

SUPPORTING STATEMENT

A. Justification:

1. The recordkeeping requirement contained in 47 CFR section 80.868 of the Commission's rules is necessary to ensure that radiotelephone distress procedures must be securely mounted and displayed in full view of the principal operating position on board certain vessels (300 gross tons) required by the Communications Act or the International Convention for the Safety of Life at Sea to be equipped with a radiotelephone station.

The Commission is now requesting approval for an extension (no change in the recordkeeping requirement). There is no change in the Commission's previous burden estimates.

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

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

2. The information is used by a vessel radio operator during an emergency situation, and is designed to assist the radio operator to utilize proper distress procedures during a time when he or she may be subject to considerable stress or confusion.
3. Prior to finalizing rule makings the Wireless Telecommunications Bureau conducts an analysis to insure that improved information technology cannot 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 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.
6. If the card of instructions was not posted, an aid to vessel radio operators during emergency situations would not be available. Safety related communications could take longer and/or be less useful to search and rescue organizations.

7. Current data collection is consistent with 5 CFR 1320.6, except that the subject records (i.e., card of instructions) are required to be retained for 10 years to coincide with the station license term. However, this retention period is not included in the rule section. *See* 47 CFR 90.868. The retention of the records for 10 years imposes a negligible burden on the licensee while providing valuable information to radio operators during an emergency.
8. Pursuant to 5 CFR 1320.8(d), the Commission published a notice soliciting public comment for 60 days which appeared in the Federal Register on March 6, 2013 (78 FR 14545). No PRA comments were received.
9. Respondents will not receive any payments.
10. There is no need for confidentiality.
11. This does not address any private matters of a sensitive nature.
12. This record keeping requirement merely consists of the mounting of a card summarizing radio distress procedures in view of the radiotelephone operators' position on board certain compulsory equipped vessels. According to the Universal Licensing System (ULS) database, we estimate that 4,506 licensees will be required to meet this requirement.

4,506 (respondents) x 0.1 (min.) = **451 hours**.
13. Cost to respondents: We assume that the respondent would use internal personnel to prepare the information.

451 hours x \$25/hour + 10% overhead = \$12,402.50.
14. Estimated annual cost to the Federal Government: None.
15. There is no change in the Commission's burden estimates.
16. The data will not be published for statistical use.
17. No expiration date will be displayed.
18. There are no exceptions to Item 19.

B. Collections of Information Employing Statistical Methods:

No statistical methods are employed.