

SUPPORTING STATEMENT

A. Justification:

1. FCC Form 161, "CORES Update/Change Form," is part of the Commission's Registration System (CORES). This form may be found at: www.fcc.gov/Forms/Form161/161.pdf.
 - (a) Applicants/entities (respondents) use FCC Form 161 to update/change their name, address, contact representative, telephone, e-mail address, fax number, etc., which was previously entered into the CORES database.
 - (b) The Commission uses FCC Form 161 to allow applicants and licensees doing business with the FCC to keep their account information current.
 - (c) The Commission will also use FCC Form 161 to update/change information in the Commission's database.
 - (d) For businesses and individuals¹, the FCC Registration Number (FRN) is its Federal Communications Commission-issued FCC FRN. The FRN is a unique account number that is used for identification purposes only.
 - (e) FCC Form 161 has a "personal security question," and a "custom personal security question."
 - (f) Finally, the FCC has incorporated a "certification statement" and "signature line."²

This information collection contains personally identifiable information on individuals (PII).³

- (a) The FCC maintains a system of records notice (SORN), FCC/OMD-9, "Commission Registration System (CORES)," to cover the collection, purposes(s), storage, safeguards, and disposal of the PII that individual respondents may submit on FCC Form 161.
- (b) The FCC published this SORN last on April 5, 2006 (71 FR 17234, 17253).
- (c) If the FCC makes substantive changes to CORES, the Commission will conduct a full Privacy Impact Assessment of FCC/OMD-9 SORN and post it on the FCC webpage, as required by OMB Memorandum, M-03-22 (September 22, 2003).

Statutory authority for this collection of information is the Debt Collection Improvement Act of 1996, Public Law 104-134, Chapter 10, § 31001.

¹ The FCC has determined, upon closer examination, that most of the "individuals" who are filing FCC Form 161 are doing so in their "entrepreneurial capacity" as business owners, which exempts most of the information that they provide from personally identifiable information (PII) covered by the Privacy Act. Nonetheless, there is a system of records notice, FCC/OMD-9, "Commission Registration System (CORES)" to cover any PII data that they may provide.

² These two additions were incorporated from FCC Form 162 when this collection was previously submitted to OMB in 2007. Upon issuance of the Notice of Action (NOA) for 3060-0918 on March 26, 2007, the Commission then cancelled FCC Form 162 (3060-0919).

³ Ibid.

2. The Commission uses the information that applicants provide on FCC Form 161 to update and/or to change their CORES information.⁴
 - (a) This is necessary to ensure that the Commission has accurate information to identify the applicant filer and to ensure proper crediting of the transaction and money, if applicable.
 - (b) Applicants (respondents) may update/change their data via the FCC Internet webpage: www.fcc.gov/frnreg.
3. Respondents may provide the information on FCC Form 161 electronically via the FCC's webpage: www.fcc.gov/frnreg, or respondents may continue to file the paper version of FCC Form 161.
4. There is no similar information already available. The Commission is required to obtain this information from any applicants and/or licensees doing business with the Commission.
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.
 - (a) The collection will have minimal impact on all respondents.
 - (b) The Commission has limited its collection of information to only the extent needed to identify a person or business interacting with the Government.
6. The FRN is used each time a person or entity does business with the Commission. Although this unique number is stored in the Commission's CORES database, it is an integral part of each filing or service/benefit request. It also serves to identify the filer so as to ensure proper crediting of the transaction and money, if applicable.
7. This information is only collected to update/change data in the CORES system.
8. The Commission published a Notice in the *Federal Register* on December 30, 2009 (74 FR 69097). No comments were submitted following publication of the notice.
9. Respondents will not received any payments or gifts.
10. Consistent with the provisions of the Privacy Act, the Taxpayer Information Number, *i.e.*, Social Security Number and/or the Employee Identification Number, will not be made available to the public. A privacy act statement is included on FCC Form 161 so that applicants (respondents) are informed of the need to obtain the information.⁵
 - (a) The Commission maintains a SORN, FCC/OMD-9, "Commission Registration System (CORES)" to cover the collection, purpose(s), storage, safeguards, and disposal of the PII that individual respondents may submit on FCC Form 161.

⁴ CORES provides applicants (respondents) with a CORES registration number, which the Commission uses to identify applicants and their business account information with the FCC. This number is used solely for identification purposes.

⁵ Ibid.

- (b) FCC Form 161 includes a privacy statement to inform applicants (respondents) of the Commission’s need to obtain the information and the protections that the FCC has in place to protect the PII.

11. This collection does not address any private matters of a sensitive nature. In addition:

- (a) The Commission assigns each applicant that registers in CORES a FCC Registration Number (FRN), as explained above.
- (b) Furthermore, the Commission will redact any sensitive information before it makes FCC forms and other documents available for public inspection.
- (c) The FCC has a SORN, FCC/OMD-9, “Commission Registration System (CORES),” which covers the PII that applicants submit on FCC Form 161, as noted above.⁶
- (d) Furthermore, the Commission will redact any PII submitted on this form before it makes FCC Form 161 available for public inspection.

12. The Commission estimates that:

- (a) The respondents who are required to file FCC Form 161 include:
 - (1) Businesses and other for-profit entities, including individuals in their “entrepreneurial capacity” (“businesses”) (66%)
 - (2) Institutions and other non-profits (“institutions”) (24%)
 - (3) State, local, or tribal governments (“governments”) (10%)
- (b) The average burden on respondents is approximately ten minutes (0.167 hours) based on FCC staff’s knowledge and familiarity with the availability of the data that respondents are required to have to file FCC Form 161, “CORES Update/Change Form:”
 - (1) Businesses x 0.66 x 57,600 applicants = 38,016 respondents
 - (2) Institutions x 0.24 x 57,600 applicants = 13,824 respondents
 - (3) Governments x 0.10 x 57,600 applicants = 5,760 respondents

Total Number of Respondents: 57,600 (respondents)

Total Number of Responses: 57,600 responses

The number of responses is calculated as one response per applicant and a one time reporting requirement to register with the FCC)

- (1) 38,016 business responses x 0.167 hours (10 mins)/FCC Form 161 = 6,462.72 hrs/yr
- (2) 13,824 institutional responses x 0.167 hours (10 mins)/FCC Form 161 = 2,350.08 hrs/yr

⁶ Ibid.

(3) 5,760 government responses x 0.167 hours (10 mins)/FCC Form 161 = 979.20 hrs/yr

Total Annual Hourly Burden: 6,462.72 hrs + 2,350.08 hrs + 979.20 hrs = **9,792.0 hours**

The Commission estimates that respondents will use the equivalent of a senior staff person at the GS-13/Step 5 (\$48.51 per hour) to complete and file FCC Form 161:

(1) businesses: 6,462.72 hours x \$48.51/hour = \$313,516.49

(2) institutions: 2,350.08 hours x \$48.51/hour = \$114,006.00

(3) governments: 5,760 hours x \$48.51/hour = \$47,502.50

Total “In House” Costs: \$313,516.49 + \$114,006.00 + \$47,502.50 = **\$475,024.98**

13. The Total Annual Reporting and Recordkeeping Cost Burden estimates:

(a) Total annualized capital/startup costs: \$0.00

(b) Total annual costs (O&M): \$0.00

(c) Total annualized cost requested: **\$0.00**

14. There are no costs to the Federal Government:

(a) Congress requires the FCC to collect section 9 regulatory fees, which provide the major funding source for the FCC’s operating budget; and

(b) The FCC considers the costs to administer the regulatory fee program, including processing FCC Form 161, as part of its regular operations.

15. The Commission has made these adjustments to this information collection, as follows:

(a) We have increased our estimate for the total number of respondents—from 52,628 to 57,600 respondents and made the corresponding increases in the total number of responses annually—from 52,628 to 57,600 responses, due to empirical evidence providing a more accurate basis for the Commission’s estimate of the number of respondents filing FCC Form 161 annually and as a result of the increase in the number of respondents for 3060-0917; and

(b) The increase in the number of respondents for this collection is due, in part, to the Commission’s estimate that there will be an increase of approximately 50,000 respondents and responses as a result of those who will be registering in CORES and then begin filing FCC Form 323, “Ownership Report for Commercial Broadcast Stations.”

16. The data will not be published for statistical use.

17. We are seeking continued OMB approval not to display the expiration date of OMB approval of the information collection.

CORES Update/Change Form, FCC Form 161

- (a) Once the form is printed, waiving the OMB expiration date will obviate the Commission's need to maintain paper stocks of forms rather than destroying them away because of an outdated OMB expiration date or change our electronic forms that are available on the Internet or Right Fax system.
- (b) The Commission will use an edition date in lieu of an OMB expiration date.
- (c) Additionally, the Commission published all OMB-approved information collections in 47 CFR § 0.408.

18. The 60 day *Federal Register* Notice incorrectly stated that this collection had a Privacy Impact Assessment (PIA). As noted in Question 1, no PIA is required at this time.

There are no other exceptions to item 19 of the OMB 83-I "Certification Statement."

B. Collections of Information Employing Statistical Methods:

This information collection does not employ any statistical methods.