

SUPPORTING STATEMENT

A. Justification:

1. Section 13.217 requires that each Commercial Operator License Examination Manager (COLEM) recovering fees from examinees who took the Commercial Operator Examination must maintain records of expenses and revenues, frequency of examinations administered, and examination pass rates. These records must cover the period from January 1 to December 31 of the preceding year, be maintained for one year, and be made available to the Commission upon request. This record-keeping requirement is in place in order to assist the Commission in detecting any wrongdoing within the commercial operator examination program. A copy of the rule is attached.

With this submission, the Commission is seeking extension (no change) to this information collection in order to obtain the full three year clearance from OMB.

Statutory authorization for this collection of information is contained in Sections 4, 303, 48 Stat. 1066, 1082 as amended; 47 U.S.C. §§154, 303.

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

2. The records are journal entries showing revenues collected and expenses incurred. The records may be inspected by FCC field investigators. The records will provide a vehicle for the FCC to cancel the designation of a person or organization as an examination manager. If the information were not collected, it is conceivable that fraud and abuse could occur in the commercial operator examination program.
3. Prior to finalizing rule makings, the Wireless Telecommunications Bureau conducts an analysis to insure that improved information technology can 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. No other Federal agency collects this data.
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 that absolutely necessary to deter against possible abuses.
6. If the records were not kept it is conceivable those examinees could be overcharged and that fraud and deceit could be used for unjust enrichment of the examiners.

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 initiated a 60-day public comment period, thereby giving the public an appropriate amount of time in which to comment on this information collection as required by 5 C.F.R. § 1320.8, via publication of the Notice in the Federal Register on January 31, 2008 (73 FR 5842). 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. There is no need for confidentiality.
11. This does not address any private matters of a sensitive nature.
12. There are approximately 9 Commercial Operator Managers (COLEM) who are required to maintain records of examinees revenues and expenses, frequency of exams, and exams pass rates. We estimate that each respondent would devote 1 hour a year to record keeping. Collectively, the 9 COLEMs would devote 9 hours per year to record-keeping.

9 (respondents) x 1 hour (record-keeping) = **9 Hours Total Annual Burden.**

13. Estimate of cost to respondents: We estimate that each COLEM will employ 1 in-house clerical person at the GS 7/5 level, at a salary of \$20.44 per hour, to maintain these records.

\$ 20.44	per hour (clerical cost)
<u> x 9</u>	<u> hours</u>
\$183.96	Total in-house Cost to Respondents

14. Estimated annual cost to the Federal Government: None.
15. There is an adjustment to the hour burden of this information collection due to changes resulting from new estimations.
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 no exceptions to Item 19.

B. Collections of Information Employing Statistical Methods:

No statistical methods are employed.