

SUPPORTING STATEMENT

A. Justification:

1. *Circumstances that make collection necessary.* Under OMB Control Number 3060-0986, the Commission is revising the information collections that are used to determine the amount of, and eligibility for, high-cost universal service support received by incumbent and competitive eligible telecommunications carriers (ETCs). In addition, the Commission is incorporating additional information collections that are used to determine eligibility for exception from the interim, emergency cap on the amount of high-cost support that competitive eligible telecommunications carriers may receive from the universal service fund. See page 2 for the revisions now being proposed to this information collection.

During the review process in preparation for the program revision, it was determined that an error was made for calculations previously reported regarding section 12d, “Support in Competitive Study Areas”. We have made the appropriate adjustment for this section in the corresponding chart at the end of this Supporting Statement.

Finally, the Commission is also revising the collection to incorporate the reporting requirements of OMB 3060-0793 for the self-certification as a rural carrier requirement into this collection under OMB Control Number 3060-0986. The self-certification for rural carriers is rarely filed with the Commission; therefore, its incorporation into OMB 3060-0986 will ease the Commission’s administrative burden for complying with information collection requirements. Upon OMB approval of this revision, the Commission will voluntarily discontinue OMB Control Number 3060-0793 and retain this one for OMB’s inventory.

The Communications Act of 1934, as amended (the Act) requires the “preservation and advancement of universal service.” The information collections reported under this control number are the result of various Commission actions to promote the Act’s universal service goals, while minimizing waste, fraud, and abuse.

Background on 3060-0986:

The Commission created FCC Form 525 in 2005 to collect line count data required from competitive ETCs pursuant to this and other OMB Control Numbers, as well as line count data related to lines provided by competitive ETCs using unbundled network elements (UNEs). The UNE data are necessary for the Universal Service Administrative Company (USAC) to implement section 54.307 of the Commission’s rules.

FCC Form 525 has also been used as a way to reduce the burdens in several other collections by standardizing the information submission format.

As collections 3060-0972, -0774 and -0942 are renewed, the information provided in FCC Form 525 will be eliminated from the burden estimates for these collections.

On April 29, 2008, the Commission adopted the *Competitive ETC Interim Cap Order*. The order adopted an interim, emergency cap on the amount of high-cost support that competitive ETCs in each state are eligible to receive beginning March 2008 on an annualized basis. The Commission also adopted two limited exceptions from the application of the interim cap.

- (a) A competitive ETC will not be subject to the interim cap to the extent it files cost data demonstrating that its costs meet the support threshold in the same manner as the incumbent local exchange carrier (LEC).
- (b) The Commission also created a limited exception for competitive ETCs serving tribal lands or Alaska Native regions. A competitive ETC may voluntarily participate in this limited exception on a study area by study area basis. The uncapped per line support is limited to one payment per each residential account.

Background for 3060-0793:

In the *Tenth Report and Order*, the Commission adopted proposals that carriers serving study areas with fewer than 100,000 access lines that already have certified their rural status need not re-certify for purposes of receiving support beginning January 1, 2000 and need only file thereafter if their status changes. Further, carriers serving more than 100,000 access lines need to file rural certifications for their year 2001 status and thereafter only if their status has changed. Although the Commission originally required incumbent rural carriers to self-certify their rural status each year, the Commission subsequently recognized that the vast majority of carriers certifying as rural telephone companies serve fewer than 100,000 lines. Thus, the Commission eliminated the annual rural certification filing requirement for carriers with fewer than 100,000 lines. Incumbent rural carriers with more than 100,000 lines were required to file a one-time self-certification letter only if its status as a rural carrier changes. *See Federal-State Joint Board on Universal Service, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs*, CC Docket Nos. 96-45, 97-160, Tenth Report and Order, Tenth Report and Order, 14 FCC Rcd 20156, 20352-20354, paras. 443-449 (1999) (*Tenth Report and Order*).

This submission does not change the information collection requirements for self-certification as a rural carrier.

Revisions now being proposed to this information collection:

- (1) FCC 08-122, *Competitive ETC Interim Cap Order* requires competitive ETCs must report the number of lines that serve tribal lands or Alaska Native regions to receive high-cost support in order to be exempt from the operation of the interim cap on the amount of high-cost support and provide a supporting certification. As described below, most of the affected competitive ETCs will be able file the line count data on their existing FCC Form 525s, without any additional burden. Because a small number of carriers may need

to file additional FCC Form 525s, however, this revision increases the number of respondents for that information collection. Additionally, all competitive ETCs opting into this exception will need to file a certification in support of their line count filing, and this revision adds that information collection to this burden estimate. See item 12e for an explanation of the burden estimates.

- (2) No revision to this information collection is submitted at this time to address any information collection arising from the exception for competitive ETCs demonstrating their own high costs. A revision to collect that information will be submitted to OMB for approval at a later date and the two comments received from Nex-Tech and WCX will be addressed at that time.
- (3) Finally, this submission incorporates the reporting requirement for self-certification as a rural carrier from OMB Control Number 3060-0793 into this OMB Control Number (OMB Control Number 3060-0986). There are no changes to this part of this information collection. The current estimated respondent/response (1) and burden hours (1) has been transferred into this information collection. Upon OMB approval of this information collection revision, the Commission will voluntarily discontinue OMB Control Number 3060-0793 and retain OMB Control Number 3060-0986 as the active number in OMB's inventory.

Current Information Collection Requirements:

a. Election of Disaggregation Plan and Change in Path:

Incumbent rural carriers and other carriers receiving Interstate Common Line Support were required to elect one of three disaggregation paths through a submission to the state commission or, if appropriate, the Commission prior to May 15, 2002. These disaggregation paths permit a carrier to target its high-cost support to particular high-cost zones within its study area, which, in turn, permit competitive ETCs to receive support at the targeted level. Because the one-time election of disaggregation path has passed, the burdens associated with the one-time election have been removed from this control number. However, because a carrier may still change its election upon petition to, or by order of, the appropriate regulatory authority, this control number assumes that one carrier may be subject to the burden. See 47 CFR § 54.315(a).

b. Reporting Working Loops at Cost-Zone Level:

Rural carriers that disaggregate and target per-line support to zones within their study area are required to report loops at the cost-zone level, which is a modification of the general rule that carriers report loops at the study-area level. See 47 CFR §§ 54.307(b) and (c). This permits USAC to calculate the per-line support amount that will be provided to any competitive ETC serving the zone.

c. State Certification Letter under 254(e) of the Act:

The Commission requires that states file annual certifications with the Commission to ensure that carriers use universal service support “only for the provision, maintenance and upgrading of facilities and services for which the support is intended” consistent with section 254(e). Accordingly, the Commission requires states that wish to receive federal universal service high-cost support for carriers within their boundaries to file a certification with the Commission and USAC stating that all federal high-cost funds flowing to carriers in that state will be used in a manner consistent with section 254(e). Absent such certification, carriers will not receive such support. *See* 47 CFR §§ 54.313(b), 54.314.

The Commission recognizes that some state commissions may have only limited regulatory oversight to ensure that federal support is reflected in intrastate rates. States nonetheless may certify to the Commission that a non-rural carrier in the state has accounted to the state commission for its receipt of federal support and that such support will be used “only for the provision, maintenance and upgrading of facilities and services for which the support is intended.” Incumbent and competitive ETCs serving lines in the state may formulate plans to ensure compliance with section 254(e), and present those plans to the state, so that the state may make the appropriate certification to the Commission. Absent the filing of such certification, carriers will not receive support. *See* 47 CFR §§ 54.313(b), 54.314.

d. Support in Competitive Study Areas:

Rural carriers and competitive ETCs are required to file line count data on a regular quarterly basis upon competitive entry in rural carrier study areas. Requiring all carriers to file line counts on the same schedule ensures that only one carrier receives support for each line serviced. Further, quarterly filing decreases the interval between the provision of service and receipt of universal service support. In addition, it allows closer monitoring of the competitive entry impact, because it reveals any loss or gain of subscriber lines by competing carriers on a quarter-to-quarter basis. We emphasize that this requirement does not apply in rural carrier study areas in which a competitive ETC has not been designated. *See* 47 CFR §§ 36.611, 36.612, 54.307. Rural carriers acquiring exchanges shall separately provide the information listed in section 47 CFR 36.611 for both acquired and existing exchanges, as if these two categories of exchanges constitute separate study areas. *See* 47 CFR § 36.611.

FCC Form 525 simplifies the collection of line count data from competitive ETCs. That form also collects data required pursuant to other OMB control numbers, including 3060-0972, 3060-0774, and 3060-0942, as well as line count data related to lines provided by competitive ETCs using UNEs. The UNE data are necessary for USAC to implement section 54.307 of the Commission’s rules. FCC Form 525 reduces burdens in multiple collections by standardizing the information submission format.

Competitive ETCs seeking to take advantage of the tribal lands/Alaska Native region exception to the interim cap on support will need to file their line counts for covered and non-covered locations on separate forms. Most competitive ETCs already report their line counts in this manner and will not experience any additional burden due to this requirement.

Because a small number of competitive ETCs may need to file additional FCC Form 525s, however, this revision increases the number of respondents to this information request. The Commission will not amend FCC Form 525 to incorporate the information requests related to this limited exception to the interim cap on high-cost support. We also note that, in the recent 30-day notice, we included, as a separate burden, the need for this group of competitive ETCs to request a Study Area Code from USAC so that a separate FCC Form 525 could be filed. On further consideration, we have determined that this burden is already included in the burden estimate for filing an FCC Form 525, and that including it separately would be duplicative.

e. Competitive ETC Tribal Lands/Alaska Native Regions Exception:

The “tribal lands/Alaska Native regions” exception provides competitive ETCs with high-cost support irrespective of the interim cap on the amount of high-cost support adopted by the Commission on April 29, 2008 (FCC 08-122). A competitive ETC seeking to receive support pursuant to this exception must provide line data for each study area showing the number of lines serving in a tribal land or Alaska Native region (“covered location”) and certify that the line meet the requirements of exception. *See Competitive ETC Interim Cap Order*, 23 FCC Rcd at 8848-8849, para. 32-34. Any additional burdens associated with the filing of the line count data have been reflected in the increased number of respondents to FCC Form 525, described in section d., above. Additionally, each competitive ETC opting into this exception will be required to file, each time it files line count data, a certification that the lines reflected in a particular filing are within a covered location. This revision includes estimated burdens for complying with the certification.

f. Safety Net Additive:

The “safety net additive” provides additional support to carriers “who make significant investment in rural infrastructure.” Safety net additive support is available only in years in which support levels would otherwise exceed the indexed cap on the high-cost loop support fund. To receive such support in a particular study area, a carrier must show that growth in telecommunications plant in service (TPIS) per line is at least 14 percent greater than the study area’s TPIS per line in the prior year, or the “base year.” Any study area that initially qualifies for safety net additive support also qualifies for such support in each of the four succeeding years if the cap is again triggered, regardless of whether the study area meets the 14 percent criterion in the succeeding years.

Carriers must provide written notice to the Commission and USAC in conjunction with their annual or quarterly submissions to National Exchange Carrier Association (NECA) indicating that a study area meets the 14 percent TPIS trigger. If a carrier fails to provide written notification to the Commission and USAC, the study area that otherwise would have qualified for the safety net additive support will not be eligible. *See* 47 CFR § 36.605(c)(2).

g. Safety Valve:

The “safety valve” mechanism enables rural carriers acquiring access lines to receive additional support over a period of five years to reflect post-transaction investment made by the acquiring carrier. Once relevant regulatory approvals are obtained and the transaction is closed, the rural carrier must provide written notice to USAC that they have acquired access lines that may become eligible for safety valve support and identify when the index year for determining eligibility began. See 47 CFR § 54.305(f).

h. Procedures for Self-Certification as a Rural Carrier:

Because line counts can be verified easily with publicly available data, the Commission eliminated the annual rural certification filing requirement for carriers with fewer than 100,000 lines, and for incumbent rural carriers with more than 100,000 lines, after a one-time self-certification explaining how they qualify as rural. Subsequently, a carrier is required to file a rural certification letter only if its status as a rural carrier changes. See *Federal-State Joint Board on Universal Service, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs*, CC Docket Nos. 96-45, 97-160, Tenth Report and Order, 14 FCC Rcd at 20352-20354, paras. 443-449.

As noted on the OMB Form 83i, 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 sections 1-4, 201-205, 214, 218-220, 254, 303(r), 403, 405, and 410 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151-154, 201-205, 214, 218-220, 254, 303(r), 403, 405, and 410.

2. *Use of information.* The Commission will use the information requirements to determine whether and to what extent rural incumbent LECs and competitive ETCs providing the data are eligible to receive universal service support.
3. *Technological collection techniques.* In an effort to reduce any burden created by these information collection requirements, the Commission shall permit all respondents to file responses using automated, electronic, mechanical or other technological collection techniques where feasible.
4. *Efforts to identify duplication.* There will be no duplication of information. The information sought is unique to each carrier or respondent and similar information is not already available. The Commission is using already established reporting and recordkeeping requirements to satisfy certain statutory directives and eligibility criteria.
5. *Impact on small entities.* Section 254(b) directs the Commission to base policies for the preservation and advancement of universal service on six principles. A fair and reasonable application of those principles including our adoption of the additional principle of competitive neutrality will favorably impact all business entities, including smaller entities. The collection of information may affect small entities as well as large entities.

6. *Consequences if information is not collected.* The information collected is used to determine eligibility for and to calculate high-cost universal service support. Without the requested information, USAC will not be able to determine a carrier's eligibility or how much support it would receive. This may result in partial or complete denial of high-cost universal service support for the carrier.
7. *Special circumstances.* We do not foresee any special circumstances that would cause an information collection to be conducted under extraordinary circumstances.
8. *Federal Register notice; efforts to consult with persons outside the Commission.* The Commission placed a 60-day notice in the *Federal Register* pursuant to 5 CFR 1320.8(d). See 74 FR 3035. The Commission received comments from two parties (Nex-Tech and WCX, both addressing the "own-cost" data collection for competitive ETCs. We will address those comments when the Commission seeks OMB approval during the next revision of this information collection. A reference to the 60 day notice is included in the submission to the OMB.
9. *Payments or gifts to respondents.* The Commission does not anticipate providing any payment or gift to respondents.
10. *Assurances of confidentiality.* The Commission is not requesting that respondents submit confidential information to the Commission. We note that USAC must preserve the confidentiality of all data obtained from respondents and contributors to the universal service support program mechanism, must not use the data except for purposes of administering the universal service support program, and must not disclose data in company-specific form unless directed to do so by the Commission.
11. *Questions of a sensitive nature.* There are no questions of a sensitive nature with respect to the information collections described herein.
12. *Estimates of the hour burden of the collection to respondents.* The following represents the hour burden on the collections of information:

a. Election of Disaggregation Plan and Change in Path:

(1) Number of respondents: 1 rural carrier may file a notice.

(2) Frequency of response: On occasion reporting requirement and third party disclosure requirement.

Carriers are required to provide written notice to the state Commission that it wants to change to a different disaggregation and targeting methodology.

(3) Annual hour burden per respondent: 10 hours. Total annual hour burden is: 1 respondent x 10 hours = **10 hours.**

- (4) Total estimate of annualized cost to respondents for the hour burden: \$400. (10 hours x \$40/hr.).
- (5) Explanation of calculation. We estimate that each carrier will spend 10 hours drafting a notice to the state commission or appropriate regulatory authority that it wants to change to a different disaggregation and targeting methodology. To date no carrier has availed itself of the opportunity to change its disaggregation plan. 1 (number of respondents) x 10 (hours to prepare letter) x \$40/hr. (including administrative staff time and overhead) = \$400.

b. Reporting Working Loops at Cost-Zone Level:

- (1) Number of respondents: Approximately 260.

Only rural carriers or other incumbent carriers receiving Interstate Common Line Support that disaggregate their high-cost support must file.

- (2) Frequency of response: Annual and quarterly reporting requirements.

If there is no competition in the service area, the carrier is required to file annually. If competition exists in the service area the carrier is required to file quarterly. Each carrier must provide NECA with numbers of working loops at the cost-zone level. We estimate that there are approximately 250 carriers that will be filing on a quarterly basis and 10 on an annual basis.

- (3) Annual hour burden per respondent: 2 hours per respondent for 10 carriers that is filing on an annual basis. 8 hours per respondent for 250 carriers that is filing on a quarterly basis. Total annual hour burden is calculated as follows:
- a. 10 respondents x 1 report per respondent = 10 responses x 2 hours per report = 20 hours;
 - b. 250 respondents x 4 reports per respondent = 1,000 responses x 8 hours, = 8,000 total hours. Therefore, the total is: 20 hours + 8,000 hours = **8,020 total annual hours.**
- The hour burden is not expected to vary widely because of differences in activity, size, or complexity.

- (4) Total estimate of annualized cost to respondents for the hour burden: \$320,800. (8,020 hours x \$40/hr.).

- (5) Explanation of calculation: We estimate that time to comply with the requirement will be 8,020 hours x approximately \$40/hr. = \$320,800.

c. State Certification Letter Under 254(e):

- (1) Number of respondents: 60 respondents. (51 states, plus approximately 9 rural and non-rural carriers will have to file their own certification).

- (2) Frequency of response: Annual reporting requirement. Each state commission must file a letter with the Commission certifying that a carrier within the state had accounted for its receipt of federal support in its rates or otherwise used the support for the “provision, maintenance, and upgrading of facilities and services for which the support is intended” in accordance with section 254(e). Carriers that are not under a state regulatory authority will have to file with the Commission directly.
- (3) Annual hour burden per respondent: 3 hours. Total annual hour burden is: 3 hours x 60 respondents = **180 hours**.
- (4) Total estimate of annualized cost to respondents for the hour burden: \$7,200. (180 hours x \$40/hr.).
- (5) Explanation of calculation. We estimate that each state commission will spend 3 hours drafting a letter to the Commission to certify that a carrier within the state had accounted for its receipt of federal support. 60 (number of respondents) x 3 (hours to prepare certification letter) x \$40/hr.(including administrative staff time and overhead) = \$7,200.

d. Support in Competitive Study Areas: (FCC Form 525):

- (1) Number of respondents: Approximately 1,033 rural carriers and competitive ETCs will have to submit line count data quarterly once a competitive ETC enters the rural incumbent LEC’s service area.
- (2) Frequency of response: Quarterly reporting requirement. Each carrier must file line count data with USAC upon competitive entry in rural carrier study areas.
- (3) Annual hour burden per respondent: 6 hours. Total annual hour burden is: 1,033 respondents x 6 hours x 4 reports per respondent = **24,792 hours**.
- (4) Total estimate of annualized cost to respondents for the hour burden: \$991,680. (24,792 hours x \$40/hr.).
- (5) Explanation of calculation: We estimate that 1,033 rural carriers and competitive ETCs will submit line count data quarterly once a competitive ETC enters the rural incumbent LEC’s service area, taking an average of 6 hours to complete. We assume that respondents will use some combination of staff and in house attorney services (blended rate of \$40/hr.) when preparing the worksheet. Thus, 24,792 hours x 40 = \$991,680.

e. Competitive ETC Tribal Land/Alaska Native Region Exception:

- (1) Number of respondents: Approximately 25 competitive ETCs serving tribal lands or Alaska Native regions may certify the number of lines on a study area basis that meet the limited exception. The competitive ETC must provide a description of how it meets the certification threshold.

- (2) Frequency of response: Quarterly reporting requirement. Each competitive ETC may file a certification with USAC in order to be eligible for the exception to the emergency interim cap on high-cost support. Each competitive ETC must also provide a description of how it meets the certification threshold.
- (3) Annual hour burden per respondent: .5 hours. Total annual hour burden is: (25 respondents x .5 hours x 4 reports per respondent = **50 hours (program change)**).
- (4) Total estimate of annualized cost to respondents for the hour burden: \$2,000. (50 hours x \$40/hr.).
- (5) Explanation of calculation: We estimate that 25 competitive ETCs serving tribal lands or Alaska Native regions may submit certifications and supporting descriptions of how they meet the certification threshold annually, taking an average of .5 hours to complete. We assume that respondents will use some combination of staff and in house attorney services (blended rate of \$40/hr.) when preparing the worksheet. Thus, .5 hours x \$40 = \$2,000.

f. Safety Net Additive:

- (1) Number of respondents: 514 rural carriers will have to file a notice.
- (2) Frequency of response: On occasion reporting requirement and third party disclosure requirement. Carriers shall be required to provide written notice to the Commission and USAC in conjunction with their annual or quarterly submissions to NECA indicating that a study area meets the 14 percent TPIS trigger.
- (3) Annual hour burden per respondent: .5 hours. Total annual hour burden is: 514 respondents x .5 hours = **257 hours**.
- (4) Total estimate of annualized cost to respondents for the hour burden: \$10,280. (257 hours x \$40/hr.).
- (5) Explanation of calculation: We estimate that each carrier will spend .5 hour drafting a notice to the Commission and USAC indicating that a study area meets the 14 percent TPIS trigger. 514 (number of respondents) x .5 (hours to prepare certification letter) x \$40/hr. (including administrative staff time and overhead) = \$10,280.

g. Safety Valve:

- (1) Number of respondents: 25 rural carriers will have to file a notice.
- (2) Frequency of response: On occasion reporting requirement and third party disclosure requirement. Rural carriers shall provide written notice to USAC when their index year has been established for purposes of calculating eligibility for safety valve support.

- (3) Annual hour burden per respondent: .5 hours. Total annual hour burden is: 25 respondents x .5 hours = 12.5 hours (rounded to **13 hours**).
- (4) Total estimate of annualized cost to respondents for the hour burden: \$500. (12.5 hours x \$40/hr.).
- (5) Explanation of calculation: We estimate that each carrier will spend .5 hour drafting a notice to USAC indicating when their index year has been established for purposes of calculating eligibility for safety valve support. 25 (number of respondents) x .5 (hours to prepare certification letter) x \$40/hr. (including administrative staff time and overhead) = \$500.

h. Procedures for Self-Certification as a Rural Carrier Whose Status Has Changed (formerly OMB Control Number 3060-0793):

- (1) Number of respondents: 1 rural carrier may file a self-certification letter.
- (2) Frequency of response: An occasional reporting requirement if a rural carrier's status has changed since its last filing.
- (3) Annual hour burden per respondent: 1 hour. Total annual hour burden is: 1 respondent x 1 hour = **1 hour**.
- (4) Total estimate of annualized cost to respondents for the hour burden: \$40.
- (5) Explanation of calculation: We estimate that a rural carrier whose status changes will spend 1 hour certifying that it is a rural telephone company. 1 (number of respondents) x 1 (hour to prepare certification) x \$40 per hour (including administrative staff time and overhead) = \$40.

Note: The following change was made to:

Item 12b, "Reporting Loops at Cost-Zone Level", the previous submission incorrectly calculated the number of responses, since this is quarterly reporting requirement, the 250 respondents would each file four responses per year, for a total of 8,000 responses. The Commission also reports that 10 respondents would each file 1 response per year x 2 hours per response, for a total of 10 responses and 20 burden hours. This results for a total of 8,020 total annual hours. The previous submission incorrectly calculated this number as 2,020 hours.

The annual cost estimates increased because the previous submission did not factor the four responses per year for the quarterly filing requirement, for a total of \$320,800 for in-house and overhead costs. \$80,800 was previous estimated. See the chart on the next page.

For item 12d, “Support in Competitive Study Areas”, the previous submission incorrectly calculated the number of responses, total burden hours, and in-house office and overhead costs. Since this is a quarterly filing, the 1,013 respondents would each file four responses per year, for a total of 4,132 responses. Each response should take an estimated 6 hours to complete for a total of 24,792 hours. The previous submission incorrectly calculated this number as 138 hours. See the chart below.

Additionally, this revision (item 12e) estimates approximately 25 respondents as result of the tribal lands/Alaska Native regions exception to the interim cap on high-cost support. Therefore, the total costs for respondents to complete this information collection should be \$991,680, instead of the previously reported \$8,079.50. See the chart below.

Finally, this revision also incorporates item 12h from OMB Control Number 3060-0793. The estimated respondents and responses and burden hours are minimal and remain unchanged. See below.

Information Collection Requirements	Number of Respondents	Number of Responses	Estimated Time per Response (hours)	Total Burden Hours	In-house Office and Overhead Costs
a. Election of Disaggregation Plan and Change in Path (47 C.F.R. § 54.315(a))	1	1	10	10	\$400.00
b. Reporting Working Loops at Cost-Zone Level (47 C.F.R. §§ 54.307(b) and 54.307(c))	10	10	2	20	
		250 x 4 =			
	250	1,000	8	8,000	\$320,800.00
c. State Certification Letter under Section 254(e) of the Communications Act (47 C.F.R. §§ 54.313(b) and 54.314)	60	60	3	180	\$7,200.00
d. Support in Competitive Study Areas – FCC Form 525 (47 C.F.R. § 36.311, 36.312, and 54.307)	1,033	1,033 x 4 = 4,132	6	24,792	\$991,680.00
e. Competitive ETC Tribal Lands/Alaska Native Regions Exception (<i>See Competitive ETC Interim Cap Order</i> , 23 FCC Rcd at 8848-8849, para. 32-34.) new SAC	25	25 x 4 = 100	0.5	50	\$2,000.00
f. Safety Net Additive (47 C.F.R. § 36.605(c)(2))	514	514	0.5	257	\$10,280.00
g. Safety Valve (47 C.F.R. § 54.305(f))	25	25	0.5	13	\$500.00
h. Procedures for Self-Certification as a Rural Carrier Whose Status Has Changed (<i>See Tenth Report and Order</i> , 14 FCC Rcd at 20352-20354, paras. 443-449)	1	1	1	1	\$40.00
TOTALS	1,919	5,843	.5 – 10	33,323	\$1,332,900.00

Total Number of Respondents: 1,919.

Total Number of Responses Annually: 5,843.

Total Annual Hourly Burden for requirements (a) – (i): 33,323 hours

Total Annual “In House” Costs: \$1,332,900.

13. *Estimates for the cost burden of the collection to respondents.* There are no outside contracting costs for this information collection. See the last column in the chart in item 12 above for the estimated in-house costs.
14. *Estimates of the cost burden to the Commission.* There will be few, if any, costs to the Commission because notice and enforcement requirements are already part of Commission duties. Moreover, there will be minimal cost to the federal government since an outside party will administer this program.
15. *Program changes or adjustments.* The Commission is consolidating 3060-0986 and 3060-0973 to aid in the reduction of Commission information collections. The Commission is incorporating additional information collections used to determine eligibility for an exception from the interim, emergency cap on the amount of high-cost support that competitive eligible telecommunications carriers may receive from the universal service fund. Finally, we are correcting errors in calculation regarding items 12b and d. Therefore, the estimates that the total annual burden hours for all collections under this OMB control number have been adjusted to **+24,733 hours; the additional requirement in item 12e is a +50 hour program change resulting in a difference of +24,783 hours;** and the total in-house costs have been adjusted to \$1,332,900. **Finally, the annual costs were adjusted to factor four reporting responses a year for the quarterly requirements which increased the total estimated annual costs.**
16. *Collections of information whose results will be published.* Non-proprietary information will likely be made publicly available although the Commission does not have specific plans for doing so at this time.
17. *Display of expiration date for OMB approval of information collection.* The Commission seeks approval to continue to not display the OMB expiration date for OMB approval on the FCC Form 525. The Commission will use an edition date in lieu of an OMB expiration date. This is necessary so that when the OMB expiration date changes, the Commission does not have to update electronic versions or destroy paper stocks. Finally, the Commission publishes a list of all OMB-approved information collections, including this one, in 47 CFR 0.408 of the Commission’s rules.
18. *Exceptions to certification statement for Paperwork Reduction Act submissions (Item 19 of OMB Form 83-I).* There are exceptions to the 60 and 30 day notices that were published in the Federal Register. Both notices contained inaccurate estimates because the Commission decided to submit this information collection as revision discussed in item 12e rather than a simple extension.

B. Collections of Information Employing Statistical Methods:

The Commission does not anticipate that the collection of information will employ statistical methods.