

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS

A. Justification

1. Explain the circumstances that make the collection of information necessary.

NHTSA is proposing to collect and aggregate information from state level reporting entities that can be used to measure the progress of 9-1-1 authorities across the country in enhancing their existing operations and migrating to more advanced - Internet-Protocol-enabled emergency networks. The data will be maintained in a "National 9-1-1 Profile Database." One of the objectives of the National 9-1-1 Program is to develop, collect, and disseminate information concerning practices, procedures, and technology used in the implementation of E9-1-1 services and to support 9-1-1 Public Safety Answering Points (PSAPs) and related state and local public safety agencies for 9-1-1 deployment and operations. The National 9-1-1 profile database can be used to follow the progress of 9-1-1 authorities in enhancing their existing systems and implementing next-generation networks for more advanced systems. This ICR relates to the DOT safety goal.

2. Indicate how, by whom, and for what purpose the information is to be used.

The goal of the data collection process is to support a national 9-1-1 profile that will be used to help accurately measure and depict the current status and planned capabilities of 9-1-1 systems across the United States. Evaluations, based upon the data collected, will help draw attention to key roadblocks and solutions in the deployment process and to target possible future activities and resources consistent with the goals of the program. The information in aggregated form will be available to state and local stakeholders in the public safety community.

The information to be collected includes data useful to evaluating the status of 9-1-1 programs across the country, along with their progress of implementing advanced systems and capabilities. The data elements involved will fall within two major categories: baseline and progress benchmarks.

- "Baseline" data elements reflect the current status and nature of 9-1-1 operations from state to state. These elements are largely descriptive in nature, are intended to provide a general view of existing 9-1-1 services across the country, and are grouped within three categories: administrative, system, and fiscal data.
- "Progress benchmarks" reflect the status of state efforts to implement advanced next generation 9-1-1 systems and capabilities. As titled, these data elements are largely implementation or deployment benchmarks against which progress can be measured. The elements involved are grouped in a logical order of planning, procurement, installation and testing, transition, and operations. Planning through testing elements reflects both state level and sub-state

level activity and efforts. Transitional and operational elements specifically represent the latter.

Under this proposed effort, NHTSA would specifically request reporting entities to voluntarily collect and annually report the data described above utilizing the described web-based data collection tool. Reporting entities are state level 9-1-1 program officials, and the data reported will reflect state-level aggregated data. Where a state statute has not established a state-level 9-1-1 program, the authorized entity is the state E9-1-1 Coordinator designated under 47 U.S.C. 942(b)(3)(A)(ii).

The total number of respondents is identified at fifty-six (56), including the fifty states and the six U.S. Territories of Guam, U.S. Minor Outlying Islands, American Samoa, Mariana Islands, U.S. Virgin Islands, and Puerto Rico.

The above reporting entities will be requested to annually update data relating to their state or territory using the described web-based tool. 9-1-1 Public Safety Answering Points (PSAPs) and related national, state and local public safety agencies will be the users of this data.

3. Describe whether, and to what extent, the collection of information involves the use of technological collection techniques or other forms of information technology.

In order to collect information needed to develop and implement effective strategies that meet the Program's goal of providing leadership, coordination, guidance and direction to the enhancement of the Nation's 9-1-1 services, NHTSA proposes to utilize a web-based, data reporting and collection tool accessible through the website: www.911.gov.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used.

The National 9-1-1 Program facilitates coordination and communication among Federal, State, and local emergency communications systems, emergency personnel, public safety organizations, telecommunications carriers, and telecommunications equipment manufacturers and vendors involved in the implementation of E9-1-1 services. While the Federal Communications Commission (FCC) does have jurisdiction over private sector entities such as telecommunications service providers, the National 9-1-1 Program coordinates efforts among private and public entities at the Federal, State and local levels specifically involved with 9-1-1 services, and the access to emergency services. While the data collected by the FCC are useful, these limited excursions into issues related to 9-1-1 services do not provide sufficient information to meet the needs of the public safety community for service evaluation and programmatic decision making.

The National Association of State 9-1-1 Administrators (NASNA) does compile some information from its members that may contribute to the goal of this effort. However, NASNA membership does not

include all states, and such collection is ad hoc and not currently part of any organized periodic effort.

The National Emergency Number Association (NENA) likewise periodically collects information and data that may contribute to this effort. However, like NASNA, those efforts are largely ad hoc in nature, and not comprehensive. This proposed collection will not duplicate those efforts.

While such data does exist at state and sub-state levels, no other source of aggregated data exists in any comprehensive way at a national level. Nor is such data readily accessible to the public safety agencies involved across the country.

Overall, the following criteria were applied to determine whether existing information may be duplicative:

- Currency of information - the data must be current in order to have utility for the program purposes described above.
 - Nationwide - For the sake of national evaluation, the data involved must comprehensively reflect state and local activity across the country.
 - Consistency - For the sake of aggregation and comparison, the data must be consistent with comparable elements.
5. If the collection of information impacts small businesses or other small entities, describe methods used to minimize burden.

The collection of information has been limited to state reporting entities, and has minimum impact on small businesses or other small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently.

The technology impacting 9-1-1 services has changed substantially in recent years. Both public and private sectors have increasingly focused on addressing the need to enhance the technology utilized by 9-1-1 services across the Nation. Without up-to-date information, the National 9-1-1 Program, along with state and local public safety entities will not be able to adequately gauge progress towards implementing new and more advanced 9-1-1 systems in any comparative fashion. While the National 9-1-1 Program will benefit from this information, it is anticipated that the greatest benefit will accrue to the state and local public safety community faced with the challenge of migrating to the next generation of 9-1-1.

7. Explain any special circumstances that would cause the information collection to be conducted in a manner inconsistent with the guidelines set forth in 5 CFR 1320.6.

No special circumstances require the collection of information to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.

8. Provide a copy and identify the date and page number of the publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize the public comments received in response to that notice and describe actions to consult with persons outside the agency to obtain their views.

The Notice appeared in the Federal Register, February 11, 2011 (76FR7897). The closing date for comments was April 12, 2011. No comments were received.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payment of gifts will be offered to state reporting entities involved in this process.

10. Describe any assurance of confidentiality provided to respondents.

No assurances of confidentiality are given by the agency. All information submitted by respondents is done so on a voluntary basis and is intended for the program purposes described above. As described, this program will utilize a secure web-based, data collection utility. As part of adopted program policies and procedures, data reported by each state will only be released subject to provisions of the Freedom of Information Act (FOIA), as amended. Annual summary reports will be available to the public.

11. Provide additional justification for questions of a sensitive nature.

The data reporting and collection process involved in this request will not contain any questions related to matters that are commonly considered sensitive or private.

12. Provide estimates of the hour burden of the collection of information on the respondents.

The total number of respondents is 56, including the fifty states and six U.S. Territories of Guam, U.S. Minor Outlying Islands, American Samoa, Mariana Islands, U.S. Virgin Islands, and Puerto Rico. NHTSA estimates that the time required to annually report the data described utilizing the web-based tool will be three hours (2 hours of preparation, 1 hour of entry to website (3 x 56 = 168) per reporting entity, for a total of 168 hours for all entities.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.

The respondents would not incur any reporting costs from the information collection beyond the time it takes to gather the information, prepare it for reporting and then populate the web-based data collection tool. The respondents also would not incur any recordkeeping burden or recordkeeping costs from the information collection.

14. Provide estimates of annualized cost to the Federal government.

Total estimated cost to the government for maintaining the data reporting and collection process is as follows:

Contractor costs associated with collection, analysis, and report development total: \$24,108.80.

This estimate is based on the total cost for contractor supported collection, analysis and report of information obtained in the data collection process, including 160 fully loaded hours at \$150.68 per hour.

15. Explain the reasons for any program changes or adjustments report on Items 13 or 14 of the OMB form 83-1.

Since this is a new request, there will be a program change of adding 168 burden hours to NHTSA overall total.

16. For collections of information whose results will be published, outline plans for tabulation and publication.

Based on the results of the data annually reported by state reporting entities, the NHTSA plans to generate an annual summary report describing the progress of public entities across the country in implementing more advanced 9-1-1 systems and services. This report would be made available to public and private entities for use in their program development activities. The proposed data reporting and collection process will comply with the federal Data Quality Act (amends PRA. 44 U.S.C. 3501 et seq).

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Approval is not sought to not display the expiration date.

18. Explain each exception to the certification statement identified in Item 19, Certification for Paperwork Reduction Act Submissions," of OMB Form 83-1.

No exceptions to the certification statement are made.