

SUPPORTING STATEMENT

A. Justification:

1. In response to the events of September 11, 2001, the Federal Communications Commission (Commission or FCC) created a Homeland Security Policy Council to assist the Commission in evaluating and strengthening measures for protecting U.S. communications infrastructure and facilities from further terrorist attacks; to assist the Commission in ensuring rapid restoration of communications capabilities after disruption by a terrorist threat or attack; and to assist the Commission in ensuring that public safety, public health, and other emergency and defense personnel have effective communications services available to them in the immediate aftermath of any terrorist attack within the United States. To fulfill this mission, the FCC's Homeland Security Policy Council had to be able to contact key communications providers to determine the extent of a communications disruption and appropriate agency response. Accordingly, the Commission submitted, and OMB approved, a collection through which the Commission would call communications providers to ask them for their emergency contact information. Such providers could voluntarily provide this information, which the Commission would aggregate within an electronic database.

The Commission, through its newly-formed Public Safety and Homeland Security Bureau (PSHSB), is now updating the previously approved Emergency Contact Information system with a Disaster Information Reporting System (DIRS) that uses an electronic Emergency Contact Information form that participants may fill out using an Internet-based graphical user interface. The Commission has also updated the process to include electronic forms through which participants may inform the Commission of damage to communications infrastructure and facilities and may request resources for restoration. See the attached screenshots of the new forms plus a copy of the DIRS user manual for which the Commission is requesting approval. Finally, the Commission is updating the process by increasing the number of reporting entities to ensure inclusion of wireless, wireline, broadcast, cable and satellite communications providers. The Commission is requesting revision of the currently approved collection.

Legal authority for this collection of information is contained in 47 U.S.C. 154(i), 218, 303(r) and 47 CFR Section 0.181(h).

As noted on the Form OMB 83-I, this information collection does not affect individuals or households; thus, there are no impacts under the Privacy Act.

2. This emergency contact and communications infrastructure/network damage information will be utilized in the event of a major disaster or crisis that results in

communications disruption. Respondent wireless, wireline, broadcast, cable and satellite communications providers will enter emergency contact information in the DIRS database. In the event of an actual emergency, respondents also may enter infrastructure damage information into the database. Also in the event of an emergency, Commission staff may contact respondents. The Commission has coordinated with the Department of Homeland Security (DHS) and its component National Communications System (NCS) in the design of this data collection, including the identification of the data that should be collected. Furthermore, the Commission will coordinate DIRS data with NCS in support of NCS's role as primary agency for Emergency Support Function-2 (ESF-2) (Communications) of the National Response Plan (NRP).

3. This information is only available to authorized personnel within the Commission and DHS via electronic means. Each respondent may update its information in the database as needed using the web-based forms, but will not have access to view the entire database nor any data input by other respondents.
4. This information is not available elsewhere. It was created specifically to meet the requirements in Section 0.181(h). This is a unique collection and there is no duplication.
5. In compliance with the Paperwork Reduction Act of 1995, the FCC is making the effort to minimize the burden on all respondents, regardless of size. The PSHSB has limited the information requested to that which is absolutely necessary to gather emergency contact information and communications infrastructure damage information. Providing this information will have minimal impact on small business because the information is input over a web-based interface and can be input efficiently at the Respondent's convenience. Further, participation in the DIRS is entirely voluntary.
6. Failure to collect this information will adversely impact the FCC's ability to carry out its congressionally mandated objective of regulating communications by wire and radio to ensure the national defense, and promoting safety of life and property.
7. Information will be collected on occasion and during major disasters or other crises.
8. A 60-day notice was published in the Federal Register on March 14, 2007 (72 FR 11876). The Commission received comments from AT&T, Verizon Wireless, and T-Mobile USA, Inc. ("T-Mobile") (Commenters). A copy of each of the comments is included in this submission to the OMB.

The Commenters do not object to the collection, but note that the information at issue is highly sensitive and should be subject to confidentiality provisions. As the Commenters point out, however, the collection does not explicitly request the submission of confidential information. Thus, DIRS participants must separately request -- on each occasion that a filing with such information is made -- confidential

treatment upon peril that the information will be made part of the public domain. Commenters argue that, under the special circumstances of this collection, this requirement is both unnecessary and cumbersome. Rather, the information submitted should automatically be treated as confidential upon filing, without the need for DIRS participants to file separate confidentiality request each time they enter data into the system. The Commenters argue that treating DIRS data as confidential is more consistent with both the underlying carrier sensitivities regarding the sensitive nature of the information as well as with the Commission's public safety mandates that the information is intended to serve. The Commenters request that filings of emergency contact information and information concerning damage to communications infrastructure and facilities into the DIRS be automatically and presumptively treated as confidential under the Commission's confidentiality rules upon filing.

9. We acknowledge the concerns of the commenting parties, and agree that it is consistent with the primary objective of the DIRS to treat filings as confidential. We will work with respondents to ensure that their concerns regarding the confidentiality of DIRS filings are resolved in a manner consistent with the Commission's rules.
10. No gifts or payments will be received.
11. The reporting requirement does not address private matters of a sensitive nature.
12. Respondent wireless, wireline, broadcast, cable and satellite companies will enter emergency contact information in the DIRS database, and when necessary will enter critical information (*i.e.* related to infrastructure damage) into DIRS. We anticipate that this data entry will take 0.1 hours for initial entry of contact information; 0.5 hours for initial input of critical information, and 0.1 hour for updates of critical information. This estimate is based on FCC staff's knowledge and familiarity with the availability of the data required.

Total Burden Hours to collect this information is as follows:

5,300 respondents x 0.1 hours (6 minutes) = 530 hours for initial entry of contact information

5,300 respondents x 0.50 hours (30 minutes) = 2,650 hours for initial input of critical information

5,300 respondents x 0.1 hours (6 minutes) = 530 hours for updates of critical Information

Total annual burden = 3,710 hours

13. There is no cost to the respondents.
14. There are no costs to the Commission beyond what we consider to be part of the FCC's normal operating costs.

15. The increase in burden is due to an increase in the number of respondents. The reason for this increase is discussed in paragraph 1. The number of respondents represents an actual estimate. Therefore, we are reporting a program change of 2,650 hours. The Commission anticipates that the burden per respondent should actually decrease due to the efficient nature of the new electronic form as opposed to the prior telephone interview format.
16. We do not intend to publish this information for statistical use.
17. We are seeking approval to not display the expiration date for OMB approval of the information collection. The information is retained in an electronic format and will be updated regularly. We will use an edition date in lieu of an OMB expiration date. Additionally, all information collection requirements are published in 47 CFR 0.408.
18. There are minimal exceptions from the 60 day notice to the certification statement in Item 19 due to the more accurate estimates contained the in the certificate.

B. Collections of Information Employing Statistical Methods:

This information collection does not employ any statistical methods.