

## SUPPORTING STATEMENT

**A. Justification:**

1. This section governs interconnection of private land mobile radio service stations with the public switched telephone network as follows:

(a) Pursuant to 47 CFR § 90.477(a), licensees of interconnected land stations must maintain as part of their station records a detailed description of how interconnection is accomplished.

(b) Pursuant to 47 CFR §§ 90.477 (b)(2), and (d)(2), at least one licensee participating in any cost sharing arrangement for telephone service must maintain cost sharing records, the costs must be distributed at least once a year, and a report of the distribution must be placed in the licensee's station records and made available to participants in the sharing arrangement and the Commission upon request.

(c) Pursuant to 47 CFR § 90.477(d)(3), licensees in the Industrial/Business Pool and those licensees who establish eligibility pursuant to 47 CFR § 90.20(a)(2), other than persons or organizations charged with specific fire protection activities, persons or organizations charged with specific forestry-conservation activities, or medical emergency systems in the 450-470 MHz band, and who seek to connect within 120 km (75 mi.) of 25 cities specified in § 90.477(d)(3), must obtain the consent of all co-channel licensees located both within 120 km (75 mi.) of the center of the city, and within 120 km (75 mi.) of the interconnected base station transmitter. Consensual agreements must specifically state the terms agreed upon and a statement must be submitted to the Commission indicating that all co-channel licensees have consented to the use of interconnection.

On December 14, 1998, the Federal Communications Commission ("the Commission") published a *Report and Order* in the *Federal Register* in WT Docket Nos. 98-20 and 96-188, at 63 FR 68904. This *Report and Order* consolidated, revised, and streamlined the Commission's rules governing licensing application procedures for radio services licensed by the Wireless Telecommunications Bureau ("WTB") in order to fully implement the Universal Licensing System ("ULS").

ULS is the Commission's automated licensing system and integrated database for wireless services that enables licensees and applicants to file applications electronically. The *Report and Order* also adopted the new consolidated application forms and established procedures to ensure a smooth transition from the pre-existing licensing processes to the process developed for ULS. As a result of the ULS rule conversions in connection with this information collection, 47 CFR §90.477(a), interconnected systems now file all information (100 percent) electronically via ULS. Pursuant to 47 CFR § 90.477(d)(3), interconnected systems were changed to reflect NAD83 coordinates.

Statutory authority for this collection of information is contained in 47 U.S.C. § 332(a), as amended.

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

2. These requirements to keep records when the land stations involved are multiple licensed or shared is mandated by the requirements set forth in 47 U.S.C. 332(c) of the Communications Act of 1934, as amended, regarding inter-service sharing opportunities in the private mobile services. The information is used by the participating licensees to effect the required cost sharing.
3. Prior to finalizing rulemakings, the Wireless Telecommunications Bureau conducts an analysis to insure that improved information technology cannot 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 databases in the Commission or other federal agencies.
4. No similar information is 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 applications and to deter against possible abuses.
6. The rules require that costs be distributed at least once per year. Since the licensees involved in these shared interconnection arrangements are likely to change relatively often, distribution periods greater than one year would be inappropriate.
7. Current data collection is consistent with 5 CFR § 1320.6.
8. Notice of the information collection appeared in the *Federal Register* on April 28, 2008 (73 FR 22945), in compliance with 5 CFR § 1320.8(d). No comments to the paperwork burden in this collection were filed. A reference to the notice is included in the submission to the OMB.
9. There are no payments or gifts to respondents.
10. No questions of a confidential nature are asked.
11. This collection does not address any private matters of a sensitive nature.

12. The number of respondents for this information collection is based on the licensing statistics on interconnected systems which were extracted from ULS for the 25 major U.S. urbanized areas set forth below:

Urban Area	North Latitude	West Longitude
New York, New York-Northeastern New Jersey	40° 45' 06.4"	73° 59' 37.5"
Los Angeles-Long Beach, California	34° 03' 15.0"	118° 14' 31.3"
Chicago, Illinois-Northwestern, Indiana	41° 52' 28.1"	87° 38' 22.2"
Philadelphia, Pennsylvania/New Jersey	39° 56' 58.4"	75° 9' 19.6"
Detroit, Michigan	42° 19' 48.1"	83° 2' 56.7"
San Francisco-Oakland, California	37° 46' 38.7"	122° 24' 43.9"
Boston, Massachusetts	42° 21' 24.4"	71° 03' 23.2"
Washington, DC/Maryland/Virginia	38° 53' 51.4"	77° 00' 31.9"
Cleveland, Ohio	41° 29' 51.2"	81° 41' 49.5"
St. Louis, Missouri/Illinois	38° 37' 45.2"	90° 12' 22.4"
Pittsburgh, Pennsylvania	40° 26' 19.2"	79° 59' 59.2"
Minneapolis-St. Paul, Minnesota	44° 58' 56.9"	93° 15' 43.8"
Houston, Texas	29° 45' 26.8"	95° 21' 37.8"
Baltimore, Maryland	39° 17' 26.4"	76° 36' 43.9"
Dallas-Fort Worth, Texas	32° 47' 09.5"	96° 47' 38.0"
Milwaukee, Wisconsin	43° 02' 19.0"	87° 54' 15.3"
Seattle-Everett, Washington	47° 36' 31.4"	122° 20' 16.5"
Miami, Florida	25° 46' 38.4"	80° 11' 31.2"
San Diego, California	32° 42' 53.2"	117° 09' 24.1"
Atlanta, Georgia	33° 45' 10.4"	84° 23' 36.7"
Cincinnati, Ohio/Kentucky	39° 06' 07.2"	84° 30' 34.8"
Kansas City, Missouri/Kansas	39° 04' 56.0"	94° 35' 20.8"
Buffalo, New York	42° 52' 52.2"	78° 52' 20.1"
Denver, California	39° 44' 58.0"	104° 59' 23.9"
San Jose, California	37° 20' 15.8"	121° 53' 27.8"

**Note: Coordinates are referred to North American Datum 1983 (NAD83)**

Pursuant to 47 CFR § 90.476(c), Commercial Mobile Radio Services ("CMRS") are exempt from complying with the provisions of §§ 90.476 - 90.483, and therefore are not subject to the requirements set forth in these rule sections. Consequently, the following statistics are based on filings from private radio service licensees that are interconnected and therefore subject to rule sections 90.476 – 90.483.

**(a) Interconnected licensees – 90.477(a).** According to ULS data compiled over the past three year period (2004-2007), there were a total of 8,420 licensees authorized under a total of 16,445 licenses in the Private Land Mobile Services, that are authorized for interconnection and are required to comply with 47 CFR § 90.477(a); however, this requirement is to be met when a license is either initially authorized or modified for interconnection and is not an annual requirement. As in the previous submission of this

collection, we conclude that the estimated time needed to complete this requirement is 15 minutes (0.25 hrs.) on average. We divide the total number of licenses authorized over the past three years by three to estimate the annual number of licenses subject to this requirement.

$$16,445 \div 3 = 5,482 \text{ (respondents)} \times 0.25 \text{ (hours)} = \mathbf{1,370 \text{ hrs.}}$$

**(b) Interconnected cost-sharing licensees above 800 MHz – 90.477(b)(2).** According to ULS data compiled over the past three year period (2004-2007) for relevant licenses in frequency ranges above 800 MHz, there were 1,536 licensees involved in cost-sharing arrangements that are required to comply with § 90.477(b)(2) annually. As in the previous submission of this collection, we conclude that the estimated time needed to complete this requirement is 15 minutes (0.25 hrs.) on average. We estimate that there are, at a minimum, two licensees involved in each respective cost-sharing arrangement. Therefore, in estimating the impact of the requirements of this section, we divide the total number of licensees in half to get the number of respondents who will spend 768 burden hours annually.

$$1,536 \div 2 = 768 \text{ (above 800 MHz licensees)} \times 0.25 \text{ (hours)} = \mathbf{192 \text{ hrs.}}$$

**Interconnected cost-sharing licensees below 800 MHz – 90.477(d)(2).** According to ULS data compiled over the past three year period (2004-2007) for relevant licenses in frequency ranges below 800 MHz, there were 7,036 licensees involved in cost-sharing arrangements that are required to comply with § 90.477(d)(2) annually. As in the previous submission of this collection, we conclude that the estimated time needed to complete this requirement is 15 minutes (0.25 hrs.) on average. We further estimate that there are, at a minimum, two licensees involved in each respective cost-sharing arrangement. Therefore, in estimating the impact of the requirements of this section, we divide the total number of licensees in half to get the number of respondents (3,518) who will spend 880 burden hours annually.

$$7,036 \div 2 = 3,518 \text{ (below 800 MHz licensees)} \times 0.25 \text{ (hours)} = \mathbf{880 \text{ hrs.}}$$

**(c) Interconnected urban licensees -90.477(d)(3).** According to ULS data compiled over the past three year period (2004-2007), there were 1,006 licensees with facilities located within the 120 km (75 miles) of designated urban areas authorized under a total of 1,577 licenses that are required to comply with § 90.477(d)(3). We estimate that it will take these urbanized licensees 2 hours per authorization on average to satisfy the rule 90.477 (d)(3) requirement, as the requirement is imposed on a per application basis at the time of licensing. Accordingly, we estimate that the licensees will spend 1,577 burden hours annually to satisfy this requirement. We also divide the total number of licenses authorized over the past three years by three to estimate the annual number of licenses subject to this requirement.

$$1,577 \div 3 = 526 \text{ (respondents)} \times 2 \text{ (hours)} = \mathbf{1,052 \text{ hrs.}}$$

$$\text{We add ((a) } 1,370 + \text{ (b) } 192 + \text{ 880 + (c) } 1,052) = 3,494 \text{ hours.}$$

**Total Annual Burden Hours: 3,494 hrs.**

We add ((a) 5,482+ (b) 768 + 3,518 + (c) 526) = 10,294 to get the total number of respondents.

**Total Number of Respondents: 10,294**

13. We estimate that applicants will use in-house clerical personnel (equivalent to a GS 7, Step 5, at an average of \$20 per hour) in order to meet these requirements.

$$10,294 \text{ (respondents)} \times \$20/\text{hour} = \$205,880.00$$

**TOTAL IN-HOUSE COST BURDEN IS: \$205,880.00**

14. There is no cost to the Federal Government.
15. As noted in #12 above, we have adjusted the number of respondents affected, which has decreased the total burden hours. In the previous submission to the OMB, we estimated 12,024 responses. The Commission is now estimating 10,294 responses and we have reduced the total annual burden hours by -8,530 hours.
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 were employed for submission of information covered under this submission.