

SUPPORTING STATEMENT

New collection titled: Part 87 – Aeronautical Advisory Stations (Unicom) – “Squitters”

**A. Justification:**

1. On March 1, 2013, the Federal Communications Commission, released a *Report and Order* in the *Airport Equipment* proceeding, in WT Docket Nos. 10-61 and 09-42; FCC 13-30. In the *R&O*, the Commission amends its Part 87 rules to authorize new ground station technologies that will promote aviation safety, and allow use of frequency 1090 MHz by aeronautical utility mobile stations for airport surface detection equipment, commonly referred to as vehicle “squitters,”<sup>1</sup> to help reduce collisions between aircraft and airport ground vehicles. Further, the Commission establishes service rules for audio visual warning systems to help aircraft in flight avoid antenna structures and other obstacles, and adopts rules to permit ground testing of aviation data link test systems. However, in this *R&O*, the Commission declined to authorize remote monitoring of certain automated ground stations.

The Commission seeks OMB approval for the burden implemented by the *R&O* due to actions taken by the Commission.

Section 87.287(b) requires that before submitting an application for an aircraft data link land test station, an applicant must obtain written permission from the licensee of the aeronautical enroute stations serving the areas in which the aircraft data link land test station will operate on a co-channel basis. The Commission may request an applicant to provide documentation as to this fact.

As noted on the Form OMB 83-I, this information collection does affect individuals or households.

Statutory authority for this collection of information is contained in 15 U.S.C. 79 *et seq.*; 47 U.S.C. sections 151, 154(i), 154(j), 155, 157, 225, 303(r), and 309 of the Communications Act of 1934, as amended.

2. The written permissions will aid the Commission in ensuring that licensees are complying with its policies and rules, while allowing the owners of antenna structures and other aviation obstacles to use Audio Visual Warning Systems (AVWS) stations, thereby helping aircraft avoid potential collisions and enhancing aviation safety, without causing harmful interference to other communications.

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<sup>1</sup> “Squitter” refers to random output pulses from a transponder caused by ambient noise or by an intentional random triggering system, but not by the interrogation pulses.

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 basis 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 requirements to that absolutely necessary for evaluating and processing each application and to deter against possible abuses of the processes.
6. This information is considered essential to the implementation of the Act as described above.
7. Current data collection is consistent with 5 CFR 1320.6.
8. The Commission initiated a 60-day public comment period which appeared in the Federal Register on April 8, 2013 (78 FR 20916). 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 in this collection.
12. There are approximately 170 airlines flying in the U.S. and we estimate there to be 30 aircraft maintenance companies doing this type of data link testing, for a total of 200 licensees. We estimate that half of the airlines (85) will contract the work out to the maintenance companies, and the remaining 85 will be using in-house engineering personnel to meet this requirement @ 1 hour per respondent.

115 (maintenance co. respondents) x 1 hr. = 115 hours. + 85 (airline engineers) x 1 hr. = 85 hours for a total of 200 hours.

**TOTAL ANNUAL HOUR BURDEN IS: 200 Hours.**

13. **Estimate of cost to respondents:** We estimate the salary of a contract engineer to be \$250.00 an hour, opposed to that of an in-house engineer, whose salary is estimated to be \$150.00 an hour.

115 (contracted testors) x \$250.00/hour = \$28,750.

85 (in-house engineers) x \$150.00/hour = \$12,750.

**TOTAL ANNUAL OUTSIDE CONTRACTING COST BURDEN IS: \$28,750.**

14. Estimate of cost to Federal Government: None.
15. The burdens implemented by this R&O represent a program change increase of 200 total annual burden hours and \$28,750 in outside contracting costs.
16. The data will not be published for statistical use.
17. We do not seek approval to display the expiration date for OMB approval of the information collection.
18. There was one exception to Item 19. We incorrectly stated in the 60 day notice that there was an impact under the Privacy Act. However, individuals or households are not part of the respondents in this information collection and we have noted that in paragraph one of this supporting statement.

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

No statistical methods are employed.