

SUPPORTING STATEMENT

1. The Federal Communications Commission (“Commission”) is requesting that the Office of Management and Budget (“OMB”) approve a three-year extension of the delegated authority information collection titled, “Surrenders of Authorizations for International Carrier, Space Station and Earth Station Licensees.” A surrender of authorization is the licensee’s voluntary cancellation of a license (or authorization) to provide international telecommunications services, such as discontinuing the operation of a space station.

This information collection was initiated as a result of the Commission’s release of a Public Notice (DA 06-569) on March 15, 2006 titled, “International Bureau Announces New and Improved Filing Modules Within Its MyIBFS Electronic Filing System: Surrender of Authorization and Improved Space Station Milestone Filing.” The Public Notice announced the International Bureau’s launching of an electronic (“e-filing”) module for surrendering authorizations and an improved milestone filing module for satellite space stations within its MyIBFS consolidated licensing and electronic filing system. (Note: The OMB approved the electronic filing of milestones under OMB Control No. 3060-1007).

Before MyIBFS was modified to include the e-filing module, licensees notified the Commission of surrenders of authorizations by letter. This was a time-consuming process for Commission staff because numerous surrenders of authorization may be included in one letter and, therefore, required careful review by the staff to ensure that all surrenders of authorizations were announced to the public via Public Notice. Furthermore, the Commission has experienced periodic disruptions of regular mail delivery due to the threat of contamination. These disruptions caused delays up to fourteen days in the processing of applicants’ mailed filings. E-filing eliminates the problems associated with the Commission’s delayed receipt of surrenders of authorizations by mail.

E-filing has numerous benefits for licensees, Commission staff and the general public. For instance, the e-filing module allows licensees to make filings more rapidly and efficiently than the paper filing option. E-filing eliminates the delays associated with manual processing for Commission staff. The information is available immediately to Commission staff and members of the public without the need for staff to scan or otherwise convert paper filings into computerized form. Furthermore, e-filing through MyIBFS makes applications almost immediately available to interested parties and the general public over the Internet. The availability of this information 24 hours a day and 7 days a week is important to keep the public informed of the discontinuance of international telecommunications services.

There are no specific Commission rules pertaining to surrenders of authorizations because it is voluntary on the part of the licensee. However, the Commission established

policies for processing surrenders of authorizations electronically as stated in the Public Notice (DA 06-569). Additionally, 47 CFR 1.1006 pertains to electronic filing of applications in the International Bureau Filing System (IBFS), 47 CFR 25.110 addresses electronic filing of applications that fall under Part 25 of the Commission's rules, and 47 CFR 63.20 and 47 CFR 63.53 address electronic filing of Section 214-related applications.

The statutory authority for this information collection is contained in 47 U.S.C. Sections 154(i), 157(a), 161, 303(c), 303(f), 303(g) and 303(r).

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

2. Licensees file surrenders of authorizations with the Commission on a voluntary basis. This information is used by Commission staff to issue Public Notices to announce the surrenders of authorization to the general public. The Commission's release of Public Notices is critical to keeping the general public abreast of the licensees' discontinuance of telecommunications services.

3. This Supporting Statement reflects that a total of 90 percent of all licensees file documents with the Commission electronically in the MyIBFS electronic filing system. In December 2006, the Commission received approval for mandatory electronic filing of surrenders of authorizations for both Part 25 and non-Part 25 applicants under OMB Control No. 3060-1095. Mandatory electronic filing was approved for Part 25 applicants under OMB Control No. 3060-0678 in 2005. However, a Public Notice has not yet been published by the Commission to announce the mandatory filing for non-Part 25 applicants. Therefore, this Supporting Statement reflects that 10 percent of applicants file surrenders of authorizations in paper form which includes 5 percent of non-Part 25 licensees who file surrenders of authorizations in paper form and 5 percent of applicants who submit confidential documents to the Commission by mail.

4. The agency does not impose similar information collection requirements on the respondents.

5. In conformance with the PRA, the Commission is making an effort to minimize the burden on all respondents, regardless of size. The Commission has limited the information collection requirements to those that are absolutely necessary for evaluating and processing surrenders of authorizations. This information collection does not have a substantial impact on small entities.

6. Without this collection of information, licensees would be required to submit surrenders of authorizations to the Commission by letter which is more time consuming than submitting such requests to the Commission electronically. In addition, Commission staff would spend an extensive amount of time processing surrenders of authorizations received by letter. The collection of information saves time for both licensees and Commission staff since they are received in MyIBFS electronically and

include only the information that is essential to process the requests in a timely manner. Furthermore, the e-filing module expedites the Commission staff’s announcement of surrenders of authorizations via Public Notice.

7. The information collection does not propose any new or amended information collection requirements that are not consistent with the general information collection guidelines in 5 CFR § 1320.

8. On November 3, 2008, the Commission published a 60-day notice in the Federal Register (FR cite: 73 FR 65310) to solicit comments from the public. The comment period ended on January 2, 2009. No comments were received from the public.

9. The respondents will not receive any payments or gifts.

10. There is no need for confidentiality with this information collection.

11. This information collection does not address any matters of a private or sensitive nature.

12. Total Estimate of Annual Respondents and Annual Burden Hours:

Please see the charts below for the number of responses, frequency of response, estimated time per response and total annual burden hours for the 306 respondents to this information collection.

Explanation of Burden Estimate	Number of Responses	Frequency of Response	Time Per Response	Total Annual Burden Hours
Space station surrenders of authorization	16	1 On occasion	1 Hour	16
Earth station surrenders of authorization	249	1 On occasion	1 Hour	249
Section 214 surrenders of authorization	41	1 On occasion	1 Hour	41
Totals:	306	1 On occasion	1 Hour	306

13. Estimate of the Total Annual Cost Burden to Respondents:

There are no applications fees since the surrenders of authorizations are voluntary on the part of the licensees. There are no outside legal or engineering fees associated with filing the requests. Therefore, the total annual cost burden to respondents is **zero (\$0)**.

14. Total estimate of Annualized Cost to the Federal Government

The total estimated annualized cost to the Federal government is **\$11,537.39**. Please see the chart below for details.

Staff Member	Estimated Number of Surrenders Processed Annually	Frequency of Response	Time Per Response	Total Annual Costs
(1) GS-11/Step 5 Industry Analyst @ \$33.12 per hour (16 space station surrenders processed annually)	\$33.12 X 16 Hours = \$529.92	1 On occasion (As received in MyIBFS)	1 Hour	\$529.92
(1) GS-12/Step 5 Telecommunications Specialist @ \$39.70 per hour (249 earth station surrenders processed annually)	\$39.70 X 249 Hours = \$9,885.30	1 On occasion (As received in MyIBFS)	1 Hour	\$9,885.30
(1) GS-9/Step 5 Industry Analyst @ \$27.37 per hour (41 Section 214 surrenders processed annually)	\$27.37 X 41 Hours = \$1,122.17	1 On occasion (As received in MyIBFS)	1 Hour	\$1,122.17
Total:	\$11,537.39	1 On occasion	1 Hour	\$11,537.39

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

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

17. We are not seeking approval to not display the expiration date for OMB approval of the information collection.

18. There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods:

No statistical methods are employed.