

Supporting Statement
U.S. Department of Commerce
National Telecommunications and Information Administration
Public Telecommunications Facilities Program Grant Monitoring
OMB Control No. 0660-0001

Section A. Justification

This information collection request is to extend the Office of Management and Budget approval.

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

Under the authority of 47 U.S.C. 390-394, 397-399 (copy in ROCIS), the National Telecommunications and Information Administration (NTIA) administers the Public Telecommunications Facilities Program (PTFP). Each year approximately 150 grants are awarded under the program. The purpose of the program is to assist, through matching funds, in the planning and construction of public telecommunications facilities in order to achieve the following objectives:

- a.) Extend delivery of public telecommunications services to as many citizens in the United States as possible by the most efficient and economical means, including the use of broadcast and nonbroadcast technologies;
- b.) Increase public telecommunications services and facilities available to, operated by, and owned by minorities and women; and
- c.) Strengthen the capability of existing public radio and television stations to provide public telecommunications services to the public.

The reporting requirements described below are necessary for NTIA/PTFP to ensure that grant funds are used in accordance with the authorizing statute, PTFP regulations, grant terms and conditions, and the various applicable OMB Circulars governing grants and cooperative agreements.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If NTIA's Information Quality Guidelines apply, state this and confirm that the collection complies with the Guidelines.

- a.) Standard Forms: In accordance with OMB Circulars and Department of Commerce regulations on grants management, DOC/NTIA uses standard reporting forms to handle financial reporting and the processing of payments to grantees. The burden hours involved with these forms are not reflected in this request.

b.) Performance Reports: Under OMB Circulars A-102 and A-110, grantees are required to provide project performance reports in addition to financial reporting. PTFP complies with the OMB Circulars by requiring performance reports quarterly from the approximately 350 recipients whose grants are active in any year.

c.) Construction Project Requirements: The majority of the approximately 150 PTFP grants awarded each year are for “construction” of public broadcasting facilities. The term “construction,” however, does not include buildings or land and is restricted primarily to the purchase of equipment that would be considered non-expendable personal property under OMB regulations. See 47 U.S.C. 397(1). The majority of PTFP grantees approximate “construction,” as the term is commonly applied to Federal projects, only in the erection of broadcast towers to operate radio or TV transmission antennas.

One requirement is placed on all construction project grantees. It is imposed by a special award condition. This requirement is to submit a construction schedule to NTIA/PTFP within 30 days of receipt of the grant. It lists the approximate dates when the grantee will finalize specifications for procurement, place purchase orders, take delivery of project equipment, and install the equipment purchased. It is filed only at the beginning of the project unless there is a major revision of the project that requires changes in many elements of the schedule.

The construction schedule is obtained to assure PTFP’s ability to monitor the progress of the project through **quarterly performance reports**, which alert NTIA/PTFP if the project is falling behind in its completion.

d.) Planning Grant Requirements: Every year the PTFP issues a limited number of planning grants (8 to 10 out of the total of 150 grants). These grants are to carry out projects that do not involve the purchase of equipment, but that may involve payments to consultants, salaries paid to planning staff members, travel, supplies, and similar budget items. Planning grantees are required by a special award condition to submit a planning timetable within 30 days after receipt of the award and are subject to the same quarterly reporting schedule as construction grantees.

The planning timetable serves the same purpose as the construction schedule described above. It assures NTIA/PTFP that all necessary steps are included in the funded planning process and permits the program to monitor the grantee’s performance. **Quarterly performance reports** subsequently alert the program if the project is not keeping to the schedule established for research, community polling, engineering studies, or other project purposes.

e.) Close-out Procedures: The PTFP’s close-out procedures are consistent with the requirements of 15 CFR Part 14 and 15 CFR Part 24, including: a 90-day period for the grantee to submit the material after the expiration of the grant award period, submission of all financial and performance reports, and an accounting for property acquired in the manner prescribed in Sec. 14.71 of 15 CFR Part 14 and Sec. 24.50 of 15 CFR Part 24. Because PTFP construction grants are primarily for the acquisition of equipment, the inventory required by Sec. 14.71 of 15 CFR

Part 14 and Sec. 24.50 of 15 CFR Part 24 is the most time-consuming portion of the close-out procedure for most grantees. It is estimated that PTFP receives close-out materials from approximately 130 grantees a year.

Close-out procedures for planning grants require the submission of a final project report and all financial reports usually required by OMB Circulars and authorizing regulations. Because the PTFP seldom awards more than 8 to 10 planning grants in each fiscal year, close-out for planning projects is a very minor part of the PTFP's burden-hours projection.

f.) Draft Planning Report: ELIMINATED. A draft final report was formerly required 45 days prior to the expiration date of the award for planning grant projects. This was to be followed by a final planning report submitted as part of the project cost out. NTIA found that the draft report was an unnecessary burden on the grantees and served no useful purpose.

g.) Annual Reports: Under the authorizing statute, construction grants that have been completed and closed out must be monitored for a full 10 years after the project completion date. See 47 U.S.C. Sec. 392(g). To accomplish this monitoring, PTFP requires all grantees in the 10-year Federal interest period to submit an annual report that certifies that the grantee remains an eligible entity and that the equipment purchased under the grant continues to be used for grant-approved purposes and is adequately maintained and insured. Approximately 1,300 grantees are required to file annual reports on or before April 1 of each year.

NTIA's Information Quality Guidelines apply and this collection complies with the Guidelines.

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.

Presently, respondents may submit their reports in paper format or via the PTFP Online Reporting and Tracking System (PORTS). Beginning in FY 2010, all respondents will be required to submit reports using PORTS.

Using PORTS is a more efficient method of submitting reports because it utilizes forms and data already in each respondent's PORTS file, resulting in a reduction in the burden hours required to prepare and submit a report.

4. Describe efforts to identify duplication.

Each PTFP grant monitored, or closed out, is a unique project, so there is no duplication of information in performance reports, close-outs, or other project-related activities. The annual reports filed by grantees in the 10-year interest period may require a single organization to report to PTFP about several past grant projects. Checklist annual report forms are provided online in PORTS.

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

Many PTFP grantees are small entities, and the reporting requirements have been kept to a minimum to assure that they are able to comply with the least possible burden. Such as, each grantee's construction schedule is maintained online in PORTS and easily updated for quarterly performance reports with appropriate notations (e.g., "completed," "vendor delivery made late," etc.) next to individual entries on the schedule. NTIA/PTFP moves approved equipment lists to PORTS from the online applications after awards are made, and grantees note acquisitions on the lists as items are purchased. Only the standard financial reporting forms are used for financial reports. Occasionally, additional requirements are imposed if grantee performance during the previous period is determined to be unacceptable.

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

If reports were not collected as frequently, the Department of Commerce and NTIA would not be able to properly comply with OMB Circulars and grantees might not be paid as promptly for their expenses under the funded projects. In addition, longer reporting periods would increase the risk of misuse of grant funds. Misunderstandings or errors by the grantee can be detected in quarterly reports and corrective action taken. The periodic reports are the only method available to NTIA/PTFP for reducing waste or misuse of government resources.

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

Under the authorizing statute, completed and closed out construction grants must be monitored for 10 years after the project completion date.

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 record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A notice was published in the Federal Register on June 12, 2009, page 28017, soliciting public comments on the information collection. No comments were received.

NTIA conducts an annual consultation process with the Corporation for Public Broadcasting (CPB) and other public broadcasting organizations and associations. They are invited to

comment on any aspect of the grant program on behalf of their constituents. NTIA has not specifically placed the PTFP reporting requirements before these organizations for comment, but many of the public radio and TV stations that comprise the memberships of these organizations have received PTFP grants. If those grantees had problems with the requirements, the organizations cited here would bring those problems to the attention of NTIA/PTFP. NTIA staff members also attend industry meetings whenever possible to discuss the program in general and receive comments from grantees.

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

Not applicable.

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

No assurance of confidentiality is provided to respondents. In collecting this information, NTIA complies with the Privacy Act of 1974 and the Freedom of Information Act.

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.

The information collection does not include sensitive questions.

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

Burden Hours Calculation

Requirement	No. of Grantees	Hours/Grantee	Total Burden Hours
Construction Schedule/Planning Timetable	150	8	1,200
Performance Reports	350	3/4 hr x 4/yr	1,050
Close-outs	130	16	2,080
Final Planning Report	10	10	100
Annual Reports	1,300	½ hr	650

Total	5,080
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The method of calculating the number of responses NTIA receives each year for each of the reporting requirements is presented in the table above. Program officials believe the calculations accurately reflect the burden imposed by each element in the reporting and the number of respondents to each element in any one year.

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).

The cost to respondents will, in most cases, be part of the organization’s normal cost of doing business. It is not expected that substantial cost will be incurred specifically because of PTFP monitoring requirements. No technical reports, such as audited financial statements, requiring outside preparation are required as part of routine monitoring. No special equipment or supplies are required to prepare or submit reports.

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

The budget for the administration of the PTFP is \$2 million, including activities for application solicitation, review, approval, processing, and monitoring. The amount cannot be broken down by the function of monitoring because the individuals paid under the overall administrative budget are involved in all the activities listed.

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

The decrease in burden hours is due to program change - the draft planning report has been eliminated and as of FY 2010, respondent will be required to submit all reports via the PTFP Online Reporting and Tracking System (PORTS).

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

Not applicable.

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.

Not applicable.

Section B. Collections of Information Employing Statistical Methods

The NTIA/PTFP information collection does not employ statistical methods.