

**B. Collections of Information Employing Statistical Methods:**

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When item 17 on the Form OMB 83-I is checked, "Yes," the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

*1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection methods to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.*

The potential respondent universe is all entities that apply to participate in FCC spectrum auctions. Applicants are individuals and businesses. No sampling or other respondent selection methods are used. No random survey sampling is done. The Commission does not use statistical samples, because the total number of participants per auction is so small. Some auctions have as few as 5-10 participants, and only five times in the 16-year history of the Auctions program has the Commission had more than 200 applicants qualify to participate in an auction. Most often, the number of qualified bidders in an auction ranges between 20 and 50. Therefore, if statistical sampling were used, the Commission would probably be surveying less than 10 applicants for its smaller auctions and about 20-25 applicants for its largest auctions. In this case, statistical sampling would not improve the accuracy of the results or significantly reduce the burden.

The last time an auctions customer survey was conducted was in 2003, after Auction 48. The following are typical survey response rates achieved:

After Auction 16, 62 questionnaires were sent out and 21 responses were received.  
After Auction 17, 139 questionnaires were sent out and 26 responses were received.  
After Auction 22, 67 questionnaires were sent out and 12 responses were received.  
After Auction 23, 90 questionnaires were sent out and 18 responses were received.  
After Auction 24, 18 questionnaires were sent out and 5 responses were received.  
After Auction 25, 241 questionnaires were sent out and 29 responses were received.  
After Auction 48, 104 questionnaires were sent out and 30 responses were received.

Given the number of responses received for surveys conducted after past auctions, if the Commission were to send questionnaires only to a statistical sampling, the number of responses that it would receive would be very small, and as a result, would be less useful in providing customer feedback to the Commission.

The questionnaire is really not so much a “survey” because it is not designed to gather statistics for subsequent analysis, but rather as a request for feedback from auction participants regarding the Division’s customer service. The questionnaires are not part of a rulemaking proceeding and are not used to adopt Commission policy or regulations. The questionnaire provides useful feedback in determining the extent to which the Commission is meeting its goal of providing participants in competitive bidding with the highest level of customer satisfaction through information dissemination and the responsiveness of the Commission staff to customer inquiries. Through the questionnaire, the Commission also seeks input from auction participants to gather information to assist it in evaluating the effectiveness of its automated bidding system.

*2. Describe the procedures for the collection of information including:*

- *Statistical methodology for stratification and sample selection,*
- *Estimation procedure,*
- *Degree of accuracy needed for the purpose described in the justification,*
- *Unusual problems requiring specialized sampling procedures, and*
- *Any use of periodic (less frequent than annual) data collection cycles to reduce burden.*

The survey is conducted by mail, e-mail, and/or telephone. Respondents may return their responses by mail, fax, telephone, or e-mail. If future customer surveys are conducted by posting the survey either on the Commission’s electronic auctions system or the Internet, responses would be received electronically, either via the Commission’s electronic auctions system or via the Internet. Because statistical sampling is not employed, there is no need to determine the degree of accuracy of such a collection methodology. The average expected response time will be approximately 15 minutes. To reduce the burden of this information collection, the Commission will continue to conduct the survey on a periodic (less frequent than annual) basis.

*3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.*

Responses to the Auction Survey are strictly voluntary. Any customer feedback received is helpful, but it is not critical to the conduct of the auctions program. If the Commission determines that it needs to maximize the rate of response to the questionnaire, a pre-addressed, stamped envelope could be placed in the mailings.

*4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of test may be submitted for approval separately or in combination with the main collection of information.*

No tests of procedures or methods have been undertaken to date.

*5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.*

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