

SUPPORTING STATEMENT

A. Justification

1. 47 CFR 76.1706 states that cable operators shall maintain a log showing the date and location of each leakage source identified pursuant to 47 CFR 76.614, the date on which the leakage was repaired, and the probable cause of the leakage. The log shall be kept on file for a period of two years and shall be made available to authorized representatives of the Commission upon request.

The Commission is requesting an extension of this information collection in order to receive the full three year approval/clearance from OMB.

This information collection 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 Sections 302 and 303 of the Communications Act of 1934, as amended.

2. The data is used by cable television systems and the Commission to locate and eliminate harmful interference as it occurs, to help assure safe operation of aeronautical and marine radio services, and to minimize the possibility of interference to these safety-of-life services. If this collection of information is not conducted, there would be a greater likelihood of harmful interference to aeronautical and marine radio services; Commission efforts to locate and eliminate such interference would be impaired; and potentially there would be a greater risk to safety-of-life and property.

3. The use of information technology is becoming moderately feasible for this information collection. Many cable operators have installed computer storage programs that automatically detect and log the occurrence of signal leaks. We estimate that approximately 80% of cable television systems currently use these computer programs.

4. This agency does not impose similar requirements on the respondents. There are no similar data available.

5. This information collection requirement does not have a significant impact on a substantial number of small entities/businesses.

6. If we conducted this collection of information less frequently, the Commission's efforts to locate and eliminate harmful interference to aeronautical and marine radio services would be

Title: Section 76.614, Cable Television System Regular Monitoring; Section 76.1706, Signal Leakage Logs and Repair Records

impaired; there would be a greater likelihood of interference to these safety-of-life radio services; and potentially there would be a greater risk to the safety-of-life and property.

7. There are no special circumstances associated with this collection of information.
8. The Commission published a Notice (75 FR 34739) in the *Federal Register* on June 18, 2010 seeking comments for the information collection requirements contained in this supporting statement. No comments were received as a result of the Notice.
9. There will be no payment or gifts given to respondents.
10. There is no need for confidentiality with this collection of information.
11. This information collection does not address any private matters of a sensitive nature.
12. The paperwork burden for maintaining logs is estimated as follows:

We estimate that there are approximately 5,800 cable television systems currently operating on aeronautical frequencies, of which approximately 20% do not use computer storage programs that automatically detect and log the occurrence of signal leaks. Therefore, these cable television systems will be required to record the leakage **manually**.

$$5,800 \text{ systems} \times 20\% = \mathbf{1,160 \text{ systems}^1}$$

We estimate that there will be an average of five leaks per system per month (60 annually) and that the average burden of logging is one minute per leak.

$$1,160 \text{ systems} \times 5 \text{ leaks/month} \times 12 \text{ months/year} \times 0.0167 \text{ (1 minute)} \text{ per leak} = \mathbf{1,162 \text{ hours}}$$

In addition, all system operators undergo a recordkeeping burden for keeping the signal leakage **log on file** for a period of two years and making the file available to authorized representatives of the Commission upon request. We estimate the average annual recordkeeping burden to all respondents to be 0.5 hours (30 minutes).

$$5,800 \text{ systems}^2 \times 0.5/\text{system} = \mathbf{2,900 \text{ hours}}$$

¹ There are a total of 1,160 (20% of 5,800 cable TV systems) that are affected by this requirement. Since the other 80% of the cable systems have computer storage programs that automatically detect and log the occurrence of signal leaks these systems are not affected and are not included in this count of systems.

² The entire 5,800 systems are affected by this requirement.

Total Annual Burden Hours = 1,162 hours + 2,900 hours = 4,062 hours

Estimates "In-house costs": We estimate an average hourly wage of \$20.00 per hour for individuals tasked with the signal leakage logging and recordkeeping requirements.

4,062 hours x \$20.00 per hour = **\$81,240**

These estimates are based on the Commission's knowledge and familiarity with the availability of the data required.

13. Annual Cost Burden:

- (a) Total annualized capital/startup costs: None
- (b) Total annual costs (O&M): None
- (c) Total annualized cost requested: None

14. There is no cost to the Federal Government.

15. The Commission had an adjustment to the total annual burden hours of -701 hours. This adjustment is due to a decrease in the number of respondents for this information collection. There are no program changes to this collection.

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

17. We do not seek approval to not display the expiration date for OMB approval of this information collection.

18. There are no exceptions to the Certification Statement.

B. Collections of Information Employing Statistical Methods

No statistical methods are employed.