

Supporting Statement for Paperwork Reduction Act Submissions

Title: Telecommunications Service Priority (TSP) System

OMB Control Number: 1670-0005

General Information

This statement is in response to the general requirements of the Paperwork Reduction Act Submission Worksheet. The approval reflects the reinstatement for the Collection of Information of all the Telecommunication Service Priority (TSP) forms.

In reference to the statements that follow, information about Federal government users is excluded from this analysis. Organizations that are included are those others that will interact with the TSP Program; that is, telecommunications vendors and the following kinds of users: State, local and foreign governments, and private industry. (Industry in this context means users requiring a priority under the TSP Program, not the telecommunications vendors providing the service.) Foreign government and private industry burden hours are included with the State and local analysis, because the procedures they will follow for TSP service is similar to those required of State and local governments.

The TSP Program provides telecommunications service vendors a means of identifying the services that should be restored or provisioned first in the event of an emergency or crisis, and the legal protection for giving a preference to certain users over others. The office of the Manager, National Communications System (OMNCS) believes this critical aspect of the TSP Program benefits government at all levels, as well as the general populace.

The OMNCS worked extensively with industry through the National Security Telecommunications Advisory Committee (NSTAC) TSP Task Force to develop the TSP Program. The OMNCS continues to work with the joint industry/Government TSP Oversight Committee and any TSP Working Groups to refine the forms used for information collection, to ensure that TSP remains responsive to the needs of the National Security and Emergency Preparedness (NS/EP) community, and that it is cost effective. If at any time industry technology permits a more efficient way of satisfying NS/EP requirements we will encourage its adoption. Users may access the system and forms at <http://tsp.ncs.gov>

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The TSP Program was proposed to the Federal Communications Commission (FCC) by the National Communications System in 1987 and approved by the FCC when it issued a Report and Order on November 17, 1989. TSP replaced the earlier Restoration Priority System and improves on that program by fully addressing the Government's need for priority treatment of NS/EP telecommunications services.

The legal authority, 47 CFR Part 64, Appendix A, "Telecommunications Service Priority System for National Security Emergency Preparedness," and NCSD 3-1 are attached as appendices A and B.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

Information to request a priority, to obtain a sponsor for requesting a priority, and for other administrative requirements of the program, is required from any person or organization having an NS/EP service for which they wish priority restoration from the vendor providing the service. Information is also required to allow immediate installation of a new service to support NS/EP requirements. Information is required from vendors to allow the OMNCS to track and identify the telecommunications services that are being provided priority treatment.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

We encourage all participants to interact directly with the TSP Program via the Priority Telecommunications System (PTS) client/server. **This is a dial-up system that requires a user id and password.** The TSP Program Office also recently developed the TSP e-forms application, which will be available via the TSP home page, to facilitate electronic submission for users of the internet. The use of the PTS and the TSP e-forms application will significantly decrease the burden hours placed on the user and increase the efficiency of the TSP Program. The paper forms will also be available for download via the TSP home page.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

We reviewed the requirements of the TSP Program extensively both before it was instituted and during the years of its use, and believe that the information requested is the minimum necessary to manage the TSP Program. Additionally, all requirements will be periodically reviewed to ensure that they remain correct and that we have continued need for the data requested.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize.

This form does not impact small businesses or other small entities.

6. Describe the consequence to Federal/DHS program or policy activities if the collection of information is not conducted, or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

We have identified the minimum frequency necessary to ensure the viability of the program. Additionally, the OMNCS actively worked with both the industry Task Force and government subcommittees to reduce the amount of information required whenever possible. Any further reduction in the amount of information collected would provide the OMNCS with insufficient information with which to manage the System. One of the major reasons the prior Restoration Priority System was replaced was that the records of that system were inadequate, and there was no review process to ensure that only those users with a continued need for priority service held a priority rating. Without this information collection, the NCS would not be able to manage the TSP System.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

(a) Requiring respondents to report information to the agency more often than quarterly.

Information is required on particular occasions. Those conditions may be more than quarterly in some years.

(b) Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.

There is no requirement to respond in a written manner once the forms have been submitted.

(c) Requiring respondents to submit more than an original and two copies of any document.

Respondents are only required to submit the original document, copies are not required.

(d) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.

Respondents are not required to keep any of the documentation.

(e) In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study.

This collection does not employ statistical analysis.

(f) Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.

This collection does not employ statistical analysis.

(g) That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.

There is no confidential information collected, however the data is kept in a sensitive but unclassified environment.

(h) Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

It is not necessary to submit any trade secrets or other types of confidential data.

8. Federal Register Notice:

a. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

On January 25, 2008, the Department published a 60 Day Federal Register Notice (73 FR 4613). There were no comments received.

On April 4, 2008, the Department published a 30 Day Federal Register Notice (73 FR 18542). There were no comments received.

b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

The OMNCS worked with the TSP Oversight Committee to confirm that this collection of data was adequate and necessary.

c. Describe consultations with representatives of those from whom information is to be obtained or those who must compile records. Consultation should occur at least once every three years, even if the collection of information activities is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The OMNCS worked with the TSP Oversight Committee to confirm that this collection of data was adequate and necessary.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No gifts or payments of any kind were provided to those associated with the program.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The TSP Program database is maintained at the "Sensitive Information" level. Access to the database will be limited to U.S. Government employees and U.S. citizen contractor employees with a need to access the database to perform their work. Individual respondents may access their data within the database. Password and privacy techniques are used to limit access to the database and the data within the database. The TSP database has been issued an ATO from the DHS NPPD CIO.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No information that is commonly considered sensitive is required in this collection.

12. Provide estimates of the hour burden of the collection of information. The statement should:

a. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desired. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the

reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

<i>FORM #</i>	<i>RESPONDENTS</i>	<i>RESPONSES per RESPONDENTS</i>	<i>HOURS per RESPONSE</i>	<i>TOTAL HOURS</i>
SF314	304	1	.75 (45 min)	228
SF315	27,000	1	.25 (15 min)	6,750
SF317	1	1	.42 (25 min)	.42
SF318	428	1	.75 (45 min)	321
SF319	428	1	1.0 (60 min)	428
Total	28,161	5	3.17	7,727.42

b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

As shown in the table above the total burden hours for this information collection is 7,727.42

c. Provide estimates of annualized cost to respondents for the hour burdens for collections of information; identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.

Assuming the average respondent is a telecommunications specialist with an hourly rate of \$32.50, multiply total burden hours, 7,727.42 x \$32.50 and the total annual cost is \$251,141.15.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

The cost estimate should be split into two components: (1) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection as appropriate.

Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information to keep records for the government, or (4) as part of customary and usual business or private practices.

There is no additional cost to the responders due to this collection of information. The respondents will be charged by the telecommunications vendors for providing TSP service; this amount is the vendor's published tariff rate. For state and local entities, costs are directly related to the number of services for which they request priority assignment.

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing and support staff), and any other expense that would have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.

We would expect a mid-level manager and/or their staff or contractors to manage the data collection process. It is expected that the minimum requirement for Federal Government support would be 4 full time and one partial time employees (1 Fed FTE and 3.5 Contractor FTE). There are also costs associated with the database used to hold the information collected.

Based on the Federal Government General Schedule Salary Table, the annual salary of a GS-13 employee is \$82,165. The annual salary for an Emergency Communications Specialist under the NCS SETA Contract is \$83,200. Estimated average maintenance cost for the database is \$10,000.

To arrive at a total, we added 1 Fed FTE Salary at \$82,165 plus the 3.5 Contractor FTE salaries of \$373,365 (3.5 x \$83,200), plus the \$10,000 maintenance costs.

Thus the all-inclusive total annualized cost to the Federal Government is \$383,365.00

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I. Changes in hour burden, i.e., program changes or adjustments made to annual reporting and recordkeeping **hour** and **cost** burden. A program change is the result of deliberate Federal government action. All new collections and any subsequent revisions of existing collections (e.g., the addition or deletion of questions) are recorded as program changes. An adjustment is a change that is not the result of a deliberate Federal government action. These changes that result from new estimates or actions not controllable by the Federal government are recorded as adjustments.

Between 2004 and 2007 the number of users/ vendors increased from 409 to 1,054.

There was a significant increase in users/vendors from the last submission. This is a result of Hurricane Katrina and an FCC outreach effort. The TSP Program had not been taken advantage of by many state/local governments or wireless carriers. The lack of timely restoration of communications during Hurricane Katrina recovery efforts showed many NS/EP users that TSP is a useful tool. Also, the FCC began an outreach campaign that has increased awareness.

The reduction in burden hours from last submission is due to a better review by the program office of the application process resulting in more accurate reporting this time around.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The TSP collection of information will not be published.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain reasons that display would be inappropriate.

We are not seeking that approval.

18. Explain each exception to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no exceptions listed in Item 19.