

**SUPPORTING STATEMENT
U.S. DEPARTMENT OF COMMERCE
NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION
BROADBAND SUBSCRIPTION AND USAGE SURVEY (SUPPLEMENT TO THE
CENSUS BUREAU'S CURRENT POPULATION SURVEY)
OMB CONTROL NO. 0660-0021**

A. JUSTIFICATION

This is an emergency review request for this collection of information (reinstatement with change of a previously approved collection). The date requested for approval is September 1, 2009.

1. Explain the circumstances that make the collection of information necessary.

President Barack Obama is committed to expanding broadband technology across the country.^a The Administration is working with Congress, the Federal Communications Commission (FCC), Rural Utilities Service, the States, and other parties to develop and implement economic and regulatory policies that foster broadband deployment. Current, systematic, and comprehensive data on broadband subscription and use by U.S. households is critical to allow policymakers not only to gauge progress made to date, and to identify problem areas with a specificity that permits carefully targeted and cost effective responses.

NTIA proposes to add five questions to the Census Bureau's October 2009 Current Population Survey (CPS) in order to gather reliable data on broadband (also known as high-speed Internet) use by U.S. households (Attachment A in ROCIS). The Census Bureau is widely regarded as a superior collector of data based on its centuries of experience and its scientific methods. Collection of NTIA's requested broadband usage data, moreover, will occur in conjunction with Census' scheduled October Current Population Survey (CPS), thereby significantly reducing the potential burdens on the Bureau and the households surveyed. Questions on Internet usage were included in seven previous Census household surveys.

The need for comprehensive broadband data has become more pressing in recent months and has necessitated this request for expedited review. The General Accountability Office (GAO) and NTIA recently issued reports noting the lack of useful broadband data for policymakers, and Congress passed legislation – the Broadband Data Improvement Act in 2008 and the American Recovery and Reinvestment Act in 2009 – wholly or partly in response to such criticisms. The Organization for Economic Cooperation and Development (OECD) has ranked the United States a disappointing number 15 in household broadband access despite a period of rapid growth in the technology's penetration. The OECD has noted that the user data that they are using to benchmark the United States is from 2007 as they have no other current official data from the United States. Modifying the October CPS to include NTIA's requested broadband data will allow the Commerce Department and NTIA to respond to Congressional concerns,

Congressional directives, and to work with the OECD on its broadband methodologies with more recent data.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

The Census Bureau will collect the desired information on a one-time basis during its October 2009 CPS. NTIA will use the data collected to assist the President, the Congress, and the FCC to develop targeted, sound, and cost effective policies to foster the deployment of broadband and other Internet services throughout the United States. The data collected will also be available to the public to further policy research on broadband and other communications issues, and will be used on an international level at the OECD to better inform their broadband methodologies. A prominent use for the data will be as an input into a national broadband map that NTIA must develop and maintain as required by the American Recovery and Reinvestment Act of 2009.

Information quality is an integral part of the pre-dissemination review of the information disseminated by the Census Bureau (fully described in the Census Bureau's Information Quality Guidelines). Information quality is also integral to the information collections conducted by the Census Bureau and is incorporated into the clearance process required by the Paperwork Reduction Act.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

The Census Bureau considers personal visits and telephone interviews, using computer-assisted telephone interviewing and computer-assisted personal interviewing, the most appropriate collection methodology, given existing available information technology.

4. Describe efforts to identify duplication.

Adding the NTIA's proposed five questions to the Census Bureau's October CPS will generate official geographic and demographic statistics on broadband and Internet usage in the United States that is unavailable from any other source. To NTIA's knowledge, there are no other data sources that can provide the depth, scope, and reliability of information on broadband deployment than is available from the CPS.

5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

Not Applicable.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

Comprehensive and reliable data is essential to the development of sound and cost effective government policies regarding broadband deployment and the Internet.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

There are no special circumstances. The Census Bureau collects the CPS data in a manner that is consistent with the Office of Management and Budget's guidelines.

8. Provide a copy of the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

The Federal Register Notice (FRN) soliciting public comment will be submitted requesting comments twenty-one days after publication. A copy of the FRN to be submitted is in ROCIS.

NTIA consulted with the following person(s) concerning the development of the proposed questions:

Christopher Laskey, Census Bureau, (301) 763-5312

Lisa Clement, Census Bureau, (301) 763-5482

Greg Weyland, Census Bureau, (301) 763-3790

The result of these consultations is NTIA's five proposed supplemental questions. The advance letter referred to in response to Question 10 provide respondents with an address at the Census Bureau and at the OMB to which they can submit general comments on the survey, specifically those regarding respondent burden.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

The CPS respondents are not provided payments or gifts.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.

The Census Bureau will collect CPS data (including NTIA's proposed supplemental questions) in compliance with the Privacy Act of 1974. Each sample household will receive an advance letter approximately one week before the start of the initial CPS interview. The letter includes the information required by the Privacy Act of 1974, informs each respondent of the voluntary nature of the survey, and states the estimated time required for participating in the survey.

Additionally, interviewers must ask each respondent if he/she received the advance letter and, if not, will provide a copy of the letter to each respondent and allow sufficient time for him/her to read its contents. Upon request, interviewers also provide households with the pamphlet on "How the Census Bureau Keeps Your Information Strictly Confidential," which reaffirms the confidentiality assurances and mentions the Census Bureau's past performance in assuring confidentiality. All information given by respondents to Census Bureau employees is held in strict confidence under Title 13, United States Code, Section 9. Each Census Bureau employee has taken an oath to that effect and is subject to a jail penalty and/or a substantial fine if he/she discloses any information given to him/her.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

NTIA's proposed supplemental questions are not of a sensitive nature.

12. Provide an estimate in hours of the burden of the collection of information.

The Census Bureau estimates that the total respondent burden for NTIA's proposed five questions is 581 hours (38 seconds per household for the 55,000 households in the CPS sample). By way of contrast, the OMB-approved respondent burden for the Census Bureau and the Bureau of Labor Statistics to conduct the basic CPS for October (without NTIA's proposed questions) is 7,918 hours.

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in Question 12 above).

There are no costs to the respondents other than that of their time to respond.

14. Provide estimates of annualized cost to the Federal government.

The Census Bureau is charging NTIA \$325,000 to include the five supplemental questions in the CPS with associated agreed-upon tables.

15. Explain the reasons for any program changes or adjustments.

The program change is due to the reinstatement of a previously approved collection. The number of respondents, responses, and burden hours summaries were zeroes.

16. For collections whose results will be published, outline the plans for tabulation and publication.

The Census Bureau will conduct the CPS in October 2009. Fact sheets and any appropriate reports will be issued during the first quarter of 2010.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

Not applicable.

18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I.

There are no exceptions to the certification.

^a See White House website at <http://www.whitehouse.gov/issues/economy/> (last viewed July 16, 2009).