

## SUPPORTING STATEMENT

### **A. Justification:**

1. FCC Form 606 is used to associate a licensee's FCC Registration Number (FRN) to licensee's Wireless Telecommunications Bureau and/or Public Safety and Homeland Security Bureau call signs and antenna structure registration numbers with the Federal Communications Commission (FCC) and filed through the Commission's Universal Licensing System (ULS).

The FCC adopted a rule requiring a mandatory FCC Registration Number (FRN). This requirement became effective December 3, 2001, for all parties and entities doing business with the Commission who file applications with ULS or register towers via Antenna Structure Registration (ASR). As a result of the Commission Registration System (CORES) and the implementation of the FRN, several important changes occurred for filers of ULS and ASR. This requirement was to facilitate compliance with the Debt Collection Improvement Act of 1996 (DCIA).

The Commission is now seeking approval for an extension of a three-year clearance. No revisions are being made to the collection.

This information collection contains personally identifiable information on individuals (PII).

- a) The FCC maintains a system of records notice (SORN), FCC/WTB-1, "Wireless Services Licensing Records," covers the collection, purpose(s), storage, safeguards, and disposal of the PII that individual wireless telecommunications and public safety services licensees maintain under FCC Form 606.
  - b) The FCC published this SOR on April 5, 2006 (71 FR 17234, 17253).
  - c) Going forward, if the FCC makes substantive changes to the Wireless Services Licensing Records, the Commission will conduct a full Privacy Impact Assessment of FCC/WTB-1 SORN covered by FCC/WTB-1, update this SORN, publish a Notice in the *Federal Register*, and post it on the FCC webpage, as required by OMB Memorandum M-03-22 (September 22, 2003).
2. The information collected in the application will be used to populate the Universal Licensing System (ULS) for licensees and antenna structure registration owners who interact with ULS. This information will also be used to match records in the ULS database to the Collection System records to validate payment for application and for Debt collection purposes.

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 within PLMRS is publicly available.

3. The Commission reports 100% of the applications are filed electronically.
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, regardless of size. The Commission has limited the information requirements to those absolutely necessary for evaluating and processing each application and to deter against possible abuses of the processes.
6. Respondents are required to obtain an FRN from the Commission. If changes are required after obtaining the FRN, registrants must modify their FRN by submitting another FCC Form 606 or accessing the interactive version of the form and modifying electronically.
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 February 21, 2008 (73 FR 9568). No comments were received as a result of the notice. A copy of the Federal Register notice is referenced in this submission to the OMB.
9. Respondents will not receive any payments.
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 Private Land Mobile Radio Service 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. 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. There are no requests of a sensitive nature considered or those considered a private matter being sought from the applicants on this collection.
12. The Commission estimates that there are 1,233,000 existing licensees in the databases. However, most licensees will only need to make a one-time submission of the FCC Registration Number and include all of their call signs and antenna structure registration

numbers as part of the single submission.

It would be somewhat impossible to provide an exact number of respondents as some licensees will only be submitting for a single call sign while others may have hundreds of call signs issued to them. For purposes of estimating this submission, we will use a figure of one-third of the number of licensees for respondents. We estimate the number of respondents filing this form to be 411,000.

In addition, we estimate the number of antenna structure owners filing to associate antenna structure registration numbers to be 18,000.

Total number of respondents:  $411,000 + 18,000 = 429,000$ .

The average burden per applicant is estimated to range from approximately 5 minutes to 4 hours, averaging 1 hour, based on FCC staff's knowledge and familiarity with the availability of data required. Entities with numerous call signs have an option of providing WTB with an electronic ASCII text file that they would download from their systems. We expect that respondents will fulfill the requirements of this collection with in-house clerical staff.

The total annual burden is:

**$429,000 \times 1 \text{ hour} = 429,000 \text{ hours}$**

Clerical staff @ \$10 per hour x 429,000 hours = \$4,290,000

13. Cost to the Respondent:

There should be no additional costs to respondent except for the Internet access/phone charges when submitting electronically.

14. Cost to the Federal Government:

There are no costs to the Federal Government as FCC Form 602 is filed electronically, and staff does not routinely or regularly review the filings.

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 606. Granting this waiver will prevent the Commission from having to update the electronic version in the ULS. All OMB-approved information collections are published in 47 CFR 0.408. This section includes the OMB control number, title of the collection and the OMB expiration date.

18. There are no exceptions to the "Certification Statement" in Item 19.

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

This information collection does not use any statistical methods.