Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; E911 Requirements for IP-Enabled Service Providers CG Docket No. 03-123 and WC Docket No. 05-196, FCC 08-151

SUPPORTING STATEMENT

A. Justification

1. With this submission, the Commission revises information collection 3060-1089: Telephone Numbering System and E911 Requirements for Internet-based Telecommunications Relay Service Providers.

   Between 2005 and 2006, the Commission issued three separate notices proposing rules to ensure numbering and E911 services to users of two forms of Internet-based Telecommunications Relay Services (TRS) — specifically, Video Relay Service (VRS) and Internet Protocol Relay Service (IP Relay).[1] Those notices proposed several information collections, which the Office of Management and Budget reviewed as part of Control Number 3060-1089. On June 11, 2008, the Commission adopted an *Order* setting forth rules requiring VRS and IP Relay providers to supply numbering and E911 capabilities to their users.[2] The *Order* requires seven separate collections of information:

(A) *Routing Information*. VRS and IP Relay providers must obtain current routing information, including IP addresses or domain names and user names, from their registered users and must maintain such information in their internal databases.

(B) *Provision of Routing Information*. VRS and IP Relay providers must provision their registered users' routing information to the TRS Numbering Directory and must maintain such information in that database.

(C) *Registered Location*. As of December 31, 2008, VRS and IP Relay providers must obtain from each of their registered users, prior to the initiation of service, the physical location at which the service will be utilized and keep that information in their own databases. If the VRS or IP Relay is capable of being used from more than one location, the providers must offer their registered users one or more methods of updating their physical location, including at least one option that requires use only of the customer premises equipment necessary to access the VRS or IP Relay. Any method utilized must allow a registered user to update his or her Registered Location at will and in a timely manner.

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[1] *See Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Access to Emergency Services*, CGB Docket No. 03-123, Notice of Proposed Rulemaking, 20 FCC Rcd 19476 (Nov. 30, 2005); *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Misuse of Internet Protocol (IP) and Video Relay Service*, CGB Docket No. 03-123, Further Notice of Proposed Rulemaking, 21 FCC Rcd 5478 (May 8, 2006); *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CGB Docket No. 03-123, Declaratory Ruling and Further Notice of Proposed Rulemaking, 21 FCC Rcd 5442 (May 9, 2006).

[2] *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; E911 Requirements for IP-Enabled Service Providers*, CGB Docket No. 03-123, WC Docket No. 05-196, Report and Order, FCC 08-151 (June 24, 2008) (*Order*).

(D) *Provision of Registered Location*. As of December 31, 2008, each VRS and IP Relay provider must place its registered users' Registered Location, the provider's name, and the communications assistant's (CA) identification number into, or make that information available through, Automatic Location Information (ALI) databases[3] across the country.

(E) *User Notification*. Every VRS or IP Relay provider must include an advisory on its website and in any promotional materials addressing numbering or E911 services for VRS or IP Relay. At a minimum, the advisory must address the following issues: (i) the process by which VRS or IP Relay users may obtain ten-digit telephone numbers, including a brief summary of the numbering assignment and administration processes adopted herein; (ii) the portability of ten-digit telephone numbers assigned to VRS or IP Relay users; (iii) the process by which persons using VRS or IP Relay may submit, update, and confirm receipt by the provider of their Registered Location information; and (iv) an explanation emphasizing the importance of maintaining accurate, up-to-date Registered Location information with the user's default provider in the event that the individual places an emergency call via an Internet-based relay service.

(F) *Affirmative Acknowledgements*. VRS and IP Relay providers must obtain and keep a record of affirmative acknowledgement from each of their registered users of having received and understood the user notification.

(G) *Interstate TRS Fund Submission*. Each VRS and IP Relay provider must submit its actual reasonable costs to implement the numbering and emergency call handling requirements set forth in the *Order* to the Interstate TRS Fund Administrator for reimbursement from the Interstate TRS Fund.

Title IV of the Americans with Disabilities Act of 1990 requires the creation of a nationwide TRS program to allow persons with hearing and speech disabilities access to the nation's telephone network.[4] Title IV requires that TRS be available to the extent possible and in the most efficient manner,[5] and that relay services offer access to the telephone system that is "functionally equivalent" to voice telephone services, as reflected in the TRS mandatory minimum standards.

VRS and IP Relay users have not previously had a reliable or consistent means by which others can identify or reach them because these services have not been linked to a uniform telephone numbering scheme. The *Order* remedies this problem by, among other things, integrating VRS and IP Relay users into the ten-digit numbering system known as the North American Numbering Plan.

[3] Automatic Location Information (ALI) databases contain location information that is associated with calling numbers that are used to route emergency calls appropriately.

[4] Pub. L. No. 101-336, § 401, 104 Stat. 327, 336–69 (1990); 47 U.S.C. § 225.

[5] 47 U.S.C. § 225(b)(1).

To complete a telephone call to an Internet-based TRS user, a provider must have some method of logically associating the telephone number dialed by the caller to the Internet-based TRS user's device. That method, known as the TRS Numbering Directory, is a central database that maps each user's telephone number to routing information needed to find that user's device on the Internet. The *Order* requires VRS and IP Relay providers to collect and maintain the routing information from their registered users and to provision that information to the TRS Numbering Directory so that this mapping can occur.

The Commission is also obligated to promote "safety of life and property"[6] and to "encourage and facilitate the prompt deployment throughout the United States of a seamless, ubiquitous, and reliable end-to-end infrastructure" for public safety.[7] Enhanced 911 service — a critical part of the nation's public safety infrastructure — enables all citizens to reach emergency services directly and efficiently, irrespective of technology.[8] E911 works by routing emergency calls to the appropriate emergency answering authority over a dedicated, redundant, highly-reliable wireline network that is interconnected with but largely separate from the public switched telephone network (the Wireline E911 Network). E911 relies on Automatic Location Information (ALI) databases.

Because there is no reliable means for VRS and IP Relay providers, unlike wireline carriers, to automatically know the physical location of their users, the *Order* requires VRS and IP Relay providers to collect and maintain the Registered Location of their registered users. And to ensure that authorities can retrieve a user's Registered Location (along with the provider's name and CA's identification number for callback purposes), the *Order* requires VRS and IP Relay providers to provision that information into, or make that information available through, ALI databases across the country.

To ensure that Internet-based TRS users are aware of their providers' numbering and E911 service obligations and to inform them of their providers' E911 capabilities, the *Order* requires VRS and IP Relay providers to post an advisory on their websites and in any promotional materials addressing numbering or E911 services for VRS or IP Relay and to obtain and keep a record of affirmative acknowledgement from each of their registered users of having received and understood the user notification.

Statutory authority is contained in sections 1, 2, 4(i), 4(j), 225, 251, and 303(r) of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 152, 154(i), 154(j), 225, 251, 303(r). The statutory provisions and regulations authorizing the information collections are attached as Appendix A.

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[6] *See* 47 U.S.C. § 151.

[7] 911 Act § 2(b).

[8] *See* 911 Act § 3, *codified at* 47 U.S.C. § 251(e).

2. The present *Order* adopts actual, rather than proposed, information collections for the first time. Therefore, the responses listed below address how, by whom, and the purpose of the information collection requirements.

   (A) *Routing Information*. Each VRS or IP Relay provider collects its registered users' routing information from their communications devices so that such routing information can be provisioned into the TRS Numbering Directory.

   (B) *Provision of Routing Information*. A VRS or IP Relay provider provisions its registered users' routing information into the TRS Numbering Directory so that other providers can access that routing information to complete a call to a particular Internet-based TRS user.

   (C) *Registered Location*. Each VRS or IP Relay provider collects its registered users' Registered Locations using the same equipment the provider uses to provide service or any other methods the provider chooses to offer. A VRS or IP Relay provider, along with the entity that operates the Wireline E911 Network and public safety officials, uses the Registered Location to deliver 911 calls to the appropriate emergency answering point.

   (D) *Provision of Registered Location*. A VRS or IP Relay provider, along with the entity that operates the Wireline E911 Network and public safety officials, provisions the Registered Location along with other callback information to public safety officials through ALI databases maintained by local exchange carriers (and, in at least one case, a state government) across the country. The VRS or IP Relay provider, the entity that operates the Wireline E911 Network, and public safety officials can then use this information to facilitate emergency response.

   (E) *User Notification*. Every VRS and IP Relay provider must post an advisory on its website and in any promotional materials addressing numbering or E911 services for VRS or IP Relay so that customers understand the capabilities, limitations, and obligations of providers.

   (F) *Affirmative Acknowledgements*. Every VRS or IP Relay provider must obtain and keep a record of affirmative acknowledgement from each of their registered users of having received and understood the user notification to facilitate the Commission's review and, if necessary, enforcement of these rules.

   (G) *Interstate TRS Fund Submission*. Each VRS and IP Relay provider must submit its actual reasonable costs to implement the numbering and emergency call handling requirements to the Interstate TRS Fund Administrator to be reimbursed by the Interstate TRS Fund. Submitted costs may include those additional costs incurred by a provider that directly relate to: (1) ensuring that database information is properly and timely updated and maintained; (2) processing and transmitting calls made to ten-digit numbers assigned pursuant to the *Order*; (3) routing emergency calls to an appropriate public safety answering

point (PSAP); (4) other implementation related tasks directly related to facilitating ten-digit numbering and emergency call handling; and (5) consumer outreach and education related to the requirements and services adopted in the *Order*. These costs are separate from the providers' other costs presently encompassed by the per-minute compensation rates.

3. The Commission encourages VRS and IP Relay providers to use information technology to whatever extent possible to reduce the burden of these information collections.

   (A) *Routing Information*. The Commission expects that a VRS or IP Relay provider's collection of routing information will be automatically done over the Internet.

   (B) *Provision of Routing Information*. VRS and IP Relay providers must provision a registered user's updated routing information to the TRS Numbering Directory by electronic means.

   (C) *Registered Location*. If a VRS or IP Relay provider's service is capable of being used from more than one location, the provider must offer its registered users one or more methods of updating their Registered Location, including at least one option that requires use only of the customer premises equipment necessary to access the VRS or IP Relay. The Commission expects that many VRS and IP Relay providers will also allow their registered users to update their Registered Location via a webpage.

   (D) *Provision of Registered Location*. VRS and IP Relay providers must use electronic means to provide information in or through ALI databases.

   (E) *User Notification*. Every VRS and IP Relay provider must use electronic means, *i.e.*, a webpage, to disseminate the advisory. Providers must also include the advisory whenever they disseminate promotional materials addressing numbering or E911 services for VRS or IP Relay using whatever method they choose, electronic or otherwise.

   (F) *Affirmative Acknowledgements*. The record of affirmative acknowledgements can be obtained and stored electronically, likely via a webpage and in an electronic database.

   (G) *Interstate TRS Fund Submission*. The VRS and IP Relay providers' actual reasonable costs to implement the numbering and emergency call handling requirements set forth in the *Order* may be submitted to the Interstate TRS Fund Administrator electronically.

4. None of the information collected as a result of the *Order* will be duplicative of other information. The Commission has also taken the affirmative step of requiring VRS and IP Relay providers to cease acquiring routing information from any registered user that ports his or her number to another VRS or IP Relay provider.

5. The Commission has attempted to balance the economic interests of small businesses with the public's great interest in access to numbering and E911 services when using VRS and IP

Relay, and has taken several steps to minimize the information collection burden for small business concerns, including those with fewer than 25 employees.

(A) *Routing Information*. In requiring that VRS and IP Relay providers obtain routing information for their registered users, the *Order* requires that providers who have issued, leased, or otherwise provided customer premises equipment (usually larger providers) must ensure that such equipment delivers routing information to each user's default provider.

(B) *Provision of Routing Information*. Once a provider has automatically received that information, it can provision the TRS Numbering Directory with that information electronically.

(C) *Registered Location*. In requiring that VRS and IP Relay providers obtain their registered users' Registered Location, the *Order* allows providers to comply with this requirement directly or by utilizing the services of a third party.

(D) *Provision of Registered Location*. In requiring that VRS and IP Relay providers provision Registered Location information along with callback information to public safety officials through ALI databases, the *Order* allows providers to comply with this requirement directly or by utilizing the services of a third party.

(E) *User Notification*. In requiring VRS and IP Relay providers to provide their users with an advisory about numbering and E911 services, the *Order* only requires posting on provider websites and in any promotional materials addressing those services.

(F) *Affirmative Acknowledgements*. Additionally, affirmative acknowledgements of having received the advisory by registered users can be received electronically through a provider's website. The Commission believes that these requirements should entail minimal burden on small entities.

(G) *Interstate TRS Fund Submission*. The VRS and IP Relay providers' actual reasonable costs to implement the numbering and emergency call handling requirements set forth in the *Order* may be submitted to the Interstate TRS Fund Administrator electronically.

Two further measures should minimize the impact of these information collections on small businesses. *First*, the Commission has given VRS and IP Relay providers, large and small, until December 31, 2008, to implement the requirements of the *Order*, including the information collections contained therein. *Second*, the Commission has authorized the Interstate TRS Fund to compensate VRS and IP Relay providers for the reasonable costs of complying with the numbering and registration requirements of the *Order*. These measures should substantially alleviate any burdens on small businesses, including those with fewer than 25 employees.

6. If a VRS or IP Relay provider did not collect a registered user's routing information whenever it changed or did not provision any updated routing information to the TRS Numbering Directory, individuals and businesses trying to contact that registered user using his or her telephone number would be unable to complete the call. And if the contacting entity were a public safety official trying to reestablish contact after an interrupted call, less frequent information collection could hamper and threaten the integrity of a public safety response.

   If a VRS or IP Relay provider did not collect a registered user's Registered Location whenever that user sought to change it or did not provision a registered user's Registered Location and other callback information through the ALI databases as needed, emergency calls could be routed to geographically inappropriate emergency authorities, and public safety officials would be stripped of the benefits of E911 service.

   (E) *User Notification*. Posting an advisory on a VRS or IP Relay provider's website is a one-time collection and users may not realize the capabilities and obligations of those providers absent such an advisory. Requiring the inclusion of an advisory whenever a VRS or IP Relay provider disseminates promotional materials regarding numbering or E911 services ensures that every user who may rely on those services will know the provider's capabilities and obligations.

   (F) *Affirmative Acknowledgements*. The affirmative acknowledgements by registered users of having received the advisory is a one-time collection. Without it, the Commission's ability to review and enforce its advisory requirements would be hampered.

7. (F) *Affirmative Acknowledgements*. A VRS or IP Relay provider may retain the affirmative acknowledgements by registered users of having received the advisory for more than three years to the extent users remain registered with that provider for more than three years.

8. Pursuant to 5 C.F.R. § 1320.8(d), the Commission placed a 60-day notice in the Federal Register soliciting comments on the information collection. *See* 73 FR 41351, dated July 18, 2008. The Commission received no comments in response to its solicitation.

9. Section 225 of the Communications Act of 1934, as amended, creates a cost recovery regime whereby the Interstate TRS Fund compensates TRS providers for the reasonable costs of providing service in compliance with TRS regulations.[9] Here, the Commission has authorized the Interstate TRS Fund to reimburse respondents for the actual reasonable costs of complying with the new requirements adopted in the *Order*, including costs for ensuring that the routing information in the TRS Numbering Directory is properly and timely updated and maintained; for routing emergency calls to the appropriate emergency authority and provisioning Registered Location information to the ALI databases; for disseminating the advisory to users; and for retaining the affirmative acknowledgements of registered users.

[9] 47 U.S.C. § 225(d)(3); 47 C.F.R. § 64.604(c)(5).

10. The *Order* requests comment on whether and how the Commission's customer proprietary network information (CPNI) and other privacy protections should be extended to VRS and IP Relay providers and their collections of information required in the *Order*.[10] The dissemination of the advisory does not raise confidentiality concerns.

    The Commission takes several steps to specifically protect registered users' routing information and the provision of that information to the TRS Numbering Directory. *First*, VRS and IP Relay providers "must ensure that all [equipment] they have issued . . . to VRS or IP Relay users delivers routing information or other information *only* to the user's default provider, except as is necessary to complete or receive 'dial around' calls on a case-by-case basis."[11] *Second*, VRS and IP Relay providers must "[t]ake such steps as are necessary to cease acquiring routing information from any VRS or IP Relay user that ports his or her number to another VRS or IP Relay provider or otherwise selects a new default provider"[12] and they must stop provisioning that information to the TRS Numbering Directory.[13] *Third*, access to the routing information in the TRS Numbering Directory is limited to VRS and IP Relay providers and an administrator.[14]

    The Commission also requires VRS and IP Relay providers to "[e]nsure" that gathering a registered user's Registered Location and provisioning that information along with callback information into or through ALI databases "is limited to that needed to facilitate 911 services, is made available only to emergency call handlers and emergency response or law enforcement personnel, and is used for the sole purpose of ascertaining a user's location in an emergency situation or for other emergency or law enforcement purposes."[15]

    This information collection affects individuals or households, and thus there are impacts under the Privacy Act. However, a third party, the individual or household's VRS or IP Relay provider, collects the information that is related to individuals or households; and the Commission has no direct involvement in this collection. As such, the Commission is not required to complete a privacy impact assessment. Further, VRS and IP Relay providers generally have written privacy policies governing the treatment of information collected from their users, and the Commission expects that much of the information collected here would fall under those policies.

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[10] *See Order*, FCC 08-151, at 49–56, paras. 131–46. Section 222 of the Act prevents telecommunications carriers from disclosing customer proprietary network information (CPNI), including customer location information, without customer approval. 47 U.S.C. § 222(c)(1).

[11] *Order*, FCC 08-151, Appendix B (amending 47 C.F.R. § 64.611(e)(1)) (emphasis added).

[12] *Id.* (amending 47 C.F.R. § 64.611(c)(2)(i)).

[13] *See id.* (amending 47 C.F.R. § 64.611(c)(2)(ii)).

[14] *See id.* (amending 47 C.F.R. § 64.613(a)(3)).

[15] *See id.* (amending 47 C.F.R. § 64.605(a)(2)(vi)).

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

12. Eleven entities currently provide VRS and IP Relay services to about 200,000 users. The Commission expects that the availability of numbering and E911 services will increase the number of users to about 265,000 next year, and 295,000 in 2010.

(A) *Routing Information*. VRS and IP Relay providers will need to obtain updated routing information and to provision that routing information to the TRS Numbering Directory whenever a registered user's routing information changes. The Commission expects that VRS and IP Relay providers will develop, test, and deploy a system to obtain, retain, and provision this routing information automatically. In addition to this burden, once VRS and IP Relay providers start registering users on December 31, 2008, VRS and IP Relay users will need to configure their devices to notify their default providers whenever their routing information changes. VRS and IP relay providers will likely need to follow up with those registered users unable to so configure their devices. Although the burden for each VRS and IP Relay provider will vary based on the number of its registered users and customer churn, we estimate on an industry-wide basis that the annual hour burden of obtaining, retaining, and provisioning routing information will be:

11,550 hours in 2008,
118,650 hours in 2009, and
34,290 hours in 2010.

The average burden will therefore be 54,830 hours per year. The annual "in-house" cost burden to the respondents is thus estimated to be:

$275,358 in 2008,
$2,445,799 in 2009, and
$866,002 in 2010.

The average "in-house" cost burden will therefore be $1,195,720 per year.

(B) *Provision of Routing Information*. The costs for provisioning the routing information to the TRS Numbering Directory are included in the calculations above for collecting routing information.

(C) *Registered Location*. Once VRS and IP Relay providers start registering users on December 31, 2008, they will need to obtain and retain a Registered Location for each registered user. The Commission expects VRS and IP Relay providers will design systems with in-house staff that will not only fulfill this requirement, but also notify users of the advisory and obtain from registered users affirmative acknowledgments of having read and understood the advisory. VRS and IP Relay providers will need to register a user both when a user receives a number from the provider and when the user ports his or her number from another provider. The Commission expects that most users will complete this registration process online, although some will prefer to speak with a service representative. The Commission also expects that a registered user may, on occasion, need to update his or her

Registered Location, and that doing so will require less time because of his or her familiarity with the registration process. Although the burden for each VRS and IP Relay provider will vary based on the number of its registered users and customer churn, we estimate on an industry-wide basis that the annual hour burden of obtaining and retaining Registered Location information and notifying users of the advisory will be:

6,050 hours in 2008,
65,641 hours in 2009, and
25,303 hours in 2010.

The average burden will therefore be 32,331 hours per year. The annual "in-house" cost burden to respondents is thus estimated to be:

$186,533 in 2008,
$1,328,575 in 2009, and
$595,966 in 2010.

The average "in-house" cost burden will therefore be $703,691 per year.

(D) *Provision of Registered Location*. VRS and IP Relay providers must place Registered Location and other callback information into, or make that information available through, ALI databases each time one of their registered users makes an emergency call. To do so, the VRS and IP Relay industry will need to hire on their staff software developers to develop, test, and deploy a provisioning system in 2008, and to maintain that system thereafter. We estimate this burden will be:

22,000 hours in 2008,
4,400 hours in 2009, and
4,400 hours in 2010.

The average burden will therefore be 10,267 hours per year. With these costs amortized over three years, the Commission expects the average "in-house" cost burden per year to be **$497,420**.

(E) *User Notification*. To the extent that providers incorporate the advisory into any promotional materials regularly sent by providers, there should be no additional annual burden or "in-house" cost burden to the respondents.

(F) *Affirmative Acknowledgements*.[16] VRS and IP Relay providers must store a record of affirmative acknowledgement for each registered user. To the extent those records are stored electronically, the Commission estimates that annual, industry-wide burden will be **132 hours** per year, and an average annual "in-house" cost burden of **$6,395**.

(G) *Interstate TRS Fund Submission*. Each VRS and IP Relay provider must submit its actual reasonable costs to implement the numbering and emergency call handling

[16] The electronic recordkeeping requirement for affirmation acknowledgements does have burden attached to the requirement. Therefore, the Commission is including the requirement in this information collection to receive OMB approval for the requirement.

requirements set forth in the *Order* to the Interstate TRS Fund Administrator for reimbursement from the Interstate TRS Fund. The Commission estimates that annual, industry-wide burden will be **1,056 hours** per year, for an average annual "in-house" cost burden of **$51,163**.

Overall, the Commission expects that, as a result of the *Order*, there will be about:

1,520,000	routing information collections,
1,520,000	provisions of routing information to the TRS Numbering Directory,
612,000	Registered Location collections,
612,000	provisions to the ALI databases,
388,000	advisories, and
388,000	affirmative acknowledgements.
+ 132	Interstate TRS Fund submissions
5,040,132	responses over the next three years.

This amounts to an average of **1,680,044** responses per year.

***TOTAL NUMBER OF RESPONDENTS*. In sum, the Commission expects there to be 11 primary respondents — the VRS and IP Relay providers.**

***TOTAL NUMBER OF ANNUAL RESPONSES*. The Commission expects there to be a total of 5,040,132 responses over the next three years or an average of 1,680,044 responses per year.**

***TOTAL NUMBER OF ANNUAL BURDEN HOURS*.** The Commission expects the burden hours to be:

40,788	hours in 2008,
189,879	hours in 2009, and
65,181	hours in 2010.

We expect the cumulative burden hours to be:

98,616 hours per year

***TOTAL ANNUAL "IN-HOUSE" COST BURDEN*.** The Commission expects the total "in-house" cost burden to be:

$1,016,869 in 2008,
$4,329,352 in 2009, and
$2,016,946 in 2010.

We expect the cumulative cost to be:
$2,454,389 per year[17]

Attached as Appendix B is a set of charts detailing how the various burden estimates reported here were calculated.

13. The Commission expects that many of the initial costs of VRS and IP Relay providers — including the development of software systems needed to obtain, retain, and provision routing information; to obtain, retain, and provision Registered Location and other callback information; to notify users of the advisory; and to receive affirmative acknowledgements — will be covered by "in-house" work (burden hours), and those expenditures are included and amortized into the "in-house" cost burden as discussed above under question 12 since new staff will be hired to fulfill the requirements. The only capital expenditure not so covered is the annual equipment cost of gateway routers used to translate VRS and IP Relay calls into traditional analog formats for provisioning the ALI databases, which the Commission estimates will cost the industry **$2,100,000** per year.

The Commission also estimates that VRS and IP Relay providers will need to spend $28,600 per year for additional server space, memory, communications, and backup/recovery service associated with routing systems; $28,600 per year for additional server space, memory, communications, and backup/recovery service associated with registration systems; and $1,940,000 per year for dedicated lines between gateway routers and specialized routers associated with provisioning information to the ALI databases. The Commission also expects VRS and IP Relay providers to pay an average of $126,667 per year for access to the Wireline E911 Network for provisioning information to the ALI databases, and $479 per year to store any affirmative acknowledgments sent to providers in paper form. Thus, the Commission estimates that the total average, annualized costs for operations, maintenance, and purchase of services are **$2,124,346**.

***TOTAL ANNUAL COST BURDEN*. In sum, the Commission expects the total cost of complying with these requirements for the 11 VRS and IP Relay providers to be:**
$2,100,000 + 2,124,346 = $4,224,346 per year[18]

Attached as Appendix C is a set of charts detailing how the various burden estimates reported here were calculated.

[17] Because the Commission has authorized the TRS Interstate Fund to reimburse VRS and IP Relay providers for the actual reasonable costs of complying with most of the new requirements adopted in the *Order*, we expect much of the burden of these information collections will fall not on providers but on the Fund.

[18] Because the Commission has authorized the Interstate TRS Fund to reimburse VRS and IP Relay providers for the actual reasonable costs of complying with most of the new requirements adopted in the *Order*, we expect much of the burden of these information collections will fall not on providers but on the Fund.

14. None of the information collected will be directly reported to or reviewed by the Commission. To the extent that VRS and IP Relay providers can seek compensation from the Interstate TRS Fund for the reasonable, actual costs of complying with the *Order*, that funding will come not from the federal budget, but instead from contributions from carriers providing interstate telecommunications services.[19] Consequently, the annual cost to the federal government of these information collections should be negligible.

15. The Commission reevaluated its burden that was previously approved by OMB. This reevaluation was due to an increase in the number of VRS and IP Relay providers and a decrease in the estimated use of VRS and IP Relay amongst the deaf and hard-of-hearing community. Therefore, the reevaluation resulted in an adjustment of +14,356 to the annual burden hours.

    The Commission had program changes to the total annual burden hours and total annual cost burden due to the adoption of the information collection requirements contained in FCC 08-151. The program changes increased the total annual burden hours by +50,244 hours and the total annual cost burden by +$4,244,346.

16. The information collected will not be published for statistical use.

17. The information collection does not include any Commission forms; consequently, the Commission has no reason to seek approval to avoid displaying the expiration date for OMB approval of the information collection.

18. In the 60-day *Federal Register* Notice published on July 18, 2008 at 73 FR 41351, the Commission reported the total annual number of responses as 1,068,000, the total annual hourly burdens as 130,618, and the total annual costs as $4,224,000. The Commission corrects these numbers to read as: 1,680,044 responses; the total annual burden hours to read as: 98,616 hours; and the total annual costs to read as: $4,224,346. Also, quarterly reporting requirement was omitted from the 60 day Federal Register Notice. It is a reporting requirement that is included in this information collection. There are no other exceptions to the Certification Statement in Item 19.

B. Collections of Information Employing Statistical Methods

The information collections do not employ any statistical methods.

[19] *See* 47 C.F.R. § 64.604(c)(5)(iii).