

SUPPORTING STATEMENT

New collection entitled: FCC Wired and Wireless Internet Survey.

A. Justification:

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

The Commission requests emergency processing under 5 C.F.R. § 1320.13 for this collection of information critical to the National Broadband Plan (Broadband Plan) required under the American Reinvestment and Recovery Act of 2009 (ARRA), Pub. L. No. 111-5, 123 Stat 115 (2009).

This collection of information is necessary to complete research done for the Broadband Plan on key consumer issues including transparency and barriers to consumer switching among providers of broadband and related services. These issues are central to a number of the Broadband Plan’s purposes, including “ensur[ing] that all people of the United States have access to broadband capability[;] . . . analy[zing] . . . the most effective and efficient mechanisms for ensuring broadband access by all people of the United States;” developing “a detailed strategy for achieving affordability of such service and maximum utilization of broadband infrastructure and service by the public;” and “evaluat[ing] . . . the status of deployment of broadband service, including progress of projects supported by the grants made pursuant to this section.” *ARRA § 6001(k)(2)*.

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

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 & Policy Analysis (OSPPA) will use information collected under this survey to understand what consumers know—and need to know—about the performance, cost, and terms and conditions of broadband and related services, and what barriers they face to switching service providers. This understanding will complete ongoing research for the Broadband Plan on these issues and provide a foundation for future decisionmaking regarding broadband and related services.

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. This survey seeks to understand the impact of and consumers' understanding regarding prices, performance characteristics, contract structures, and fees, for wireline and wireless broadband, as well as related services.

Information collected from last-mile broadband providers through the Commission's Form 477 concerns facilities and physical access and provides information about broadband speed tiers—this provider-based collection does not provide information on price or other terms of service. The FCC's recent Consumer Home Broadband Adoption and Use survey asked respondents to report the average monthly fees for their telecommunications services, but did not provide data on contract terms and fees, which are *de facto* elements of the prices consumers pay, or on barriers to switching providers. The collections above lack sufficient depth to determine the impact of and consumers' understanding regarding pricing, performance characteristics, contract structures and fees.

The collection effort proposed has specific elements focused on contract terms and fees. 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.

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 the impact of and consumers' understanding regarding pricing, performance characteristics, contract structures and fees.

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.

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.¹ By the middle of the decade, initial experimental work had begun, exploring the practicality of interviewing respondents on cell phones.² Starting in 2007, Princeton Survey Research Associates International (PSRAI), 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.³

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

¹ *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>.

² *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>.

³ *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.

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 assumption.

Since the initial work, PSRAI and others have experimented with lower reimbursements to cell phone users as well as dropping reimbursements 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.*

For Paperwork Reduction Act purposes the total time burden for the survey is estimated at 1,600 hours for the telephone survey **(3,000 respondents x .533333333 hours per response = 1,600 total annual burden hours.**

This estimate is based on completing 3,000 20-minute telephone interviews with adults from the general population and the estimated time burden on adults who do not consent to complete the interview.

Respondent Time Burden				
3,000 20-minute telephone interviews				
		Total minutes	Total Hours	Mean minutes/person
Minutes for interviews				
3,000	20-minute interviews plus time to reach respondents	62,850	1,048	20.95
Minutes for contacts without a completed interview				
25%	Response Rate			
	Time if no respondent answers	0	0	0
9,000	Time if respondent answers phone, but does not complete interview	33,098	552	3.68
Total Time Burden				
Total individuals possibly contacted in order to achieve 3,000 responses.		Total minutes	Total Hours	Mean minutes/person
12,000		95,948	1,600	8.0

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 31,983 cell phone minutes for both respondents and those who do not respond. Assuming that 28% of total calling hours per time zone are “non-free” hours of service, and that cell phone minutes consumed during the “non-free” hours of service would cost the respondent \$0.10/minute, the total cost is estimated at \$896. 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 Abt/SRBI, in partnership with Princeton Survey Research Associates International (PSRAI), to draft a survey instrument, conduct the interviews, and compile the results. The cost of the contract is \$192,879. 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 1,600 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).

Once data collection is completed, the FCC will complete ongoing analysis aimed at understanding the impact of broadband industry practices on consumers. This will involve analysis of cross-tabulations of survey questions that focus on satisfaction with broadband services with a number of different questions about industry practices and respondents’ demographic characteristics.

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.