

SUPPORTING STATEMENT

A. Justification:

The Commission is submitting this information collection as an extension to OMB (no change in requirements) in order to obtain the full three year clearance.

1. The requirements contained in Part 17 are necessary to implement a uniform registration process for owners of antenna structures. The following are the information collection requirements:

- Antenna structure owners are required to provide tenant licensees with a copy of the antenna registration;
- Display the registration number on or around the antenna structure;
- Notification of improper functioning of antenna structure lights;
- Recording of improper functioning of antenna structure lights.

Statutory authority for this collection of information is contained in Secs. 4, 303, 48 Stat. 1066, 1082, as amended; 47 U.S.C. 154, 303; 47 U.S.C. 301, 309.

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 information is used by the Commission during investigations related to air safety or radio frequency interference. A registration number is issued to identify antenna structure owners in order to enforce Congressionally mandated provisions related to the owners.

3. A petition for rulemaking has been filed with the Commission that seeks, among other things, to eliminate the current requirement in 47 C.F.R. Sections 17.4(e)-(f) and 17.6(c) that antenna structure owners provide tenants with a paper copy of Form 854R (the antenna structure registration). This matter is currently pending before the Commission.

4. This agency does not impose 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, regardless of size. The Commission has limited the information requirements to those absolutely necessary for evaluating and processing each application and to deter against possible abuses of the processes.

6. The information is collected only when an antenna owner requests to construct an antenna structure. Less frequent submissions are not possible.
7. Current data collection is consistent with 5 CFR 1320.6.
8. The Commission initiated a 60-day public comment period which appeared in the Federal Register on November 20, 2008 (73 FR 70346). No comments were received as a result of the notice.
9. Respondents will not receive any payments.
10. There is no need for confidentiality.
11. There are no requests of a sensitive nature considered or those considered a private matter being sought from the applicants on this collection.
12. We estimate that each owner would be required to make approximately 12 copies of the antenna registration and provide it to tenant licensees on his tower. It is estimated that a secretary would spend six minutes per copy to complete this task or 1.2 hours for each structure.

(a) Burden for disclosure: $25,600 \times .1 \times 12 = \mathbf{30,720 \text{ hours}}$

It is estimated that the posting of the sign will take twelve minutes for the new registrant.

Burden for posting: $25,600 \times .2 = \mathbf{5,120 \text{ hours}}$

(b) It is estimated that there are 14,965 notifications of malfunctioning lights per year and that existing tower owners will spend .05 hour (3 minutes) reporting the malfunctions to the Federal Aviation Administration.

Burden for notifying: $14,965 \times .05 = \mathbf{748 \text{ hours}}$

It is estimated that there are 14,965 notifications of malfunctioning lights per year and that existing tower owners will spend .25 hour (15 minutes) reporting the malfunctions in their station records.

Burden for recordkeeping: $14,965 \times .25 = \mathbf{3,741 \text{ hours}}$.

TOTAL ANNUAL RESPONSES: 25,600 + 14,965 = 40,565.

TOTAL ANNUAL BURDEN HOURS: 40,329 hours.

13. Estimated annual cost to respondents:

<u>Third Party Disclosure:</u>		<u>Notifying lighting malfunction</u>
\$21.36 per hour (secretary)	\$	21.36 per hour (secretary)
X 1.2 hour preparation		X .05 hour to call
X2,000 registrations per year		X14,965 reports per year
+ 10% overhead		+ 10% overhead
<u>\$56,390</u>		<u>\$ 17,581</u>

<u>Reporting lighting malfunction</u>	
\$ 21.36	per hour (secretary)
X .25	hour preparation
X14,965	registrations per year
+ 10%	overhead
<u>\$ 87,904</u>	

Total:
\$161,875

13a. Capital, operational or maintenance costs to respondent.

<u>Posting of Sign:</u>	
\$125	cost of sign
<u>x25,600</u>	antenna tower structures
\$3,200,000	

14. There are no costs to the Federal Government because: (1) the third-party disclosure is between the antenna structure owner and tenant licensees; (2) posting the registration number near the antenna structure is done by the antenna structure owner and involves no federal cost; (3) notification of lighting outages to the FAA is done by the antenna structure owner and results in FAA, not FCC, action; and (4) reporting lighting outages in the antenna structure owner's records in and of itself requires no federal action.

15. No adjustment or program change was made.

16. The data will not be published for statistical use.

17. We do not seek approval to not display the expiration date for OMB approval of the information collection.

18. There were no exceptions to Item 19.

B. Collections of Information Employing Statistical Methods:

No statistical methods are employed.