

## SUPPORTING STATEMENT

### A. Justification:

1. The Commission adopted and released a Second Report and Order, FCC 08-208, which contained in section 80.231 a requirement that manufacturers of Class B Automatic Identification System (AIS) transmitters for the Maritime Radio Service must include with each transmitting device a statement explaining how to enter static information accurately and to affix a warning that entering inaccurate information is prohibited. The requirements will ensure that advance marine vessel tracking and navigation information transmitted from Class B AIS device are accurate and reliable thereby promoting marine safety. The rule also requires manufacturers to obtain a letter from the U.S. Coast Guard stating the AIS device satisfies all of the requirements specified in IEC 62287-1, and to submit the letter to the Commission with its certification application for a Class B AIS device

Additionally, prior to submitting a certification application (FCC Form 731, OMB Control Number 3060-0057) for a Class B AIS device, the following information must be submitted in duplicate to the Commandant (CG-521), U.S. Coast Guard, 2100 2<sup>nd</sup> Street, SW, Washington, DC 20593-0001:

- 1) The name of the manufacturer or grantee and the model number of the AIS device; and
- 2) Copies of the test report and test data obtained from the test facility showing that the device complies with the environmental and operational requirements identified in IEC 62287-1.

After reviewing the information described in the certification application, the U.S. Coast Guard will issue a letter stating whether the AIS device satisfies all of the requirements specified in IEC 62287-1. A certification application for an AIS device submitted to the Commission must contain a copy of the U.S. Coast Guard letter stating that the device satisfies all of the requirements specified in IEC 62287-1, a copy of the technical test data and the instruction manual(s).

The certification application will be FCC Form 731 which is already approved under OMB Control Number 3060-0057. Upon OMB approval, the Commission will submit a correction worksheet to increase the number of respondents for FCC Form 731 to include these Class B AIS manufacturers.

The Commission is now seeking OMB approval for an extension (no change in the reporting and/or recordkeeping requirements). There is no change in the Commission's burden estimates.

Statutory authority for this collection of information is contained in 47 U.S.C. 154, 303, 307(e), 309, and 332 of the Communications Act of 1934, as amended.

As noted on the Form OMB 83-I, this information collection does not affect individuals or households; thus, there are no impacts under the Privacy Act.

2. The information collection requires that manufacturers of AIS transmitters label each produce and affix and label each transmitting device with a statement explaining how to enter static information and the following statement: *"WARNING: It is a violation of the rules of the Federal Communications Commission to input an MMSI that has not been properly assigned to the end user, or to otherwise input any inaccurate data in this device."* The information collection also requires manufacturers to assure device meets standards set forth in IEC 62287-1 and is used by FCC

engineers to determine the interference potential of the proposed device's operation.

3. Prior to finalizing rule makings the Wireless Telecommunications Bureau conducts an analysis to insure that improved information technology may be used to reduce the burden on the public. This analysis considers the possibility of obtaining and/or computer-generating the required data from existing data bases in the Commission or other federal agencies.
4. This agency does not impose comparable information 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 that absolutely necessary to deter against possible abuses.
6. This information is considered essential to the implementation of the Act as described above, and may be reviewed by Commission engineers to ensure compliance with its rules.
7. Current data collection 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 November 22, 2011 (76 FR 72205), as required by 5 CFR § 1320.8(d). No comments were received as a result of the Notice. The notice is referenced in this submission to the OMB.
9. Respondents will not receive any payments.
10. There is no need for confidentiality.
11. This information collection does not address any private matters of a sensitive nature.
12. Approximately 20 manufacturers will be required to label AIS Class B devices. Informal consultation and past experience was used to arrive at the estimate of 1 hour per response per manufacturer to label AIS transmitters for a total annual burden of **20 hours**.

Approximately 20 manufacturers will be required to obtain from U.S. Coast Guard and submit to the FCC a letter stating the AIS radio device satisfies requirements specified in IEC 62287-1. Based on a review of the subject records, it is estimated that an average of 1 hour per year per manufacturer is required to maintain this documentation.

13. Estimate of cost to respondents:
  - a. There are no capital or start-up costs.
  - b. Estimate of cost to respondents: Informal consultation with manufacturers was used to arrive at an estimate of 50,000 devices that require labeling. Each label cost \$.50 to produce and affix to the device. Therefore:  $50,000 \times \$0.50 \times 1 \text{ hour} = \$25,000.00$ .

The Commission also assumes that the respondents would use outside engineering personnel to obtain the information from the U.S. Coast Guard and prepare the letter to the FCC.  
 $\$150/\text{hour} \times 20 \text{ responses} \times 1 \text{ hour} = \$3,000$ .

Therefore, \$25,000 + \$3,000 = **\$28,000 total annual outside contracting costs.**

14. Estimate of cost to Federal Government: None.
15. There are no changes to the Commission's burden estimates.
16. The data will not be published for statistical use.
17. We do not seek approval to not display the OMB expiration date on the labeling requirement. The Commission publishes a list of OMB-approved information collections along with their title(s) and OMB expiration date(s) in 47 CFR 0.408.
18. There are no exceptions to Item 19.

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

No statistical methods are employed.