

SUPPORTING STATEMENT

A. Justification:

1. FCC 605 is a multi-part, consolidated, general application form that is part of the Universal Licensing System (ULS). Form 605 includes a main form containing administrative information and a series of Schedules used to file technical information applicable to a specific radio service. The form is used to file for authorization to operate radio stations, amend pending applications, modify existing licenses, renew or renew/modify existing licenses, request cancellation of a license, withdraw a pending application, request a duplicate license, or request an administrative update of an existing license (*i.e.*, name change without change to corporate structure or control, change mailing address, change name of vessel, etc.) in the Ship (Part 80), Aircraft (Part 87), Amateur (including Amateur Vanity (Part 97)), Restricted and Commercial (Part 13), and General Mobile Radio Services (GMRS) (Part 95). This form is also used to apply for a Developmental License or a Special Temporary Authority (STA) in these services and to self-certify for temporary authorization to operate where applicable. Respondents are encouraged to submit FCC 605 electronically.

This consolidated form was created to have a consistent "look and feel" that maximizes the collection of data and minimizes narrative responses, free-form attachment, and free-form letter requests. The consolidated application form permits common fields, questions and statements to reside in one place. Technical data, specific to each service, can be captured in their own schedule. FCC 605 accommodates applicants requesting a change which involves multiple existing licenses (*i.e.*, duplicate, change of mailing address, etc.).

Among the data collected on this form is the FCC Registration Number (FRN). Use of the FRN in the ULS creates a common link among a single entity's filings with the FCC. Effective December 3, 2001, collection of FRN is required to comply with the Debt Collection Improvement Act of 1996 (DCIA).

The radio services for which this collection of information is required are governed by FCC Rules, 47 CFR Parts 13, 80, 87, 95 and 97.

Records may include information about individuals or households, *e.g.*, personally identifiable information or PII, and the use(s) and disclosure of this information is governed by the requirements of a system of records notice or 'SORN', FCC/WTB-1, "Wireless Services Licensing Records." There are no additional impacts under the Privacy Act.

The Commission is requesting OMB approval for an extension (no change in the reporting, recordkeeping and/or third party disclosure requirements). The Commission has reformatted the FCC 605 Schedule D to rearrange the layout of Question 2 for Vanity Call Sign Change; to further clarify the filing instructions; and to define the term ‘in-law’.

This collection of information reflects an adjustment to decrease the number of respondents from 175,000 to 130,000 due to a reduction in filers. There is an increased cost to the respondents due to an increase in the average fee required to accompany filings. The cost increased from \$2,538,000 to \$2,676,700, an increase of \$138,000.

Statutory authority for this collection of information is contained in 47 CFR §1.913(a)(4) of the FCC Rules.

2. The FCC uses the information in FCC Form 605 to determine whether the applicant is legally, technically, and financially qualified to obtain a license. Without such information, the Commission cannot determine whether to issue the licenses to the applicants that provide telecommunication services to the public, and therefore, to fulfill its statutory responsibilities in accordance with the Communications Act of 1934, as amended. Information provided on this form will also be used to update the database and to provide for proper use of the frequency spectrum as well as enforcement purposes.

For Third Party Disclosure requirements, Amateur and Commercial Radio Service applicants for initial authorization (“new application”) or an upgrade of authorization (“modify application”) are required to provide a completed FCC Form 605 to a Volunteer Examination Coordinator (VEC) or Commercial Radio Operator License Examination Manager (COLEM) prior to taking an exam. The VEC or COLEM certifies additional information as to the results of the exam and may electronically forward the FCC Form 605 to the FCC. Approximately 64,000, or 49% of the respondents are filed electronically through these third parties. There is no additional cost or time burden to the applicant for this third party filing. (Any additional respondent costs and burden are associated with the examination procedures.). Again, information about individuals or households, and the use(s) and disclosure of this information is governed by the requirements of system of records, FCC/WTB-1. All information is publicly available except the Date of Birth for Commercial Radio Operator applicants and applicant Telephone Numbers are redacted.

3. The Commission anticipates that 97% of the respondents will file FCC Form 605 electronically.
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 collection requirements to those absolutely necessary for evaluating and processing each application and to deter against possible abuses of the processes.
6. Generally, the frequency of filing of FCC Form 605 is determined by the applicant and licensee, *i.e.* licensees are required to renew their authorizations at which time the information is verified: Commercial Radio Operator and GMRS licensees file every 5 years, Ship, Aircraft, and Amateur licensees file every 10 years, and Restricted Radiotelephone Operators which have a “lifetime issue”, file just once, except when there is a name change, an address change, a vessel name change, etc. Thus, we must verify the information in our database at these time intervals or when these various changes are made in order to maintain the integrity of the database and to provide proper management of the frequency spectrum.
7. This collection of information is consistent with the guidelines in 5 CFR § 1320.6.
8. The Commission published a 60-day notice soliciting public comment which appeared in the Federal Register on January 13, 2011 (76 FR 2376). No comments were received as a result of the notice.
9. Respondents will not receive any payments.
10. To protect the privacy of its applicants, the FCC will redact the telephone number(s) of applicants and the birth date of the Commercial Radio Operator applicants.

Information on the FCC Form 605 is maintained in the Commission’s system of records notice or ‘SORN’, FCC/WTB-1, “Wireless Services Licensing Records.” These licensee records are publicly available and routinely used in accordance with subsection b of the Privacy Act, 5 U.S.C. 552a(b), as amended. Taxpayer Identification Numbers (TIN) and material that is afforded confidential treatment pursuant to a request made under 47 CFR §0.459 will not be available for public inspection.

The Commission has in place the following policy and procedures for records retention and disposal: Records will be actively maintained as long as the individual remains a licensee. Paper records will be archived after being keyed or scanned into the system. Electronic records will be backed up on tape. Electronic and paper records will be maintained for at least twelve years and three months.

11. This collection does not address private matters of a sensitive nature, and the PII is

covered by the system of records notice or ‘SORN’, FCC/WTB-1, “Wireless Services Licensing Records”.

12. The Commission estimates 130,000 respondents (applicants/licensees) annually and that applicants will complete the form on their own. This collection is relatively simple, only requiring administrative data on the Main Form, and in most situations, requires minimal technical data specific to the radio service supplied by an attached schedule. The *average* burden per respondent is estimated to be 26.4 minutes (0.44 hours). The estimate is based on FCC staff’s knowledge and familiarity with the availability of the data required.

FCC Form 605 Burden:

130,000 applications X 0.44 hours (26.4 minutes) = 57,200 hours

Total Burden Hours: = 57,200 hours.

THIRD PARTY DISCLOSURES: Amateur and Commercial Radio Service applicants for initial authorization (“new application”) or an upgrade of authorization (“modify application”) are required to provide a completed FCC Form 605 to a Volunteer Examination Coordinator (VEC) or Commercial Radio Operator License Examination Manager (COLEM) prior to taking an exam. The VEC or COLEM certifies additional information as to the results of the exam and may electronically forward the FCC Form 605 to the FCC. Approximately 64,000, or 49% of the respondents are filed electronically through these third parties. There is no additional cost or time burden to the applicant for this third party filing. (Any additional respondent costs and burden are associated with the examination procedures.).

13. Cost to the Respondent:

Total capital and start-up costs to prepare FCC Form 605:

There is no cost to file the application electronically with the FCC other than the cost of Internet access.

We estimate that approximately 29% of the Form 605 applications filed will require a \$71 filing fee.

130,000 respondents X 29% = 37,700 feeable applications

37,700 feeable applications X \$71= \$2,676,700

Total Estimated Annual Costs: \$2,676,700.

14. Cost to the Federal Government:

FCC 605 Applications estimated to be filed: 130,000 (97% of those electronically).

\$288 x 10 (10,000 28-page forms) (Cost of printing is \$288 per 1,000)	=	\$2,880 (Printing Costs)
3,900 Applications x 0.084 (5 min) x \$35.39 per hour for a Data Entry Contractor	=	\$ 11,594 (Data Entry)
6,500 Applications x .50 (30 min.) x \$40.66 per hour (GS-12, Step 5) for an Application Examiner	=	\$132,145 (Processing)
\$12,000 month x 12 months For contracted Computer Programming Support	=	\$ 144,000 (Programming Support)
1 Program Analyst, GS 13, Step 5 To oversee and maintain automation processes	=	\$100,904 (Other Support)
Sub-Total	=	\$ 391,523
25% Overhead		<u>\$ 97,881</u>
Total		\$ 489,404

15. There are no program changes in this collection. There is an adjustment to decrease the number of respondents from 175,000 to 130,000, a change of -45,000 respondents; a 19,800 hour decrease adjustment in the total annual burden; and a \$138,700 increase adjustment in annual cost. This increase is due to an increase in the filing fee.

16. The data will not be published for statistical use.

17. The Commission is requesting a waiver from displaying the OMB expiration date on the FCC Form 605. Granting this waiver will prevent the Commission from destroying stock upon re-approval of the form or having to update the electronic versions each time this information collection is submitted to OMB.

18. There only exception to the certification statement was that when the Commission published the 60-day notice we stated that we would be submitting a revision to OMB.

Upon further review, it was determined that this was an extension.

B. Collections of Information Employing Statistical Methods:

No statistical methods are employed.