purpose of the collection of information is used to evaluate whether foreign air carriers requesting new authority or with existing authority to operate in the U.S. will be able to conduct their operations safely within the National Airspace System (NAS) and in compliance with international obligations. Operators meeting those standards are issued operations specifications (OpSpecs) authorizing them to operate in the U.S. Consistent with previous practices, FAA includes a regulatory standard for issuing maintenance OpSpecs to persons operating U.S.-registered aircraft outside the U.S. in common carriage. Operators are required to respond, as needed, to the collection to obtain or retain a benefit (OpSpecs).

OpSpecs are issued to the operator applying. OpSpecs are not available for viewing to the general public. OpSpecs are available for viewing to FAA offices for the purpose of safety oversight of the operators. FAA occasionally shares OpSpecs information, as needed, with other agencies such as Transportation Security Administration (TSA), Department of Transportation (DOT) or to answer questions from U.S. congress.

The FAA requires foreign operators applying for the issuance or amendment of OpSpecs to submit supporting documentation. The type of documentation that a foreign operator needs to



provide to the FAA is identified in FAA Order 8900.1 volume 12, which is publicly available¹. The information is helpful to new applicants as well as existing operators.

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.

The information collection process is predominantly electronic. FAA estimates over 95% of the information collection is done via e-mail, Safety Assurance System (SAS) Operations Safety System (OPSS), previously Web-based Operations Safety System (WebOPSS) or combination thereof. This is based on applicant's capability and choice. The FAA estimates less than 5% of the information collection is done by mail. The submission is consistent with Government Paperwork Elimination Act. For additional details on transition from WebOPSS to SAS OPSS see FAA InFO 25007.

In Fall 2025, the FAA transitioned to SAS OPSS for the issuance and maintenance of OpSpecs issued to individual foreign operators. All new and existing applicants may request access to SAS External Portal (SAS EP), which is utilized for non-FAA access to SAS. To gain access to SAS EP, the applicant must apply for a secure FAA User Name/ID. The FAA has made available, and recommends all applicants complete the SAS EP training first.

SAS OPSS allows foreign air carriers to draft, view and digitally sign (at no cost) their OpSpecs; this expedites issuance of new and revised authorizations.

Foreign air carriers who do not have access to SAS External Portal must manually sign and then return (signed) OpSpecs to the FAA. This is normally done via email.

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.

There is no duplication. There is one responsible office assigned to each operator based on geographical area and services². The responsible office issues OpSpec to their assigned operators via SAS OPSS. What has been issued is transparent to other offices within FAA who may have the need for the information. OpSpecs are issued as a set of authorizations working together, not independent authorizations.

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

¹ Link to FAA Order 8900.1 volume 12 in Dynamic Regulatory System: <https://drs.faa.gov/browse/doctypeDetails>:

² Link to IFOs https://www.faa.gov/about/office_org/field_offices/ifo/

The burden for the collection of information affects all applicants proportionally. Each foreign air carrier is issued a minimum set of OpSpecs. The actual number of OpSpecs and content needed to be issued is then tailored to each foreign air carrier's operation. A small foreign air carrier will need less OpSpecs and have less content within OpSpecs issued than a large foreign air carrier. The more OpSpecs and content needed to be issued the more documentation required from the foreign air carrier. Complexity of operation also increase the collection of information.

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.

Without the collection, the FAA would not have adequate or appropriate information to conduct safety oversight of foreign operators or conduct oversight of the maintenance of U.S.-registered aircraft operated outside the U.S. in common carriage. FAA must conduct adequate safety oversight of such foreign air carriers and the airworthiness of U.S.-registered aircraft in common carriage outside the U.S. in accordance with FAA's statutory obligation and international obligations. To issue OpSpecs without collection of information could lead to an accident. The collection is in the public interest, helps to ensure passengers boarding foreign air carriers or U.S. registered aircraft arrive safely at their destination. Likewise the collection helps to ensure safe transportation of cargo by air.

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

- *requiring respondents to report information to the agency more often than quarterly;*
- *requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;*
- *requiring respondents to submit more than an original and two copies of any document; requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;*
- *in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;*
- *requiring the use of a statistical data classification that has not been reviewed and approved by OMB;*
- *that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which*

unnecessarily impedes sharing of data with other agencies for compatible confidential use; or

- *requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.*

The FAA currently requires all foreign operators who fly into the U.S. NAS or operate U.S. registered aircraft outside the U.S. in common carriage to maintain and keep current FAA issued OpSpecs until suspended, terminated or voluntarily surrendered. Information on suspension, and termination is publicly available in Dynamic Regulatory System (DRS), FAA Order 8900.1 volume 12, chapter 4 section 12, compliance and enforcement.³

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.

The FAA published notice for public comment in the Federal Register on January 16, 2026 (91 FR 2268. No comments were received.

Stakeholders also communicate with responsible flight standards offices, on as needed basis.

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

Payments or gifts are not provided to respondents.

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

Assurance of confidentiality is not provided to respondents.

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.

³ Link to FAA Order 8900.1 volume 12 in Dynamic Regulatory System, DRS:
[https://drs.faa.gov/browse/doctypeDetails:](https://drs.faa.gov/browse/doctypeDetails)

There are no questions of a sensitive nature.

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

International Field Offices (IFOs) review new applications for OpSpecs issuance under 14 CFR part 129. Then, from time to time, IFOs amend existing operators OpSpecs. Amendments to existing operators OpSpecs are initiated either at the request of the applicant, or initiated by the FAA. In 2025, the FAA conducted an analysis of OpSpecs issued which showed there were, annually, approximately:

-36 new operators.

-511 existing operators.

WebOPSS was the source data used for this analysis. The labor burden to the operator varies with each foreign country.

The FAA is not aware of the existence of a single global wage calculation that could be used to conduct an accurate analysis. English is not the native language of the majority of foreign countries. Additionally, not all foreign countries publish wages. Finally, there is variation in cost of living worldwide.

Summary (Annual numbers)	Reportin g	Recordkeepin g
New applicants		
# of Respondents	36	
# of Responses per respondent	1	
Time per Response	27 hours	
Existing operators		
# of Respondents	511	
# of Responses per respondent	1	
Average Time per Response	47 hours	

New applicants.

The FAA expects to receive 36 new applications for 14 CFR part 129 OpSpecs annually. This number corresponds to the annual average number of applications for foreign OpSpecs the agency received based on the last three years. The source data used was WebOPSS. The

number of OpSpecs issued to an operator varies. This is due to many factors such as: the operator’s size, complexity of operation, will the operator operate U.S. registered aircraft to the U.S. or solely outside the U.S. etc.

The FAA estimates one response per operator. This one response is equivalent to ten OpSpecs issued to a new operator. This number is also an estimate. The FAA further estimates that each new application requires approximately 27 hours total preparation time by the operator (for the initial set of (ten) OpSpecs). The 27 hour estimate was the average hourly burden based on feedback from 2 new applicants, who volunteered to respond to a survey conducted by the FAA in 2022 [Approval under the “Generic Clearance for Customer Interactions” (OMB Control number 2120-0772). Title of Information Collection: Foreign Operator Survey.]

Summary (Annual numbers)	Reporting	Recordkeepin g	Disclosure
# of Respondents	36		
# of Responses per respondent	1		
Time per Response	27 hours		
Total # of responses	36		
Total burden (hours)	972		

Existing Operators.

The FAA estimates one response per operator. This one response is equivalent to seven OpSpecs issued/reissued to an existing operator. This number is also an estimate. The FAA further estimates that each existing operator spends 47 hours in total preparation time by the operator (for the estimated seven OpSpecs). The 47 hour estimate was the average hourly burden based on feedback from three existing operators, who volunteered to respond to a survey conducted by the FAA in 2022 [Approval under the “Generic Clearance for Customer Interactions” (OMB Control number 2120-0772). Title of Information Collection: Foreign Operator Survey.].

Summary (Annual numbers)	Reporting	Recordkeepin g	Disclosure
# of Respondents	511		
# of Responses per respondent	1		



rounded			
Time per Response	47 hours		
Total # of responses	511		
Total burden (hours)	24,017		

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

There is no additional costs.

The FAA does not place a record keeping requirement on foreign air carriers.

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.

To estimate cost to the FAA the FAA requested feedback from each IFO. Specifically, for hourly time estimates it took each IFO to process:

- a new applicant; and
- an OpSpec change for an existing applicant.

For inspector hourly rate the FAA used the inspector per hour rate of \$189 published in latest edition of AC 187 fees.⁴ The formula and methodology for the hourly inspector rate in the AC is contained in 14 CFR part 187, Appendix 1. Although OpSpecs are issued to foreign operators domestically and the FAA does not collect a fee for their issuance/reissuance the FAA used the calculations for fee collection in the above-mentioned AC for the purpose of this calculation. This is because FAA inspectors spend a significant amount of time in indirect work such as training, review of policy and guidance documents associated with each OpSpec authorization, as well as time on various administrative functions such as PTRS, SAS AR, VIS, NVIS and WebOPSS, SAS OPSS entries for which the AC accounts for its fee calculation. When the foreign operator operates U.S. registered aircraft there is also the additional indirect cost of issuing Special Purpose Pilot Authorizations (SPPAs). Recordkeeping is another indirect cost associated with the collection.

⁴ Link to FAA AC 187-1U

<https://drs.faa.gov/browse/excelExternalWindow/DRSDOCID108955228920250710182917.0001>

Advanced technology requires a high level of expertise and specialized training for both operators and FAA. Differences in manufacturing technical standards for avionics equipment and airplane flight manuals all add to the challenge. There were various types of OpSpecs issued by IFOs to foreign operators, some of which authorized for the use of advanced technology requiring a high level of knowledge and expertise, which takes time to acquire (i.e. OpSpecs authorizing required navigation performance authorization required, (RNP-AR), and OpSpecs authorizing special procedures or lower landing minimums).

All of the above increase the level of indirect and direct inspector work, cost to the federal government. A more thorough safety review is required by FAA inspectors to insure the aircraft and crew meet the requirements of the U.S. National Air Space; to mitigate operational risk and maintain a high level of safety, a core function of the FAA’s mission, entrusted by and in support of the flying public.

The table below shows that the FAA spends an average of 40 hours to issue OpSpecs to a new operator. This is costing the agency \$ 272,160 using \$189 per hour rate discussed above to issue OpSpecs to 36 new operators [40 hours times \$189 times 36 new operators]. The actual time to process an OpSpec change varies with the type of change needed. On average the time it takes to process OpSpec changes for an existing operator is 21 hours, costing the agency a total of \$2,028,159 [21 hours times \$189 times 511 existing operators.]

Summary (Annual Numbers)	Reporting	Recordkeeping
New Operators		
# of Respondents	36	36
Time per response	40 hours	
Labor \$	272,160	
Existing Operators		
# of Respondents	511	511
Time per response	21 hours	
Labor \$	2,028,159	

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

The adjustment in estimated new applicant and existing operator and inclusion of updated indirect costs to the FAA, using FAA AC 187.

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.

The information collected will not be published.

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.

Not applicable.

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

There are no exceptions.

