

SUPPORTING STATEMENT

A. Justification:

1. FCC Form 603 is a multi-purpose form that is used by radio services in Wireless Services within the Universal Licensing System (ULS). FCC 603 is composed of a main form that contains the administrative information and a series of schedules used for filing technical information. These schedules are required when applying for Auctioned Services, Partitioning and Disaggregation, Undefined Geographical Area Partitioning, and Notification of Consummation or Request for Extension of Time for Consummation. Applicants/licensees in the Public Mobile Services, Personal Communications Services, Private Land Mobile Radio Services, Broadband Radio Service, Educational Broadband Service, Maritime Services (excluding Ship), and Aviation Services (excluding Aircraft) use FCC Form 603 to apply for an assignment or transfer, to establish their parties' basic eligibility and qualifications, to classify the filing, and/or to determine the nature of the proposed service. This form is also used to notify the FCC of consummated assignments and transfers of wireless licenses to which the Commission has previously consented or for which notification but not prior consent is required. Respondents are encouraged to submit FCC 603 electronically.

The data collected on FCC 603 include the FCC Registration Number (FRN), which serves as a "common link" for all filings an entity has with the FCC. The Debt Collection Improvement Act of 1996 required that those filing with the Commission to use the FRN, effective December 3, 2001.

In this latest revision, pursuant to Second Report and Order Implementation of the Commercial Spectrum Enhancement Act and Modernization of the Commission's Competitive Bidding Rules and Procedures, WT Docket No. 05-211 adopted June 1, 2006 and released June 2, 2006, FCC Form 603 is being revised to accommodate:

- **To include Gross Revenue for Attributable Material Relationship (AMR Entity)*; and**
- **Clarify existing questions/instructions of the general public as noted in the Communications Act of 1934, as amended. This includes changes in Commission phone numbers, email addresses, etc.****

***The Commission has revised FCC Form 603 to include a new page 5 in Schedule A. The increase in the number of respondents for this collection is due the submission of the AMR Entities. Because the Commission is including this new set of respondents, we are reporting a program change increase in the hourly burden and annual cost burden.**

****The Commission is also now including the Public Safety and Homeland Security Bureau in the title of FCC Form 603 and throughout the collection where needed. There are no additional respondents or burdens due to this change.**

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," covers the collection, purpose(s), storage, safeguards, and disposal of the PII that individual wireless telecommunications and public safety services licensees maintain under FCC Form 601.

(b) The FCC published this SORN on April 5, 2006 (71 FR 17234, 17253).

(c) Going forward, if the FCC makes substantive changes to the Wireless Services Licensing Records, the Commission will conduct a full Privacy Impact Assessment of FCC/WTB-1 SORN covered by FCC/WTB-1, update this SORN, publish a Notice in the *Federal Register*, and post it on the FCC webpage, as required by OMB Memorandum M-03-22 (September 22, 2003).

Statutory authority for this collection of information is contained in 47 CFR §1.913(a) (3) of the FCC Rules.

2. The FCC uses the information in FCC Form 603 to determine whether the applicant is legally,

Technically, and financially qualified to obtain a license. Without such information, the Commission can not determine whether to issue the licenses to the applicants that provide telecommunication services to the public, and therefore, to fulfill its statutory responsibilities in accordance with the Communications Act of 1934, as amended. Information provided on this form will also be used to update the database and to provide for proper use of the frequency spectrum.

Information about individuals or households, and the use(s) and disclosure of this information is governed by the requirements of system of records, FCC/WTB-1. All information within PLMRS is publicly available except the TIN is redacted.

3. The Commission anticipates that 96% of the applicants will file FCC Form 603 electronically.

4. This agency does not impose a similar information collection on the respondents. There are no similar data 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 collection requirements to those absolutely necessary for evaluating and processing each application and to deter against possible abuses of the processes.

6. Generally, the frequency of filing FCC Form 603 is determined by the applicant and the licensee. FCC Form 603 is required when an authorization is assigned or transferred.
7. This collection of information is consistent with the guidelines in 5 CFR § 1320.6.
8. The Commission published a 60-day notice which appeared in the Federal Register on January 8, 2007 (72 FR 782 & 783). No comments were received as a result of this notice. A copy of the Federal Register notice is included in this submission to the OMB.
9. Respondents will not receive any payments.
10. Respondents may request materials or information submitted to the Commission be withheld from public inspection under 47 CFR §0.459 of FCC rules.

Information on the FCC Form 603 is maintained in the Commission's system of records, FCC/WTB-1, "Wireless Services Licensing Records." These licensee records are publicly available and routinely used in accordance with subsection b. of the Privacy Act, 5 U.S.C. 552a(b), as amended. TIN Numbers and material that is afforded confidential treatment pursuant to a request made under 47 CFR §0.459 will not be available for public inspection.

The Commission has in place the following policy and procedures for records retention and disposal: Records will be actively maintained as long as the individual remains a licensee. Paper records will be archived after being keyed or scanned into the system. Electronic records will be backed up on tape. Electronic and paper records will be maintained for at least eleven years.

11. There are no requests of a sensitive nature or those considered a private matter being sought from the applicants on this collection.
12. The Commission estimates that respondents (applicants/licensees) will file 32,551 FCC Form 603 applications annually and that the average burden per respondent will be 1.75 hours.

We estimate that 50% of the respondents (16,276) will complete the application themselves with no additional assistance and that 50% (16,275) will contract out completing the form to a law firm or application preparation service. We estimate that it will take 1.75 hours per respondent to complete FCC Form 603 for the respondents completing the forms without hiring a consultant. For those respondents hiring a consultant we estimate a burden of approximately 30 minutes (0.5 hours) to coordinate with the consultant.

The total annual burden is:

16,276 @ 1.75 hours = 28,483 hours

16,275 @ 0.5 hours = 8,138 hours

Total Burden Hours: 28,483 + 8,138 = 36,621 hours

Assuming that 50% of the respondents use personnel comparable in pay to a mid-to-senior level federal employee (GS-13, Step 5) to prepare the collection, we estimate the cost to be about \$42 per hour @ 1.75 hours per filing. The cost per filing: $\$42 \times 1.75 = \73.50 .

16,276 applications @ \$73.50 per filing = \$1,196,286.

50% will contract out completing the form to a law firm or application preparation service and will spend approximately 30 minutes coordinating this information. Assuming they use personnel comparable in pay to a mid to senior level federal employee (GS 13, Step 5) to coordinate this submission we estimate the cost to be approximately \$42 per hour @ 0.5 hours per filing. The cost per filing: $\$42 \times 0.5/\text{filing} = \21.00 .

16,275 applications @ \$21.00 per filing = \$341,775

Total in-house cost to the respondents: \$1,196,286 + \$341,775 = \$1,538,061

13. Cost to the Respondent:

- a. There are no capital and start-up costs to prepare FCC Form 603.
- b. The annual costs (O&M) consist of the following:

There is no cost to file the application electronically with the FCC other than the cost of a long distance phone call and/or Internet access. We assume that respondents that file manually will incur postage costs, which are considered "in house costs."

- 1) The FCC filing fees for this application vary based on radio service. For purposes of this submission, we estimate an average filing fee of \$45 per application:

32,551 @ \$45 = \$1,464,795

- 2) We also estimate that 50% of the respondents will contract out the completion of Form 603 and will use an attorney/engineer or application preparation service at a cost of \$200/hour to prepare the FCC Form 603:

16,275 applications x .5 hours @ \$200/hour = \$1,627,500

Total Estimated Annual Costs: \$1,464,795 + \$1,627,500 = \$3,092,295

14. Cost to the Federal Government:

FCC Form 603 applications estimated to be filed: 32,551.

(Cost of printing for FCC 603 (40 pages) is estimated to be \$800 per thousand.)

1 (1,000) @ \$800 = \$800 (Printing)

1,302 applications to be data entered
at an average of 5 mins. (.084 hrs.) each
using a data entry contractor @ \$32.54 hr.
109 hours @ \$32.54 = \$3,547 (Data Entry)

16,276 applications x 30 min. (0.5 hrs.)
@ \$29.47 per hour (GS-11, Step 5) for an
Industry Analyst = \$239,826.86 (Processing)

16,275 applications x 0.166 (10 min.)
@ \$29.47 per hour (GS-11, Step 5) for an
Industry Analyst = \$ 79,617.63 (Processing)

Sub-Total	=	\$323,791.49
25% Overhead		\$ 80,947.87
Total		\$404,739.36

15. The program changes in this information collection result from the adoption of the 2nd Report and Order in WT Docket Number 05-211. The program change is due to an increased set of new respondents (AMR Entities) that are now required to complete new page 5 on Schedule A of the FCC Form 603.

16. The data will not be published for statistical use.

17. The Commission is requesting a continued waiver from displaying the OMB expiration date on the FCC Form 603. Granting this waiver will prevent the Commission from destroying stock upon re-approval of the form or updating the electronic screens in ULS. The Commission published all OMB-approved information collections along with their OMB Control Numbers, titles, and OMB expiration dates in 47 CFR 0.408.

18. There are no exceptions to the "Certification Statement" in Item 19.

B. Collections of Information Employing Statistical Methods:

This information collection does not use any statistical methods.