

## SUPPORTING STATEMENT

### **A. Justification:**

1. The Federal Communications Commission ("Commission") is requesting that the Office of Management and Budget (OMB) approve a three-year extension of OMB Control No. 3060-1057 (delegated authority collection) titled, "Application for Authority to Construct or Make Changes in an International Broadcast Station (FCC Form 420-IB)." There are no changes in reporting requirements, respondents, burden hours or costs.

The FCC Form 420-IB will be used to request authority from the Commission to construct or make changes in an international broadcast station. This application has not been developed yet due to a lack of budget resources and technical staff. After the FCC Form 420-IB has been developed, it will be completed by international broadcasters in lieu of the "Application for Authority to Construct or Make Changes in an International, Experimental Television, Experimental Facsimile, or a Developmental Broadcast Station," (FCC Form 309).

Currently, the FCC Form 309 is shared between the International Bureau and the Media Bureau. The FCC Form 309 is used by the Media Bureau for experimental broadcast licenses and it is used by the International Bureau in connection with international broadcast stations. (Note: The OMB approved the FCC Form 309 under OMB Control Number 3060-1035).

The International Bureau and Media Bureau have different information collection requirements and automation goals. The International Bureau plans to have the FCC Form 420-IB available on its Internet-based, user-friendly International Bureau Filing System ("MyIBFS"). International broadcasters will utilize MyIBFS to file FCC Form 420-IB. However, experimental licensees will not use MyIBFS to file their applications since the computer system was designed to process applications for licenses related to international services only. The proposed FCC Form 420-IB was put under the separate OMB control number of 3060-1057 in order to facilitate the automation of the form in MyIBFS and any changes to the form in the future. The FCC Form 309 will continue to be used by the Media Bureau in connection with the authority to construct or make changes to an experimental broadcast license.

The FCC Form 420-IB does not affect individuals and, therefore, is not subject to the Privacy Act of 1974, as amended.

The Commission has authority for this collection pursuant to the rules set forth in 47 C.F.R. Part 73, Subpart F.

2. The information collected pursuant to the rules set forth in 47 CFR Part 73, Subpart F, is used by the Commission to assign frequencies for use by international broadcast stations, to grant authority to operate such stations and to determine if interference or adverse propagation conditions exist that may impact the operation of such stations. If the Commission did not collect this information, it would not be in a position to effectively coordinate spectrum for

international broadcasters or to act for entities in times of frequency interference or adverse propagation conditions. The orderly nature of the provision of international broadcast service would be in jeopardy without the Commission's involvement.

3. The FCC Form 420-IB has not been developed yet due to a lack of budget resources and technical staff. After it has been developed, it will be available to applicants on the International Bureau Filing System ("MyIBFS"). The development of this new application is contingent upon the availability of budget funds. At present, zero (0) percent of this collection is automated.

4. These information collection requirements are not duplicated elsewhere in the Commission's rules.

5. The information collection requirements do not have a significant impact on a substantial number of small entities. The total number of entities subject to the Commission's international broadcast rules is approximately 10 and only a small percentage, if any, of the 10 could be categorized as a small entity. Also, the paperwork burdens accounted for in this collection are minimal.

6. If the Commission did not collect this information, it would not be in a position to effectively coordinate spectrum for international broadcasters or to act for entities in times of frequency interference or adverse propagation conditions. The orderly nature of the provision of international broadcast service would be in jeopardy without the Commission's involvement.

7. This information collection is conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6 in the following ways:

The report filed pursuant to Section 73.702(e) is to be filed by entities within 14 days after the end of each broadcast season. Section 73.759(g) states that changes or modifications of transmission systems not specified in that rule section can be made at any time without the authority of the Commission provided that the Commission shall be immediately notified thereof. Section 73.761(b) requires that entities immediately notify the Commission in writing of limitations and discontinuances of operation and that the Commission shall subsequently be notified when the station resumes regular operation. Finally, Section 73.782 requires that logs involving communications incident to a disaster or which include communications incident to or involved in an investigation by the Commission and concerning which the licensee has been notified, shall be retained by the licensee until he/she is specifically authorized in writing by the Commission to destroy them.

8. A 60-day notice was published in the Federal Register on November 1, 2006 (71 FR 64276) to solicit comments from the public on the extension of this collection. No comments were received from the public. A copy of the notice is included in this submission to the OMB.

9. The Commission does not provide any payment or gift to respondents.

10. There is no need for confidentiality pertaining to the information collection requirements in this collection.

11. This collection does not contain questions of a sensitive nature.

12. An estimate of the annual hour burden of respondents is as follows:

<b>FCC Form 420-IB</b>	<b>Respondents</b>	<b>Frequency of Response &amp; Hours</b>	<b>Respondents X Hours = Burden Hours</b>
Complete Application	10	6 On-occasion filing	60
Outside Legal and Engineering Assistance	10	10	100
<b>Total:</b>	10 Average	16 Hours	160 Annual Hours Average

13. The estimated costs of \$44,000 are summarized in the chart below.

<b>FCC Form 420-IB</b>	<b>Respondents</b>	<b>Hours</b>	<b>Costs</b>	<b>Total</b>
Application Fees	10	N/A	\$2,405 per application	\$24,050
Outside Legal/Engineering Assistance	10	10 Hours per submission	\$200 per hour X 10 hours = \$2,000 per submission	\$20,000
<b>Total:</b>	10 Average	10 Hours Average	\$4,405 Cost Per Submission	\$44,050 (Rounded down to \$44,000) Total estimated costs

14. The estimated annualized costs to the Federal government is **\$183,000** and is calculated as follows:

10 international broadcast license applications X 360 annual hours = 3,600 annual hours

GS-855-14/Step 10 Electronics Engineer @ \$50.83 per hour X 3,600 annual hours = \$182,988 (rounded to \$183,000)

15. There are no program changes or adjustments.

16. The results of this information collection requirement will not be published for statistical use.

17. We are seeking approval to not display the expiration date for OMB approval of this information collection. The Commission will use an edition date in lieu of the OMB expiration date. Additionally, the OMB expiration date and OMB control number are “displayed” in 47 CFR 0.408.

18. There are no exceptions to the certification statement.

**B. Collections of Information Employing Statistical Methods:**

Not applicable. This information collection does not employ statistical methods.