

SUPPORTING STATEMENT

A. Justification:

The Federal Communications Commission (FCC) seeks to promote efficiency in the Commission's service to the public and to encourage the use of private sector organizations to take over government operations whenever possible.

1. The Communications Act requires the Commission to inspect the radio installation of large cargo ships and certain passenger ships at least once a year to ensure that the radio installation is in compliance with the requirements of the Communications Act.

Additionally, the Communications Act requires the inspection of small passenger ships at least once every five years.

The Safety Convention (to which the United States is a signatory) also requires an annual inspection.

However, the Safety Convention permits an Administrator to entrust the inspections to either surveyors nominated for the purpose or to organizations recognized by it. Therefore, the United States can have other parties conduct the radio inspection of vessels for compliance with the Safety Convention.

The Commission allows FCC-licensed technicians to conduct these inspections. FCC-licensed technicians certify that the ship passed an inspection and issue a safety certificate. These safety certificates (FCC Forms 806, 824, 827 and 829) indicate that the vessel complies with the Communications Act and the Safety Convention. These technicians are required to provide a summary of the results of the inspection in the ship's log. In addition, the vessel's owner, operator, or ship's master must certify in the ship's log that the inspection was satisfactory.

Inspection certificates issued in accordance with the Safety Convention must be posted in a prominent and accessible place on the ship.

Legal authority for this collection of information is contained in Sections 154(i), 303(r), 361, 362 and 385 of the Communications Act of 1934, as amended, and the Safety Convention Chapter I., Regulations 6(a).

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. The purpose of the information is to ensure that the inspection was successful so that passengers and crewmembers of certain United States ships have access to distress communications in an emergency.
3. This collection cannot be done electronically. There is no consideration to use information technology for this collection of information. Copies of the FCC forms are available on the FCC website for printing at: <http://www.fcc.gov/formpage.html>.

Ship Inspections, FCC Forms 806, 824, 827, and 829

4. This is a unique collection, and there is no duplication.
5. In compliance with the Paperwork Reduction Act of 1995, FCC is making the effort to minimize the burden on all respondents, regardless of size. This collection has no impact on small businesses or other small entities.
6. If these inspections were not conducted, it would adversely affect the safety of crews and passengers on certain United States vessels and be in violation of the Communications Act and the Safety Convention.
7. This collection of information is consistent with the guidelines contained in 5 C.F.R. Section 1320.5(d)(2).
8. The Commission published a notice in the *Federal Register* initiating a 60-day comment period on December 8, 2008 (73 FR 74493). The Commission received no comments following publication of this notice.
9. No gifts or payments will be given to respondent for this collection.
10. There is no need for confidentiality. Respondents may, however, request confidential treatment for information that they believe to be confidential under 47 C.F.R. Section 0.459 of the Commission's rules.
11. This collection does not address any private matters of a sensitive nature.
12. The Commission estimates that there are 3,770 ships requiring mandatory ship radio inspections.

Of the 3,770 ships, approximately 570 require annual inspections.

The remaining 3,200 ships require mandatory ship radio inspections once every 5 years. (approximately 640 annually).

This results in a total number of 1,210 respondents required to complete ship inspection forms annually.

Total Number of Respondents: 1,210

1,210 respondents x 1 ship inspection = 1,210 responses (reporting requirement)

1,210 respondents x 1 ship inspection certificate = 1,210 responses (3rd party disclosure)

1,210 respondents x 1 ship log entry = 1,210 responses (recordkeeping)

Total Number of Responses Annually: 1,210 + 1,210 + 1,210 = 3,630 responses

Each ship inspection certificate will take approximately 0.084 hours (5 minutes) to complete.

The actual inspection will take approximately 4 hours to complete.

Ship Inspections, FCC Forms 806, 824, 827, and 829

Providing a summary in the ship's log will take approximately 0.25 hours (15 minutes) to complete.

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

1,210 respondents x 0.084 hours/annual ship inspection certificate = 102 hours (3rd party disclosure)

1,210 respondents x 4.0 hours/actual inspection = 4,840 hours (reporting requirement)

1,210 respondents x 0.25 hours/ship's log summary = 303 hours (recordkeeping)

Total Annual Hour Burden: 102 hours + 4,840 hours + 303 hours = **5,245 hours**

13. There is no cost burden to the respondents resulting from the collection of information.

Total Annual Costs: \$0.00

14. Cost to the Federal Government: These ship inspections are conducted by private sector technicians licensed by the FCC. There is no cost to the federal government.
15. The Commission has revised its estimate of the total number of responses annually—from 1,210 to 3,630 responses, to comply with the ROCIS calculation matrix requirements (adjustment).

The total number of respondents and the total annual hourly burden both remain the same as per the previous submission.

There are no program changes.

16. The data will not be published.
17. An extension of the waiver not to publish the expiration date on the forms is requested. The Commission will use an edition date in lieu of the OMB expiration date. This will obviate the need for the Commission to destroy existing stock of forms upon the expiration of the clearance. OMB approval of the expiration date of the information collection will be displayed at 47 C.F.R. Section 0.408.
18. As noted above, the Commission has revised the total number of responses annually from 1,210 to 3,630 responses to comply with the ROCIS calculation matrix requirements.

The recordkeeping requirement was omitted from the 60 day Federal Register Notice; there are no other exceptions to the information that the Commission published in the 60 day Federal Register Notice.

B. Collections of Information Employing Statistical Methods:

This information collection does not employ any statistical methods.