SUPPORTING STATEMEMENT

A. Justification:

1. In response to the events of September 11, 2001, the Federal Communications Commission (Commission or FCC) created an Emergency Contact Information System to assist the Commission in ensuring rapid restoration of communications capabilities after disruption by a terrorist threat or attack, and to ensure that public safety, public health, and other emergency and defense personnel have effective communications services available to them in the immediate aftermath of any terrorist attack within the United States. The Commission submitted, and OMB approved, a collection through which key communications providers could voluntarily provide contact information.

The Commission's Public Safety and Homeland Security Bureau (PSHSB) updated the Emergency Contact Information system with a Disaster Information Reporting System (DIRS) that uses electronic forms to collect Emergency Contact Information forms and through which participants may inform the Commission of damage to communications infrastructure and facilities and may request resources for restoration. The Commission updated the process by increasing the number of reporting entities to ensure inclusion of wireless, wireline, broadcast, cable and satellite communications providers.

The Commission is now requesting revision of the currently approved collection. In recent years, communications have evolved from a circuit-switched network infrastructure to broadband networks. The Commission is seeking to extend the Disaster Information Reporting System to include interconnected Voice over Internet Protocol and broadband Internet Service Providers. Increasing numbers of consumers, businesses, and government agencies rely on broadband and interconnected VoIP services for everyday and emergency communications needs, including vital 911 services. It is therefore imperative that the Disaster Information Reporting System be expanded to include these new technologies in order for the Commission the gain an accurate picture of communications landscape during disasters.

See the attached screenshots of the new forms plus a copy of the DIRS user manual for which the Commission is requesting OMB approval.

Statutory authority for this collection of information is contained in 47 U.S.C. 154(i), 218, 303(r) 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. This emergency contact and communications infrastructure/network damage information will be utilized in the event of a major disaster or crisis that results in communications disruption. Respondent wireless, wireline, broadcast, cable, satellite, interconnected Voice over Internet Protocol and broadband Internet Service Providers will maintain emergency contact information in the DIRS database. In the event of an actual emergency, respondents also may enter infrastructure damage and restoration information into the database. Also in the event of an emergency, Commission staff may contact respondents. The Commission has coordinated with the Department of Homeland Security (DHS) and its component National Communications System (NCS) in the design of this data collection, including the identification of the data that should be collected. Furthermore, the Commission will coordinate DIRS data with NCS in support of NCS's role as primary agency for Emergency Support Function-2 (ESF-2) (Communications) of the National Response Plan (NRP).
- 3. This information is only available to authorized personnel within the Commission and DHS via electronic means. Each respondent may update its information in the database as needed using the web-based forms, but will not have access to view the entire database nor any data input by other respondents.
- 4. This information is not available elsewhere. It was created specifically to meet the requirements in Section 0.181(h) of the Commission's rules. This is a unique collection, and there is no duplication.
- 5. In compliance with the Paperwork Reduction Act of 1995, the FCC is making the effort to minimize the burden on all respondents, regardless of size. The PSHSB has limited the information requested to that which is absolutely necessary to gather emergency contact information and communications infrastructure damage and restoration information. Providing this information will have minimal impact on small business because the information is input over a web-based interface and can be input efficiently at the respondent's convenience. Further, participation in the DIRS is entirely voluntary.
- 6. Failure to collect this information will adversely impact the FCC's ability to carry out its congressionally mandated objective of regulating communications by wire and radio to ensure the national defense, and promoting safety of life and property.
- 7. Information may be provided to the Commission in fewer than 30 days because depending on the nature of the crisis, it is critical that the Commission have the information readily available in the immediate aftermath of an emergency.

- 8. Pursuant to 5 CFR 1320.8(d), a 60-day notice was published in the Federal Register on February 14, 2012 (77 FR 8256). The Commission received no PRA comments as a result of the notice.
- 9. No gifts or payments will be received.
- 10. The Commission acknowledges and agrees that it is consistent with the primary objective of the DIRS to treat filings as confidential. We will work with respondents to ensure that their concerns regarding the confidentiality of DIRS filings are resolved in a manner consistent with Commission rules.
- 11. The reporting requirement does not address private matters of a sensitive nature.
- 12. Respondent wireless, wireline, broadcast, cable, satellite, and now interconnected Voice over Internet Protocol and broadband Internet Service Provider companies will enter emergency contact information in the DIRS database, and when necessary will enter critical information (*i.e.* related to infrastructure damage and restoration) into DIRS. We anticipate that this data entry will take 0.1 hours for initial entry of contact information; 0.5 hours for initial input of critical information, and 0.1 hour for updates of critical information. This estimate is based on FCC staff's knowledge and familiarity with the availability of the data required.

Total Burden Hours to collect this information is as follows:

- 6,750 respondents x 0.1 hours (6 minutes) = 675 hours for initial entry of contact information;
- 6,750 respondents x 0.50 hours (30 minutes) = 3,375 hours for initial input of critical information;
- 6,750 respondents x 0.1 hours (6 minutes) = 675 hours for updates of critical information;
- Total annual burden = (675 + 3,375 + 675) = 4,725 hours.
- 13. There are no outside contracting costs to the respondents.
- 14. There are no costs to the Commission beyond what we consider to be part of the FCC's normal operating costs.
- 15. The increase in burden is due to an increase in the number of new respondents that now have to comply with these reporting requirements. Therefore, we are reporting a program change increase of 1,015 hours.
- 16. We do not intend to publish this information for statistical use.
- 17. We are seeking OMB approval to not display the OMB expiration date for this information collection because each time this collection is submitted to OMB for approval, the Commission would have to update the electronic database. This is not

cost effective for the Commission. Additionally, all OMB-approved information collections are published in 47 CFR 0.408 of the Commission's rules which "displays" the OMB control number, OMB expiration date and title of the collection.

18. There are no exceptions to item 19 of the Supporting Statement or certification.

B. Collections of Information Employing Statistical Methods:

This information collection does not employ any statistical methods.