

SUPPORTING STATEMENT

A. Justification:

1. The record keeping requirements contained in § 80.503 are necessary to ensure licensees which share private facilities operate within the specified scope of service, on a non-profit basis, and do not function as communications common carriers providing ship-shore public correspondence services.

The Commission is requesting an extension (no change in the recordkeeping requirements) in order to obtain the three year clearance from the OMB. There is no change in the estimated burden.

Statutory authority for this collection of information is contained in §§ 4, 303, 307(e), 309, and 332, 48 Stat. 1066, 1082, as amended; 47 U.S.C. 154, 303, 307(e), 309, and 332, unless otherwise noted. Interpret or apply 48 Stat. 1064–1068, 1081–1105, as amended; 47 U.S.C. 151–155, 301–609; 3 UST 3450, 3 UST 4726, 12 UST 2377 unless otherwise noted.

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 is used by FCC personnel during inspection and investigations to insure compliance with applicable rules. If this information was not available enforcement efforts could be hindered; frequency congestion in certain bands could increase; and the financial viability of some public coast radiotelephone stations could be threatened.
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 a similar information collection on the respondents. There are 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.
6. In this case conducting the "collection" less frequently equates to eliminating the requirement to have the documentation available. As indicated above, this could result in enforcement efforts being hindered, increased frequency congestion in certain bands, and the financial viability of some public coast stations being threatened.
7. Current data collection is consistent with 5 CFR 1320.6, except that the subject records are required to be retained for 10 years in order to coincide with the station license term. The retention of these records for 10 years imposes a negligible burden on the licensee while providing valuable information to FCC personnel to insure compliance with applicable rules and treaties.
8. The Commission published a 60-day public comment period which appeared in the Federal Register Notice on June 4, 2012 (77 FR 32969). No PRA comments were received as a result of the Notice.
9. Respondents will not receive any payments.

- 10. There is no need for confidentiality.
- 11. There are no requests of a sensitive nature considered or those considered a private matter being sought from the applicants on this collection.
- 12. Approximately 100 limited coast stations engage in sharing arrangements. Based on a review of such records, it is estimated that an average of 16 hours per year per station would be required for a professional staff member to prepare and amend such arrangements and records. Therefore, the total burden is: **100 respondents x 16 hours per response = 1,600 total annual burden hours.**
- 13. Estimate of cost to respondents: None.

\$50.00	per hour (in-house professional staff)
x 16	hours per station
x 100	stations
+ 10%	overhead
<u>\$88,000</u>	

- a. There are no capital or start-up costs.
- b. There are no operational or maintenance costs.

- 14. Estimated annual cost to the Federal Government: None.
- 15. There are no changes to the estimated burden.
- 16. The data will not be published for statistical use.
- 17. We do not seek approval to not display the expiration date for OMB approval of the information collection.
- 18. There were no exceptions to Item 19.

B. Collections of Information Employing Statistical Methods:

No statistical methods are employed.