

## SUPPORTING STATEMENT

### **A. Justification:**

1. The recordkeeping requirements contained in Section 80.409 is necessary to document the operation and public correspondence service of public coast radiotelegraph, public coast radiotelephone stations and Alaska-public fixed stations, ship radiotelegraph, ship radiotelephone and applicable radiotelephone including the logging of distress and safety calls where applicable. A copy of the rule is attached.

The Commission is seeking an extension (no change in recordkeeping requirements) in order to obtain the full three year clearance from the OMB for the following subparts under 47 CFR 80.409:

- Section 80.409(c), Public Coast Station Logs: This requirement is necessary to document the operation and public correspondence of public coast radio telegraph, public coast radiotelephone stations, and Alaska public-fixed stations, including the logging of distress and safety calls where applicable. Entries must be made giving details all work performed which may affect the proper operation of the station. Logs must be retained by the licensee for a period of two years from the date of entry, and, where applicable, for such additional periods such as logs relating to a distress situation or disaster must be retained for three years from the date of entry in the log. If the Commission has notified the licensee of an investigation, the related logs must be retained until the licensee is specifically authorized in writing to destroy them. Logs relating to any claim or complaint of which the station licensee has notice must be retained until the claim or complaint has been satisfied or barred by statute limiting the time for filing suits upon such claims.
- Section 80.409(d), Ship Radiotelegraph Logs: Logs of ship stations which are compulsorily equipped for radiotelegraphy and operating in the band 90 to 535 kHz must contain specific information in log entries according to this subsection.
- Section 80.409(e), Ship Radiotelephone Logs: Logs of ship stations which are compulsorily equipped for radiotelephony must contain specific information in applicable log entries and the time of their occurrence. This subpart was slightly modified to include reference to upgraded technology, i.e., Global Maritime Distress and Safety Systems (GMDSS) equipment.

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

Statutory authority for this collection of information is contained in Sections 4, 303, 307(e), 309, and 332, 48 Stat. 1066, 1082, as amended; 47 U.S.C. 154, 303, 307(e), 309, and 332, unless

otherwise noted. Interpret or apply 48 Stat. 1064–1068, 1081–1105, as amended; 47 U.S.C. 151–155, 301–609.

2. The information is used by FCC personnel during inspection and investigations to ensure compliance with applicable rules and to assist in accident investigations. If the information was not collected, documentation concerning the operation of public coast radiotelegraph stations, public coast radiotelephone stations and Alaska-public fixed stations would not be available.
3. Prior to finalizing rule makings the Wireless Telecommunications Bureau conducts an analysis to insure that improved information technology cannot 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 information collection on the respondents. There is 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 requirements to those absolutely necessary.
6. This is a recordkeeping requirement. The information is documented and not "collected" or reported. If this information were not retained, enforcement efforts and accident investigations could be hampered if the documentation concerning station operation were not available.
7. There are no special circumstances which would require collections to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.
8. The Commission published a Notice in the Federal Register on August 8, 2007 (72 FR 44529), as required by 5 CFR Section 1320.8(d). We received no comments; a copy of the Notice is included in this submission to the OMB.
9. Respondents will not receive any payments.
10. There is no need for confidentiality.
11. This does not address any private matters of a sensitive nature.
12. There are approximately 236 public coast radiotelegraph stations, public coast radiotelephone stations and Alaska-public fixed stations subject to rule section 80.4090(c). We assume that the respondent would use internal personnel (radio operator) @ \$19/hour + 10% overhead, and that it would take approximately 95 hours per response to meet this requirement. This estimate is based on a review of such records and consultations with a few respondents.

236 (respondents) x 95 (hours) = **22,420 hours.**

There are approximately 20,223 compulsory equipped vessels that are required to be

equipped with radio telephone and/or radiotelegraph stations subject to rule section 80.409 (d) and (e). These stations vary from large oceangoing ships to small passenger boats, and the information required to be recorded varies somewhat with the category of vessel and radio station. It is estimated that 27.3 burden hours are spent per year complying with these recordkeeping requirements. We assume that the respondent would use internal personnel (radio operator) @ \$19/hour per response + 10% overhead to meet this requirement. The estimate is based on staff expertise, review of such logs and consultation with a few respondents.

20,223 (respondents) x 27.3 (hours) = 552,088 hours.

Therefore, 236 + 20,223 = **20,459 respondents.**

**Total “Annual” Burden Hours: 22,420 + 552,088 = 574,508 hours.**

13. Estimate of cost to respondents:

- a. There are no capital or start-up costs.
- b. There are no operational or maintenance costs

14. Estimated annual cost to the Federal Government: None. This is a recordkeeping requirement.

15. Because the number of respondents in both categories changed, the total annual burden hours were re-calculated. Therefore, the Commission is reporting an adjustment for this submission to OMB.

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 exceptions to Item 19. The Commission transposed the number of respondents when we published the 30 day notice. With this submission, we are reporting more accurate estimates.

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

No statistical methods are employed.