

SUPPORTING STATEMENT

A. Justification:

1. In order to control interference between stations and assure adequate community coverage, AM stations must conduct various engineering measurements to demonstrate that the antenna system operates as authorized. The following rule sections are included with this collection.

47 CFR Section 73.54(c) requires that AM licensees file a letter notification with the FCC when determining power by the direct method. In addition, Section 73.54(c) requires that background information regarding antenna resistance measurement data for AM stations must be kept on file at the station.

47 CFR Section 73.54(d) requires AM stations using direct reading power meters to either submit the information required by (c) or submit a statement indicating that such a meter is being used.

47 CFR Section 73.61 requires that each AM station using directional antennas make field strength measurement as often as necessary to insure proper directional antenna system operation. Stations not having approved sampling systems make field strength measurements every three months. Stations with approved sampling systems must make field strength measurements as often as necessary. Also, all AM stations using directional antennas must make partial proofs of performance as often as necessary.

47 CFR Section 73.62(b) requires an AM station with a directional antenna system to measure and log every monitoring point at least once for each mode of directional operation within 24 hours of detection of variance of operating parameters from allowed tolerances.

47 CFR Section 73.68(b) requires that licensees of existing AM broadcast stations with antenna monitor sampling systems meeting the performance standards specified in the rules may file informal requests for approval of their sampling systems.

47 CFR Section 73.68(d) requires that a request for modification of the station license be submitted to the FCC on FCC 302-AM when the antenna sampling system is modified or components of the sampling system are replaced. Immediately prior to modification or replacement of components of the sampling system and after a verification that all monitoring point values and operating parameters are within the limits or tolerances, the licensee is required to record certain indications for each radiation pattern.

47 CFR Section 73.69(c) requires AM station licensees with directional antennas to file an informal request to operate without required monitors with the Media Bureau in Washington, D. C., when conditions beyond the control of the licensee prevent the restoration of an antenna monitor to service within a 120 day period. This request is filed in conjunction with Section 73.3549.

47 CFR Section 73.69(d)(1) requires that AM licensees with directional antennas request to obtain temporary authority to operate with parameters at variance with licensed values when an authorized antenna monitor is replaced pending issuance of a modified license specifying new parameters.

47 CFR Section 73.69(d)(5) requires AM licensees with directional antennas to submit an informal request for modification of license to the FCC within 30 days of the date of antenna monitor replacement.

47 CFR Section 73.154 requires the result of the most recent partial proof of performance measurements and analysis to be retained in the station records and made available to the FCC upon request. Maps showing new measurement points shall be associated with the partial proof in the station's records and shall be made available to the FCC upon request.

47 CFR Section 73.158(b) requires a licensee of an AM station using a directional antenna system to file a request for a corrected station license when the description of monitoring point in relation to nearby landmarks as shown on the station license is no longer correct due to road or building construction or other changes. A copy of the monitoring point description must be posted with the existing station license.

47 CFR Section 73.3538(b) requires a broadcast station to file an informal application to modify or discontinue the obstruction marking or lighting of an antenna supporting structure.

47 CFR Section 73.3549 requires licensees to file with the FCC requests for extensions of authority to operate without required monitors, transmission system indicating instruments, or encoders and decoders for monitoring and generating the Emergency Alert System codes. Such requests must contain information as to when and what steps were taken to repair or replace the defective equipment and a brief description of the alternative procedures being used while the equipment is out of service.

The Commission is requesting an extension for this submission in order to obtain the full three year clearance from OMB.

As noted on the OMB Form 83-I, this information collection 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 Section 154(i) of the Communications Act of 1934, as amended.

2. In order to control interference between stations and assure adequate community coverage, AM stations must conduct various engineering measurements to demonstrate that the antenna system operates as authorized. The data is used by station engineers to correct the operating parameters of the antenna. The data is also used by FCC staff in field investigations to ensure that stations are in compliance with the technical requirements of the Commission's rules.

3. Most, if not all, respondents are using electronic engineering programs to reduce the burden of calculating technical information. We do not believe the use of information technology is feasible for the recordkeeping and informal requests included in this collection.

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.

6. The frequency for this collection of information is determined by a station's detection of variance of operating parameters from allowed tolerances.

7. This collection of information is consistent with the guidelines in 5 CFR 1320.5(d)(2).

8. The Commission published a Notice (72 FR 73817) in the Federal Register on December 28, 2007. No comments were generated as a result of the Notice.

9. No payment or gift was provided to the respondents.

10. There is no need for confidentiality with this collection of information.

11. This information collection does not address any private matters of a sensitive nature.

12. We estimate 1,900 AM stations licensed with directional antennas. These 1,900 AM Stations will file one or more responses under the rule sections, as required annually, i.e., multiple responses. The respondents and/or a station engineer will complete most of these information collections. The estimated salary for the respondent is \$33.65/hour and \$22/hour for the station engineer. In addition, the in-house attorney with an average salary of \$40/hour will work on a portion of the information collections.

Rule Sections	Estimated Number of Responses	Estimated Hours for Respondent/Station Engineer	Total Annual Burden Hours	Hourly "In House" Cost	Total "In House" Costs
Section 73.54 (Letter notification)	50	1 hour	50 hours	\$22/hr.	\$1,100
Section 73.54 (Recordkeeping)	50	2 hours	100 hours	\$33.65/hr.	\$3,365
Section 73.61 (with approved sampling system)	250	16 hours	4,000 hours	\$22/hr.	\$88,000
Section 73.61 (without approved sampling system)	1,640	8 hours	13,120 hours	\$22/hr.	\$288,640
Section 73.61 (with directional antennas)	378	25 hours	9,450 hours	\$22/hr.	\$207,900
Section 73.62(b)	250	4.5 hours	1,125 hours	\$22/hr.	\$24,750
Section 73.68(b)	100	1 hour	100 hours	\$22/hr.	\$2,200
Section 73.68(d)	100	1 hour	100 hours	\$22/hr.	\$2,200
Section 73.69(c)	5	1 hour	5 hours	\$22/hr.	\$110
Section 73.69(d)(1)	5	2 hours	10 hours	\$22/hr.	\$220
Section 73.69(d)(5)	10	1 hour	10 hours	\$22/hr.	\$220
Section 73.154	750 proofs	0.5 hours	375 hours	\$33.65/hr.	\$12,618.75
Section 73.154	350 maps	0.5 hours	175 hours	\$33.65/hr.	\$5,888.75
Section 73.158(b)	50 ¹	5 hours	250 hours	\$22/hr.	\$5,500
Section 73.158 (b)	50 ²	0.5 hours	25 hours	\$40/hr	\$1,000
Section 73.3538(b)	20 ³	2 hours	40 hours	\$22/hr.	\$880
Section 73.3538(b)	20 ⁴	1 hour	20 hours	\$40/hr.	\$800
Section 73.3549	100 ⁵	2 hours	200 hours	\$33.65/hr.	\$6,730
Section 73.3549	100 ⁶	1 hour	100 hours	\$40/hr.	\$4,000
Totals:	4,278 Responses	75 hours	29,255 hours	\$518.60	\$656,122.50

¹ Station engineer will complete this portion of the information collections to be submitted to the FCC.

² In-house attorney will complete this portion of information collections to be submitted to the FCC.

³ Station engineer will complete this portion of the information collections to be submitted to the FCC.

⁴ In-house attorney will complete this portion of information collections to be submitted to the FCC.

⁵ Respondent will complete this portion of the information collections to be submitted to the FCC.

⁶ In-house attorney will complete this portion of the information collections to be submitted to the FCC.

These estimates are based on FCC staff's knowledge and familiarity with the availability of the data required.

Total Number of Annual Respondents: 1,900 AM Stations

Total Number of Annual Reponses: 4,278 (multiple responses)

Total Annual Burden Hours: 29,255 hours

Total Annual In-house Cost: \$656,122.50

13. **Annual Cost Burden:** We assume that the respondent would use a consulting engineer for some measurements and a consultant attorney for submission of information to the FCC. We estimate that this consulting engineer would have an average salary of \$150/hour and that an attorney would have an average salary of \$200/hour.

Rule Sections	Estimated Number of Responses	Estimated Hours for Consulting Engineer/Outside Attorney	Hourly Cost	Annual Costs Burden
Section 73.54 (Letter notification)	50	1 hour	\$200/hour	\$10,000

Section 73.54 (Recordkeeping)	50	1 hour	\$150/hour	\$7,500
Section 73.68(b)	100	1 hour	\$150/hour	\$15,000
Section 73.69(c)	5	1 hour	\$200/hour	\$1,000
Section 73.69(d)(1)	5	1 hour	\$200/hour	\$1,000
Section 73.69(d)(5)	10	1 hour	\$150/hour	\$1,500
Section 73.158(b)	50 ⁷	1 hour	\$200/hour	\$10,000
Section 73.3538(b)	20 ⁸	1 hour	\$200/hour	\$4,000
Section 73.3538(b)	20 ⁹	1 hour	\$150/hour	\$3,000
Section 73.3549	100 ¹⁰	1 hour	\$200/hour	\$20,000
Total Annual Cost Burden	410	10 hours	\$1,800	\$73,000

Total Annual Cost Burden: \$73,000

14. **Cost to the Federal Government:** The Commission will use an engineer at the GS-12 step 5 grade level, \$37.89/hour and a clerk at the GS-7 step 5 grade level, \$21.36/hour to review and process information collections that is submitted to the Commission. The average processing times for these collections of information will range from 0.25 – 16 hours processing time depending on the type of information submitted.

Rule Sections	FCC Staff Review Time	Reviewer	Hourly Salary	Number of Reviews	Cost to Federal Government
Section 73.54 (Letter notification)	0.25 hours	Clerk	\$21.36	50	\$267.00
	0.50 hours	Engineer	\$37.89	50	\$947.25
Section 73.54 (Recordkeeping)	0.25 hours	Clerk	\$21.36	50	\$267.00
	0.50 hours	Engineer	\$37.89	50	\$947.25

⁷ Respondent will use a consulting attorney to complete 50 reviews of the 100 reviews under Section 73.158(b).

⁸ Respondent will use a consulting attorney to complete this portion of the information collections under Section 73.3538 to be submitted to the FCC.

⁹ Respondent will use a consulting engineer to complete this portion of the information collections under Section 73.3538 to be submitted to the FCC.

¹⁰ Respondent will use a consulting attorney to complete 100 reviews of the 200 reviews under Section 73.3549.

Rule Sections	FCC Staff Review Time	Reviewer	Hourly Salary	Number of Reviews	Cost to Federal Government
Section 73.61 (with approved sampling system)	0.25 hours 0.50 hours	Clerk Engineer	\$21.36 \$37.89	250 250	\$1,335.00 \$4,736.25
Section 73.61 (without approved sampling system)	0.25 hours 1 hour	Clerk Engineer	\$21.36 \$37.89	1,640 1,640	\$8,757.60 \$62,139.60
Section 73.61 (with directional antennas)	0.25 hours 16 hours	Clerk Engineer	\$21.36 \$37.89	378 378	\$2,018.52 \$229,158.72
Section 73.62(b)	0.25 hours 2 hours	Clerk Engineer	\$21.36 \$37.89	250 250	\$1,335.00 \$18,945.00
Section 73.68(b)	0.25 hours 0.50 hours	Clerk Engineer	\$21.36 \$37.89	100 100	\$534.00 \$1,894.50
Section 73.68(d)	0.25 hours 0.50 hours	Clerk Engineer	\$21.36 \$37.89	100 100	\$534.00 \$1,894.50
Section 73.69(c)	0.25 hours 0.50 hours	Clerk Engineer	\$21.36 \$37.89	5 5	\$26.70 \$94.73
Section 73.69(d)(1)	0.25 hours 0.50 hours	Clerk Engineer	\$21.36 \$37.89	5 5	\$26.70 \$94.73
Section 73.69(d)(5)	0.25 hours 0.50 hours	Clerk Engineer	\$21.36 \$37.89	10 10	\$53.40 \$189.45
Section 73.154	0.25 hours 0.25 hours	Clerk Engineer	\$21.36 \$37.89	750 proofs 750 proofs	\$4,005.00 \$7,104.38
Section 73.154	0.25 hours 0.25 hours	Clerk Engineer	\$21.36 \$37.89	350 maps 350 maps	\$1,8969.00 \$3,315.38
Section 73.158(b)	0.25 hours 1 hour	Clerk Engineer	\$21.36 \$37.89	50 50	\$267.00 \$1,894.50
Section 73.3538(b)	0.25 hours 1 hour	Clerk Engineer	\$21.36 \$37.89	40 40	\$213.60 \$1,515.60
Section 73.3549	0.25 hours 0.25 hours	Clerk Engineer	\$21.36 \$37.89	200 200	\$1,068.00 \$1,894.50
TOTAL:					\$359,343.86

Total Cost to the Federal Government: \$359,343.86

15. There no program changes or adjustments.

16. The data will not be published.

17. OMB approval of the expiration of the information collection will be displayed at 47 C.F.R. Section 0.408.

18. The Commission published a Federal Register Notice (72 FR 73817) on December 28, 2007. The Commission corrects the total annual burden hours to read as “29,255 hours” instead of “29,225 hours.” There are no other exceptions to the Certification Statement in Item 19.

B. Collections of Information Employing Statistical Methods:

No statistical methods are employed.