

## SUPPORTING STATEMENT

### A. Justification:

1. This submission is being made as a proposed revision to an existing information collection pursuant to 44 U.S.C. § 3507. This submission seeks to revise FCC Form 499-A and its accompanying instructions to include entities that do not currently file the Form.

### *History*

In the Communications Act of 1934, as amended (the Act), Congress directed the Commission to implement measures necessary to promote the advancement of universal service. Specifically, section 254 of the Act directs the Commission to establish universal service support mechanisms with the goal of ensuring the delivery of affordable telecommunications services to all Americans, including consumers in high-cost areas, low-income consumers, eligible schools and libraries, and rural health care providers. In furtherance of this goal, section 254(d) of the Act states that “[e]very telecommunications carrier that provides interstate telecommunications services shall contribute, on an equitable and nondiscriminatory basis, to the specific, predictable, and sufficient mechanisms established by the Commission to preserve and advance universal service.” Section 254(d) also vests the Commission with the permissive authority to require “[a]ny other provider of interstate telecommunications . . . to contribute to the preservation and advancement of universal service if the public interest so requires.”

The Commission has taken numerous steps to carry out the universal service objectives established by the Act. As part of its efforts to ensure the ongoing stability and sufficiency of the universal service support system in an increasingly competitive marketplace, the Commission initiated a proceeding to revisit its universal service contribution methodology in May 2001. In the *Interim Contribution Methodology Order and Further Notice*, the Commission established various interim measures that modified reporting requirements for the FCC Form 499, which collects data that is used to calculate contributions to the federal universal service support mechanisms. Seeking to further develop the record regarding various proposals submitted in response to the *Interim Contribution Methodology Order and Further Notice*, the Commission released a Further Notice of Proposed Rulemaking and Report and Order (*First Further Notice*) in February 2002. The *First Further Notice* invited commenters to supplement the record with any new arguments or data on proposals to retain or modify the existing, revenue-based assessment methodology. In a subsequent order and further notice, the *Second Wireless Safe Harbor Order*, the Commission sought additional comment on capacity-based proposals that had been developed in the record. The Commission also sought comment on a telephone-number based proposal advanced by AT&T and the Ad Hoc Telecommunications Users Group. The Commission subsequently sought comment on a Commission staff study, which estimated potential contribution assessment levels under the then-newly modified revenue-based method and the three connection-based proposals in the further notice portion of the *Second Wireless Safe Harbor Order*. It also sought comment on various alternative contribution methodologies.

In the *2006 Contribution Methodology Order*, the Commission adopted interim modifications to the existing methodology for assessing contributions to the federal universal service fund in order to maintain the stability and sufficiency of the fund in the near-term in response to marketplace changes while the Commission continued to examine more fundamental reform. Specifically, the Commission raised the interim wireless safe harbor from 28.5 percent to 37.1 percent. In conjunction with this increase, the Commission also required wireless carriers that use traffic

studies to submit them no later than the deadline for submitting the FCC Form 499-Q that reflects the results of that study. The Commission also set forth rules requiring providers of certain voice over Internet Protocol (VoIP) services that interconnect with the nation's existing public switched telephone network (interconnected VoIP providers) to contribute to universal service support mechanisms. An interconnected Voice over Internet protocol (VoIP) service is a service that: (1) enables real-time, two-way voice communications; (2) requires a broadband connection from the user's location; (3) requires Internet protocol-compatible customer premises equipment (CPE); and (4) permits users generally to receive calls that originate on the public switched telephone network and to terminate calls to the public switched telephone network. To fulfill this obligation, the Commission adopted three means by which interconnected VoIP providers could determine their contribution requirements. First, they may report based on their actual interstate and international telecommunications revenues. Second, interconnected VoIP providers may report revenues based on an interim safe harbor that allows the reporting of 64.9 percent of interconnected VoIP telecommunications revenues as interstate and international. Third, interconnected VoIP providers may report their revenues based on pre-approved traffic studies.

On June 1, 2007, the U.S. Court of Appeals of the District of Columbia Circuit, in *Vonage Holdings Corp. v. FCC*, generally affirmed the *2006 Contribution Methodology Order*. The Court, however, vacated the pre-approval requirement for traffic studies submitted by interconnected VoIP providers and the interim suspension of one transitional requirement. Later, on June 15, 2007, the Commission released the *TRS Contribution Order*, requiring interconnected VoIP providers to contribute to the Telecommunications Relay Service (TRS) Fund. The previously approved revisions to the FCC Forms 499-A and 499-Q and accompanying instructions incorporated the changes required by the *Vonage Holdings Corp. Decision* and *TRS Contribution Order*. These changes include removing the pre-approval requirement for interconnected VoIP providers who file traffic studies from the instructions to the FCC Forms 499-A and 499-Q, removing the interim suspension of the carrier's carrier rule from the instructions to the FCC Forms 499-A and 499-Q and from the FCC Form 499-A, and including the requirement that interconnected VoIP providers contribute to the TRS Fund in the FCC Form 499-A instructions.

On October 28, 2010, President Obama signed into law the Twenty-First Communications and Video Accessibility Act of 2010 (CVAA), Public Law 111-260. In section 103(b) of the CVAA, Congress added a new section 715 to the Act. That section directed the Commission, within one year after the date of enactment of the CVAA, to require each interconnected VoIP service provider and each provider of non-interconnected VoIP service to participate in and contribute to the TRS Fund established in section 64.604(c)(5)(iii) of the Commission's rules.

***Proposed Information Collection Requirements Which Require the Office of Management and Budget's (OMB) Review and Approval:***

On March 3, 2011, the Commission released the *Contributions to the TRS Fund NPRM (NPRM)*, FCC 11-38, initiating a proceeding to adopt rules that will implement section 103(b) of the CVAA. The *NPRM* seeks public comment on the following: should non-interconnected VoIP service providers be required to register and contribute to the TRS Fund by filing the FCC Form 499-A; should the safe harbor provision extend to non-interconnected VoIP service providers; what revenues should be included in calculating VoIP service providers' TRS contributions, *i.e.*, just revenues from interstate end-users calls or revenues from all sources; and should the FCC require VoIP service providers that offer services for free and have zero end-user revenues to make any contributions to the TRS Fund.

Therefore, the Commission is seeking a preapproval for the proposed modifications to the currently approved form and instructions for FCC Form 499-A. The modification is to apply the registration and annual filing requirement for FCC Form 499-A to non-interconnected VoIP service providers, pursuant to 47 U.S.C §§ 1, 4(i), (4)(j), 225, and 715 of the Act, as amended 47 U.S.C. §§ 151, 154(i), 154(j), 225, and 616; and 47 C.F.R. §§ 64.601 through 64.613. The application of the FCC Form 499-A to carriers, interconnected VoIP service providers, and non-interconnected VoIP service providers, is needed to administer the Universal Service Fund, the TRS Fund, and the cost recovery mechanism for numbering administration and long-term number portability. FCC Form 499-Q and its instructions remains unchanged.

This information collection does not affect individuals or households; thus, there are no impacts under the Privacy Act.

Statutory authority for this information collection is contained in sections 151, 154(i), 154(j), 155, 157, 201, 205, 214, 225, 254, 303(r), 715 and 719 of the Act, 47 U.S.C. §§ 151, 154(i), 154(j), 155, 157, 201, 205, 214, 225, 254, 303(r), 616, and 620.

2. This information collection requires contributors to the telecommunications relay service, numbering administration, and universal service funds to file, pursuant to sections 151, 225, 251 and 254 of the Act, a Telecommunications Reporting Worksheet, Form 499-Q on a quarterly basis and/or the Form 499-A on an annual basis. The current submission proposes to apply the reporting requirements currently applicable to all other contributors to the TRS Fund to non-interconnected VoIP service providers to carry out the Congressional mandate of the CVAA, and to collect information necessary to evaluate each contributors' contributions to the TRS Fund, pursuant to section 225 of the Act.

3. Respondents are able to obtain copies of the Telecommunications Reporting Worksheet (Worksheet) from the Universal Service Administrative Company (Administrator), the Commission's website or the Commission's fax-on-demand system. Worksheets are filed with the Administrator and may be filed electronically. The Commission will make available electronic versions of the Worksheet that may be used to produce completed copies. Forms may be downloaded electronically and arrangements can be made for the electronic payment of universal service contributions.

4. The information sought is unique to each contributor and similar information would not be available to the Commission from other sources. Without this information, contributions to the federal universal service support mechanisms (and other federal programs) could not be calculated. The Commission is not aware of any similar information already available that can be used or modified for the purposes described in Item 2 above.

5. As a general proposition, Congress has required that all telecommunications carriers contribute to these support and cost recovery mechanisms. In addition, Congress has given the Commission authority to require contributions from any other providers of telecommunications. As such, the information collections may affect small entities, as well as large entities. The Commission has taken steps to ensure that these mechanisms are competitively neutral -- which will favorably affect all entities, including small entities. The Commission also has retained the *de minimis* exemption to ensure that compliance costs associated with contributing to universal service do not exceed actual contribution amounts.

6. Funding for the universal service support mechanisms (derived from statutory mandates) depends on accurate information from contributors. The frequency of filing the Worksheet is determined by the Commission. Contributors to the federal universal service support

mechanisms are currently required to submit the Worksheet annually and quarterly. Only by collecting data this frequently can the Commission continue to ensure that the federal universal service support and TRS Fund reimbursement mechanisms meet the statutory requirement to be specific, predictable, and sufficient.

7. No other special circumstances will apply to this information collection.

8. Pursuant to 5 CFR § 1320.8(d), the Commission published a 60 day *Federal Register* notice in the *Federal Register* on April 4, 2011 (76 FR 18490) seeking comments from the public on the information collection requirements contained in this supporting statement. The Commission received no comments following publication of this notice.

9. The Commission does not anticipate providing any payment or gift to respondents.

10. The Commission will allow respondents to certify that data contained in their submissions are privileged or confidential commercial or financial information and that disclosure of such information would likely cause substantial harm to the competitive position of the entity filing the Worksheet. If the Commission receives a request for or proposes to disclose the information, the respondent would be required to make the full showing pursuant to the Commission's rules for withholding from public inspection information submitted to the Commission.

11. The information collection does not address any matters of a sensitive nature.

12. The following represents the hour burden on the collections of information discussed herein. In the July 2010 submission, we provided burden estimates for filing the 499-A and 499-Q, and separate burden estimates for wireless and interconnected VoIP providers filing traffic studies, as well as burden estimates for recordkeeping, notification, and third party disclosure associated with these reporting requirements. Because of the adoption of the *NPRM*, we will be including the proposed information collection requirement for the FCC Form 499-A.

***Existing Information Collection Requirements:***

*Filing Form 499-A:*

(1) Number of respondents: There are approximately 5,800 telecommunications carriers and other providers of telecommunications that may be subject to the filing requirements.

(2) Frequency of response: Annual reporting requirement. Based on the estimated number of respondents and the frequency of responses, we estimate that the annual total number of responses will be 5,800 for this form.

(3) Annual hour burden per respondent: 13.5 hours per respondent. Total annual burden: 78,300 hours (5,800 respondents x 13.5 hours per respondent for the annual filing). This average includes estimates for the time needed to identify, compile, and in some cases, estimate information at the requested level of detail. We also note that the estimate provided is an average, with some respondents requiring more time to complete the worksheets and others requiring less time. The burden estimate is based on our prior experience with the Worksheet.

(4) Total estimate of annualized cost to respondents for the hour burdens for collection of information: \$3,523,500.

(5) Explanation of the calculation: \$3,523,500. As explained above, we estimate that 5,800 carriers and other providers of telecommunications will file the annual report, taking an average of 13.5 hours to complete the annual report. We assume that respondents will use some combination of staff and in house attorney services (blended rate of \$45/hour) when preparing the Worksheets. Thus 5,800 (number of respondents) x 13.5 (hours per respondent for the annual filing) x \$45 (per hour cost) = \$3,523,500.

*Filing Form 499-Q:*

(1) Number of respondents: There are approximately 3,600 telecommunications carriers and other providers of telecommunications that may be subject to the filing requirements.

(2) Frequency of response: Quarterly reporting requirement. Approximately 3,600 of the respondents may have to file the FCC Form 499-Q.

(3) Annual hour burden per respondent: 10 hours per respondent. Total annual burden: 144,000 hours (3,600 respondents x 10 hours per respondent for the annual filing x 4 quarterly filings = 144,000). This average includes estimates for the time needed to identify, compile, and in some cases, estimate information at the requested level of detail. We also note that the estimate provided is an average, with some respondents requiring more time to complete the worksheets and others requiring less time. The burden estimate is based on our prior experience with the Worksheet.

(4) Total estimate of annualized cost to respondents for the hour burdens for collection of information: \$6,480,000.

(5) Explanation of the calculation: \$6,480,000. As explained above, we estimate that approximately 3,600 may be required to file four quarterly reports, taking an average of 10 hours to complete each quarterly report. We assume that respondents will use some combination of staff and in house attorney services (blended rate of \$45/hour) when preparing the Worksheets. Thus, 3600 (number of respondents) x 4 (quarterly filings) x 10 (hours per respondent for the annual filing) x \$45 (per hour cost) = \$6,480,000.

*Filing Traffic Studies (Wireless and Interconnected VoIP Providers):*

(1) Number of respondents: There are approximately 914 wireless and interconnected VoIP providers (453 wireless providers and 461 interconnected VoIP providers) that may be subject to the filing requirements. Of those 914, we expect 272 to provide traffic studies as the basis for reporting revenues (180 wireless providers and 92 interconnected VoIP providers).

(2) Frequency of response: Annually; quarterly reporting requirements. The estimated 272 respondents that elect to file traffic studies would be required to complete those studies annually and quarterly.

(3) Annual hour burden per respondent: We estimate 25 hours per respondent. Thus 25 (hours per submission) x 272 (number of respondents) x 5 (for each quarterly plus one annual filing) = 34,000 hours (total ongoing burden). In addition, we estimate that for 92 of the 272 respondents that are likely to file traffic studies will either be filing new or substantially revised traffic studies. Respondents filing new or substantially revised traffic studies will have an initial one-time additional burden of 186 hours per respondent to establish procedures, analyze data, and document and audit records for their traffic studies. Thus 186 (one time additional burden hours) x 92 (new or substantially revised traffic studies) = 17,112 (total one-time burden for these

respondents). Total annual burden hours: 34,000 (ongoing burden) + 17,112 (one-time burden) = **51,112** hours. This average includes estimates for the time needed to identify, compile, and estimate traffic levels. We note that the estimate provided is an average, with some respondents requiring more time to complete the worksheets and others requiring less time.

(4) Total estimate of annualized cost to respondents for the hour burdens for collection of information: \$2,300,040.

(5) Explanation of the calculation: \$2,300,040. As explained above, we estimate that 272 wireless and interconnected VoIP providers will file traffic studies on an annual and quarterly basis, taking an average of 25 hours to complete the annual traffic study and taking 25 hours to complete each quarterly and annual traffic study. We assume that respondents will use some combination of staff and in house attorney services (blended rate of \$45/hour) when preparing the traffic studies. Thus total annual burden hours **51,112** (total burden hours) x \$45 (per hour cost) = \$2,300,040.

*Recordkeeping Requirement:*

(1) Number of respondents: There are approximately 5,800 telecommunications carriers and other provider of telecommunications that must maintain records in connection with their filings. Because all traffic study filers file the Form 499-Q and Form 499-Q respondents file the Form 499-A, the total number of respondents required to keep records is equal to the number of Form 499-A respondents (i.e., 5,800).

(2) Frequency of response: Recordkeeping requirement. Approximately 21,560 occurrences when a telecommunications carrier and other providers of telecommunications must maintain records in connections to their filings. Thus, 5,800 (Form 499-A responses) + 14,400 (Form 499-A responses + 1,360 traffic study submissions) = 21,560 responses.

(3) Annual hour burden per respondent: .25 hours per occurrence (21,560 occurrences. Total annual burden hours: .25 (hours per occurrence) x 5,800 (total occurrences annually and quarterly) = 5,390 hours. This average includes estimates for the time needed to maintain records and documentation to support the filed information. We also note that the estimate provided is an average, with some respondents requiring more time to complete the requirement and others requiring less time. The burden estimate is based on our prior experience with recordkeeping.

(4) Total estimate of annualized cost to respondents for the hour burdens for collection of information: \$242,550.

(5) Explanation of the calculation: \$242,550. As explained above, we estimate that approximately 21,560 occurrences when a telecommunications carrier and other provider of telecommunications must maintain records in connection with its filing, taking an average of .25 hours to complete each response. The 21,560 occurrences include maintaining records for the annual filing, four quarterly filings, and five (one annual and four quarterly) traffic study filings. We assume that respondents will use some combination of staff and in house attorney services (blended rate of \$45/hour) when preparing the Worksheets. Thus 21, 560 (total annual and quarterly responses) x .25 (hours per occurrence) x \$45 (per hour cost) = \$242,550.

*Notification Requirement:*

(1) Number of respondents: There are approximately 1,451 telecommunications carriers and other providers of telecommunications that may be required to file a notification to report information such as new filer status, changed registration information, changed designated agent for service of process information, or revised revenue information.

(2) Frequency of response: On occasion reporting requirement. Approximately 1,451 of the respondents may be required to file a notification.

(3) Annual hour burden per respondent: 2 hours per respondent. Total annual burden hours: 2,902 hours (2 hours per respondent x 1,451 respondents. This average includes estimates for the time needed to identify, compile, and in some cases, estimate information at the requested level of detail. We also note that the estimate provided is an average, with some respondents requiring more time to complete the notification and others requiring less time. The burden estimate is based on our prior experience with the Worksheet.

(4) Total estimate of annualized cost to respondents for the hour burdens for collection of information: \$130,590.

(5) Explanation of the calculation: \$130,590. As explained above, we estimate that approximately 1,451 telecommunications carriers and other providers of telecommunications may be required to file a notification, taking an average of 2 hours to complete the notification. We assume that respondents will use some combination of staff and in house attorney services (blended rate of \$45/hour) when preparing the Worksheets. Thus  $2 \text{ (hours per respondent)} \times 1,451 \text{ (respondents)} \times 1 \text{ (number of required submissions)} \times \$45 \text{ (per hour cost)} = \$130,590$ .

*Third Party Disclosure Requirement:*

(1) Number of respondents: There are approximately 3 telecommunications carriers and other providers of telecommunications that may choose to respond to a third party disclosure request.

(2) Frequency of response: Third party disclosure requirement. Approximately 3 of the respondents may respond to a third party disclosure request.

(3) Annual hour burden per respondent: 2 hours per respondent for an on-occasion response. Total annual burden hours: 6 hours (3 respondents x 2 burden hours per respondent). This average includes estimates for the time needed to identify, compile, and respond to the third party disclosure request. We also note that the estimate provided is an average, with some respondents requiring more time to complete the response and others requiring less time. The burden estimate is based on our prior experience with third party disclosure requests.

(4) Total estimate of annualized cost to respondents for the hour burdens for collection of information: \$270.

(5) Explanation of the calculation: \$270. As explained above, we estimate that approximately 3 telecommunications carriers and other providers of telecommunications may respond to a third party disclosure request, taking an average of 2 hours to complete each response. We assume that respondents will use some combination of staff and in house attorney services (blended rate of \$45/hour) when preparing the Worksheets. Thus  $3 \text{ (number of respondents)} \times 2 \text{ (burden hours)} \times 1 \text{ (number of required submissions)} \times \$45 \text{ (per hour cost)} = \$270$ .

***Proposed Information Collection Requirement:***

*Filing Form: 499-A*

1) Number of respondents: **2,383**. Currently, there are approximately 5,800<sup>1</sup> telecommunications carriers and other providers of telecommunications that are currently subject to the filing requirements. The *NPRM* propose to add 2,383 non-interconnected VoIP service providers to those subject to the filing requirements. VoIP service providers are included in the census business category “All Other Telecommunications.” This category comprises “establishments primarily engaged in providing specialized telecommunications services, such as satellite tracking, communications telemetry, and radar station operation. This industry also includes establishments primarily engaged in providing satellite terminal stations and associated facilities connected with one or more terrestrial systems and capable of transmitting telecommunications to, and receiving telecommunications from, satellite systems. Establishments providing Internet services or VoIP services via client-supplied telecommunications connections are also included in this industry.” For this category, Census Bureau data for 2007 show that there were a total of 2,383 firms that operated for the entire year. If every entity included in the category “All Other Telecommunications” was such a provider, the total number of additional entities added to those who would have to file the FCC Form 499-A would be nearly 2,383 firms.

(2) Frequency of response: Annual reporting requirement. Based on the estimated number of respondents and the frequency of responses, we estimate that the additional annual number of responses for Form 499-A will be 2,383.

(3) Annual hour burden per respondent: 13.5 hours per respondent. Total annual burden: 32,170.5 hours (**32,171 rounded**) (**2,383 respondents x 13.5 hours per respondent for the annual filing**). This average includes estimates for the time needed to identify, compile, and in some cases, estimate information at the requested level of detail. We also note that the estimate provided is an average, with some respondents requiring more time to complete the worksheets and others requiring less time. The burden estimate is based on our prior experience with the Worksheet. This number considerably overstates the Total Annual Burden because it considers the category “All Other Telecommunications,” in which non-interconnected VoIP service providers are included, to consist entirely of such providers who will now have to fill out and file the FCC Form 499-A. In reality, only a small, but unknown, number of those in the “All Other Telecommunications” category are non-interconnected VoIP service providers.

(4) Total estimate of annualized cost to respondents for the hour burdens for collection of information: **\$1,447,695**.

(5) Explanation of the calculation: **\$1,447,695**. As explained above, we estimate that 8,183 carriers and other providers of telecommunications will file the annual report, taking an average of 13.5 hours to complete the annual report. We assume that respondents will use some combination of staff and in house attorney services (blended rate of \$45/hour) when preparing the Worksheets. Thus 2,383 (number of respondents) x 13.5 (hours per respondent for the annual filing) x \$45 (per hour cost) = \$1,447,695.

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<sup>1</sup> The current number of 5,800 telecommunications carriers and other providers of telecommunications are already accounted for in the existing information collection requirements approved by OMB on September 1, 2010. See page 4 of this supporting statement for the calculations of the burden hours for the existing Form 499-A filings.



**Cumulative total of both the existing and proposed information collection requirements:**

Summary of Burden Hours

| <u>Requirements for 499</u>              | <u>In Current Inventory</u> | <u>Proposed<sup>2</sup> Inventory</u> |
|--|-----------------------------|---------------------------------------|
| FCC Form 499-A                           | 78,300                      | +32,171                               |
| FCC Form 499-Q                           | 144,000                     | -0-                                   |
| Recordkeeping Requirement                | 5,390                       | -0-                                   |
| Notification                             | 2,902                       | -0-                                   |
| Third Party Disclosure                   | 6                           | -0-                                   |
| Voluntary Survey                         | -0-                         | -0-                                   |
| <b>Subtotal</b>                          | <b>230,598</b>              | <b>+32,171</b>                        |
|  |                             |                                       |
| <u>Requirements for Traffic Studies</u>  | <u>In Current Inventory</u> | <u>Proposed Inventory</u>             |
| Traffic Studies                          | <u>51,112</u>               | -0-                                   |
| <b>Subtotal</b>                          | <b>51,112</b>               | -0-                                   |
| <b>Total Annual Burden Hours:</b>        | <b>281,710</b>              | <b>313,881<sup>3</sup></b>            |
|  |                             |                                       |
| <b>Total Number of Respondents:</b>      | <b>5,800</b>                | <b>8,183<sup>4</sup></b>              |
|  |                             |                                       |
| <b>Total Number of Annual Responses:</b> | <b>44,574</b>               | <b>46,957<sup>5</sup></b>             |

13. The following represents the Commission’s estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.

(1) Total capital start-up costs component annualized over its expected useful life: \$0. The collections will not result in additional capital expenditures such as

<sup>2</sup> Except as otherwise indicated, “Proposed” refers to the burden hours proposed in excess of those included in the Current Inventory.

<sup>3</sup> This number represents the proposed total burden hours (i.e. the current total burden hours of 281,710 – plus the proposed additional burden hours of +32,171).

<sup>4</sup> This number represents the proposed number of respondents (i.e. the current total number of respondents of 5,800 – plus the proposed additional number of respondents of +2,383).

<sup>5</sup> This number represents the proposed number of annual responses (i.e. the current total number of responses of 44,574 – plus the proposed additional number of responses of +2,383).

computers or software. Respondents may voluntarily use an online filing mechanism. The Commission assumes that respondents will not use this system if it increases their costs of filing. The Commission will address the potential costs of mandatory electronic filing if it subsequently adopts such an approach.

(2) Total operation and maintenance and purchase of services component:

All respondents will file the worksheet at least annually, so operation and maintenance costs will be limited to postage, ink, etc., which are costs incurred in the normal course of doing business. Additionally, costs to respondents that file traffic studies will also be limited to postage, ink, etc., which are costs incurred in the normal course of doing business. As stated in Item 3: Worksheets are filed with the Administrator and may be filed electronically. Therefore, the Commission does not estimate any costs to respondents that are outside of doing the normal course of business.

14. There will be few, if any costs to the Commission because notice and enforcement requirements are already part of the Commission's duties. Moreover, there will be minimal cost to the federal government since outside parties administer the mechanisms.

15. We are proposing program changes to an existing information collection approved by OMB on September 1, 2010. If the proposed information collection requirements are adopted by the Commission in a final rulemaking, the program change/increases will be added to OMB's inventory for this collection as follows: **+2,383 respondents**, from 5,800 respondents to 8,183 respondents; **+2,383 responses**, from 44,574 responses to 46,957 responses; **+32,171 annual burden hours**, from 281,710 hours to 313,881 hours; and \$0 annual cost.

16. The Commission does not anticipate publishing all of the information collected. Several data items captured in the Worksheet, however, such as the names of the carriers that file, the regions in which they operate, the carrier type categories checked, the corporate headquarters addresses, the mechanisms contributed to, the telephone numbers provided for customer inquiries, the categories of revenue filed, agent for service of process information, etc., will be made available to the public.

17. The Commission seeks continued approval not to display the expiration date of OMB approval on the form at issue. Display of the expiration date on the Form 499 would not be in the Commission's interest because the Commission would have to destroy all of the unused forms previously printed. The Commission would also have to update the electronic version of the Form 499. This would constitute waste and would not be cost effective. Therefore, the Commission seeks to continue the current practice of using an edition date in lieu of the OMB expiration date. We also note that the OMB control number, expiration date, and title are referenced in section 0.408 of the Commission's rules. See 47 C.F.R. § 0.408.

18. There are no exceptions to the certification statement.

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

The Commission does not anticipate that the collection of information will employ statistical methods.