

**SUPPORTING STATEMENT**

**A. Justification:**

1. FCC 605 is a multi-part, consolidated, general application form that is part of the Universal Licensing System (ULS). Form 605 includes a main form containing administrative information and a series of Schedules used to file technical information applicable to a specific radio service. The form is used to file for authorization to operate radio stations, amend pending applications, modify existing licenses, renew or renew/modify existing licenses, request cancellation of a license, withdraw a pending application, request a duplicate license, or request an administrative update of an existing license (*i.e.*, name change without change to corporate structure or control, change mailing address, change name of vessel, etc.) in the Ship (Part 80), Aircraft (Part 87), Amateur (including Amateur Vanity (Part 97), Restricted and Commercial (Part 13), and General Mobile Radio Services (GMRS) (Part 95). This form is also used to apply for a Developmental License or a Special Temporary Authority (STA) in these services and to self-certify for temporary authorization to operate where applicable. Respondents are encouraged to submit FCC 605 electronically.

This consolidated form was created to have consistent "look and feel" that maximizes the collection of data and minimizes narrative responses, free-form attachment, and free-form letter requests. The consolidated application form permits common fields, questions and statements to reside in one place. Technical data, specific to each service, can be captured in their own schedule. FCC 605 accommodates applicants requesting a change which involve multiple existing licenses (*i.e.*, duplicate, change of mailing address, etc.).

Among the data collected on this form is the FCC Registration Number (FRN). Use of the FRN in the ULS creates a common link among a single entity's filings with the FCC. Effective December 3, 2001, collection of FRN is required to comply with the Debt Collection Improvement Act of 1996 (DCIA).

The radio services for which this collection of information is required are governed by FCC Rules, 47 CFR Parts 13, 80, 87, 95 and 97.

**The Commission is now revising FCC 605 Schedule D by removing within the past 2 years on the first eligibility of Item 2 per §97.21(b). There is no change in reporting requirements, recordkeeping and/or third party disclosure requirements as well as estimated average burden (hours and costs) or the number of respondents.**

Records of the Ship, Aircraft, Amateur, Restricted and Commercial Operator and General Mobile Radio Services may include information about individuals or households, and the use(s) and disclosure of this information is governed by the

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requirements of a system of records, FCC/WTB-1, "Wireless Services Licensing Records". However, the Commission makes all information within these radio services publicly available on its Universal Licensing System (ULS) webpage, except the Date of Birth for Commercial Operator licensees, however, this information will be redacted from public view. The public is entitled to download this public information. There are no additional impacts under the Privacy Act.

Statutory authority for this collection of information is contained in 47 U.S.C. Sections 4(i), 303(r), and 332(a)(2) of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 303(r), and 332(a)(2).

2. The FCC uses the information in FCC Form 605 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 as well as enforcement purposes.

For third party disclosure requirements, Amateur Radio Service applicants for initial authorization ("new application") or an upgrade of authorization ("modify application") are required to provide a completed FCC Form 605 to a VEC (Volunteer Exam Coordinator) prior to taking an exam. The VEC certifies additional information as to the results of the exam and forwards the FCC Form 605 to the FCC (VECs are participating in electronic filing and these are forwarded to the FCC electronically). This affects approximately 75,000 of the 175,000 respondents (approximately 43%). There is no additional cost or time burden to the applicant for this Third Party Disclosure. (Any additional respondent costs and burden are associated with Amateur exam procedures.). Again, 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 is publicly available except the Date of Birth for Commercial Operator licensees is redacted.

3. The Commission anticipates that 97% of the applicants will file FCC Form 605 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 of FCC Form 605 is determined by the applicant and licensee, *i.e.* applicants are required to renew their authorizations at which time the information is verified: Commercial Operator and GMRS applicants file every 5 years, Ship, Aircraft, and Amateur applicants file every 10 years, and Restricted Radiotelephone Operator Permits which have a “lifetime issue”, file just once, except when there is a name change, an address change, a vessel name change, etc. Thus, we must verify the information in our database at these time intervals or when these various changes are made in order to maintain the integrity of the database and to provide proper management of the frequency spectrum.
7. This collection of information is consistent with the guidelines in 5 CFR § 1320.6.
8. The Commission initiated a 60-day public comment period which appeared in the Federal Register on December 20, 2007 (72 FR 72355). 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. Respondents will not receive any payments.
10. To protect the privacy of its applicant, the FCC will redact the telephone number(s) of applicants and the birth date for the Commercial Operator applicants.

Information on the FCC Form 605 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 twelve years.

11. The FCC does not ask any questions of a sensitive nature of applicants when they apply for these licenses. Personal information is redacted from public view.
12. The Commission estimates that respondents (applicants/licensees) will file **175,000** FCC Form 605 annually and that applicants will complete the form on their own. This

collection is relatively simple, only requiring administrative data on the Main Form, and in most situations, requires minimal technical data specific to the radio service supplied by an attached schedule. The *average* burden per respondent is estimated to be 26.4 minutes (0.44 hours). The estimate is based on FCC staff's knowledge and familiarity with the availability of the data required.

$$175,000 \text{ applications} \times 0.44 \text{ hours (26.4 minutes)} = 77,000 \text{ hours}$$

**Total Burden Hours: = 77,000 hours**

THIRD PARTY DISCLOSURES: Amateur Radio Service applicants for initial authorization ("new application") or an upgrade of authorization ("modify application") are required to provide a completed FCC Form 605 to a VEC (Volunteer Exam Coordinator) prior to taking an exam. The VEC certifies additional information as to the results of the exam and forwards the FCC Form 605 to the FCC (VECs are participating in electronic filing and these are forwarded to the FCC electronically). This affects approximately 75,000 of the 175,000 respondents. There is no additional cost or time burden to the applicant for this Third Party Disclosure. (Any additional respondent costs and burden are associated with Amateur exam procedures.)

13. Cost to the Respondent:

Total capital and start-up costs to prepare FCC Form 605:

There is no cost to file the application electronically with the FCC other than the cost of a long distance phone call and Internet access. Respondents filing manually will incur postage costs ("in house costs").

We estimate that approximately 29% of the Form 605 applications to be filed will require a \$50 filing fee.

$$\begin{aligned} 175,000 \text{ respondents} \times 29\% &= 50,750 \text{ feeable applications} \\ 50,750 \text{ feeable applications} \times \$50 &= \$2,537,500. \end{aligned}$$

**Total Estimated Annual Costs: \$2,537,500 which has been rounded to \$2,538,000.**

14. Cost to the Federal Government:

FCC 605 Applications estimated to be filed: 175,000 (97% of those electronically).

$$\begin{aligned} \$288 \times 10 \text{ (10,000 28-page forms)} &= \$2,880 \text{ (Printing Costs)} \\ \text{(Cost of printing is \$288 per 1,000)} & \end{aligned}$$

$$5,250 \text{ Applications} \times 0.084 \text{ (5 min)} = \$14,350 \text{ (Data Entry)}$$

x \$32.54 per hour for a  
Data Entry Contractor

87,500 Applications x .50 (30 min.)                    =        \$894,250 (Processing)  
x \$20.44 per hour (GS-7, Step 5) for  
an Application Examiner

87,500 Applications x .166 (10 min.)                =        \$296,891 (Processing)  
x \$20.44 per hour (GS-7, Step 5) for  
an Application Examiner

Sub-Total	=	\$1,208,371
25% Overhead		<u>\$ 302,093</u>
<b>Total</b>		<b>\$1,510,464</b>

15. There are no program changes or adjustments reported in this collection.
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 605. Granting this waiver will prevent the Commission from destroying stock upon re-approval of the form.
18. There are no exceptions to the certification statement.

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

No statistical methods are employed.