

SUPPORTING STATEMENT

This collection is submitted as an extension of the existing collection. The increased estimated burden of 48 hours is related to an underestimate of likely respondents in the initial submission and substantial growth in the number of competitive eligible telecommunications carriers (ETCs) serving the market since the prior estimate.

A. Justification:

1. Section 254(e) of the Telecommunications Act provides that a carrier receiving universal service support must use that support “only for the provision, maintenance, and upgrading of facilities and service for which the support is intended.” Accordingly, Section 54.809 requires each price cap carrier or competitive ETC that wishes to receive interstate access universal service support to file an annual certification with the Universal Service Administrative Company (USAC) and the Commission. The certification must state that the carrier will use its interstate access universal service support only for the provision, maintenance, and upgrading of facilities and service for which the support is intended. *See* 47 CFR § 54.809.

2. The Commission and USAC use the certifications to ensure that carriers comply with section 254(e) of the Telecommunications Act by using the interstate access universal service support only for the provision, maintenance, and upgrading of facilities and service for which the support is intended.

3. Carriers are not prohibited from electronically sending certifications to USAC or the Commission, however, must submit a paper version to USAC containing authorized signatures.

4. There is no duplication of information filed. This collection will be filed with USAC and the Commission.

5. The certification to USAC and the Commission will affect large and small entities. Because many aspects of the CALLS Plan decrease administrative burdens, we do not believe that the overall information requirements will severely impact small businesses.

6. If carriers do not file the certifications, USAC and the Commission will be unable to ensure that carriers comply with section 254(e) by using the interstate access universal service support only for the provision, maintenance, and upgrading of facilities and service for which the support is intended.

7. The Commission does not foresee any special circumstances that would cause this information collection to be conducted under extraordinary circumstances.

8. Pursuant to 5 CFR Section 1320.8, the Commission published a 60 day notice in the Federal Register on July 22, 2009 (74 FR 36220). No comments were received.

9. The Commission does not anticipate providing any payment or gift to respondents.

10. The Commission is not requesting respondents to submit confidential information to the Commission or to USAC. If the Commission requests respondents to submit information to the Commission or to USAC that the respondents believe is confidential, respondents may request confidential treatment of such information pursuant to section 0.459 of the Commission's rules.

11. There are no questions of a sensitive nature with the respect to the information requested.

12. Estimates of hour burden of the collection of information.

We assume that respondents will employ in house staff to collect and prepare the information for filing, and that respondents send the certification by mail.

Number of Respondents: 604.

Frequency of Response: Annually reporting requirement.

Hours Per Respondent: 1.5 hours.

How Burden was estimated: Based on discussions with USAC, we estimate that it will take a total of 1.5 hours for each respondent to prepare and send the certifications to both USAC and the Commission. The amount of time required is affected by the fact that most respondents have previously filed a similar certification for the Universal Service Fund.

Total Annual Hour Burden of All Respondents: 1.5 hours per respondent x 604 respondents = **906 hours**.

Estimate of annualized cost to respondents for the hour burdens for collections of information: 906 hours x \$40 per hour (including staff time and overhead) = \$36,240.

13. Estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. None.

a) *Total capital and start-up cost component* (annualized over its useful life). Capital costs are normal and will be limited to the cost of mailing the certification.

b) *Total operation and maintenance and purchase of services component:* \$0. We do not anticipate any costs from operation, maintenance, or purchase of services.

14. Estimate of annualized cost to the federal government. There will be few, if any costs to the Commission because notice and enforcement requirements are already part of Commission duties. Moreover, there will be minimal cost to the federal

government since an outside party (USAC) will administer the interstate access universal service program.

15. The Commission is reporting an increase in burden to 906 hours is requested. The adjusted increase in estimated burdens is due to an increase in the estimated number of respondents (+32), which are related to growth in the number of competitive ETCs serving the market since the prior estimate. Therefore, the total annual burden hours increased by 48 hours.

16. The Commission does not anticipate that it will publish any of the information.

17. The Commission does not seek approval not to display the expiration date or OMB approval of the information collections.

18. The Commission does not seek any exceptions.

B. Collection of Information Employing Statistical Methods:

The Commission does not anticipate that the collection of information will employ statistical methods.