

SUPPORTING STATEMENT

A. Justification:

1. The record keeping requirement contained in § 80.413 is necessary to document the number and type of transmitters operating under an on-board station license.

The Commission is seeking an extension (no change in the recordkeeping requirement) in order to obtain the three year clearance from the OMB. There is no change in the estimated burden.

Statutory authority for this collection of information is contained in §§ 4, 303, 307(e), 309, and 332, 48 Stat. 1066, 1082, as amended; 47 U.S.C. 154, 303, 307(e), 309, and 332, unless otherwise noted. Interpret or apply 48 Stat. 1064–1068, 1081–1105, as amended; 47 U.S.C. 151–155, 301–609; 3 UST 3450, 3 UST 4726, 12 UST 2377.

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 FCC personnel during inspections and investigations to determine what mobile units and repeaters are associated with on-board stations aboard a particular vessel. If this information were not collected, no means would be available to determine if this type of radio equipment is authorized or who is responsible for its operation. Enforcement and frequency management programs would be negatively affected.
3. Prior to finalizing rule makings the Wireless Telecommunications Bureau conducts an analysis to insure that improved information technology cannot be used to reduce the burden on the public. This analysis considers the possibility of obtaining and/or computer-generating the required data from existing data bases in the Commission or other Federal agencies.
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. If the required information was "collected" less frequently, i.e., not at all, there would be no way for the FCC to determine what mobile units and repeaters are authorized pursuant to a particular on-board station license, nor would the Commission be able to identify who is responsible for their operation.
7. Current data collection is consistent with 5 CFR 1320.6, with the exception that the subject records (i.e. station records) are required to be retained for 10 years to coincide with the station license term. The retention of these records for 10 years imposes a negligible burden on the licensee while providing valuable information to FCC personnel to aid in enforcement and frequency management programs.

8. The Commission initiated a 60-day public comment period which appeared in the Federal Register Notice on May 14, 2009 at 74 FR 22742. No comments were received as a result of the Notice. A copy of the Federal Register Notice is referenced in the submission to the OMB.
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. There are approximately 1,000 licensees of maritime on-board stations. Based on a review of the subject records, it is estimated that an average of two (2) hours per year per vessel is required to maintain these simple and minimal records. $1,000 \times 2 \text{ hours} = \mathbf{2,000 \text{ total annual burden hours}}$.

Estimated annual cost to respondents:

\$17.00	per hour (radio operator)
X 2	hours per station
X1,000	licensees
+ 10%	overhead
\$37,400	

13. Estimate of cost to respondents: None.
 - a. There are no capital or start-up costs.
 - b. There are no operational or maintenance costs
14. Estimated annual cost to the Federal Government: None.
15. There is no change to the cost and hour burdens of this information collection.
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.