

SUPPORTING STATEMENT

A. Justification:

1. Each licensee in the private land mobile radio service must comply with the recordkeeping requirements of this section pursuant to 47 C.F.R. § 90.443 of the Commissions rules. Specifically, paragraph (b) of this section requires that the dates and pertinent details of any maintenance performed on station equipment, and the name and address of the service technician who did the work be entered in the station records. These records will reflect whether or not maintenance of the licensee's equipment has been performed.

This information collection contains personally identifiable information on individuals (PII).

- (a) The FCC maintains a system of records notice (SORN), FCC/WTB-1, "Wireless Services Licensing Records," that covers the collection, purpose(s), storage, safeguards, and disposal of the PII that individual private land mobile radio licensees maintain under 47 CFR 90.443(b).
- (b) The FCC published this SORN most recently on April 5, 2006 (71 FR 17234, 17269).
- (c) Going forward, if the FCC makes substantive change to the Wireless Services Licensing Records, the Commission will conduct a full Privacy Impact Assessment of the SORN covered by FCC/WTB-1, update this SORN, publish a Notice in the Federal Register, and post these two documents on the FCC webpage, as required by OMB Memorandum, M-03-22 (September 22, 2003).

The Commission is requesting an extension for this information collection in order to obtain the full three year clearance from the OMB.

Statutory authority for this collection of information is contained in 47 U.S.C. Section 303(j), as amended.

2. The maintenance records may be used by the licensee or Commission field personnel to note any recurring equipment problems or conditions that may lead to degraded equipment performance and/or interference generation. Tower lighting records required are to ensure that the licensee is aware of the tower light condition and proper operation, in order to prevent and/or correct any hazards to air navigation.

3. Prior to finalizing rule making the Wireless Telecommunications Bureau conducts an analysis to ensure that improved information technology may be used to reduce the burden on the public. This analysis considers the possibility of obtaining and/or computer-generating the required data from existing data bases in the Commission or other federal agencies.
4. This agency does not impose a similar collection on the respondent. No similar information is available.
5. In conformance with the Paperwork Reduction Act of 1995, the Commission is making an effort to minimize the burden on all respondents, regardless of size. The Commission has limited the information requirements to that absolutely necessary for evaluating and processing the application and to deter against possible abuses of the processes.
6. Licensees meeting these record-keeping requirements generate only documentation as circumstances warrant, and not on a regular schedule. Accordingly, a reduction in the frequency of collection is not feasible.
7. This collection is inconsistent with 5 CFR 1320.6 because licensees are required to maintain paper and electronic records for at least eleven years.
8. Notice of the information collection appeared in *Federal Register* on November 29, 2006 (71 FR 69123), in compliance with 5 C.F.R. Section 1320.8(d). No comments were received. A copy of the notice is attached to this submission.
9. There are no payments or gifts to respondents.
10. There is a need for confidentiality with respect to all Private Land Mobile Radio service filers in this collection. Pursuant to § 208(b) of the E-Government Act of 2002, 44 U.S.C.A. § 3501, in conformance with the Privacy Act of 1974, 5 U.S.C. 552(a), the Wireless Telecommunications Bureau (Bureau) instructs licensees to use the FCC's ULS, ASR, Commission Registrations System (CORES) and related systems and subsystems to submit information.¹ CORES is used to receive an FCC Registration Number (FRN) and password, after which one must register all current call sign and Antenna Structure Registration (ASR) numbers associated with a FRN within the Bureau's system of records (ULS database). Although ULS stores all information pertaining to the individual license via the FRN, confidential information is accessible only by persons or entities that hold the password for each account, and the Bureau's Licensing Division staff. Upon the request of a FRN, the individual licensee is consenting to make publicly available, via the ULS database, all information that is not confidential in nature.

¹ These instructions have been approved by the Office of Management and Budget (OMB) under Control Number 3060-1042.

Information on the private land mobile radio licensees is maintained in the Commission's system of records, FCC/WTB-1, "Wireless Services Licensing Records." The licensee records will be publicly available and routinely used in accordance with subsection b. or the Privacy Act. TIN Numbers and material which is afforded confidential treatment pursuant to a request made under 47 C.F.R. § 0.459 will not be available for Public inspection. Any personally identifiable information (PII) that individual applicants provide is covered by a system of records, FCC/WTB-1, "Wireless Services Licensing Records," and these and all other records may be disclosed pursuant to the Routine Uses as stated in this system of records notice.

11. This collection does not address any private matters of a sensitive nature with the exception of the personally identifiable information (PII) that individuals are required to maintain, as noted elsewhere in this supporting statement.
12. The burden imposed by the requirement of paragraph (b) of this section regarding equipment maintenance records, is information that would routinely be included on the service company's billing invoices. Accordingly, the licensee must simply place this invoice into a file. This information would be generated only when equipment malfunctions and not on a regular basis, and should take no more than 5 minutes per filing.

Not all licensees, in any given year, will require maintenance to their systems, or enter into new cost sharing arrangements. With this in mind, we estimate that approximately 57,410 licensees will be required to preserve equipment maintenance records annually, each with a burden of five minutes.

NOTE: The burdens imposed by the requirements of paragraphs (a), (c) and (d) of this section pursuant to §§ 90.179(d), 90.215 and 90.477 are included under IC 3060-0262, 3060-0261 and IC 3060-0291 respectively, and are not recounted here.

$$57,410 \text{ (licensees)} \times .083 \text{ hours (5 mins.) (recordkeeping)} = 4,765 \text{ hours}$$

Total Annual Hour Burden is: 4,765 hours.

13. We presume that each licensee will use in-house clerical personnel at the GS-8 Step 5 level, earning (average \$20 per hour) to file and maintain this information.

$$4,765 \text{ hours} \times \$20/\text{hr. (clerical)} = \$95,300.00$$

Total Annual Cost Burden is: \$95,300.00

14. The government review time is estimated at 5 min./response with review being performed by personnel at the GS-12 level. We estimate that of the 57,410 licensees approximately 5% of their records (2,870) will be reviewed annually by field personnel for a total administrative burden of approximately 238 hours.

238 hours x \$31.64/hr (examiner) = \$7,530.00

15. There is no change in burden.
16. The data will not be published for statistical use.
17. We do not seek approval to not display the expiration date for OMB approval of the information collection.
18. There are no exceptions to Item 19.

B. Collections of Information Employing Statistical Methods:

No statistical methods were employed.