

**Associate WTB and/or PSHSB Call Signs and Antenna Structure Registration
Numbers with Licensee's FRN
FCC 606**

SUPPORTING STATEMENT

A. Justification:

1. FCC Form 606 is used to associate a licensee's FCC Registration Number (FRN) to licensee's Wireless Telecommunications Bureau and/or Public Safety and Homeland Security Bureau call signs and antenna structure registration numbers with the Federal Communications Commission (FCC) and filed through the Commission's Universal Licensing System (ULS).

Current FCC Rules require a mandatory FCC Registration Number (FRN) for all parties and entities doing business with the Commission who file applications with ULS or register towers via Antenna Structure Registration (ASR). As a result of the Commission Registration System (CORES) and the implementation of the FRN, several important changes occurred for filers of ULS and ASR. This requirement is to facilitate compliance with the Debt Collection Improvement Act of 1996, Public Law 104-134, 110 Stat. 1321, 1358 (April 26, 1996).

The Commission is now seeking approval for an extension of a three-year clearance. No revisions are being made to the collection but we have recalculated and adjusted the burden hours and respondents.

The statutory authority for this information collection is contained in Debt Collection Improvement Act of 1996 (DCIA), Public Law 104-134, 110 Stat. 1321, 1358 (April 26, 1996).

Records may include information about individuals or households, *e.g.*, personally identifiable information or PII, and the use(s) and disclosure of this information is governed by the requirements of a system of records notice or 'SORN', FCC/WTB-1, "Wireless Services Licensing Records." There are no additional impacts under the Privacy Act.

2. The information collected in the application will be used to populate the Universal Licensing System (ULS) for licensees and antenna structure registration owners who interact with ULS. This information will also be used to match records in the ULS database to GENESIS (FCC Core Financial System) to validate payment for application and for Debt collection purposes.

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3. The Commission reports 100% of the applications are filed electronically.
4. This agency does not impose a similar information collection on the respondents. There is no similar data 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 those absolutely necessary for evaluating and processing each application and to deter against possible abuses of the processes.

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6. Respondents are required to obtain a FRN from the Commission. If changes are required after obtaining the FRN, registrants must modify their FRN by submitting another FCC Form 606 or accessing the interactive version of the form and modifying electronically.
7. This collection of information is consistent with the guidelines in 5 CFR § 1320.6.
8. The Commission initiated a 60-day public comment period which appeared in the Federal Register on April 22, 2011 (76 FR 22701). No comments were received from the public as a result of the notice.
9. Respondents will not receive any payments.
10. Respondents may request materials or information submitted to the Commission be withheld from public inspection under 47 CFR §0.459 of the FCC rules.

Information on the Private Land Mobile Radio Service is maintained in the Commission's system of records notice or 'SORN', FCC/WTB-1, "Wireless Services Licensing Records." These licensee records are publicly available and routinely used in accordance with subsection b. of the Privacy Act, 5 U.S.C. 552a(b), as amended. Material that is afforded confidential treatment pursuant to a request made under 47 CFR §0.459 will not be available for Public inspection.

The Commission has in place the following policy and procedures for records retention and disposal: Records will be actively maintained as long as the individual remains a licensee. Paper records will be archived after being keyed or scanned into the system. Electronic records will be backed up on tape. Electronic and paper records will be maintained for at least twelve years and three months.

11. This collection does not address private matters of a sensitive nature, and the PII is covered by the system of records notice or 'SORN', FCC/WTB-1, "Wireless Services Licensing Records".
12. The Commission estimates that there are 1,233,000 existing licensees in the databases. However, most licensees will only need to make a one-time submission of the FCC Registration Number and include all of their call signs and antenna structure registration numbers as part of the single submission.

It would be somewhat impossible to provide an exact number of respondents as some licensees will only be submitting for a single call sign while others may have hundreds of call signs issued to them. Since most licensees holding multiple call signs have already completed the FRN association process, we anticipate that most FRN associations are filed for a single call sign or tower registration. We will use the total number of associations for respondents. We average approximately 40,000 call sign and 3,000 tower registration FRN associations each year.

Total number of respondents: 40,000 + 3,000 = **43,000**

The average burden per applicant is estimated to range from approximately 5 minutes to 1 hour for licensees associating many call signs or tower registrations. We will use 15 minutes (.25 hours), based on FCC staff's knowledge and familiarity with the process and availability of the data. Entities with numerous call signs have an option of providing WTB with an electronic ASCII text file that they would download from their systems. We expect that respondents will fulfill the requirements of this collection with in-house clerical staff.

Total number of annual responses: 43,000

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Total annual burden hours: 43,000 x .25 hour = **10,750 hours**

In-house Cost: The Commission estimates that clerical staff paid at \$10 per hour will fulfill the requirements.
10,750 hours x \$10/hours = **\$107,500**

13. Cost to the Respondents:

There should be no additional costs to respondents.

14. Cost to the Federal Government:

There are no costs to the Federal Government as FCC Form 606 is filed electronically, and staff does not routinely or regularly review the filings.

15. There are no program changes reported in this collection. There are adjustments/decreases to the number of respondents of 386,000, to the number of responses of 386,000 and to the annual burden hours of 418,250. With this submission, the Commission really examined and evaluated the numbers that were accounted for in this supporting statement. Therefore, the Commission used more concrete and precise numbers based on the previous FCC Form 606 filings with the Commission. Therefore, the decreases in the annual burden hours are due to the decreases in the amount of time that is estimated for respondents to complete Form 606 and decreases in the number of annual respondents and responses to this information collection.

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

17. The Commission is requesting a continued waiver from displaying the OMB expiration date on the FCC Form 606. Granting this waiver will prevent the Commission from having to update the electronic version in the ULS. All OMB-approved information collections are published in 47 CFR 0.408. This section includes the OMB control number, title of the collection and the OMB expiration date.

18. The Commission initiated a 60-day public comment period which appeared in the Federal Register on April 22, 2011 (76 FR 22701). In that notice the Commission stated that the estimated time per response is 17.6 hours. With this submission the Commission corrects the estimated time per response to read .25 hours per response instead. There are no other exceptions to the "Certification Statement".

B. Collections of Information Employing Statistical Methods:

This information collection does not use any statistical methods.