

SUPPORTING STATEMENT

New collection entitled: National Broadband Plan Survey of Consumers.

**A. Justification:**

1. *Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.*

The Broadband Data Improvement Act of 2008, Pub. L. No. 110-385, Stat 4096 § 103(c)(1) directs the Commission to collect information on the types of technology used to provide broadband to consumers, the price of such services, actual data transmission speeds, and the reasons for non-adoption of broadband service.

The Commission requests emergency processing under 5 C.F.R. 1320.13 for these collections so that the information will be available for Commission use in the formulating policy recommendations for the adoption and use of broadband as required under the American Reinvestment and Recovery Act of 2009 (ARRA), Pub. L. No. 111-5, 123 Stat 115 (2009), to be delivered to Congress by February 17, 2010 as part of the National Broadband Plan.

As noted on the OMB Form 83i, this information collection does affect individuals or households; thus there are impacts under the Privacy Act.

Statutory authority for these collections of information is contained in Section 103(c)(1) of the Broadband Data Improvement Act of 2008, 47 USC 1303 § 103 (c)(1).

2. *Indicate how, by whom and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.*

The Commission's Office of Strategic Planning (OSP) will use information collected under this survey to help determine the extent of broadband Internet adoption, and use the data to inform policy recommendations under the National Broadband Plan.

Information on consumers without broadband Internet at home will be used to carefully identify the nature and extent of the problem and used to develop policy recommendations through the National Broadband Plan.

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, e.g., permitting electronic submissions of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.*

The residential consumer survey will be a random digit dial (RDD) telephone survey where the interviewer will read questions to respondents.

4. *Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in item 2 above.*

To our knowledge, no similar effort to collect consumer information exists. The National Broadband Plan seeks to understand the extent of home broadband adoption and non-adoption. In order to make policy recommendations the Commission needs this information on the extent and nature of the problem.

Information collected from last-mile broadband providers through the Commission's Form 477 concerns facilities and physical access and does not address home broadband adoption or use.

Information collected through the Current Population Survey, the Decennial Census, and the American Community Survey lacks sufficient question depth to determine attitudes towards technology and reasons for broadband non-adoption. The collection effort proposed has a specific element focused on non-adoption. Therefore, the proposed information collection is different in purpose and source.

5. *If the collection of information impacts small businesses or other small entities (item 5 of OMB Form 831), describe any methods used to minimize the burden.*

Not applicable. This survey collection affects individual consumers. A separate survey will be submitted to the OMB for approval for business entities.

6. *Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing the burden.*

The Commission's other data collection efforts are insufficient to determine the extent and nature of broadband Internet non-adoption.

Pursuant to the Broadband Data Improvement Act of 2008, the Commission is required to collect this information.

7. *Explain any special circumstances that would cause an information collected in a manner inconsistent with the guidelines in 5 C.F.R. § 1320.5(d)(2).*

There are no special circumstances that would cause an information collection in a manner inconsistent with the guidelines in 5 C.F.R. § 1320.5(d)(2).

8. *If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 C.F.R. § 1320.5(d), soliciting comments on the information prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to those comments. Describe 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.*

This is an emergency request. The Commission is requesting a waiver of the 60 day Federal Register notice requirement under 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Upon OMB approval of this emergency request, the Commission will conduct all the regular OMB processes to obtain the full three year clearance from them.

In the course of its work on the National Broadband Plan, the Commission has held public workshops on issues important to the Plan. From these workshops, as well as comments submitted in response, the Commission solicited views on the availability of data, frequency of collection, and on the data elements to be recorded.

9. *Explain any decision to provide any payment or gift to respondents, other than enumeration of contractors or grantees.*

The growing number of Americans who live in a household without a landline telephone presents an insurmountable challenge to telephone surveys that are conducted only on landline telephones.<sup>1</sup> By the middle of the decade, initial experimental work had begun, exploring the practicality

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<sup>1</sup> *Wireless Substitution: Early Release of Estimates From the National Health Interview Survey, July-December 2008*, Blumberg and Luke, Division of Health Interview Statistics, National Center for Health Statistics, <http://www.cdc.gov/nchs/data/nhis/earlyrelease/wireless200905.htm>.

of interviewing respondents on cell phones.<sup>2</sup> Starting in 2007, Princeton Survey Research Associates International, as well as others, convinced clients to begin experimenting with dual-frame designs that included samples from cell phone numbers. By 2008, many PSRAI clients had switched exclusively to dual-frame designs.<sup>3</sup>

The initial experiments with cell phone interviewing included the offer of a token amount of money, often \$5 or \$10, to the cell phone respondents as a thank-you for their help in the survey. This seemed to many survey professionals to be a reasonable decision, given that some, but not all, cell phone respondents would have to incur the cost of the minutes used in the interview. It has been assumed, since cell phone interviewing was a new approach, that payment of the money would encourage respondents to cooperate with a new methodology. The initial work by Yuan and others supported that contention.

Since the initial work, PSRAI and others have experimented with lower reimbursements to cell phone users as well as dropping them altogether. PSRAI has not had the opportunity to conduct rigorous experiments on the impact of dropping the reimbursement payments. For that reason, PSRAI considers offering the reimbursements to cell phone respondents a “best practice” for a project that seeks as high a response rate as possible.

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

No personally identifying information will be transmitted to the Commission from the survey contractor as a matter of vendor policy.

11. *Provide additional justification for any questions of a sensitive nature.*

This information collection does not address any private matters of a sensitive nature.

12. *Provide estimates of the hour burden of the collection of information. The statement should: indicate the number of respondents, frequency of responses, annual hour burden, and an explanation of how the burden was estimated. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of the estimated hour burden, and explain the reasons for the variance.*

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<sup>2</sup> *Surveying Households on Cell Phones—Results and Lessons*, Yuan et. al., ASA Section on Survey Methods, available at <http://www.bls.gov/osmr/pdf/st050280.pdf>.

<sup>3</sup> *Some Practical Issues in Cell Phone Interviewing from a Phone Room Perspective*, Best and Hugick, a paper presented at the 2009 AAPOR Conference, Hollywood, FL, May 2009.

For Paperwork Reduction Act purposes the total time burden for the survey is estimated at 1,650 hours for the telephone survey **(5,000 respondents x .33 hours per response = 1,650 total annual burden hours)**.

However, this estimate is based on completing 4,000 20-minute interviews with adults from the general population and the estimated time burden on adults who do not consent to complete the interview.

In addition, the burden includes the estimate of completing 1,000 interviews with broadband non-adopters, who occur at an estimated 35% incidence in the population. The full non-adopters interview will run 20 minutes on average. To screen out broadband adopters, an average interview length of 7 minutes is assumed.

<b>Respondent Time Burden</b>				
<b>Base Survey: 4,000 20-minute interviews</b>				
		<b>Total minutes</b>	<b>Total Hours</b>	<b>Mean minutes/person</b>
<b>Minutes for interviews</b>				
4,000	20-minute interviews plus time to reach respondents	83,814	1,397	20.95
<b>Minutes for contacts without a completed interview</b>				
30%	Response Rate			
	Time if no respondent answers	0	0	0
9,333	Time if respondent answers phone, but does not complete interview	34,323	572	3.68
<b>Non-adopters Oversample: 1,000 20-minute interviews @ 35% incidence</b>				
		<b>Total minutes</b>	<b>Total Hours</b>	<b>Mean minutes/person</b>
<b>Minutes for interviews</b>				
1,000	20-minute interviews plus time to reach respondents	20,953	349	20.95
<b>Minutes for non-eligible households</b>				
35%	incidence			
	Time if no respondent answers	0	0	0
1,857	Time if respondent answers phone, but is <b>not</b> eligible	14,769	246	7.95
<b>Minutes for contacts without a interview, determination of eligibility</b>				
30%	Response Rate			
6,666	Total time for all contacts per household	24,515	409	3.68
<b>Total Time burden</b>				
	<b>Total individuals possibly contacted in order to achieve 5,000 responses.</b>	<b>Total minutes</b>	<b>Total Hours</b>	<b>Mean minutes/person</b>
22,856		178,374	2,973	7.80

13. *Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. Do not include the cost of any hour burden shown in items 12 and 14.*

This information collection is based on a telephone survey that will impose no cost burden on the respondents reached on their landline telephone at home.

A portion of the interviews for the survey will be conducted with respondents on their cell phones, to provide coverage for those who have no landline phone at home. Cell phone companies offer a wide variety of calling plans with a range of features, making it impossible to estimate how many cell respondents could theoretically incur extra charges for the minutes of the interview, or, alternatively, use up already paid-for minutes.

For this survey, the great majority of the calls will be made on nights and weekends, which are often periods when cell phone companies offer free, bonus or reduced-cost minutes to customers. Since the exact time period for such offers varies among cell phone providers, it is not possible to estimate how many of the cell phone respondents will incur any cost as a result of the usage of cell phone minutes for the interview. In addition, exactly where cell phone respondents are during the interview is not determined by the survey, although the assumption is that the majority of cell phone interviews are conducted when the respondent is in his or her home area and is not incurring roaming fees.

However, using the same calculations as above, and assuming cell phone interviews will consume 1/3 of the total time, the cell phone interviews will consume approximately 59,500 cell phone minutes for both respondents and those who do not respond. Assuming that all cell phone minutes consumed would cost the respondent \$0.10/minute if they occurred during the non-free hours of service (28% of total calling hours per time zone), the total cost is estimated at \$1,653. This is a conservative, maximum estimate of the possible cost, given the number of cell phone users with unlimited minute plans and the number of interviews that will actually take place during free hours of service.

14. *Provide estimates of annualized costs to the Federal government. Also provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff).*

An outside party will administer this collection. Specifically, the Commission plans to use the services of a Princeton Survey Research Associates International (PSRAI) to draft survey instruments specific to business and residential broadband Internet consumers, conduct the surveys, and compile the results. The cost of the contract is \$911,650. The Commission does not anticipate any additional costs to the Commission as a result of this collection.

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

This is a new collection resulting in a program change increase of 1,650 total annual burden hours.

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

The results of the survey will be made available annually in accordance with 47 USC 1303 § 103 (c)(2).

Data and analysis will be used in the National Broadband Plan, which will be presented to Congress by February 17, 2010. Specifically, once data collection is completed, the FCC will conduct analysis aimed at understanding barriers to broadband adoption. This will involve analysis of cross-tabulations of survey questions that focus on non-adoption with a number of different questions about attitudes toward technology and respondents' demographic characteristics. The FCC also plans to develop segments of non-adopters using cluster analysis to classify respondents along dimensions of stated barriers to adoption (e.g., cost, a sense that online content is irrelevant, digital skills), general attitudes toward technology, and proximity to the internet (e.g., whether there is an internet user in the household).

Developing segments of the non-broadband adopting population will help the FCC understand:

1. The size of various non-adoption groups;
2. The nature of the barriers to adoption that they face;
3. This in turn will aid the Commission in formulating policy recommendations on programs to encourage broadband adoption.

17. *If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reason that a display would be inappropriate.*

The Commission is not seeking approval to not display the OMB expiration date for OMB approval of the information collection. The Commission publishes a list of all OMB-approved information collections including the OMB control numbers, OMB expiration dates and titles in 47 C.F.R. 0.408.

18. *Explain any exceptions to the statement certifying compliance with 5 C.F.R. § 1320.9(d) and the related provisions of § 1320.8(b)(3).*

There are exceptions to item 19 of OMB 83i. This is an emergency request. The Commission did not publish a 60 day notice in the Federal Register due to the emergency nature of this request.