

SUPPORTING STATEMENT

A. Justification:

1. 47 CFR Section 73.61 requires that each AM station using directional antennas make field strength measurements¹ as often as necessary to ensure proper directional antenna system operation. Stations not having approved sampling systems make field strength measurements every three months. Stations with approved sampling systems must make field strength measurements as often as necessary. Also, all AM stations using directional antennas must make partial proofs of performance² as often as necessary. All of these requirements require AM stations to keep records of the test results in their station files. The FCC when making field inspections and investigations require the results of the strength measurements or proofs of performance to be in the station's files/records/logs.

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

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.

Statutory authority for this collection of information is contained in Sections 154(i) and 303 of the Communications Act of 1934, as amended.

2. The data is used by FCC staff in field inspections/investigations and by AM licensees with directional antennas to ensure that adequate interference protection is maintained between stations and to ensure proper operation of antennas.

3. We do not believe the use of information technology is feasible in this situation.

4. No other agency imposes a similar information collection on the respondents. There is 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.

¹ Field strength measurement is the effective value of the electric field intensity in microvolt or milivolts per meter produced at a point by radio waves from a particular station.

² Directional antennas full proofs of performance are field strength measurements used to determine whether the radiation pattern of an AM station is in compliance with the stations' authorization. Partial proofs, which require fewer measurements, are occasionally necessary to show that an array continues to operate properly.

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- 6. If this collection of information were conducted less frequently, licensees would not be able to assure that their antennas were operating properly or to maintain adequate interference protection between stations.
- 7. This collection of information is consistent with 5 CFR 1320.5(d)(2).
- 8. The Commission published a Notice (73 FR 75434) 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.
- 11. This collection of information does not address any private matters of a sensitive nature.
- 12. We estimate that there are 250 AM stations using directional antennas without approved sampling systems. These 250 licensees will make field strength measurements quarterly that require an average recordkeeping burden on licensees of 4 hours per station each quarter. We also estimate that there are 1,640 AM stations using directional antennas with approved sampling systems. These 1,640 licensees will make field strengths measurements semi-annually which require an average recordkeeping burden of 4 hours twice per year for each station. We also estimate that there are 1,890 AM stations with directional antennas. Twenty percent of these licensees will make partial proofs of performance annually which will require them to keep records of the results with an average recordkeeping burden of 50 hours each station.

Total Number of Annual Respondents:

250 AM Stations (without approved sampling systems)
 1,640 AM Stations (with approved sampling systems)
378 AM Stations (20% of 1,890 AM stations with directional antennas)
2,268 AM Stations

Total Number of Annual Responses: 2,268 Records Kept (responses)

Annual Burden Hours:

250 AM Stations x 4 hours recordkeeping/station x 4 times/year = 4,000 hours
 1,640 AM Stations x 4 hours recordkeeping/station x 2 times/year = 13,120 hours
 378 AM Stations x 50 hours recordkeeping/station x 1 time/year = 18,900 hours
TOTAL BURDEN = 36,020 hours

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This estimate is based on FCC staff's knowledge and familiarity with the availability of the data required.

Annual "In-House" Cost to Respondents: We assume that the licensee would use a station engineer/chief operator employed at the station to make field strength measurements, and maintain the records/files/logs of the results of the strength measurements/proofs of performance. This station engineer/chief operator is estimated to have an average salary of \$79,394 (\$38.17/hour).

250 AM Stations x 4 hours recordkeeping/station x 4 times/year x \$38.17/hour	=	\$152,680
1,640 AM Stations x 4 hours recordkeeping/station x 2 times/year x \$38.17/hour	=	\$500,790
378 AM Stations x 50 hours recordkeeping/station x 1 time/year x \$38.17/hour	=	<u>\$721,413</u>
		TOTAL ANNUAL "IN HOUSE" COST: \$1,374,883

13. **Annual Cost Burden:**

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

(b) **Total annual costs (O&M): None**

(c) **Total annualized cost requested: None**

14. There is no cost to the Federal Government.

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

16. The data will not be published.

17. OMB approval of the expiration date of the information collection will be displayed at 47 C.F.R. Section 0.408.

18. The Commission published a Notice (73 FR 75434) in the *Federal Register* on December 11, 2008 seeking public comment on the information collection requirements contained in this supporting statement. In the Notice the Commission stated the estimated time per response as 1-4 hours. We correct that time to read "4 – 50 hours." There are no other exceptions to Certification Statement.

B. Collections of Information Employing Statistical Methods

No statistical methods are employed.