

SUPPORTING STATEMENT

A. Justification:

1. Applicants/licensees/permittees are required to file FCC Form 347 when applying for a Low Power Television, TV Translator or TV Booster Station License.

On October 22, 1998, the Commission adopted a *Report and Order* in MM Docket No. 98-43, *1998 Biennial Regulatory Review - Streamlining of Mass Media Applications, Rules, and Processes*, and No. 94-149, *Policies and Rules Regarding Minority and Female Ownership of Mass Media Facilities*. Among other things, this *Report and Order* substantially revised the FCC Form 347 to facilitate electronic filing by replacing narrative exhibits with the use of certifications and an engineering technical box. The Commission also deleted and narrowed overly burdensome questions. FCC Form 347 has been supplemented with detailed instructions to explain processing standards and rule interpretations to help ensure that applicants certify accurately. These changes will streamline the Commission's processing of FCC Form 347 applications. The Commission has also adopted a formal program of pre- and post-application grant random audits to preserve the integrity of the streamlined application process.

The Commission is requesting an extension of this information collection in order to receive the full three year OMB approval/clearance.

Statutory authority for this collection of information is contained in Sections 154(i), 307, 308 and 309 of the Communications Act of 1934, as amended.

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

2. The FCC staff use the data from FCC Form 347 to confirm that the station has been built to terms specified in the outstanding construction permit. Data from FCC Form 347 is also extracted for inclusion in the subsequent license to operate the station.

3. The Commission requires applicants to file FCC Form 347 electronically.

4. No other agency imposes a similar information collection on the respondents. There are 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. Therefore, this information collection will not have a significant economic impact on a number of small entities/businesses.

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**Application for a Low Power TV, TV Translator or TV Booster Station License,
FCC Form 347**

6. The frequency for this collection of information is determined by the respondent, as necessary.
7. This collection of information is consistent with the guidelines in 5 CFR 1320.5(d)(2).
8. The Commission published a Notice (73 FR 75433) in the *Federal Register* on December 11, 2008. No comments were generated as a result of this Notice.
9. No payment or gift was provided to the respondents.
10. There is no need for confidentiality with collection of information.
11. This collection of information does not address any private matters of a sensitive nature.
12. We estimate that 300 applications will be filed and processed. The total average burden for this form is 1.5 hours per request. This estimate is based on FCC staff's knowledge and familiarity with the availability of the data required.

Total Number of Annual Respondents: 300 Licensees/Permittees

Total Number of Annual Responses: 300 FCC Form 347 Applications

Total Annual Burden Hours:

300 FCC Form 347 Applications x 1.5 hours/application = **450 hours**

Annual "In-house Cost": We assume that 50% of the estimated applications received will be completed by the respondent. The remaining 50% will be completed by an engineer at the station. The respondent is estimated to have an average salary of \$100,000/year (\$48.08/hour). A station engineer is estimated to have an average salary of (\$65,967) \$31.61/hour.

150 FCC Form 347 Applications (50% of the total applications) x 1.5 hrs x \$48.08/hr = \$10,818.00

150 FCC Form 347 Applications (50% of the total applications) x 1.5 hrs x \$31.61/hr = \$ 7,112.25

TOTAL ANNUAL "IN-HOUSE COST" = \$17,930.25

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13. Annual Cost Burden: An application fee must be submitted with filing of the application (\$120/application).

(a) Total annualized capital/startup costs: **None**

(b) Total annual costs (O&M): **\$36,000**

300 FCC Form 347 Applications x \$120 filing fee/application = \$36,000

(c) Total annualized cost requested: **\$36,000**

14. Cost to the Federal Government: The Commission will use professionals at the GS-13, Step 5 (\$45.05/hr.) and clerical personnel at the GS-7, Step 5 (\$21.36/hr.) to process the FCC Form 347 applications.

Professional Staff: 2 hours x \$45.05 x 300 applications = \$27,030.00

Clerical Staff: 1 hour x \$21.36 x 300 applications = \$ 6,408.00

\$33,438.00

30% Overhead Costs = \$10,031.40

Total Cost to the Federal Government: \$43,469.40

15. There are no program changes or adjustments to this information collection.

16. The data will not be published.

17. An extension of the waiver not to publish the expiration date on the form is requested. This will prevent the Commission from needing to update electronic files upon the expiration of the clearance.

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

B. Collections of Information Employing Statistical Methods:

No statistical methods are employed.