

Supporting Statement
U.S. Department of Commerce
National Telecommunications and Information Administration
Public Telecommunications Facilities Program (PTFP) Application Form
OMB Control No. 0660-0003

Section A. Justification

1. Explain the circumstances that make the collection of information necessary.

Under the authority of 47 U.S.C. 390-393, 397, 399b (copy attached), the National Telecommunications and Information Administration (NTIA) administers the Public Telecommunications Facilities Program (PTFP). Each year approximately 150 grants are awarded under the program. The purpose of the program is to assist, through matching funds, in the planning and construction of public telecommunications facilities in order to achieve the following objectives:

- a.) Extend delivery of public telecommunications services to as many citizens in the United States as possible by the most efficient and economical means, including the use of broadcast and non-broadcast technologies;
- b.) Increase public telecommunications services and facilities available to, operated by, and owned by minorities and women; and
- c.) Strengthen the capability of existing public radio and television stations to provide public telecommunications services to the public.

The awards of grants are based on the assessment of information contained on the standard grant application form (SF-424) and additional information required by NTIA. Each year new applications and re-submissions of deferred applications are made by those eligible to receive PTFP grants. The application form presented here for clearance is the only method by which PTFP can comparatively evaluate 300 proposed projects each fiscal year.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If NTIA's Information Quality Guidelines apply, state this and confirm that the collection complies with the Guidelines.

The PTFP is a competitive grant-making program that operates an annual application review process. Without the requested information collection it would be impossible to carry out PTFP's purposes. At the outset of a PTFP grant cycle, an announcement is sent to all organizations that have indicated an interest in applying to PTFP. It notifies them of the deadline

for submitting applications, that applications can be prepared on-line, and that a printed application form will be sent to any who request one.

The universe for applicants includes non-commercial educational television and radio stations, colleges and universities, states and state agencies, Indian Tribes, and non-profit corporations. They submit proposals which describe unique projects intended to provide broadcasting or telecommunications services to the general public. The majority of the applications are for the purchase of equipment such as transmitters, TV cameras, recorders, and other hardware for the transmission and production of TV or radio programs.

Each proposal reflects the unique needs of the applicant organization, but PTFP needs an organized and uniform method to evaluate one project against another in order to award grants. The requests always exceed available appropriations, usually by more than 2 to 1.

Standard Forms: In accordance with OMB Circulars and Department of Commerce regulations on grants management, DOC/NTIA uses standard forms to receive information from applicants. These forms include the SF-424, SF-424A, SF-424B, SF-LLL, CD-346 and the CD-511. The burden-hours involved with these forms are not reflected in this request.

The forms contained in this proposed information collection will supplement the Standard Forms and enable PTFP to review data about:

- a. Type of equipment requested, the urgency or need for the equipment, and whether the requested item(s) will do the job most efficiently and economically;
- b. Financial resources of the applicant, to ensure that the organization will be a viable service provider for the ten-year Federal interest period required by the authorizing legislation and will have the required local matching funds;
- c. Whether, in accordance with the authorizing legislation, Special Consideration should be given to the applicant for ownership/control by, or programming targeted to, minorities and/or women;
- d. Proof of eligibility for the program and proof of compliance with applicable Federal laws and regulations for grant applicants;
- e. Information regarding permits issued by the Federal Communications Commission required to construct the requested facilities; and
- f. Information about other stations which serve the applicant's coverage area which is used to determine the application's Priority under the PTFP Rules.

Under Department Commerce procedures for grants management (DAO 203-26), NTIA conducts a competitive review process that includes evaluation of each application by PTFP Program Officers, staff engineers, a review panel of representatives of national public broadcasting organizations, and a review panel of personnel from the professional public telecommunications field outside the DOC. Each reviewer provides comments and funding recommendations that are evaluated by PTFP management. Award decisions are made by the Assistant Secretary from the recommendations developed through this review process. The awards are usually announced about six to eight months after the application deadline.

The collection complies with NTIA's Information Quality Guidelines.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

PTFP has made the application form available for on-line preparation, and approximately two-thirds of PTFP applicants use this Internet-based technology. PTFP is also participating in the grants.gov program and has requested that the forms in this submission be included on the grants.gov website as quickly as possible after approval.

4. Describe efforts to identify duplication.

The applications submitted by various organizations in any grant cycle do not duplicate each other because each is unique to the needs, location, and service of the individual applicant. PTFP requests information on whether the applicant has sought funds for its project from another Federal agency or the Corporation for Public Broadcasting.

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

Many PTFP applicants are small entities, and the information requested has been kept to a minimum to ensure that they are able to comply with the least possible burden. The present request is for renewal of the existing information collection and no new requirements have been added.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

NTIA must solicit grant applications in every year in which the Congress passes an appropriation for the program or violate the intent of Congress by not making the funds available. It would be

impossible to make grant awards without the required competitive review process that begins with the submission of the information in the proposed collection.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

NTIA requests an original and five copies of the application form that are submitted in hard copy. The three additional copies of the application form are to be mailed to reviewers around the country who will evaluate the applications at their homes or offices. Using this method, NTIA will be able to expand the pool of reviewers and increase public participation in the PTFP application process.

The burden on the individual applicant to provide these additional three copies will be minimal.

8. Provide a copy of 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 record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A notice was published in the Federal Register on April 28, 2006, page 25153, soliciting public comments on the information collection. No comments were received.

NTIA conducts an annual consultation with the Corporation for Public Broadcasting (CPB) and other public broadcasting organizations and associations. These entities are free to comment on any aspect of the grant program on behalf of their constituents. NTIA has not specifically placed the PTFP application form before these organizations or associations, but many of the public TV and radio stations, which compose their membership, have received PTFP grants. If those grantees had problems with the application requirements, the organizations and associations representing them could have brought those problems to the attention of NTIA/PTFP. NTIA solicits comments about the application process from potential applicants as part of the application cycle. NTIA staff members also attend industry meetings, symposia, and seminars on a regular basis to discuss the program in general.

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

Not applicable.

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

NTIA complies with the Privacy Act of 1974 and the Freedom of Information Act. PTFP particularly emphasizes the confidentiality of the Name Check data collected on the CD-346, which was approved by OMB and carries the clearance number 0605-0001.

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.

The information requested by PTFP does not include any sensitive questions.

12. Provide an estimate in hours of the burden of the collection of information.

Burden Hours Calculation

Requirement	On-Line Responses		Paper Responses		Total Burden Hours
	No. of Applicants	Hours/ Applicant	No. of Applicants	Hours/ Applicant	
Original Submission	200	74.5	100	83.5	23,250
Resubmissions*	75	4	40	7	580
Total					23,830
*In every grant cycle. PTFP requires revised information to be submitted by applicants under serious consideration for awards.					

The method of calculating the number of responses NTIA receives each year for each of the reporting requirements is laid out in the table above. Program officials believe the calculations accurately reflect the burden imposed by each element in the reporting and the number of respondents to each element in any one year.

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in #12 above).

The cost to respondents will, in most cases, be part of the organization's normal cost of doing business. It is not expected that substantial cost will be incurred specifically because of PTFP application requirements. No technical reports, such as audited financial statements requiring outside preparation, are required as part of the application process.

The estimated burden for the three additional copies submitted in response to this collection will consist of 30 pages or fewer. At a cost of 10 cents a page, the cost of photocopying three additional copies would be less than \$10 per applicant (30 pages x 3 copies x .10/copy = \$9.00). This amount of copying would be burdensome for PTFP. We estimate that it would take one staff person almost two full weeks to disassemble the applications, photocopy over 27,000 pages of material (300 applications x 30 pages x 3 copies) and reassemble the applications. This two weeks of photocopying would also lengthen the application review process, thereby delaying the awarding of grants.

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

The annual budget for administration of the PTFP is \$2 million. This includes activities for application solicitation, review, approval, processing, and monitoring. PTFP staff costs cannot be broken out separately by function of application processing because individuals supported by this budget are involved in all of these activities.

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

The reduction in burden hours is the result of the following adjustments:

- a) The number of respondents has been reduced to 300 per year to more accurately reflect the historical pattern of applications.
- b) PTFP removed questions from this submission which are covered by the SF-424 and SF-424A, and
- c) An exhibit was removed which required certification by the applicant's chief financial officer.

As a result of these program changes and adjustment, the burden hours per original submission has been reduced by 2.5 hours, and the burden hours for the resubmissions has been reduced by 2 hours.

16. For collections whose results will be published, outline the plans for tabulation and publication.

Not applicable. There is no requirement to publish the collected information.

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 certification statement identified in Item 19 of the OMB 83-I.

Not applicable.

Section B. Collection of Information Employing Statistical Methods

The information collection for the Public Telecommunications Facilities Program does not employ statistical methods.