



November 6, 2020

U.S. Department of Transportation

Subject: Clearance of Renewed Approval of Information Collection: 49 U.S.C. 44701/Service Difficulty Report

References: 1. DOT Rulemaking Docket No. FAA-2020-0752
2. OMB Control No. 2120-0663
3. 14 CFR Part 121.703 Service Difficulty Reports

Dear Sirs,

Please accept the following in comments to the above referenced Department of Transportation (DOT) Federal Aviation Administration (FAA) Docket regarding Service Difficulty Reporting:

1. Whether the proposed collection of information is necessary for FAA's performance; Based on the FAA's response the information is not necessary for FAA's performance. The Federal Aviation Administration (FAA) does not manage / update the SDR database in a timely manner significantly reducing the immediate safety value. For example, on October 16, 2020, the FAA only processed 9 SDRs in a 30-day period between September 16, 2020 to October 16, 2020. (See *Excerpt Below*). During the same 30-day period between September 16, 2020 to October 16, 2020, United submitted a total of 72 reports.

Query Results (Note: Recently submitted SDR's are not available until the FAA approves the submission.)

Your query returned 9 records.

Selected	Unique Control #	Operator Designator	Difficulty Date	N-Number	Aircraft Make	Aircraft Model	JASC Code
	2020F00366		9/18/2020	371LL	PILATS	PC1247E	7250
	HALA2020092430186	HALA	9/23/2020	204HA	AIRBUS	A321271N	2310
	UIEA2020091802017	UIEA	9/16/2020	1229A	BOEING	767306	3150
	UIEA2020091872015	UIEA	9/17/2020	1093A	BOEING	76736N	2697
	UIEA2020091872013	UIEA	9/16/2020	1373A	BOEING	76731K	3030
	UIEA2020091872012	UIEA	9/16/2020	1361A	BOEING	76731B	2612
	UIEA2020091862011	UIEA	9/16/2020	1511A	BOEING	767383	3442



	UIEA2020091862008	UIEA	9/16/2020	1361A	BOEING	76731B	3460
	UIEA2020092102043	UIEA	9/16/2020	1997A	BOEING	76733A	2613

1. The accuracy of the estimated burden [FAA estimates that each response takes approximately 15 minutes (estimated total annual burden: 15,000]; SDR times of 15 minutes per report is an underestimate, we estimate that the actual time per report from an operator perspective is closer to 30 to 40 minutes, depending on the amount of research required. Although the actual entry of the SDR into the FAA system would be 15 minutes, the time estimate fails to consider:

- The individual maintenance technician entering the information into the company's internal SDR reporting programs.
- The cost of developing and maintaining an electronic SDR reporting program allowing for timely reporting of SDR events from all parts of the world.
- The time the administrative personnel take to review and validate all of the possible SDR reportable occurrences.
- The SDR awareness training time (*both initial and recurrent*) provided to both the technicians and administrative personnel to ensure all applicable events are captured.
- Weekly email summary reporting to FAA, which takes approximately 1 hour per week.

2. Ways for FAA to enhance the quality, utility and clarity of the information collection; SDR rule (*See Excerpt Below*) is subjective allowing for inconsistent reporting between 121 operators / submitters.

- (*c*) In addition to the reports required by paragraph (a) of this section, each certificate holder shall report any other failure,



*malfunction, or defect in an aircraft that occurs or is detected at any time if, **in its opinion**, that failure, malfunction, or defect has endangered or may endanger the safe operation of an aircraft used by it.*

3. Ways that the burden could be minimized without reducing the quality of the collected information.

- Automate the interface between the FAA and operators avoiding the need to batch upload reports to FAA website.
- Centralize data collection, by collecting SDR data from an OEM or other 3rd party for a more consistent industry perspective.

If you have any questions regarding these comments, please feel free to contact me at david.pohlmeyer@united.com or by phone (872-825-9645).

Sincerely,

United Airlines, Inc.

A handwritten signature in black ink that reads "David Pohlmeier".

David Pohlmeier
Sr. Manager Regulatory Compliance