

## SUPPORTING STATEMENT

### A. Justification:

1. The FCC's Wireless Telecommunications Bureau (WTB) maintains Internet software used by the public to apply for licenses, participate in auctions for spectrum, and maintain license information. In this mission, WTB has a 'help desk' that answers questions related to these systems as well as resetting and/or issuing user passwords for access to these systems. The form currently is available on the website <https://esupport.fcc.gov/request.htm> under OMB Control Number 3060-1042.

This form electronically categorizes requests to allow for more efficient skill routing internally and continuing streamlining processes within the Commission. This increases the speed of disposal of these requests.

Customers may check the status of their request using a "request number" given to the user upon submission of the request on the website. This status includes the name/number of the agent assigned to the ticket, and the ticket number. No privileged or confidential information is retrievable by this form. Examples of each screen in this process are attached to this submission.

Records may include information about individuals or households, and the use(s) and disclosure of this information is governed by the requirements of a system of records, FCC/WTB-7, "Remedy Action Request System" (RARS). There are no additional impacts under the Privacy Act.

The Commission is now seeking approval for an extension of a three-year clearance. No revisions are being made to the collection. There is no change in respondents/responses, burden hours and/or annual costs.

There is no statutory authority for this information collection. The Commission developed this IC on its own motion to assist users of the Universal Licensing System (ULS) or other electronic systems.

2. The data collected by this collection is used by:
  - FCC staff to trouble-shoot problems the public has with the FCC's systems,
  - Software development staff to improve the development of FCC public facing systems and plan for software enhancements, issues, or requests from the public,
  - FCC auction participants and licensees to determine the status of their request for support, and
  - FCC management to make decisions concerning the success of its programs.
3. Information is collected via an electronic form posted on the FCC Internet website. This is the only means of collecting this information. No paper forms are available for submitting request to the WTB for support. This form replaced free-form e-mails submitted to the WTB Support Center for help. Electronic submission of these requests from the website using a standardized format speeds delivery of service and relieves FCC staff from manually processing and tracking e-mail.
4. This process for collecting information is more efficient, categorical, and easily referenced. It also eliminates duplication of processes and streamlines WTB processes to utilize one form as opposed to e-mail, therefore, eliminating e-mails and maintaining a database of these records, categorized and easily accessible by FCC staff for trouble shooting problems and improving response time to the customer. This data is also accessible to the customer where appropriate to monitor their requests.
5. This collection of information does not notably affect small businesses or small entities.
6. Generally, the frequency of filing this help request form is determined by the filer whenever assistance is required. This process results in an increased time of response to auctions, and licensing customers experiencing difficulties with FCC electronic filing systems, questions, problems and/or issues.
7. There are no special circumstances for this collection.

*Privacy Impact Assessment, Item 8 (v) (a):* Submission of the form is voluntary. Individuals may decline to provide the information requested in the online form; however, support will not be funneled via electronic means into the Commission. The customer will have to call the Commission to request support in lieu of submitting an electronic submission.

*Privacy Impact Assessment, Item 8 (v) (b)*: Individuals grant consent for collection of the information by submitting the completed request form via the internet.

8. The Commission published a 60-day notice which appeared in the Federal Register on August 31, 2007 (72 FR 50369). No comments were received as a result of the notice. A copy of the Federal Register notice is included in this submission to the OMB.
9. There are no provisions for payment or gifts.
10. Respondents may request materials or information submitted to the Commission be withheld from public inspection under 47 CFR §0.459 of the FCC rules.

Information on the electronic help request form is maintained in the Commission's system of records, FCC/WTB-7, "Remedy Action Request System (RARS)." 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. TINs 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. Electronic records will be backed up on tape. Electronic records will be maintained for at least eleven years.

11. This collection does not address private matters of a sensitive nature.
12. We estimate that approximately 36,300 requests for help will be received through this form each year. We estimate that it will take users approximately 8 minutes to complete the form.

➤ 8 minutes X 36,300 respondents divided by 60 minutes = **4,840** annual burden hours.

13. The cost estimate for respondents is based on the following variables:

The customer base for responses consists of amateur radio licenses, administrative personnel for private and public corporation, and attorneys filing on behalf of licensees.

The following computation was used to average the cost to respondents. Each response is estimated to take eight (8) minutes.

| <u>Breakdown of Respondents</u>                    | <u>Cost Per Hour</u> | <u>Number of Respondents</u> | <u>Cost</u> |
|--|----------------------|------------------------------|-------------|
| 60% Amateur Licenses and Administrative Personnel: | \$35.00/hr.          | 21,780                       | \$101,640   |

(8 minutes divided by 60 minutes times \$35.00 times 21,780 respondents equals \$101,640)

| <u>Breakdown of Respondents</u>              | <u>Cost Per Hour</u> | <u>Number of Respondents</u> | <u>Cost</u>                  |
|--|----------------------|------------------------------|------------------------------|
| 40% Attorneys filing on Behalf of Licensees: | \$200.00/hr.         | 14,520                       | <b>\$387,200 Annual Cost</b> |

(8 minutes divided by 60 minutes times \$200.00 times 14,520 respondents equals \$387,200)

|              |  |                           |                  |
|--------------|--|---------------------------|------------------|
| <b>TOTAL</b> |  | <b>36,300 Respondents</b> | <b>\$488,840</b> |
|--------------|--|---------------------------|------------------|

14. The cost estimate should be split into two components:

- a) Estimated costs to include costs for changes to the maintenance of the Internet web form reflecting the additional audience requirements. As the Remedy system is already implemented and supported by the FCC by current staff, development and maintenance costs are inclusive of the current contracts at the FCC. This effort will utilize current hardware and software at the Commission. Estimated costs include:

40 hours of one contractor's time @ \$80.00/hr. = \$3,200.00 one time cost.  
 2 hours per month of contractor's time for maintenance @ \$80.00/hr. = \$1,920.00/yr.  
 10 hours of a staffed contractor's time for analysis @ \$80.00/hr. = \$800.00 one time cost  
 20 hours of government's time for reviewing analysis and developing @ \$75.00/hr. = \$1,500.00/yr.  
 Total Cost: \$7,420.00

- b) Estimated costs to the Federal Government annually include costs for maintenance of the Internet web form. As the Remedy system is already implemented and supported at the FCC by current staff, development and maintenance costs are inclusive of the current contracts at the FCC. This effort will utilize current hardware and software at the Commission. Estimated annual costs include:

2 hours per month of contractor's time for maintenance @ \$80.00/hr. = \$1,920.00

8 hours per month of contractor's time for reviewing and analyzing data @ \$80.00/hr = \$7,680.00

20 hours of government's time for reviewing analysis and development @ \$75.00/hr. = \$1,500.00

Total Cost: \$11,100.00

15. There are no program changes or adjustments reported in this collection.
16. Information will not be published from this collection of information.
17. We are requesting a continued waiver of the requirement to "display" the OMB expiration date. Since this is an electronic form, this will alleviate FCC staff from having to update the OMB expiration date on the application screen every time this IC is submitted to OMB for review and approval. The OMB control number, title and OMB expiration date are "displayed" in 47 CFR 0.408 of the Commission's rules.
18. There are no exceptions to the "Certification Statement" in Item 19.

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

No statistical methods are employed.