

Supporting Statement
U.S. Department of Commerce
National Telecommunications and Information Administration
Public Telecommunications Facilities Program Application Form
OMB Control No. 0660-0003

Section A. Justification

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

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

Under the authority of 47 U.S.C. 390-393, 397, 399b (copy attached), 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.

Awards of grants are based on the assessment of information contained on the standard grant application form (SF-424) and additional information required by NTIA. Each year new applications and re-submissions of deferred applications are made by those eligible to receive PTFP grants. The application form presented here for clearance is the only method by which PTFP can comparatively evaluate 300 proposed projects each fiscal year.

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 PTFP is a competitive grant-making program that operates an annual application review process. Without the requested information collection it would be impossible to carry out PTFP's purposes. At the beginning of a PTFP grant cycle, an announcement is sent to all organizations that have indicated an interest in applying to PTFP. It notifies them of the deadline for submitting applications, that applications can be prepared on-line, and that a printed application form will be sent anyone upon request.

The universe for applicants includes non-commercial educational television and radio stations, colleges and universities, states and state agencies, Indian Tribes, and non-profit corporations. They submit proposals which describe unique projects intended to provide broadcasting or telecommunications services to the general public. The majority of applications are for the purchase of equipment such as transmitters, TV cameras, recorders, and other hardware for the transmission and production of TV or radio programs.

Each proposal reflects the unique needs of the applicant organization, but PTFP needs an organized and uniform method to evaluate one project against another in order to award grants. The requests always exceed available appropriations, usually by more than 2 to 1.

Standard Forms: In accordance with OMB Circulars and Department of Commerce regulations on grants management, DOC/NTIA uses standard forms to receive information from applicants. These forms include the SF-424, SF-424A, SF-424B, SF-LLL, and CD-511. The burden-hours involved with these forms are not reflected in this request.

The forms contained in the proposed information collection will supplement the Standard Forms and enable PTFP to review data about:

- a. Type of equipment requested, the urgency or need for the equipment, and whether the requested item(s) will do the job most efficiently and economically;
- b. Financial resources of the applicant, to ensure that the organization will be a viable service provider for the ten-year Federal interest period required by the authorizing legislation and will have the required local matching funds;
- c. Whether, in accordance with the authorizing legislation, Special Consideration should be given to the applicant for ownership/control by, or programming targeted to, minorities and/or women;

- d. Proof of eligibility for the program and proof of compliance with applicable Federal laws and regulations for grant applicants;
- e. Information regarding permits issued by the Federal Communications Commissions required to construct the requested facilities; and
- f. Information about other stations which serve the applicant's coverage area which is used to determine the application's Priority under the PTFP Rules.

The PTFP-2 Form requests information about the project to assist in the review process, including whether any authorizations are required from the Federal Communications Commission in order for the project to proceed, whether any other public radio or television stations provide a signal to the applicant's intended service area, and the number of people that will be served within the station's coverage area.

The PTFP-4 Form requests information about the equipment the applicant proposes to purchase with the requested funds, including the model, number of items, and prices. The PTFP-5 Form requests information on applicant's current equipment that will be replaced by the requested equipment. Both the PTFP-4 and PTFP-5 Forms are used to evaluate the need for the requested equipment and the appropriate funding level if a grant is offered.

Under Department Commerce procedures for grant management (DAO 203-26), NTIA conducts a competitive review process that includes evaluation of each application by PTFP Program Officers, staff engineers, a review panel of representatives of national public broadcasting organizations, and a review panel of personnel from the professional public telecommunications field outside the DOC. Each reviewer provides comments and funding recommendations that are evaluated by PTFP management. Award decisions are made by the Assistant Secretary from the recommendations developed through this review process. Awards are usually announced about six to eight months after the application deadline.

The information will not be disseminated to the public.

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.

PTFP has made the application form available for on-line preparation, and approximately two-thirds of PTFP applicants use this Internet-based technology. PTFP is also participating in the grants.gov program and has requested that the forms in this submission be included on the grants.gov website as quickly as possible after approval.

4. Describe efforts to identify duplication.

The applications submitted by various organizations in any grant cycle do not duplicate each other because each is unique to the needs, location, and service of the individual applicant. PTFP requests information on whether the applicant has sought funds for its project from another Federal agency or the Corporation for Public Broadcasting.

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

Many PTFP applicants are small entities, and the information requested has been kept to a minimum to ensure that they are able to comply with the least possible burden. The present request is for renewal of the existing information collection and no new requirements have been added.

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

NTIA must solicit grant applications in every year in which the Congress passes an appropriation for the program or violate the intent of Congress by not making the funds available. It would be impossible to make grant awards without the required competitive review process that begins with the submission of the information in the proposed collection.

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

NTIA requests an original and five copies of the application form that are submitted in hard copy. The three additional copies of the application form are to be mailed to reviewers around the country who will evaluate the applications at their homes or offices. Using this method, NTIA will be able to expand the pool of reviewers and increase public participation in the PTFP application process.

The burden on the individual applicant to provide these additional three copies will be minimal. We anticipate the typical application submitted in response to this collection to consist of 30 pages or fewer. At a cost of 10 cents a page, the cost of photocopying three additional copies would be less than \$10 per applicant (30 pages x 3 copies x .10/copy = \$9.00). This amount of copying would be burdensome for PTFP. We estimate that it would take one staff person almost two full weeks to disassemble the applications, photocopy over 27,000 pages of material. (300 applications x 30 pages x 3 copies) and reassemble the applications. The two weeks of photocopying would also lengthen the application review process, thereby delaying the awarding of grants.

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 September 2, 2009, page 45420, soliciting public comments on the information collection. No comments were received.

NTIA conducts an annual consultation with the Corporation for Public Broadcasting (CPB) and other public broadcasting organizations and associations. These entities are free to comment on any aspect of the grant program on behalf of their constituents. NTIA has not specifically placed the PTFP application form before these organizations or associations, but many of the public TV and radio stations, which compose their membership, have received PTFP grants. If those grantees had problems with the application requirements, the organizations and associations representing them could have brought those problems to the attention of NTIA/PTFP. NTIA solicits comments about the application process from potential applicants as part of the application cycle. NTIA staff members also attend industry meetings, symposia, and seminars on a regular basis to discuss the program in general.

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.

NTIA complies with the Privacy Act of 1974 and the Freedom of Information Act. The information requested by PTFP does not include any sensitive questions applicants need to answer.

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 requested by PTFP does not include any sensitive questions applicants need to answer.

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

Burden Hours Calculation

| Requirement | On-Line Responses | | Paper Responses | | Total Burden Hours |
|--|-------------------|------------------|-------------------|------------------|--------------------|
| | No. of Applicants | Hours/ Applicant | No. of Applicants | Hours/ Applicant | |
| Original Submission | 200 | 74.5 | 100 | 83.5 | 23,250 |
| Resubmissions* | 75 | 4 | 40 | 7 | 580 |
| Total | | | | | 23,830 |
| *In every grant cycle. PTFP requires revised information to be submitted by applicants under serious consideration for awards. | | | | | |

The method of calculating the number of responses NTIA receives each year for each of the reporting requirements is laid out 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. No technical reports, such as audited financial statements requiring outside preparation, are required as part of the application process.

As stated in Question 7, NTIA will request three additional copies of hard copy applications. The cost to the applicants is estimated to be \$2,700 (300 applicants X \$9).

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

The annual budget for administration of the PTFP is \$2 million. This includes activities for application solicitation, review, approval, processing, and monitoring. PTFP staff costs cannot be broken out separately by function of application processing because individuals supported by this budget are involved in all of these activities.

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

A cost burden adjustment increase (\$2,700) is required to include the cost of photocopying additional copies of the application submission.

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. Collection of Information Employing Statistical Methods

The information collection for the Public Telecommunications Facilities Program does not employ statistical methods.