

## SUPPORTING STATEMENT

### **A. Justification:**

1. The Commission is seeking an extension (no change in recordkeeping requirements) in order to obtain the full three year clearance from the OMB. There is a change in burden which is due to 2 additional recordkeepers subject to this IC. See item 15.

Section 87.109 of the Commission's rules require that a station at a fixed location in the international aeronautical mobile service (IAMS) must maintain a log (written or automatic log) in accordance with the Annex 10 provisions of the International Civil Aviation Organization (ICAO) Convention. This log is necessary to document the quality of service provided by fixed stations and must contain the following information:

- 1) The name of the agency operating the station;
  - 2) The identification of the station;
  - 3) The date;
  - 4) The time of opening and closing the station;
  - 5) The frequencies being guarded and the type of watch (continuous or scheduled) being maintained on each frequency;
  - 6) Except at intermediate mechanical relay stations where the provisions of this paragraph need not be complied with, a record of each communication showing text of communication, time communications completed, station(s) communicated with, and frequency used;
  - 7) All distress communications and action thereon;
  - 8) A brief description of communications conditions and difficulties, including harmful interference. Such entries should include, whenever practicable, the time at which interference was experienced, the character, radio frequency and identification of the interfering signal;
  - 9) A brief description of interruption to communications due to equipment failure or other troubles, giving the duration of the interruption and action taken;
  - 10) Such additional information as may be considered by the operator to be of value as part of the record of the stations operations; and
- (c) Stations maintaining written logs must also enter the signature of each operator, with the time the operator assumes and relinquishes a watch.

In short, the Commission is concerned with matters involving harmful interference, equipment failure, and logging of distress and safety calls where applicable.

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.

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

2. The information is used by FCC personnel during inspections and investigations to ensure that stations are licensed and operated in compliance with applicable rules, statutes, and treaties. If the information is not collected, documentation concerning station operations will be unavailable, fixed stations in the IAMS may not be in compliance with treaty requirements, and enforcement efforts will suffer.
3. Prior to finalizing rule making the Wireless Telecommunications Bureau conducts an analysis to insure that improved information technology can 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. Further, this information can be submitted on FCC Form 601.
4. This agency does not impose a similar collection on the respondents. No similar information is 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 that absolutely necessary for evaluating and processing the application and to deter against possible abuses of the processes.
6. If required log entries were made less frequently, many of the specified events would not be recorded at all. Documentation concerning station operations would be unavailable, the Commission may not be able to identify fixed stations that are not in compliance with treaty requirements, and enforcement efforts would suffer.
7. Current data collection is consistent with 5 CFR 1320.6.
8. Pursuant to 5 C.F.R. § 1320.8, the Commission published a 60-day Notice on May 13, 2010 (75 FR 26959). No comments were received as a result of that Notice, which is included in this submission to OMB.
9. Respondents will not receive any payments.
10. There is no need for confidentiality.
11. This collection does not address any private matters of a sensitive nature.
12. There are approximately 5 fixed stations in the international aeronautical mobile service that are required to maintain logs. Based on a review of the subject records, it is estimated that an average of 100 hours per year per station is required to maintain this documentation.

5 stations x 100 (hours) = 500 Total Annual Burden Hours.

13. Estimate of cost to respondents: We anticipate that the respondents will use internal personnel to prepare this information at a cost of \$17 per hour. Therefore, there are no costs incurred.  $\$17/\text{hr.} \times 5 \times 100 \text{ hrs.} = \$8,500.00$ .
14. Cost to the Federal Government: None. This is a recordkeeping requirement.
15. There is a change in burden due to an adjustment. There are now five respondents subject to this recordkeeping requirement. Therefore, the total annual burden hours has increased by 200 hours.
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.