

**Title: Special Temporary Authorization (STA) Requests; Notifications; and Informal Filings; Sections 1.5, 73.1615, 73.1635, 73.1740 and 73.3598; CDBS Informal Forms; Section 74.788; FCC Form 337**

**SUPPORTING STATEMENT**

**A. Justification:**

1. On September 30, 2004, the Commission released the Report and Order, *In the Matter of Amendment of Parts 73 and 74 of the Commission's Rules to Establish Rules for Digital Low Power, Television Translator, and Television Booster Stations and to Amend Rules for Digital Class A Television Stations*, MB Docket No. 03-185, FCC 04-220 (“*LPTV Digital Transition Report and Order*”). The *LPTV Digital Transition Report and Order* contains rules and policies for low power stations (“LPTV”)<sup>1</sup> to transition from analog to digital broadcasting and provides that should a new digital low power television, television translator, or Class A permittee require an extension of time to construct, and have an acceptable reason for failing to construct, as set forth in 47 C.F.R. §74.788(c)(1) – (2), the permittee must comply with 47 C.F.R. §74.788(c)(4) (using Form 337). **This new requirement requires that a new digital low power television, television translator, and Class A permittee must submit FCC Form 337, Application for Extension of Time to Construct a Digital Television Broadcast Station, and comply with 47 C.F.R. §74.788(c)(4) should the permittee require an extension of time to construct and an acceptable reason for failing to construct, as set forth in 47 C.F.R. §74.788(c)(1) – (2), applies.**

**FCC Form 337.**

The FCC Form 337, Application for Extension of Time to Construct a Digital Television Broadcast Station, is used by all DTV permittees to apply for extension of time within which to construct a DTV broadcast station. This form must be filed at least sixty, but not more than ninety, days prior to the applicable construction deadline. Applicants who file this form based on financial hardships must retain documentation fully detailing and supporting their financial representations as well as any steps taken to overcome the circumstances preventing construction.

**Special Temporary Authority (STA) Requests (47 CFR § 73.1635).** Broadcast stations (AM, FM, TV, Class A TV or LPTV licensees or permittees) may file a request for STA approval to permit a station to operate a broadcast facility for a limited period at a specified variance from the terms of the station's authorization or requirements of the FCC rules. Stations may file a request for STA approval for a variety of reasons. The request must describe the operating modes and facilities to be used. Types of STA requests include Engineering and Legal STAs.

**Notifications:**

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<sup>1</sup> The low power television service consists of LPTV, TV translator, and Class A stations. LPTV stations may radiate up to 3 kilowatts of power for stations operating on the VHF band (*i.e.*, channels 2 through 13), and 150 kilowatts of power for stations operating on the UHF band (*i.e.*, channels 14 through 69). By comparison, full-service stations on VHF channels 7 through 13 radiate up to 316 kilowatts of power, and stations on the UHF channels radiate up to 5,000 kilowatts of power. LPTV signals typically extend approximately 15 to 20 miles, while the signals of full-service stations can reach as far as 60 to 80 miles.

OMB Control Number: 3060-0386

February 2011

**Title: Special Temporary Authorization (STA) Requests; Notifications; and Informal Filings; Sections 1.5, 73.1615, 73.1635, 73.1740 and 73.3598; CDBS Informal Forms; Section 74.788; FCC Form 337**

- **Change in Official Mailing Address for Broadcast Station (47 CFR § 1.5).** Broadcast stations may file this form to report any changes in the station's mailing address, but cannot use this form to correct or change the name of the licensee.
- **Consummation Notice.** Broadcast stations may file this form to notify the Commission when an assignment of license or transfer of control is consummated. The form also may be used by the station to request an extension of time to consummate.
- **Silent Notifications (47 CFR § 73.1740).** Broadcast stations (AM, FM, TV or Class A TV licensees) may file this form to notify the Commission of the station's suspension of broadcast operations. Broadcast stations may also use this form to request a silent STA or extension thereof. Types of Silent Notifications include Notification of Suspension and Resumption of Operations. Pursuant to Section 73.1740, broadcast station licensees must notify the Commission when events beyond their control make it impossible to continue operation or to adhere to the required operating schedules set forth in this rule. In addition, they must notify the Commission when they resume normal operations. (No further authority is needed for limited operation or discontinued operation for a period not exceeding 30 days.) Should events beyond the licensees control make it impossible for compliance within the required 30-day time period, broadcast station licensees must file an informal letter request for silent operations ("Silent STA," discussed below in informal filings section).
- **Section 73.1615 notifications (47 CFR § 73.1615).** Broadcast stations (AM, FM, TV or Class A TV licensees) must file a notification under 47 CFR 73.1615(c) when such a station is in the process of modifying existing facilities as authorized by a construction permit and determines it is necessary to either discontinue operation or to operate with temporary facilities to continue program service for a period not more than 30 days. Licensees or permittees of directional or nondirectional FM, TV or Class A TV or nondirectional AM must file a notification and comply with 47 CFR 73.1615(a). Licensees or permittees of a directional AM station whose modification does not involve a change in operating frequency must file a notification and comply with 47 CFR 73.1615(b). Licensees or permittees of a directional AM station whose modification does involve a change in frequency and determines it is necessary to discontinue operation for a period not more than 30 days must file a notification and comply with 47 CFR 73.1615(d)(2).
- **Tolling Notifications (47 CFR § Section 73.3598).** Broadcast stations (TV/DTV,<sup>2</sup> Class A TV, low power TV, TV translator, TV booster, AM, FM, International Broadcast, FM translator, FM booster, and LPFM permittees) may file this form to notify the Commission of an event that would toll their deadline to construct their TV facility. Section 73.3598 requires a permittee to notify the Commission as promptly as possible and, in any event, within 30 days of a tolling event, i.e., when construction is prevented due to (1) an act of God (e.g., floods, tornados, hurricanes, earthquakes, etc.); (2) the grant of the permit is the subject of administrative or judicial review (i.e., petitions for reconsideration and applications for review of the grant of a construction permit pending before the Commission and any judicial appeal); (3) construction is delayed by a

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<sup>2</sup>As of June 12, 2009, a TV/DTV station permittee may obtain an extension of time to construct its DTV facility only pursuant to the tolling provision in Section 73.3598.

**Title: Special Temporary Authorization (STA) Requests; Notifications; and Informal Filings; Sections 1.5, 73.1615, 73.1635, 73.1740 and 73.3598; CDBS Informal Forms; Section 74.788; FCC Form 337**

cause of action pending in court related to requirements for construction or operation of the station (i.e., zoning or environmental requirements); or (4) international coordination where resolution of the international coordination issue is truly beyond the control of the station (e.g., where the failure to obtain coordination will not permit the station to construct facilities sufficient to replicate its analog coverage area). Stations must report progress at six-month intervals, detailing how the tolling event continues to cause delays in construction, any construction progress, and the steps it has taken and proposes to take to resolve any remaining impediments to construction. (Any construction permit for which construction has not been completed and which an application for license has not been filed will be automatically forfeited upon expiration of the construction permit.)

**Informal Filings:**

- **Section 73.1615 informal letter requests (47 CFR § 73.1615).** Broadcast stations (AM, FM, TV or Class A TV licensees or permittees) must file an informal letter request under 47 CFR 73.1615(c) (1) when such a station is in the process of modifying existing facilities pursuant to 47 CFR 73.1615(a) or (b) and determines it is necessary to either discontinue operation or to operate with temporary facilities to continue program service for a period of more than 30 days. Licensees or permittees that filed notifications under 47 CFR 73.1615(d)(2) but which determine that it is necessary to discontinue operation for a period more than 30 days must file an informal letter request and comply with 47 CFR 73.1615(d)(1) and (2).
- **Silent STAs and Extensions (47 CFR § 73.1740).** Broadcast stations (AM, FM, TV or Class A TV licensees) that suspended broadcast operations (and filed a silent notification) pursuant to Section 73.1740 and which finds it necessary to continue its suspension of operations for more than 30 days must file an informal letter request (“Silent STA”) with the Commission under 47 CFR § 73.1740(a)(4) for additional time. If necessary, the station may file a request for an extension of its Silent STA.

Copies of all STA requests, notifications, informal filings and tolling notifications must also be retained in the station’s local public inspection file. This recordkeeping requirement is contained in OMB Control No. 3060-0214. Sections 73.3526(e) and 73.3527(e) require broadcast station licensees and permittees to retain in the station’s local public inspection file a copy of any application tendered for filing with the FCC, together with all related material.

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 1, 4(i) and (j), 7, 301, 302, 303, 307, 308, 309, 312, 316, 318, 319, 324, 325, 336, and 337 of the Communications Act of 1934, as amended.

2. The data is used by FCC staff to determine whether to grant and/or accept the requested special temporary authority (“STA”) (or other request for FCC action), the required notification, informal filing, application

**OMB Control Number: 3060-0386**

**February 2011**

**Title: Special Temporary Authorization (STA) Requests; Notifications; and Informal Filings; Sections 1.5, 73.1615, 73.1635, 73.1740 and 73.3598; CDBS Informal Forms; Section 74.788; FCC Form 337**

filings or other non-form submission.<sup>3</sup> FCC staff will review for compliance with legal and technical regulations, including but not limited to ensuring that impermissible interference will not be caused to other stations.

3. All STA requests, applications, notifications, informal filings and other “non-form” submissions *may* be filed electronically via the FCC’s Consolidated Database System (“CDBS”). These filings may also be filed by letter, but only if expressly authorized by rule or Commission approval. (We estimate that less than 15% of these filings will be made by paper.)
4. No other agency imposes a similar information collection on the respondents. There is no similar data available.
5. This information collection will not have a significant economic impact on a substantial number of small entities/businesses.
6. The frequency for this collection of information is determined by respondents, as necessary.
7. This collection of information is consistent with the guidelines in 5 CFR 1320.5(d)(2).
8. The Commission published a notice in the Federal Register on October 20, 2010 seeking public comment on the information collection requirements contained in this supporting statement, *see* 75 FR 64729. No comments have been received from the public.
9. No payment or gift was provided to the 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. We make the following estimates for STA requests, notifications, informal filings, and FCC Form 337 applications.

**a) STA Requests:**

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<sup>3</sup> Generally, “non-form” filings are notifications or requests filed with the Commission that are submitted by informal letter as opposed to a specific Commission form.

**Title: Special Temporary Authorization (STA) Requests; Notifications; and Informal Filings; Sections 1.5, 73.1615, 73.1635, 73.1740 and 73.3598; CDBS Informal Forms; Section 74.788; FCC Form 337**

- **Legal STA Requests.** We estimate that a total of 200 Legal STA requests (all broadcast services – AM, FM, TV, Class A TV or LPTV and including STA extension requests) will be filed with the Commission annually. We estimate that 10% of these filings (or 20 filings) will be made by the station licensee/permittee without outside consultation and will require four (4) hours preparation, while 90% of these filings (or 180 filings) will be contracted out to outside attorneys and will require one (1) hour of consultation with these outside parties.
- **Engineering STA Requests.** We estimate that a total of 1,000 Engineering STA requests (all broadcast services – AM, FM, TV, Class A TV or LPTV and including STA extension requests) will be filed with the Commission annually. We estimate that 10% of these filings (or 100 filings) will be made by the station licensee/permittee without outside consultation and will require four (4) hours preparation, while 90% of these filings (or 900 filings) will be contracted out to outside consulting engineers and will require one (1) hour of consultation with these outside parties.

**b) Notifications:**

- **Change in Official Mailing Address for Broadcast Station (47 CFR § 1.5).** We estimate that 200 of these notices will be filed with the Commission annually. We estimate that these filings will be made by the station licensee/permittee without outside consultation and will require 30 minutes (0.5 hours) preparation.
- **Consummation Notices.** We estimate that 400 of these notices will be filed with the Commission annually. We estimate that 10% (40) of these filings will be made by the station licensee/permittee without outside consultation and will require 30 minutes (0.5 hours) preparation and 90% (360) of these filings will be contracted out to outside attorneys and will require one (1) hour of consultation with these outside parties.
- **Silent Notifications (47 CFR § 73.1740).** We estimate that 400 of these notices (which include Notification of Suspension and Resumption of Operations) will be filed with the Commission annually. We estimate that 75% (300) of these filings will be made by the station licensee/permittee without outside consultation and will require 30 minutes (0.5 hours) preparation and 25% (100) of these filings will be contracted out to outside attorneys and/or consulting engineers and will require one (1) hour of consultation with these outside parties.
- **Section 73.1615 notifications (47 CFR § 73.1615).** We estimate that 300 of these notices will be filed with the Commission annually. We estimate that about 67% (200) filings will be made by the station licensee/permittee without outside consultation and will require 30 minutes (0.5 hours) preparation and the remaining one-third (100) of these filings will be contracted out to attorneys and/or consulting engineers and will require one (1) hour of consultation with these outside parties.
- **Tolling Notifications (47 CFR § 73.3598).** We estimate that 60 notifications and 60 waivers for additional time to construct will be filed with the Commission annually. We estimate that (50%) of the filings (30 notifications and 30 waivers) will be made by the station licensee/permittee without outside consultation and will require 30 minutes (0.5 hours) preparation and the remaining of these

**Title: Special Temporary Authorization (STA) Requests; Notifications; and Informal Filings; Sections 1.5, 73.1615, 73.1635, 73.1740 and 73.3598; CDBS Informal Forms; Section 74.788; FCC Form 337**

filings (50%)(30 notifications and 30 waivers) will be contracted out to attorneys and/or consulting engineers and will require one (1) hour of consultation with these outside parties.

**c) Informal Filings:**

- **Section 73.1615 informal letter requests (47 CFR § 73.1615).** We estimate that 150 of these informal letter requests will be filed with the Commission annually. We estimate that 20% of these filings (or 30 informal letters) will be made by the station licensee/permittee without outside consultation and will require four (4) hours preparation, while 80% of these filings (or 120 filings) will be contracted out to outside attorneys and/or consulting engineers and will require one (1) hour consultation with these outside parties.
- **Silent STAs and Extensions (47 CFR § 73.1740).** We estimate that 300 of these filings (which include requests for Silent STA and Extension of Silent STA) will be filed with the Commission annually. We estimate that 10% (30) of these filings will be made by the station licensee/permittee without outside consultation and will require 30 minutes (0.5 hours) preparation and 90% (270) of these filings will be contracted out to outside attorneys and/or consulting engineers and will require one (1) hour of consultation with these outside parties.

**d) FCC Form 337 Applications:**

- The Commission estimates that 1,000 FCC Form 337 applications will be filed with the Commission annually. We estimate that respondents will spend an average of 1 hour to complete each application.

Type	# of Respondents	# of Responses	Burden Hours of Respondents	Annual Burden Hours	Hourly Salary of Respondents <sup>4</sup>	Annual In-House Cost
<b>12a. STA Requests (47 CFR § 73.1635)</b>						
Legal STA filed by Licensee/ Permittee	20	20	4 hrs	80 hrs	\$48.08	\$3,846.40
Legal STA filed by outside attorney but requiring the respondent to consult with said attorney	180	180	1 hr consultation	180 hrs	\$48.08	\$8,654.40

<sup>4</sup> This estimate is based on an average salary for a station manager of \$100,000 per year or \$48.08 per hour.

OMB Control Number: 3060-0386

February 2011

**Title: Special Temporary Authorization (STA) Requests; Notifications; and Informal Filings; Sections 1.5, 73.1615, 73.1635, 73.1740 and 73.3598; CDBS Informal Forms; Section 74.788; FCC Form 337**

Type	# of Respondents	# of Responses	Burden Hours of Respondents	Annual Burden Hours	Hourly Salary of Respondents	Annual In-House Cost
Engineering STA filed by Licensee/ Permittee	100	100	4 hrs	400 hrs	\$48.08	\$19,232.00
Engineering STA filed by consulting engineer but requiring the respondent to consult with said engineer	900	900	1 hr consultation	900 hrs	\$48.08	\$43,272.00
<b>Total STA Requests</b>	<b>1,200</b>	<b>1,200</b>		<b>1,560 hrs</b>		<b>\$75,004.80</b>
<b>12b. Notifications (47 CFR Part 73)</b>						
Change in Official Mailing Address for Broadcast Station	200	200	0.5 hrs	100 hrs	\$48.08	\$4,808.00
Consummation Notices filed by Licensee/ Permittee	40	40	0.5 hrs	20 hrs	\$48.08	\$961.60
Consummation Notices filed by outside attorney but requiring the respondent to consult with said attorney	360	360	1 hr consultation	360 hrs	\$48.08	\$17,308.80
Silent Notifications filed by Licensee/ Permittee	300	300	0.5 hrs	150 hrs	\$48.08	\$7,212.00
Silent Notifications filed by outside attorney or consulting engineer but requiring the respondent to consult with said attorney/engineer	100	100	1 hr consultation	100 hrs	\$48.08	\$4,808.00
Rule 73.1615 Notifications filed by Licensee/Permittee	200	200	0.5 hrs	100 hrs	\$48.08	\$4,808.00
Rule 73.1615 Notifications filed by outside engineer/attorney but requiring the respondent to consult with said engineer/attorney	100	100	1 hr consultation	100 hrs	\$48.08	\$4,808.00
Tolling Notifications and Waivers for Extension of Time to Construct filed by						

OMB Control Number: 3060-0386

February 2011

**Title: Special Temporary Authorization (STA) Requests; Notifications; and Informal Filings; Sections 1.5, 73.1615, 73.1635, 73.1740 and 73.3598; CDBS Informal Forms; Section 74.788; FCC Form 337**

Type	# of Respondents	# of Responses	Burden Hours of Respondents	Annual Burden Hours	Hourly Salary of Respondents	Annual In-House Cost
Licensee/Permittee	60	60	0.5 hrs	30 hrs	48.08	\$1,442.40
Tolling Notifications and Waivers for Extension of Time to Construct filed by engineer/attorney but will require the respondent to consult with outside parties regarding the filings	60	60	1 hr consultation	60 hrs	\$48.08	\$2,884.80
<b>Total Notifications</b>	<b>1,420</b>	<b>1,420</b>		<b>1,020 hrs</b>		<b>\$49,041.60</b>
<b>12c. Informal Filings (47 CFR Part 73)</b>						
Rule 73.1615 Informal Letters filed by Licensee/Permittee	30	30	4 hrs	120 hrs	\$48.08	\$5,769.60
Rule 73.1615 Informal Letters filed by outside engineer/attorney but will require the respondent to consult with outside parties regarding the filings	120	120	1 hr consultation	120 hrs	\$48.08	\$5,769.60
Silent STA or Extension filed by Licensee/ Permittee	30	30	0.5 hrs	15 hrs	\$48.08	\$721.20
Silent STA or Extension filed by outside engineer/attorney but will require the respondent to consult with outside parties regarding the filings	270	270	1 hr consultation	270 hrs	\$48.08	\$12,981.60
<b>Total Informal Filings</b>	<b>450</b>	<b>450</b>		<b>525 hrs.</b>		<b>\$25,242.00</b>
<b>12d. FCC Form 337 Applications</b>						
<b>FCC Form 337 Applications Totals</b>	<b>1,000</b>	<b>1,000</b>	<b>1 hr.</b>	<b>1,000</b>	<b>\$48.08</b>	<b>\$48,080.00</b>
<b>TOTAL ANNUAL FILINGS/HOURS</b>	<b>4,070</b>	<b>4,070</b>		<b>4,105</b>		<b>\$197,368.40</b>

**13. ANNUAL COST BURDEN:**

a) STA Requests. An attorney would prepare and submit the request for a Legal STA, estimated



**Title: Special Temporary Authorization (STA) Requests; Notifications; and Informal Filings; Sections 1.5, 73.1615, 73.1635, 73.1740 and 73.3598; CDBS Informal Forms; Section 74.788; FCC Form 337**

above to be 180 filings, and a consulting engineer will prepare and submit the request for an Engineering STA, estimated above to be 900 filings. We estimate that the average salary for the attorney is \$300/hour and for a consulting engineer is \$250/hour. In addition, a licensee must submit a fee for each request by a commercial broadcast station for special temporary authority at \$170/request. We estimate that 85% of all requests filed (1,200) will be for commercial stations (1,200 x 85% = 1,020 requests).

180 Legal STA requests x 4 hours x \$300/hour =	\$216,000
900 Engineering STA requests x 4 hours x \$250/hour =	\$900,000
1,020 Feeable STA requests x \$170 Fee/ request =	<u>\$173,400</u>
<b>Annual Cost Burden =</b>	<b>\$1,289,400</b>

**b) Notifications.** An attorney and/or consulting engineer would prepare and submit the various types of notifications depending on the circumstances. We estimate that the average salary for the attorney is \$300/hour and for a consulting engineer is \$250/hour. Because these filings may be reviewed and/or filed by either or both an outside attorney or engineer consultant, we estimate the average salary to be \$275/hour. There are no filing fees attached to these notification filings with the Commission.

360 Consummation Notices x 1 hour x \$275/hour =	\$99,000
360 Silent Notifications x 1 hour x \$275/hour =	\$99,000
100 Rule 73.1615 notifications x 1 hour x \$275/hour =	\$27,500
60 Tolling Notifications and Waivers x 1 hour x \$275/hour =	<u>\$16,500</u>
<b>Annual Cost Burden =</b>	<b>\$242,000</b>

**c) Informal Filings.** A consulting engineer and/or an attorney would prepare and submit the informal letter depending on the circumstances. We estimate that the average salary for a consulting engineer is \$250/hour and for the attorney is \$300/hour. Because these filings may be reviewed and/or filed by either or both an outside attorney or engineer consultant, we estimate the average salary to be \$275/hour. In addition, a licensee must submit a fee for each request by a commercial broadcast station for special temporary authority at \$170/request. We estimate that 85% of all requests filed will the Commission will be for commercial stations (150 x 85% = 128 requests rounded up).

120 informal letter requests x 4 hours x \$275/hour =	\$132,000
270 Silent STA requests x 1 hour x \$275/hour =	\$ 74,250
128 informal letter requests x \$170 Fee / request =	<u>\$ 21,760</u>
<b>Annual Cost Burden =</b>	<b>\$228,010</b>

**d) FCC Form 337 Applications.** The Commission assumes that respondents would consult with

OMB Control Number: 3060-0386

February 2011

**Title: Special Temporary Authorization (STA) Requests; Notifications; and Informal Filings; Sections 1.5, 73.1615, 73.1635, 73.1740 and 73.3598; CDBS Informal Forms; Section 74.788; FCC Form 337**

an attorney before completing the FCC Form 337 and the attorney would review the completed form before it is transmitted to the Commission. It will take the attorney an hour per extension request to complete the review of each form.

1,000 FCC Form 337 Applications x 1 hour/application x \$300/hour = **\$300,000**

**Total Annual Cost Burden = \$1,289,400 + \$242,000 + \$228,010 + \$300,000 = \$2,059,410**

**14. Cost to the Federal Government:**

**a) STA Requests.** We estimate the government will use legal and engineer staff at the GS-14, step 5 level (\$57.13/hour), paraprofessional staff at the GS-11, step 5 level (\$33.92/hour) and clerical staff at the GS-5, step 5 level (\$18.50/hour). We expect the processing for the STAs to take from 0.50 to 2 hours to process.

1,200 STAs x \$57.13 x 2 hours =	\$137,112.00
1,200 STAs x \$33.92 x 2 hours =	\$ 81,408.00
1,200 STAs x \$18.50 x 0.50 hour =	<u>\$ 11,100.00</u>
<b>Cost to the Federal Government:</b>	<b>\$229,620.00</b>

**b) Notifications and Waivers.** We estimate the government will use legal and engineer staff at the GS-14, step 5 level (\$57.13/hour), paraprofessional staff at the GS-11, step 5 level (\$33.92/hour) and clerical staff at the GS-5, step 5 level (\$18.50/hour). We expect the processing for the notifications and waivers to take from 0.50 to 1 hour to process.

200 change of address notices x \$18.50 x 0.50 hours =	\$ 1,850.00
1,220 notifications x 57.13 x 1 hour =	\$69,698.60
1,220 notifications x 33.92 x 1 hour =	\$41,382.40
1,220 notifications x \$18.50 x 0.50 hours =	<u>\$11,285.00</u>
<b>Cost to the Federal Government:</b>	<b>\$124,216.00</b>

**c) Informal Filings, Silent STAs or Extensions.** We estimate the government will use legal and engineer staff at the GS-14, step 5 level (\$57.13/hour), paraprofessional staff at the GS-11, step 5 level (\$33.92/hour) and clerical staff at the GS-5, step 5 level (\$18.50/hour). We expect the processing for the informal filings, silent STAs or extensions to take from 0.50 to 2 hours to process.

**OMB Control Number: 3060-0386**

**February 2011**

**Title: Special Temporary Authorization (STA) Requests; Notifications; and Informal Filings; Sections 1.5, 73.1615, 73.1635, 73.1740 and 73.3598; CDBS Informal Forms; Section 74.788; FCC Form 337**

150 Rule 73.1615 Informal Letters x \$57.13 x 2 hours =	\$17,139.00
150 Rule 73.1615 Informal Letters x \$33.92 x 2 hours =	\$10,176.00
150 Rule 73.1615 Informal Letters x \$18.50 x 0.50 hours =	\$ 1,387.50
300 Silent STAs or Extensions x 57.13 x 2 hours =	\$34,278.00
300 Silent STAs or Extensions x \$33.92 x 2 hours =	\$20,352.00
300 Silent STAs or Extensions x \$18.50 x 0.50 hours =	<u>\$ 2,775.00</u>
<b>Cost to the Federal Government:</b>	<b>\$86,107.50</b>

**d) FCC Form 337 Applications.** We estimate the government will use professionals at the GS-13, step 5 (\$57.13/hour) to process FCC Form 337 and processing will take four hours per application.

4 hours x 57.13/hour x 1,000 FCC Form 337 applications = **\$228,520.00**

**Total Cost to the Federal Government:**

**\$229,620.00 + \$124,216.00 + \$86,107.50 + 228,520.00 = \$668,463.50**

15. There are program changes/increases to the annual number of respondents of +1,000, annual number of responses of +1,000, annual burden hours of +1,000 hours and to the annual cost burden of +\$130,000 which are due to the information collection requirements that are contained in FCC 04-220 (FCC Form 337).

There are no adjustments to this information collection.

16. The data will not be published.

17. OMB approval of the expiration of the information collection will be displayed at 47 C.F.R. Section 0.408.

18. There are no exceptions to the Certification Statement.

**B. Collections of Information Employing Statistical Methods**

No statistical methods are employed.