

SUPPORTING STATEMENT

A. Justification:

1. The Commission is seeking an extension (no change in third party disclosure requirement) for this submission to the OMB.

Section 80.868 of the Commission's rules requires a card of instructions giving a clear summary of the radiotelephone distress procedure must be securely mounted and displayed in full view of the principal operating position. It is necessary to ensure that radiotelephone distress procedures must be securely mounted and displayed in full view of the principal operating position on board certain vessels (300 gross tons) required by the Communications Act or the International Convention for Safety of Life at Sea to be equipped with a radiotelephone station.

Statutory authority for this collection of information is contained in 47 U.S.C. 154, 303, 307(e), 309, and 332, unless otherwise noted.

As noted on the Form OMB 83-I, this collection of information does not affect individuals or households; thus, there are no impacts under the Privacy Act.

2. The information is used by a vessel radio operator during an emergency situation, and is designed to assist the radio operator to utilize proper distress procedures during a time when he or she may be subject to considerable stress or confusion.
3. Prior to finalizing rule makings the Wireless Telecommunications Bureau conducts an analysis to insure that improved information technology cannot be used to reduce the burden on the public. This analysis considers the possibility of obtaining and/or computer-generating the required data from existing data bases in the Commission or other Federal agencies.
4. This agency does not impose a similar information collection on the respondents. There is no similar data available.
5. In conformance with the Paperwork Reduction Act of 1995, the Commission is making an effort to minimize the burden on all respondents, regardless of size. The Commission has limited the information requirements to those absolutely necessary.
6. If the card of instructions was not posted, an aid to vessel radio operators during emergency situations would not be available. Safety related communications could take longer and/or be less useful to search and rescue organizations.

7. Current data collection is consistent with 5 CFR 1320.6, except that the subject records (i.e., card of instructions) are required to be retained for 10 years to coincide with the station license term. However, this retention period is not included in the rule section. *See* 47 CFR 90.868. The retention of the records for 10 years imposes a negligible burden on the licensee while providing valuable information to radio operators during an emergency.
8. The Commission published a notice soliciting public comment which appeared in the Federal Register on February 25, 2010 (75 FR 8702). No comments were received.
9. Respondents will not receive any payments.
10. There is no need for confidentiality.
11. This does not address any private matters of a sensitive nature.
12. This record keeping requirement merely consists of the mounting of a card summarizing radio distress procedures in view of the radiotelephone operators' position on board certain compulsory equipped vessels. According to the Universal Licensing System (ULS) database, we estimate that 4,506 licensees will be required to meet this requirement. Further, we estimate that an average of six minutes for "upkeep" of this card is required by each vessel operator each ten year license term.

 $4,506 \text{ (respondents)} \times 0.1 \text{ (min.)} = 450.6 \text{ (rounded to 451 hours.)}$
13. Cost to respondents: We assume that the respondent would use internal personnel to prepare the information.

 $451 \text{ hours} \times \$25/\text{hour} + 10\% \text{ overhead} = \$12,402.50.$
14. Estimated annual cost to the Federal Government: None.
15. There is no change in the Commission's burden estimates.
16. The data will not be published for statistical use.
17. No expiration date will be displayed.
18. There are no exceptions to Item 19.

B. Collections of Information Employing Statistical Methods:

No statistical methods are employed.