SUPPORTING STATEMENT U.S. DEPARTMENT OF COMMERCE NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION NTIA BROADBAND-MATCH WEB TOOL OMB CONTROL NO. 0660-XXXX

A. JUSTIFICATION

This is a request for emergency review of a proposed information collection. The requested approval date is December 4, 2009.

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

Congress, through the American Recovery and Reinvestment Act, appropriated \$7.2 billion and directed the Department of Agriculture's Rural Utilities Service (RUS) and The Department of Commerce's National Telecommunications Information Administration (NTIA) to expand broadband access to unserved and underserved communities across the U.S., increase jobs, spur investments in technology and infrastructure, and provide long-term economic benefits. The result is the RUS Broadband Initiatives Program (BIP) and the NTIA Broadband Technology Opportunities Program (BTOP). BIP will make loans and grants for broadband infrastructure projects in rural areas. BTOP will provide grants to fund broadband infrastructure, public computer centers and sustainable broadband adoption projects.

For the second round of funding, BTOP will make roughly 2/3 of its funding available, and anticipates great applicant demand. NTIA Administrator Larry E. Strickling, in his testimony before the Senate Commerce Committee, suggested the use of a "comprehensive communities" strategy aimed at funding middle mile projects to anchor institutions in the community, such as libraries, colleges and potentially hospitals or public safety organizations, ideally with commitments from last mile providers who would build off of the middle mile projects to residential end users. This type of partnership might be burdensome to potential applicant partners and non-anchors that still wish to participate in the BTOP program; as such, in coordination with the White House's Open Government Initiative that seeks to promote transparency, openness and collaboration, NTIA decided to create a tool that would allow larger anchor institutions, smaller satellite organizations, ISPs and technical experts to find one another and create mutually beneficial partnerships. No specific action will be taken by NTIA to use of information, which will be maintained strictly as a resource for applicants. The information would be relevant to applicants between the tool's launch in mid December 2009 and the close of the second-round window, roughly in mid-March 2010.

The approval of this emergency review request is needed to make this tool available to the

applicants by mid December. The tool will collect:

- (1) Organization Name;
- (2) Point of Contact Name; Email Address; Telephone No.; URL; State(s);
- (3) Experience Level (1-Have Applied for BTOP/BIP Before 2-Have Applied for Federal Grant Before 3-Have Never Applied for Grant Before);
- (4) Organization Category (1-Anchor Institution 2-Supporting Institution 3-ISP 4-Technical Expert);
- (5) 50-word Description of Proposed Project;
- (6) Kind of Partner seeking/looking for; and
- (7) Check Box: a-Minority/Disadvantaged Business b-Tribal-Serving Organization c-Non-English-Speaker Serving Institution d-Public Safety.

2. Explain how, by whom, the frequency, and the purpose for which the information will be used. State whether NTIA's Information Quality Guidelines apply, if so, confirm that the collection complies with the Guidelines.

The information submitted to the tool by potential BTOP applicants will be used by other applicants to seek partners. For example, small organizations looking to partner with universities may search for the contact information of universities in their state wishing to engage smaller, community organizations, which they would subsequently use to contact them and propose a partnership. No specific action will be taken by NTIA to process or otherwise make use of this information, which will be used strictly as a resource for applicants. The information would be relevant to applicants, and as such in regular use, between the tool's launch in mid December and the close of the second-round window, roughly in mid-March. NTIA's Information Quality Guidelines do not apply to this information collection.

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.

Users will access a web portal through their browsers and will voluntarily complete a profile that contains information used to find potential grant partners and be found in turn. The data will be collected via a web interface—either HTML-based or, pending upgrades, housed on a Drupal-based server—processed on a SQL database server, and then made available through a search

tool on the web side.

4. <u>Describe efforts to identify duplication</u>.

NTIA is unaware of alternative avenues for gathering this particular information.

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

Because the collection of information is voluntary and not required, and because its use is intended specifically to serve the small and disadvantaged business and nonprofit community, this data collection represents a resource for such organizations hoping to advance through access to BTOP grants (and potentially USDA loans). Because participation is voluntary and requires merely entering basic data into an easily-accessible web profile, burden to the small business community is marginal to nonexistent.

6. <u>Describe the consequences the Federal program or policy activities if the collection is not conducted or is conducted less frequently.</u>

In the absence of BroadbandMatch tool, NTIA would have a much more difficult time guiding smaller, disadvantaged potential applicants into partnerships with larger, more capable applicants to form "comprehensive community" projects. As this is an essential goal of the program for several reasons, and as proposals will be evaluated based in large part on their ultimate realization of this goal, failure to provide an avenue for smaller applicants to form such partnerships could in fact be disadvantageous to them and have the consequence of weakening our applicant pool, which in the long run would weaken our grantee pool. Finally, because NTIA staff can only travel a limited amount as a part of our outreach efforts to minority-owned and economically-disadvantaged organizations, this tool will augment those efforts.

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

The data collection is consistent with OMB guidelines.

8. Provide information 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 or to

obtain their views on the availability of data, frequency of collection, clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Due to the time-critical situation of this proposed information collection, NTIA has requested and received a waiver of the Federal Register Notice.

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

No payments, remuneration or gifts will be provided to respondents. Participation is strictly voluntary.

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

The data collected is intended for publication as a searchable partnership database. Immediately following the completion of the BTOP program grant cycle, the data will be removed from the SQL server and will no longer be publicly available.

11. <u>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.</u>

This information collection does not contain any questions of a sensitive nature.

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

NTIA estimates 4,500 respondents/responses 15 minutes each to record the requested information **totaling 1,125 burden hours.**

13. <u>Provide an estimate of the total annual cost burden to the respondent or record keepers</u>

resulting from the collection (excluding the value of the burden hours in Question 12 above).

This collection would result in zero cost to the respondent or related record keepers.

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

NTIA estimates that the one-time cost of this tool encompasses only that portion of the \$4,000 cost of the SQL server used to house this tool until its term ends. At that time, the server will have other government use.

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

This is a new collection.

16. For data from the collections that will be published, outline the plans for tabulation and publication.

The data will not be published by NTIA, strictly speaking, though it will be always-already made public *by the respondent* at the time of their submission. All data will be submitted into a SQL database and will interface with a web-based search tool. Other than ex-post moderation for flagged, inappropriate entries, NTIA will play no role in tabulating, modifying or publishing this data.

17. <u>If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.</u>

Not applicable.

18. Explain each exception to the certification statement.

Not applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection of information will not employ statistical methods.