

SUPPORTING STATEMENT

Project 25 Compliance Assessment Program

(OMB No. 1640-0015)

A. Justification

1. The following is a request for a review of the Supplier's Declaration of Compliance form for the joint Department of Homeland Security (DHS)/National Institute of Standards and Technology (NIST) Project 25 Compliance Assessment Program (P25 CAP). The September 11 attacks and Hurricane Katrina made apparent the need for public safety radio systems to interoperate, regardless of who manufactured the equipment. In response, and per Congressional direction, DHS and NIST developed the P25 CAP to improve public safety confidence in purchasing land mobile radio (LMR) equipment built to Project 25 LMR (P25) standards, especially those P25 standards related to improving interoperability between different manufacturer's radio systems.¹ A key part of the program involves informing the emergency response community of products that comply with P25 standards. The Department of Homeland Security needs to be able to collect essential information from manufactures on their products that have met P25 standards as demonstrated through the P25 CAP.

This collection is also authorized under Homeland Security Presidential Directive 7, which requires DHS S&T to collaborate with appropriate private sector entities, continue to encourage the development of information sharing and analysis mechanisms, and to facilitate sharing of information about vulnerabilities and best practices.

It is important to note that the P25 CAP has had an impact on over a *\$1 billion in Federal grants*, including;

- The Public Safety Interoperable Communications (PSIC) grant program being administered jointly by the Department of Commerce and DHS;
- A discretionary grant program for public safety interoperability to be administered by the DHS Office of Emergency Communications; and
- Directed grants for public safety interoperable equipment to be administered by the DoJ Office of Community Oriented Policing Services.

It should also be understood that because it can take up to a year or more for Federal grant dollars to be made available to the ultimate grant recipient (the local entity after being administered by the State), in addition to the amount of time required for agencies

¹ Congressional direction for a P25 compliance assessment program can be found in the *COPS Law Enforcement Technologies and Interoperable Communications Program* section of the Conference Report to Public Law 109-148, as well as the *Science & Technology Management and Administration* section of Division E of the Conference Report to Public Law 110-161.

to develop Requests for Proposals (RFPs) for vendors, it is very likely that since the launch of the P25 CAP, Federal grant dollars from FY06 and FY07 (potentially another \$1-\$3billion in Federal grants) have been impacted.²

These estimates do not include the significant amount of funds spent every year by Federal public safety agencies procuring equipment for their own activities, or the billions spent annually by State and local governments using their own tax dollars to buy LMR equipment. It is expected that many of these agencies would also leverage the P25 CAP for their procurements.

2. Equipment suppliers provide the information to publicly attest to their products compliance with a specific set of P25 standards. The SDoC, and an accompanying summary test report which substantiates the declaration, constitutes a companies formal, public attestation of compliance with the standards for the equipment. In turn, the emergency response community will use this information to identify P25 compliant communications system products. The P25 CAP Program Manager performs a simple administrative review to ensure the documentation is complete and accurate in accordance with the current P25 CAP processes.

This information is collected, maintained, and used in a way that is consistent with the applicable DHS CIO Information Quality Guidelines and Standards. Information quality is ensured through the effective implementation of the DHS Management System, which is documented through a quality manual and supporting procedures, instructions and forms. The template is based on requirements in ISO/IEC 17050:2004.

3. The Suppliers Declaration of Compliance (SDoC) and Summary of Test Results form will be posted on the Responder Knowledge Base (RKB) website (<https://www.rkb.us/search.cfm?query=p25>). The supplier may complete the forms electronically or by hand. The completed form may then be submitted via facsimile, email, or mail to the OIC P25 CAP Program Manager.
4. Information requirements contained in the Supplier's Declaration of Compliance form are specific to the P25 CAP and are not duplicated by other government programs.
5. The collection of this information does not impact small business or other small entities.
6. If the information is not collected or not collected on a regular interval, P25 CAP could not operate in conformance with the Charter for the Project 25 Compliance Assessment Program: April 2008, ISO/IEC 17050:2004, and NIST Handbook 153:2009.

² Information collected by the Department of Justice's Office of Community Oriented Policing Services regarding communications technology grants shows that, on average, it takes 24-36 months for agencies to have communications equipment delivered and installed from the time that the local procurement process begins. Thus, many agencies that have received Federal grants over the last two years to purchase P25 equipment will not have taken final delivery of systems/products being procured, and could use the P25 CAP information to determine that the products delivered meet P25 specifications, per contract requirements.

If the information is collected less frequently then the P25 CAP is at risk that equipment suppliers will be unable to publicly attest to their products compliance with a specific set of P25 standards through a rigorous assessment process. In addition, the emergency response community will be unable to identify P25 compliant communications system products as attested by a rigorous assessment process.

If not conducted, DHS S&T would be unable to comply with the specific Congressional direction previously mentioned.

7. This collection does collect information in any special circumstances.
8. By notice in the **Federal Register** on December 29, 2011 (76 FR 81954), DHS S&T notified the public that it was requesting comments on this information collection. The notice allowed for a 60-day public comment period. No comments were received. DHS S&T then by notice in the **Federal Register** on April 27, 2012 (77 FR 25185), notified the public during a 30-day public comment period. No comments were received.

The P25 CAP process has been discussed in Telecommunications Industry Association (TIA) meetings which are open to any interested party. The process including the information requested has been approved in TIA committee meeting minutes and formal votes. The TIA committee members reviewed the P25 CAP including the forms for availability of data, frequency of collection, clarity of instructions and recordkeeping, disclosure, and reporting format and approved the program.

9. DHS S&T does not provide payments or gifts to respondents in exchange for a benefit sought.
10. The supplier loses all rights to privacy of information contained with the Supplier's Declaration of Compliance upon submission of the form to the RKB website. If applications are complete as determined by an administrative review, they are posted publicly on the Responder Knowledge Base. There are no questions of a sensitive nature in this information collection and there is no assurance of confidentiality provided to the respondents..

11.

Estimates of annualized labor costs to respondents	Supplier's Declaration of Compliance Form and Instruction	Summary Test Report Form and Instruction
No. of Respondents	12	12
No of Responses per Respondent	6	6
Avg. Burden per Response	2	2

(in hours)		
Total Annual Burden (in hours)	144	144
Average Hour Wage Rate	\$65	\$65
Total Annual Respondent Cost	\$9,360	\$9,360

Annual Reporting Burden and Respondent Cost: The total estimated ICR Public Burden in hours is 144. This figure was derived by summing the total annual burden hours from the forms. **The total annual number of respondents is 12.** Respondents submit the forms together as part of a package.

Public Cost

The estimated annual public cost is \$18,720. This figure was derived by summing the estimated annual respondent costs for all forms.

12.

Estimates of annualized non-labor costs to respondents	Amount (US dollars)
Non-Labor Costs	
None	\$ 0
Total Non-Labor Respondent Costs	\$ 0

The estimated annual non-labor costs to respondents is \$0.

13.

Estimates of annualized cost to the Federal Government	Amount (US dollars)
Paperwork Reduction Act compliance: (40 hours @ \$100 per hour)	\$4,000
PRA maintenance: (20 hours @ \$100 per hour)	\$2,000
Declaration review (60 declarations @ 180 minutes each @ \$100 hour)	\$18,000
Total Costs	\$24,000

The estimated annual cost to the federal government in relation to this information collection is \$24,000.

14. This is a renewal of an information collection.
15. DHS S&T does not intend to employ the use of statistics or the publication thereof for this information collection. DHS S&T will post SDoCs, signed by an authorized representative, on the Responder Knowledge Base without analysis of data contained within. The information will provide the emergency response community the contact information for the supplier, the product name, installed options, the test cases passed, and listing of summary tests performed and date issued. The information provides a service to the emergency response community looking to procure P25 compliant communications system products. The burden estimates have been reduced since this data collection has now been in operation for almost 3 years and the activity has dropped from 500 responses to 144 responses per year. Our burden estimates have been updated to reflect the true burden of the system to manufacturers wishing to participate a suppliers of P25 equipment to first responders.
16. DHS S&T will display the expiration date of OMB approval for this information collection.
17. DHS S&T does not request an exception to the certification of this information collection.

B. Collection of Information Employment Statistical Methods

Not Applicable