

FCC Consumer Broadband Services Testing and Measurement

SUPPORTING STATEMENT

A. Justification:

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The Commission is requesting Office of Management and Budget (OMB) approval for a revision of this information collection. The Commission is reporting a change in the number of respondents and burden hours. See item 15 for an explanation of the Commission's estimates.

In addition to the continued fixed broadband performance measurement effort, the contract has been expanded to include support for the measurement of mobile broadband network performance. The FCC, in collaboration with SamKnows, and 4 of the largest U.S. mobile carriers (Verizon, AT&T, US Sprint and T-Mobile), developed a mobile application for smartphones (both android and ipad devices) available for download by consumer volunteers. This application will help consumers determine their mobile broadband performance (download and upload speeds, latency and jitter). Broadband performance data is collected via the application running on a volunteer's smartphone and uploaded to the Cloud for post-processing that includes a technical privacy analysis for any publicly released dataset. Online speed testing is supported under this contract using popular smartphone operating systems available to the widest possible scope of consumer.

This information is crucial for good sample selection and analysis of results. This information collection request facilitating ISP Partners' participation will ensure that the information collected from consumers is accurate, addressing a serious data quality concern and otherwise contribute to the success of the program. This request is also critical to implement the programs of the National Broadband Plan (Broadband Plan) required under the American Reinvestment and Recovery Act of 2009 (ARRA), Public Law 111-5, 123 Stat 115 (2009). The Broadband Data Improvement Act of 2008, Public Law 110-385, Stat 4096 § 103(c)(1) directs the Commission to collect information on the type of technology used to provide broadband to consumers, the price of such services, actual transmission speeds, and the reasons for non-adoption of broadband service.

This collection of information continues to be necessary in order to complete a program begun in response to keen consumer interest concerning the testing and measurement of the actual speed and performance of consumers' residential fixed broadband services and

the actual usage and performance of broadband service delivered to schools and libraries. Information requested is necessary to ensure that a valid set of consumer panelists are selected to ensure that ISP Partners' contributions are integrated in a timely fashion to maximize the collection of data. This collection allows ISP Partners to support the statistical soundness of the testing and measurement methodologies and criteria used in the program. ISP Partners confirm information about subscribers to their broadband services who are participating in the program as well as other technical and market information about the services they offer. In addition, ISP Partners will also directly support the testing operations of the program. This participation will address specific shortcomings identified by ISP Partners in as part of this effort in the testing and measurement methodology and process, and improve the statistical quality of the gathering and processing of information associated with this study. Issues related to the statistical quality of the information produced by this program are central to a number of the Broadband Plan's purposes, including "ensur[ing] that all people of the United States have access to broadband capability[;] . . . analy[zing] . . . the most effective and efficient mechanisms for ensuring broadband access by all people of the United States;" developing "a detailed strategy for achieving affordability of such service and maximum utilization of broadband infrastructure and service by the public;" and "evaluat[ing] . . . the status of deployment of broadband service, including progress of projects supported by the grants made pursuant to this section." *ARRA § 6001(k)(2)*.

This information collection affects individuals or households and state, local or tribal governments. However, personally identifiable information (PII) is not being collected, made available or accessible by the Commission but instead by third parties including SamKnows, a third party contractor, and ISP Partners. In the case of the measurement agent for mobile broadband performance the entire collection mechanism is completely anonymous and information identifying an individual handset is neither solicited nor collected. Information related to time and location of information collected is processed prior to any public use to minimize any likelihood of the data being used to identify individual handsets.

In the initial submission to OMB, SamKnows collected PII from fixed broadband subscribers who chose to participate in this broadband performance study. SamKnows prepared a privacy statement that described the PII that is being collected and the privacy protections that it has established to guard the collection, uses, and disclosure of this information. The privacy and PRA disclosure statement set forth below has been modified to reflect ISP Partners' participation in the data gathering and processing of the program, to confirm information already gathered and to provide other technical and market information related to the broadband services that they offer.

Fixed Broadband Performance Privacy Statement

SamKnows, on behalf of the FCC, is collecting and storing broadband performance information, including various PII such as the street addresses, email addresses, online usage patterns, and broadband performance information from those individuals who are participating voluntarily in this test. PII not necessary to conduct this study and will not

be collected. Certain information provided by, or collected from, volunteers will be confirmed with a third party, including their ISP, to ensure a representative study and otherwise shared with third parties as necessary to conduct the program. SamKnows will not release, disclose to the public, or share any PII with any outside entities, including the FCC, except as is consistent with the SamKnows privacy policy or the terms of this agreement. See <http://www.samknows.com/broadband/privacy.php>. The broadband performance information that is made available to the public and the FCC will be in an aggregated form and with all PII removed. For more information, see the Privacy Act of 1974, as amended (5 U.S.C. § 552a), and the SamKnows privacy policy.

We have estimated that each volunteer participating in this study will assume a one hour time burden over the course of the study. Our estimate includes the time to sign-up on-line, connect the hardware device in the home, and periodic validation of the hardware.

In addition to the continued fixed broadband performance measurement effort, the contract has been expanded to include support for the measurement of mobile broadband network performance. The FCC, in collaboration with SamKnows, and 4 of the largest U.S. mobile carriers (Verizon, AT&T, US Sprint and T-Mobile), developed a mobile application for smartphones (both android and ipad devices) available for download by consumer volunteers. This application will help consumers determine their mobile broadband performance (download and upload speeds, latency and jitter). Broadband performance data is collected via the application running on a volunteer's smartphone and uploaded to the Cloud for post-processing that includes a technical privacy analysis for any publicly released dataset. Online speed testing is supported under this contract using popular smartphone operating systems available to the widest possible scope of consumers.

Mobile Broadband Performance Application Privacy Notice and Terms of Use

What Information We Collect

The information we collect about your broadband performance is anonymous. No unique or persistent identifier is associated with any data we collect from you.

We do not label the data we collect from you with anything that would directly identify your handset. Because your data is part of an anonymous pool that includes information collected from all participants, the risk of someone being able to successfully identify an individual from the data is minimal. We collect five kinds of information to measure the performance of your mobile broadband service.

- **Location**

When we measure your mobile broadband performance, we identify the location and unique ID of the cell tower that is providing that service, and the GPS location of your device when the measurements were made.

- **Time of data collection**

We record the times when we perform measurements of your mobile broadband performance. Some measurements function by recording a start and end time.

- **Handset type and operating system version**

When the measurement Application starts, we record the manufacturer and model of phone you are using, and the version of the operating system installed on your phone.

- **Cellular performance and characteristics**

We collect information about your cellular phone performance, such as your service provider, the strength of the radio signal, and what type of connection (3G or 4G) service you have.

- **Broadband performance**

The Application tests your mobile broadband upload and download rate, round trip latency, and packet loss measured between your handset and our servers managed by the FCC, the FCC contractor, and other project partners.

This data is encrypted and stored on your phone for you to review, and periodically uploaded to our servers. Older data is also periodically deleted from your phone. You can find more detail in the FCC's technical summary of this program.<http://www.fcc.gov/measuring-broadband-america/mobile/technical-summary.html>

Third Party Data Sharing

The data we collect is helpful for consumers, the FCC, and others interested in understanding mobile broadband in the United States.

We share your mobile broadband performance information in four ways.

- **Internally**

We may share your mobile broadband performance information within the FCC to write our Measuring Broadband America Report on Mobile Performance and to support our development of broadband policy.

- **Third-Party Partners Who Help Us Run Our Test and Support Our Program**

We share your mobile broadband performance information with our contractor who manages the measurement program, with partners who support the program and architecture, and with partners supporting our analysis or contributing peer reviews.

The FCC has contracted with a broadband measurement company, SamKnows (www.samknows.com/privacy), to help manage the program and conduct its technical functions. SamKnows performs functions such as writing and maintaining the software that performs the test measurements, responding to customer service requests, managing the Application and the execution of tests, collecting and protecting data gathered in the trial, and providing analysis and support for the preparation of FCC reports. The terms of our contract with SamKnows include obligations to protect the data and your privacy.

Research platforms and your carrier may support various aspects of the testing and architecture for the program. Information we collect may be shared with these parties for the purpose of conducting the trial, and will be protected by non-disclosure agreements that include strict requirements for safeguarding the collected data.

The FCC directs researchers, its contractor, and your carrier working under non-disclosure agreements (NDA) to analyze the collected data for privacy risks or concerns and to plan for future measurement efforts. We may share your detailed mobile performance data with these partners supporting our data processing and analysis for the specific purpose of identifying patterns in the data and recommending ways of addressing any concerns for your privacy and anonymity. Researchers and other partners supporting this analysis are skilled in the field of statistics and computer science to identify patterns that a third party might exploit in ways to compromise your privacy, for example by comparing the location information with other sources of information. If we find concerns, we will take steps to address the risks by making the time, location or other information less specific, limiting the combinations of information we release, or deleting information. These partners are required to sign an NDA and must agree to data handling practices that safeguard the data. The NDA prohibits any public disclosure of the data except in the form of a report to the FCC, limits both the access duration and specific research purposes of data, and requires disclosures if the data is ever compromised in any way.

- **Data Available to the Public**

We will publish aggregated averages and minimally necessary datasets that support our review of the statistics that we determine pose very low risks to your privacy, including:

Aggregated Data

We plan to publish averages and other aggregated statistics that describe important features of mobile broadband performance. These highly aggregated statistics pose very low risks to your privacy.

Processed Coarsened Raw Data

We plan to publish only the anonymous data in a processed and coarsened form that supports the averages and other statistics that we publish in our reports. Prior to release of this data, the FCC and researchers skilled in the field of statistics and computer science will identify patterns in the raw data that could be exploited to compromise your privacy. If we find concerns, we will take steps to address the risks by making the time, location or other information less specific, limiting the combinations of information we release, or deleting information.

For example, the analysis we perform would identify and address risks from a third party combining the location information in the data we collect with other sources of information to try to identify your handset in our database. We will publicly release the results of this analysis to ensure the quality of our review, and will also describe the measures we took to protect your anonymity. We will not release individual volunteers' time and location information publicly.

- Pursuant to legitimate requests by law enforcement or where otherwise required by law or regulation.

We may share mobile broadband performance data collected by this Application subject to legitimate requests by law enforcement or where otherwise required by law or regulation.

Data Consumption

By default the Application is configured to use no more than 100 megabytes of data each month. Any additional tests you initiate will also consume between 100 kB for the smallest packet loss test and 30 MB for a complete suite of tests. At any time you can change the amount of data the Application uses by increasing or reducing the “mobile data cap” in the settings menu. You should ensure that your monthly broadband usage, including the data used by the Application and Service during the Program, does not exceed the data allowance included in your mobile broadband package. Your carrier may charge you for any data used in excess of your package's data allowance.

Stopping Your Participation

If at any time you want to stop participating in this program, simply delete the Application and the accompanying data, and the Application will not collect further data. Any data collected prior to the deletion of the Application will remain in the data sets subject to the above terms and protections.

Other terms of use of the Application

- Testing Architecture and Technical Summary <http://www.fcc.gov/measuring-broadband-america/mobile/technical-summary.html>
- Program Stakeholders' Code of Conduct <http://www.fcc.gov/measuring-broadband-america/mobile/code-of-conduct.html>
- GPL2 GNU Licensing Agreement <http://www.gnu.org/licenses/gpl-2.0.html>

- About the FCC and Paperwork Reduction Act of 1995 Notice. This Collection Authorized By OMB Control No. 3060-1139 (Expires 2/28/2014). <http://www.fcc.gov/measuring-broadband-america/mobile/pra-privacy-act-notice.html>
- Mobile Provider Disclaimers <http://www.fcc.gov/measuring-broadband-america/mobile/mobile-provider-disclaimers.html>
- Application Terms and Conditions and Privacy Notice <http://www.fcc.gov/measuring-broadband-america/mobile/mobile-terms-privacy-notice.html>

2. Indicate how, by whom and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency had made of the information received from the current collection

The Commission’s Office of Engineering and Technology, Office of Strategic Planning and Policy Analysis (OSPPA), Consumer and Governmental Affairs Bureau (CGB) and other Commission entities use the information collected under this study to assess what actual broadband speeds and performance consumers are currently receiving from providers and publish reports describing the Agencies analysis on an annual basis. The Commission may also use the information collected from schools and libraries to assess broadband demand and usage patterns, Our purpose is to measure the speed of broadband services provided by ISPs across service packages and geographies, rather than assess the differences in broadband performance received by demographics. This assessment helps the Commission create standards for broadband measurements, assess the validity of ISP performance claims, and inform future steps to increasing transparency and consumer awareness of broadband service. The data are increasingly used by bureaus and offices throughout the Agency for both internal analysis as well as in information provided to the public. **3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical or other technological techniques or other forms of information technology, e.g., permitting electronic submissions of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

For fixed-line networks, the speed and performance monitoring involve the placement of hardware and software devices in consumers’ broadband equipment, to accurately measure the performance of fixed line broadband connections based on real-world usage. These hardware devices are controlled by a cluster of servers, which host the test scheduler and reporting database. The data is collated on the reporting platform and accessed via reporting interfaces on the devices via other secure online mechanisms, such as via a website portal or FTP. In this case, information technology is used extensively to reduce burden on the panelists and ISP Partners, as all data collection is automated after the initial installation of the measurement mechanism.

For the mobile networks, the speed and performance monitoring is directly measured and collected via an Application running on a volunteers’ smartphones and uploaded to the Cloud for post-processing that includes a technical privacy analysis for any publicly released dataset.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in item 2 above.

At the time the program was launched, no similar effort to collect consumer information existed in the United States, though other countries had conducted similar projects. In addition, external Internet experts confirmed that this information was both unique and of value to the public interest. This study's collection of information on actual speeds and performance of broadband connections delivered to residential customers by ISPs has been reported to be of great value to academic researchers, manufacturers and technology providers, broadband providers, public interest groups and other diverse stakeholders. Validation of subscribed speeds as opposed to actual speeds by participating ISPs remains unique to this program and provides a context for measured speeds.

Software-based tools and online tools exist that can test consumer's broadband connections, including a set of consumer tools launched by the FCC in conjunction with the National Broadband Plan. However, these tools track speeds experienced by consumers, rather than speeds delivered directly to a consumer by an ISP. The distinction is important for supporting Agency broadband policy analysis, as ISPs advertise speeds and performance delivered rather than speeds experienced, which suffers from degradation outside of an ISP's control. No other dedicated panel of direct performance meters exists today in the country. The program will continue to support existing software-based tools and online tools but the focus of the program will remain the direct measurement of broadband performance delivered to the consumer.

The collection effort also has specific elements focused on further network performance statistics, time of day parameters, and other elements affecting consumers' broadband experience that are not tracked elsewhere. The information to be confirmed by ISP Partners about their subscribers or technical and market data regarding the broadband services they provide is unavailable from other sources. The information to be requested is attached to this request.

5. If the collection of information impacts small businesses or other small entities (item 5 of OMB Form 831), describe any methods used to minimize the burden.

Not applicable. This survey collection affects individual consumers and ISP Partners that are not small businesses or small entities.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing the burden.

The Commission's other data collection efforts are insufficient to fully determine the extent and nature of the impact of consumers' speeds and performance characteristics.

If the information from ISP Partners under this collection request cannot be secured, the statistical soundness of the testing and measurement methodologies would be substantially impacted and ongoing Commission programs relying on this source of data will be compromised. The ability to assess consumer broadband performance based on this data has become central to key Commission policy development and is relied upon by other stakeholders.

7. Explain any special circumstance that would cause an information collection in a manner inconsistent with the guidelines in 5 C.F.R. § 1320.5(d)(2).

There are no special circumstances that would cause an information collection in a manner inconsistent with the guidelines in 5 C.F.R. § 1320.5(d)(2).

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 C.F.R. § 1320.5(d), soliciting comments on the information prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to those comments. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

The Commission published a 60 day notice in the Federal Register on November 22, 2013 (78 FR 70045). The Commission received no comments during this period.

The Commission has conducted ongoing public meetings and actively engaged all stakeholders to incorporate broad viewpoints on the issues related to this program and the collection issues related to ISP Partner participation. *Ex parte* records of these meetings are available in the record of the related proceedings and reflect broad support from the relevant ISPs for the collaborative approach described in this revised collection request. Stakeholders to the program have agreed to be mutually bound code of conduct. The *ex parte* documents are attached to this request.

9. Explain any decision to provide any payment or gift to respondents, other than enumeration of contractors or grantees.

9. There will be no payments in exchange for participation in this study.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

No personally identifying information (PII) will be transmitted to the Commission from the contractor as a matter of vendor policy. SamKnows maintains a series of administrative, technical, and physical safeguards to protect against the transmission of personally identifying information. At point of registrations, individuals will be given full disclosure in a "privacy statement" (as explained in Question 1 above), highlighting what information will be collected. SamKnows will also explain what information will not be collected. ISP Partners will receive personally identifying information about volunteers to confirm the validity of the information against their subscription records, but will be bound by a non-disclosure agreement that will maintain various administrative, technical, and physical safeguards to protect the information and limit its use. ISP Partners providing support to the testing program will likewise be bound to the same series of administrative, technical, and physical safeguards developed by SamKnows. In addition

all third parties supporting the program directly will be bound by a “Code of Conduct” to ensure all participate and act in good faith. A current draft of the document is attached to this request. Moreover, mobile broadband data will only include combinations of data that have been evaluated to support the non-anonymous collection strategy and privacy policy.

11. Provide additional justification for any questions of a sensitive nature.

This information collection does not address any private matters of a sensitive nature; and as noted in Questions 1 and 10, SamKnows has prepared a privacy statement to explain the various safeguards to be used in collecting and using the PII that is collected. The Commissions Terms of Use and Privacy Policy for mobile broadband performance participants is also attached.

12. Provide estimates of the hour burden of the collection of information. The statement should: indicate the number of respondents, frequency of responses, annual hour burden, and an explanation of how the burden was estimated. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of the estimated hour burden, and explain the reasons for the variance.

The total fixed and mobile time burden for the survey is estimated at 46,667 hours.

Fixed Study Annual Burden Estimate

This estimate is based on an estimated **1,000 respondents X 1 hour per response for all participation activities for a total of 1,000 burden hours for respondent subscriber volunteers.**

1,000 respondents X 1 hour per response = 1,000 hours

This estimate is based on a 10 minute initial sign-up for the panel, 30 minutes to connect and install the hardware appliance or software, and for fixed participants two-10 minute validation contacts to be conducted by the vendor over the course of the study period. A participant signup and validation are completed only one time at the beginning of their participation and continue through the duration of their participation. No additional burden is imposed on the respondent following the setup of the hardware appliance. The panel may also include broadband users such as schools and libraries.

The additional respondents include the total time burden for fixed ISP Partners participating in the survey is estimated at 3,200 hours based on an estimated **16 potential ISP Partners X 200 hours per partner for all participation activities for a total of 3,200 annual burden hours for fixed ISP partner respondents.**

16 respondents X 200 hours per partner = 3,200 hours

This estimate is based on an estimated **160 hour processing time** by a respective ISP Partner including any manual or automated processing required plus **40 hour processing time for installation and planning of optional test nodes that may be implemented by fixed ISP Partners**. In practice fixed ISP partners have indicated that confirmation of consumer data can be done on a batch basis with standard data analysis techniques.

Total Estimated Respondents: 1,016
 Total Estimated Responses: 1,016
 Total Annual Burden Hours: 4,200

Total Annual Fixed Burden: 4,200 hours.

Fixed Respondent Time Burden				
11,000 Hardware Appliances Installed in Respondent Homes/16 ISPs				
		Total minutes	Total hours	Mean minutes / person
Minutes for fixed panel participants				
1,000	Online sign-up process	10,000	167	10
1,000	Time to connect hardware in home	30,000	500	30
1,000	Validation of hardware on ongoing basis	20,000	333	20
Minutes for fixed ISP participation				
16	Manual or automated data processing	153600	160	2560
16	Installation and planning of optional test nodes that may be implemented	38400	40	640
Total Time Burden				
1,000	Total time for panel participants	60,000	1,000	60
16	Total time for ISP participants	192000	3200	12000
	Total time for all fixed participants	252000	4200	

Mobile Study Annual Burden Estimate

The total time burden for the mobile survey is estimated at **42,467 hours**. This estimate is based on an estimated **500,000 new respondents and an estimated 5 minutes per response** for installation of the “application” for a total of 41,667 total annual burden hours for respondent volunteers. There is no data entry burden for volunteers participating in the mobile survey. Potential participants will voluntarily search the Smartphone Application Market for the Application and install the software in a fully automated manner. The only user interaction required is the acceptance of the default data cap value of the Application and the Terms of Use and Privacy Notice. The Volunteer Terms and Conditions and Privacy Notice included in this request.

500,000 respondents X 5 minutes per response = 250,000 minutes/60 = 41,667 hours

The additional respondents include the total time burden for **four mobile ISP Partners** participating in the survey and an **estimated 200 hours per partner** for all participation activities for a total of **800 total annual burden hours for ISP partner respondents**. The 200 hour estimate is based on the experience of equivalent fixed ISP partners participation.

4 respondents X 200 hours each = 800 hours

Mobile Respondent Time Burden				
	Burden Estimates	Total minutes	Total hours	Mean minutes / respondent
Software Application Appliances Installed on 500,000 Respondent Volunteers' Smartphone Devices	5 minute Estimated Burden for Online Search of Application Marketplace and Software Installation	5 Minutes* 500,000 = 250,0000	250,0000/60 Minutes = 4,1667 Hours	5 Minutes
4 ISP Partner Participation	200 Hours Estimated Burden for Data Validation and Test Node Support	200 Hours* 60 Minutes* 4 Partners = 48,000 Minutes	800 Hours	12,000 Minutes
		Total Respondent	Total Respondent	Total Respondent

		Minutes Burden	Hours Burden	Mean Minutes
		500,000*5 = 250,000	41667 + 800 = 42467	12,500

Total Annual Mobile Burden: 42,467 hours.

Total Respondents:

Fixed study respondents	1,000
Fixed ISP respondents	16
Mobile study respondents	500,000
Mobile ISP respondents	4
Total Respondents	501,020

Total Annual Fixed Burden:	4,200 hours
Total Annual Mobile Burden:	<u>42,467 hours</u>
Total Annual Burden:	46,667 hours

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. Do not include the cost of any hour burden shown in items 12 and 14.

This information collection is based on a hardware or software appliance installed in the consumer’s device to collect broadband performance information in an automated fashion. It will impose no cost burden on the participants or ISP Partners. There is no cost to the respondents.

14. Provide estimates of annualized costs to the Federal government. Also provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff).

An outside party administers this collection. Specifically, the Commission employs the services of SamKnows Limited to construct and manages the respondent panels, delivers the hardware and software to participants, collects results, coordinates with ISP Partners, and provides statistical analysis. The total cost of the SamKnows annual contract is \$500,000. The Commission does not anticipate any additional costs to the Commission as a result of this collection.

15. Explain the reasons for any program changes or adjustments reported.

Hourly Burden and respondents for “Fixed Study” were decreased by 10,000 because the initial 10,000 has already been deployed. However, we added an additional 500,000 respondents and 41,667 burden hours for the “Mobile Study”. The Samknows contract

was expanded to include support for the measurement of “mobile broadband network performance.”

16. For collections of information whose results will be published, outline plans for tabulation and publication.

The raw data and analysis of the results of the study are made available on the Agency website as part periodic “US State of Broadband” reports, according to the annual schedules described in the contract.

SamKnows makes available a version of the real-time reporting website, which contains summary reports of actual fixed service coverage by region and provider for participants and providers. Bulk traffic data will be available for ongoing research purposes either by the Commission or outside researchers.

The Agency plans to release aggregated mobile broadband data in maps and other online tools on the Agency website. The underlying processing methodologies and software tools will also be released with the online data visualizations. In addition, analysis of mobile broadband data may also be incorporated into future US State of Broadband reports.

Information regarding ISP Partners participation in the program is discussed in various public documents including *ex parte* communications filed in the record for the Gen Docket No. GEN 12-264, CG Docket No. 09-158, CC Docket No. 98-170, WC Docket No. 04-36 proceedings.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reason that a display would be inappropriate.

The Commission is seeking continued OMB approval to not display the OMB expiration date for OMB approval of the information collection. The Commission publishes a list of all OMB-approved information collections including the OMB control numbers, OMB expiration dates and titles in 47 C.F.R. § 0.408.

18. Explain any exceptions to the statement certifying compliance with 5 C.F.R. § 1320.9(d) and the related provisions of § 1320.8(b)(3).

There are no exceptions to item 19.