
19. Certification for Paperwork Reduction Act Submissions

On behalf of the U.S. Department of Housing and Urban Development, I certify that the collection of information encompassed by this request complies with 5 CFR 1320.9.

Note: The text of 5 CFR 1320.9, and the related provisions of 5 CFR 1320/8(b)(3), appear at the end of the instructions. The certification is to be made with reference to those regulatory provisions as set forth in the instructions.

The following is a summary of the topics, regarding the proposed collections information, that the certification covers:

- (a) It is necessary for the proper performance of agency functions;
- (b) It avoids unnecessary duplication;
- (c) It reduces burden on small entities;
- (d) It uses plain, coherent, and unambiguous terminology that is understandable to respondents;
- (e) Its implementation will be consistent and compatible with current reporting and recordkeeping practices;
- (f) It indicates the retention periods for recordkeeping requirements;
- (g) It informs respondents of the information called for under 5 CFR 1320.8(b)(3):
 - (i) Why the information is being collected;
 - (ii) Use of the information;
 - (iii) Burden estimate;
 - (iv) Nature of response (voluntary, required for a benefit, or mandatory);
 - (v) Nature and extent of confidentiality; and
 - (vi) Need to display currently valid OMB control number;
- (h) It was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to collected (see note in item 19 of the instructions);
- (i) It uses effective and efficient statistical survey methodology; and
- (j) It makes appropriate use of information technology.

If you are unable to certify compliance with any of these provisions, identify the item below and explain the reason in item 18 of the Supporting Statement.

Signature of Program Official: XRaphael W. Bostic, Ph.D., Assistant Secretary for Policy Development and Research	Date:
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Signature of Senior Officer or Designee: X Lillian Deitzer, Departmental Reports Management Officer, Office of the Chief Information Officer	
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Supporting Statement for Paperwork Reduction Act Submissions

HUD Broadband Research Project

A. Justification

1. Circumstances that make the collection of information necessary.

In a 2008 speech on Renewing American Competitiveness, then-Senator Obama said “When kids in downtown Flint or rural Iowa can’t afford or access high-speed Internet, that sets back America’s ability to compete. As President, I will set a simple goal: every American should have the highest speed broadband access – no matter where you live, or how much money you have.” To achieve that goal, the American Reinvestment and Recovery Act of 2009 mandated that the FCC produce a National Broadband Plan that “shall seek to ensure that all people of the United States have access to broadband capability and shall establish benchmarks for meeting that goal.” HUD seeks to collect information about current broadband availability and usage in HUD-assisted housing and at Neighborhood Networks Centers to inform the development of the National Broadband Plan and to develop programs and policies that will expand broadband access to currently underserved and unserved communities.

This data collection is necessary because of the current lack of information on the availability or usage of broadband internet in HUD-assisted properties. No previous research has been conducted on broadband usage in public or assisted housing. Title 12, United States Code, Sections 1701z-1, 1701z-2(g), and 1701z-10a provide authority to collect this information.

2. How the information is used

HUD will be collecting information on whether broadband internet service is available at HUD-assisted housing as well as whether residents are subscribing to the service if it is available. HUD will also survey Neighborhood Networks Centers to learn basic information about the programming offered at these locations. The information will be used to provide input to the National Broadband Plan and to develop HUD programs to expand the availability and usage of broadband internet services in HUD-assisted properties. Additionally, the American Reinvestment and Recovery Act of 2009 provides \$7.2 billion in funding for broadband projects that HUD-grantees may be qualified to apply for.

3. Improved technology.

More than 90% of the data collection for this project will be conducted via e-mail or the internet. 1,500 surveys will be sent by US Mail due to a lack of available e-mail addresses for respondents, however, electronic submissions via e-mail or fax will be encouraged for all respondents.

4. Efforts to identify duplication.

No similar information exists. No research projects have been conducted on broadband usage and availability in public or other assisted housing or on the utilization of Neighborhood Networks Centers. HUD consulted with John Horrigan, Consumer Research Director, Omnibus Broadband Initiative at the FCC in developing this information collection and found that no similar data exists.

5. Burden to small business or small entities.

This collection will not have a significant impact on small entities such as small businesses, organizations, or government bodies. Smaller entities will require less time than larger entities to complete the survey.

6. Consequences if information is collected less frequently.

If this information is not collected, HUD will not have the necessary data to develop policies in accordance with the National Broadband Plan.

7. Special circumstances

None.

8. Public Notice.

A Federal Register Notice published on September 9, 2009 page 46445. No comments were received.

HUD consulted with John Horrigan, Consumer Research Director, Omnibus Broadband Initiative at the FCC in developing this information collection and found that no similar data exists.

9. Payment or gifts.

No payments or gifts will be provided to respondents.

10. Assurance of Confidentiality

The data collected using this instrument will be used internally at HUD. No sensitive information is being collected. No assurances of confidentiality will be given.

11. Questions of a Sensitive Nature.

No questions of a sensitive nature will be asked.

12. Annual Reporting and Recordkeeping Burden

<u>Respondents</u>	<u>Frequency of Response</u>	<u>Total Responses</u>	<u>Hours Per Response</u>	<u>Total Hours</u>	<u>Cost Per Response</u>	<u>Total Cost</u>
PHAs	Once	3,400	.25	850	\$0	\$0
Neighborhood Networks Centers	Once	1,760	.25	440	\$0	\$0
Tribal Housing Authorities	Once	1,157	.25	289.25	\$0	\$0
Multi-Family Mailed Survey	Once	500	.25	125	\$0	\$0
Multi-Family E-Mailed Survey	Once	500	.25	125	\$0	\$0
HOME Properties	Once	500	.25	125	\$0	\$0
Pre-Test	Once	20	.5	10	\$0	\$0
TOTAL	Once	7,817		1,954.25		\$0

Hours per response includes time spent gathering and reviewing information. Note that the time burden will be less for smaller respondents and that .25 hours per response is an average.

13. Estimate of Total Costs to Respondents

There are no additional costs to the respondents.

14. Estimate of Annualized Cost to Federal Government

Costs will be limited to printing and postage for the mailed segment of the survey.

15. Explanation of Program Changes / Adjustments

This is a new collection.

16. Publication of Results

HUD has no plans at this time to publish the results of this survey.

17. Display of the Expiration date for OMB Approval of the Information Collection

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

18. Explanation of Each Exception to the Certification Statement

No exceptions are made to the certification statement identified in item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

B. STATSTICAL

1. Potential Respondent Universe

The following is the proposed respondent universe for the various types of HUD-assisted housing projects and Neighborhood Networks Centers. We anticipate an approximately 80% response rate for e-mailed surveys and a somewhat lower response rate for surveys sent through the mail.

Because of the dearth of information available about broadband access and usage in Public Housing and in tribal housing, it is necessary that we survey the entire universe of these entities. This will provide a much clearer picture for HUD to make future decisions about investing in broadband. Because no evaluation has ever been done of Neighborhood Networks Centers, we will survey the entire universe of these entities as well. For Multi-Family projects (both with e-mail contact information and without) and HOME projects, we will survey a 500 project sample.

Housing Type	Sample Type (Full Universe or Sample)	Survey Type	Sample Size	Total Universe Size
Tribes	Full Universe	Mail	1,157	1,157
Neighborhood Networks	Full Universe	E-Mail	1,760	1,760
PHAs	Full Universe	E-Mail	3,400	3,400
Multi-Family -- Mail	Sample	Mail	500	11,175
Multi-Family -- E-Mail	Sample	E-Mail	500	13,508
HOME	Sample	Mail	500	39,939
TOTAL			7,817	

2. Information Collection Procedures

Random sampling will be used to select samples from the overall universe. For the housing types we are sampling, we assume an 80% response, that non-response is random and this yields national estimates that are accurate +/- 3%.

For Tribal Housing, Public Housing Authorities and Neighborhood Networks Centers, a fuller picture is required. This information will be used in subsequent efforts to design and target interventions for which information on as many potential grantees as possible is necessary.

3. Maximizing Response Rate

The survey has an extremely simple design to make response easier and more attractive. The questions are as simple and brief as possible and do not require precise reporting or analysis. HUD already has a good relationship with the respondents, which will increase the response rate. Additionally, the information being collected will prove valuable to the respondents as new policies are developed to expand broadband in public and assisted housing.

After the initial mailing and e-mailing of the survey follow-up and reminder notices will be sent to all non-responders. For those that continue to be unresponsive, follow-up phone calls may be made.

4. Tests

Prior to fielding the survey, we will conduct 10 pre-test telephone calls with representatives from each type of housing to be surveyed. These pre-tests will ensure that the questions being asked are answerable and will provide useful information to HUD.

5. Contact Information

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