

**OMB Control Number: 3060-0386**

**September 2014**

**Title: Special Temporary Authorization (STA) Requests; Notifications; and Informal Filings; Sections 1.5, 73.1615, 73.1635, 73.1740 and 73.3598; CDBS Informal Forms; Section 74.788; Low Power Television, TV Translator and Class A Television Digital Transition Notifications; FCC Form 337**

## **SUPPORTING STATEMENT**

### **A. Justification:**

1. On July 15, 2011, the Commission adopted the Second Report and Order, *In the Matter of Amendment of Parts 73 and 74 of the Commission's Rules to Establish Rules for Digital Low Power Television Translator, and Television Booster Stations and to Amend Rules for Digital Class A Television Stations*, MB Docket No. 03-185, FCC 11-110 (“*LPTV Digital Second Report and Order*”). The *LPTV Digital Second Report and Order* contains rules and policies for low power stations<sup>1</sup> to transition from analog to digital broadcasting and states that low power television, TV translator, and Class A television stations that have not already transitioned to digital must submit a notification to the Commission (through an informal filing) of their decision to either flash cut on their existing analog channel or to continue operating their digital companion channel and return their analog license.

### **History:**

On September 30, 2004, the Commission released the Report and Order, *In the Matter of Amendment of Parts 73 and 74 of the Commission's Rules to Establish Rules for Digital Low Power Television Translator, and Television Booster Stations and to Amend Rules for Digital Class A Television Stations*, MB Docket No. 03-185, FCC 04-220 (“*LPTV Digital Transition Report and Order*”). The *LPTV Digital Transition Report and Order* contained rules and policies for low power stations to transition from analog to digital broadcasting and stated that low power television, TV translator, and Class A television station DTV licensees must comply with the requirements for feeable ancillary or supplementary services. The requirement in 47 CFR 74.788(c)(4) provided that new digital low power television, television translator, and Class A permittees may submit FCC Form 337, Application for Extension of Time to Construct a Digital Television Broadcast Station, should an acceptable reason for failing to construct, as set forth in 47 CFR 4.788(c)(1) – (2), apply.

### **FCC Form 337.**

The FCC Form 337, Application for Extension of Time to Construct a Digital Television Broadcast Station, is used by all low power television, TV translator and Class A television digital permittees to apply for extension of time within which to construct their digital facility. This form must be filed at least sixty, but not more than ninety, days prior to the applicable construction deadline. Applicants who file this form based on financial hardships must retain documentation fully detailing and supporting their financial representations as well as any steps taken to overcome the circumstances preventing construction.

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<sup>1</sup> The low power television service consists of LPTV, TV translator, and Class A stations. LPTV stations may radiate up to 3 kilowatts of power for stations operating on the VHF band (*i.e.*, channels 2 through 13), and 150 kilowatts of power for stations operating on the UHF band (*i.e.*, channels 14 through 69). By comparison, full-service stations on VHF channels 7 through 13 radiate up to 316 kilowatts of power, and stations on the UHF channels radiate up to 5,000 kilowatts of power. LPTV signals typically extend approximately 15 to 20 miles, while the signals of full-service stations can reach as far as 60 to 80 miles.

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**Special Temporary Authority (STA) Requests (47 CFR 73.1635).** Broadcast stations (AM, FM, TV, Class A TV or LPTV licensees or permittees) may file a request for STA approval to permit a station to operate a broadcast facility for a limited period at a specified variance from the terms of the station's authorization or requirements of the FCC rules. Stations may file a request for STA approval for a variety of reasons. The request must describe the operating modes and facilities to be used. Types of STA requests include Engineering and Legal STAs.

**Notifications:**

- **Change in Official Mailing Address for Broadcast Station (47 CFR 1.5).** Broadcast stations may file this form to report any changes in the station's mailing address, but cannot use this form to correct or change the name of the licensee.
- **Consummation Notice.** Broadcast stations may file this form to notify the Commission when an assignment of license or transfer of control is consummated. The form also may be used by the station to request an extension of time to consummate.
- **Silent Notifications (47 CFR 73.1740).** Broadcast stations (AM, FM, TV or Class A TV licensees) may file this form to notify the Commission of the station's suspension of broadcast operations. Broadcast stations may also use this form to request a silent STA or extension thereof. Types of Silent Notifications include Notification of Suspension and Resumption of Operations. Pursuant to Section 73.1740, broadcast station licensees must notify the Commission when events beyond their control make it impossible to continue operation or to adhere to the required operating schedules set forth in this rule. In addition, they must notify the Commission when they resume normal operations. (No further authority is needed for limited operation or discontinued operation for a period not exceeding 30 days.) Should events beyond the licensees control make it impossible for compliance within the required 30-day time period, broadcast station licensees must file an informal letter request for silent operations ("Silent STA," discussed below in informal filings section).
- **Notifications (47 CFR 73.1615).** Broadcast stations (AM, FM, TV or Class A TV licensees) must file a notification under 47 CFR 73.1615(c) when such a station is in the process of modifying existing facilities as authorized by a construction permit and determines it is necessary to either discontinue operation or to operate with temporary facilities to continue program service for a period not more than 30 days. Licensees or permittees of directional or nondirectional FM, TV or Class A TV or nondirectional AM must file a notification and comply with 47 CFR 73.1615(a). Licensees or permittees of a directional AM station whose modification does not involve a change in operating frequency must file a notification and comply with 47 CFR 73.1615(b). Licensees or permittees of a directional AM station whose modification does involve a change in frequency and determines it is necessary to discontinue operation for a period not more than 30 days must file a notification and comply with 47 CFR 73.1615(d)(2).

OMB Control Number: 3060-0386

September 2014

**Title: Special Temporary Authorization (STA) Requests; Notifications; and Informal Filings; Sections 1.5, 73.1615, 73.1635, 73.1740 and 73.3598; CDBS Informal Forms; Section 74.788; Low Power Television, TV Translator and Class A Television Digital Transition Notifications; FCC Form 337**

- **Tolling Notifications (47 CFR 73.3598)**. Broadcast stations (TV/DTV,<sup>2</sup> Class A TV, low power TV, TV translator, TV booster, AM, FM, International Broadcast, FM translator, FM booster, and LPFM permittees) may file this form to notify the Commission of an event that would toll their deadline to construct their TV facility. Section 73.3598 requires a permittee to notify the Commission as promptly as possible and, in any event, within 30 days of a tolling event, i.e., when construction is prevented due to (1) an act of God (e.g., floods, tornados, hurricanes, earthquakes, etc.); (2) the grant of the permit is the subject of administrative or judicial review (i.e., petitions for reconsideration and applications for review of the grant of a construction permit pending before the Commission and any judicial appeal); (3) construction is delayed by a cause of action pending in court related to requirements for construction or operation of the station (i.e., zoning or environmental requirements); or (4) international coordination where resolution of the international coordination issue is truly beyond the control of the station (e.g., where the failure to obtain coordination will not permit the station to construct facilities sufficient to replicate its analog coverage area). Stations must report progress at six-month intervals, detailing how the tolling event continues to cause delays in construction, any construction progress, and the steps it has taken and proposes to take to resolve any remaining impediments to construction. (Any construction permit for which construction has not been completed and which an application for license has not been filed will be automatically forfeited upon expiration of the construction permit.).
- **Low Power Television, TV Translator and Class A TV Digital Transition Notification**. Low power television, TV translator, and Class A television stations that have not already transitioned to digital must submit a notification to the Commission (through an informal filing) of their decision to either flash cut on their existing analog channel or to continue operating their digital companion channel and return their analog license.

**Informal Filings:**

- **Informal letter requests (47 CFR 73.1615)**. Broadcast stations (AM, FM, TV or Class A TV licensees or permittees) must file an informal letter request under 47 CFR 73.1615(c)(1) when such a station is in the process of modifying existing facilities pursuant to 47 CFR 73.1615(a) or (b) and determines it is necessary to either discontinue operation or to operate with temporary facilities to continue program service for a period of more than 30 days. Licensees or permittees that filed notifications under 47 CFR 73.1615(d)(2) but which determine that it is necessary to discontinue operation for a period more than 30 days must file an informal letter request and comply with 47 CFR 73.1615(d)(1) and (2).
- **Silent STAs and Extensions (47 CFR 73.1740)**. Broadcast stations (AM, FM, TV or Class A TV licensees) that suspended broadcast operations (and filed a silent notification) pursuant to Section 73.1740 and which finds it necessary to continue its suspension of operations for more than 30 days must file an informal letter request (“Silent STA”) with the FCC under 47 CFR 73.1740(a)(4) for additional time. If necessary, the station may file a request for an extension of its Silent STA.

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<sup>2</sup>As of June 12, 2009, a TV/DTV station permittee may obtain an extension of time to construct its DTV facility only pursuant to the tolling provision in Section 73.3598.

**OMB Control Number: 3060-0386**

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Copies of all STA requests, notifications, informal filings and tolling notifications must also be retained in the station's local public inspection file. This recordkeeping requirement is contained in OMB Control No. 3060-0214. Sections 73.3526(e) and 73.3527(e) require broadcast station licensees and permittees to retain in the station's local public inspection file a copy of any application tendered for filing with the FCC, together with all related material.

The Commission is requesting a three year extension for this information collection from the Office of Management and Budget (OMB).

This information collection does not affect individuals or households; thus, there are no impacts under the Privacy Act.

Statutory authority for this collection of information is contained in Sections 1, 4(i) and (j), 7, 301, 302, 303, 307, 308, 309, 312, 316, 318, 319, 324, 325, 336, and 337 of the Communications Act of 1934, as amended.

2. The data is used by FCC staff to determine whether to grant and/or accept the requested special temporary authority (or other request for FCC action), the required notification, informal filing, application filings or other non-form submission.<sup>3</sup> FCC staff will review for compliance with legal and technical regulations, including but not limited to ensuring that impermissible interference will not be caused to other stations.
3. All STA requests, applications, notifications, informal filings and other "non-form" submissions *may* be filed electronically via the FCC's Consolidated Database System ("CDBS"). These filings may also be filed by letter, but only if authorized by rule or FCC approval. (We estimate less than 15% of these filings will be made by paper.)
4. No other agency imposes a similar information collection on the respondents. No similar data is available.
5. This information collection will not have a significant economic impact on a substantial number of small entities/businesses.
6. The frequency for this collection of information is determined by respondents, as necessary.
7. This collection of information is consistent with the guidelines in 5 CFR 1320.5(d)(2).
8. The FCC published a notice in the Federal Register on July 14, 2014 seeking public comment on these information collection requirements, *see* 79 FR 40756. No comments were received from the public.
9. No payment or gift was provided to the respondents.
10. There is no need for confidentiality with this collection of information.

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<sup>3</sup> Generally, "non-form" filings are notifications or requests filed with the Commission that are submitted by informal letter as opposed to a specific Commission form.

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11. This information collection does not address any private matters of a sensitive nature.

12. We estimate the following for STA requests, notifications, informal filings, and FCC Form 337 applications.

**a) STA Requests:**

- **Legal STA Requests.** We estimate receiving 200 Legal STA requests (all broadcast services – AM, FM, TV, Class A TV, LPTV and STA extensions) annually. We expect the station licensees/permittees will prepare 20 of the requests (10%) with a burden of four (4) hours and the remaining 180 requests will be made by consulting attorneys. The consultation time is one (1) hour.
- **Engineering STA Requests.** We estimate receiving 1,000 Engineering STA requests (all broadcast services – AM, FM, TV, Class A TV, LPTV and STA extensions) annually. We expect the station licensees/permittees will prepare 100 of the requests (10%) will be made by the station licensee/permittee and will require four (4) hours preparation, while 900 filings (90%) will be contracted out to consulting engineers and will require one (1) hour of consultation.

**b) Notifications:**

- **Change in Official Mailing Address for Broadcast Station (47 CFR 1.5).** We estimate that 200 notices will be filed with the Commission annually. The station licensee/permittee will need 30 minutes (0.5 hours) to prepare these filings.
- **Consummation Notices.** We estimate 400 notices will be filed with the Commission annually. We expect station licensee/permittee will file 40 notices (10%) and will require 30 minutes (0.5 hours) for preparation. For the remaining 360 notices (90%), the respondent consults with outside attorneys who will prepare/file notices. One (1) hour of consultation time is required.
- **Silent Notifications (47 CFR 73.1740).** We estimate that 400 notices (including Notification of Suspension and Resumption of Operations) will be filed with the Commission annually. We estimate that 75% (300) of these filings will be made by the station licensee/permittee and will require 30 minutes (0.5 hours) preparation and 25% (100) of these filings will be contracted out to outside attorneys and/or consulting engineers and will require one (1) hour of consultation.
- **Section 73.1615 Notifications (47 CFR 73.1615).** We estimate that 300 notices will be filed with the FCC annually. We estimate that about 67% (200) filings will be made by the station licensee/permittee and will require 30 minutes (0.5 hours) preparation and the remaining one-third (100) of these filings will be contracted out to attorneys and/or consulting engineers and will require one (1) hour of consultation.
- **Tolling Notifications (47 CFR 73.3598).** We estimate that 60 notifications and 60 waivers for additional time to construct will be filed with the Commission annually. We estimate 30 notifications and 30 waivers (50%) will be made by the station licensee/permittee and will require 30 minutes (0.5 hours) preparation and the remaining 30 notifications and 30 waivers will be contracted out to attorneys and/or consulting engineers and will require one (1) hour of consultation..

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- **Low Power Television, TV Translator and Class A TV Digital Transition Notification.** We estimate 2,439 LPTV digital transition notifications will be filed with the Commission. We estimate that 2,195 filings (90%) will be made by the station licensee/permittee and will require 30 minutes (0.5 hours) preparation, while 244 filings (10%) will be contracted out to outside attorneys and/or consulting engineers and will require 30 minutes (0.5 hours) of consultation..
- **c) Informal Filings:**
- **Informal letter requests (47 CFR 73.1615).** We estimate that 150 of these informal letter requests will be filed with the FCC annually. We estimate 30 informal letters (20%) will be made by the station licensee/permittee and will require four (4) hours preparation, while 120 letters (80%) will be contracted out to outside attorneys and/or consulting engineers and will require one (1) hour consultation.
- **Silent STAs and Extensions (47 CFR 73.1740).** We estimate 300 filings will be filed with the Commission annually. We estimate that 30 filings (10%) will be made by the station licensee/permittee and will require 30 minutes (0.5 hours) preparation and 270 filings (90%) will be contracted out to outside attorneys and/or consulting engineers and will require one (1) hour of consultation
- **d) FCC Form 337 Applications:**
- We estimate 1,000 FCC Form 337 applications will be filed annually. The respondents will spend one (1) hour to complete each application and retain financial hardship documentation, if applicable.

Type	Number of Respondents	Number of Responses	Burden Hours of Respondents	Annual Burden Hours	Hourly Salary of Respondents <sup>4</sup>	Annual In-House Cost
<b>12a. STA Requests (47 CFR § 73.1635)</b>						
Legal STA-Licensee/Permittee	20	20	4 hrs	80 hrs	\$48.08	\$3,846.40
Legal STA filed by outside attorney via respondent	180	180	1 hr consultation	180 hrs	\$48.08	\$8,654.40
Engineering STA filed by Licensee/ Permittee	100	100	4 hrs	400 hrs	\$48.08	\$19,232.00
Engineering STA filed by consulting engineer via respondent	900	900	1 hr consultation	900 hrs	\$48.08	\$43,272.00
<b>Total STA Requests</b>	<b>1,200</b>	<b>1,200</b>		<b>1,560</b>		<b>\$75,004.80</b>
<b>12b. Notifications (47 CFR Part 73)</b>						
Change in Official Mailing Address for Broadcast Station	200	200	0.5 hrs	100 hrs	\$48.08	\$4,808.00

<sup>4</sup> This estimate is based on an average salary for a station manager of \$100,000 per year or \$48.08 per hour.

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Type	Number of Respondents	Number of Responses	Burden Hours of Respondents	Annual Burden Hours	Hourly Salary of Respondents	Annual In-House Cost
Consummation Notices filed by Licensee/ Permittee	40	40	0.5 hrs	20 hrs	\$48.08	\$961.60
Consummation Notices filed by outside attorney via respondent	360	360	1 hr consultation	360 hrs	\$48.08	\$17,308.80
Silent Notifications filed by Licensee/ Permittee	300	300	0.5 hrs	150 hrs	\$48.08	\$7,212.00
Silent Notifications filed by outside attorney via respondent	100	100	1 hr consultation	100 hrs	\$48.08	\$4,808.00
Rule 73.1615 Notifications filed by Licensee/Permittee	200	200	0.5 hrs	100 hrs	\$48.08	\$4,808.00
Rule 73.1615 Notifications filed by outside engineer or attorney via respondent	100	100	1 hr consultation	100 hrs	\$48.08	\$4,808.00
Tolling Notifications and Waivers - Licensee/Permittee	60	60	0.5 hrs	30 hrs	\$48.08	\$1,442.40
Tolling Notifications and Waivers by engineer/attorney via respondent	60	60	1 hr consultation	60 hrs	\$48.08	\$2,884.80
LPTV, TV Translator, Class A Digital Transition Notification filed by Licensee/Permittee	2,195	2,195	0.5 hrs	1,098	\$48.08	\$52,791.84
LPTV, TV Translator, Class A Digital Transition Notification filed by engineer/attorney via respondent	244	244	0.5 hrs consultation	122	\$48.08	\$5,865.76
<b>Total Notifications</b>	<b>3,859</b>	<b>3,859</b>		<b>2,240 hrs</b>		<b>\$107,699.20</b>
<b>12c. Informal Filings (47 CFR Part 73)</b>						
Rule 73.1615 Informal Letters filed by Licensee/ Permittee	30	30	4 hrs	120 hrs	\$48.08	\$5,769.60
Rule 73.1615 Informal Letters filed by outside engineer or attorney via respondent	120	120	1 hr consultation	120 hrs	\$48.08	\$5,769.60
Silent STA or Extension filed						

OMB Control Number: 3060-0386

September 2014

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Type	Number of Respondents	Number of Responses	Burden Hours of Respondents	Annual Burden Hours	Hourly Salary of Respondents	Annual In-House Cost
by Licensee/ Permittee	30	30	0.5 hrs	15 hrs	\$48.08	\$721.20
Silent STA or Extension filed by outside engineer/attorney via respondent	270	270	1 hr consultation	270 hrs	\$48.08	\$12,981.60
<b>Total Informal Filings</b>	<b>450</b>	<b>450</b>		<b>525 hrs.</b>		<b>\$25,242.00</b>
<b>12d. FCC Form 337 Applications</b>						
<b>FCC Form 337 Applications Totals</b>	1,000	1,000	1 hr.	1,000 <sup>5</sup>	\$48.08	<b>\$48,080.00</b>
<b>TOTAL ANNUAL FILINGS/HOURS</b>	<b>6,509</b>	<b>6,509</b>		<b>5,325 hrs.</b>		<b>\$256,026.00</b>

**13. ANNUAL COST BURDEN:**

**a) STA Requests.** The respondent will use a consulting and/or engineer to prepare/file the legal (180) and engineering (900) STAs. The consulting fees are \$300/hour for the attorney and \$250/hour for an engineer. In addition, the respondent must pay a fee of \$170 per STA request. We estimate that 85% of all requests filed (1,200) will be for commercial stations (1,200 x 85% = 1,020 requests).

180 Legal STA requests x 4 hours x \$300/hour =	\$216,000
900 Engineering STA requests x 4 hours x \$250/hour =	\$900,000
1,020 Feeable STA requests x \$170 Fee/ request =	\$173,400
<b>Annual Cost Burden =</b>	<b>\$1,289,400</b>

**b) Notifications.** The respondent will use a consulting attorney and/or engineer to prepare various types of notifications. The consulting fees are \$300/hour for the attorney and \$250/hour for an engineer. However, we estimate the average salary at \$275/hour because these filings may be reviewed and/or filed by either or both an outside attorney or engineer. No filing fees are associated with these notifications.

360 Consumation Notices x 1 hour x \$275/hour =	\$99,000
360 Silent Notifications x 1 hour x \$275/hour =	\$99,000
100 Rule 73.1615 notifications x 1 hour x \$275/hour =	\$27,500
60 Tolling Notifications and Waivers x 1 hour x \$275/hour =	\$16,500
244 Digital Transition Notifications x 1 hours x \$275/hour =	\$67,100
<b>Annual Cost Burden =</b>	<b>\$309,100</b>

**c) Informal Filings.** The respondent will use a consulting attorney and/or engineer to prepare/file

<sup>5</sup> This burden also accounts for the time needed to retain necessary financial hardship documentation, if applicable.



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informal letters. The consulting fees are \$300/hour for the attorney and \$250/hour for an engineer. However, we estimate the average salary at \$275/ because these filings may be reviewed and/or filed by either or both an outside attorney or engineer. In addition, the respondent pay a fee of \$170 per STA request. We estimate that 85% of all requests filed will require the fee payment. (150 x 85% = 128 requests rounded up).

120 informal letter requests x 4 hours x \$275/hour =	\$132,000
270 Silent STA requests x 1 hour x \$275/hour =	\$ 74,250
128 informal letter requests x \$170 Fee / request =	<u>\$ 21,760</u>
<b>Annual Cost Burden =</b>	<b>\$228,010</b>

**d) FCC Form 337 Applications.** We expect the respondents will consult with an attorney before completing the FCC Form 337. The attorney’s review will require one hour.

1,000 applications x 1 hour x \$300/hour = \$300,000

**Total Annual Cost Burden = \$1,289,400 + \$309,100 + \$228,010 + \$300,000 = \$2,126,510**

**14. Cost to the Federal Government:**

**a) STA Requests.** The FCC will use legal and engineer staff at the GS-14, step 5 level (\$57.70/hour), paraprofessional staff at the GS-11, step 5 level (\$34.26/hour) and clerical staff at the GS-5, step 5 level (\$18.69/hour). Staff processing time varies from 0.50 to 2 hours..

1,200 STAs x \$57.70 x 2 hours =	\$138,480.00
1,200 STAs x \$34.26 x 2 hours =	\$ 82,224.00
1,200 STAs x \$18.69 x 0.50 hour =	<u>\$ 11,214.00</u>
<b>Total:</b>	<b>\$231,918.00</b>

**b) Notifications and Waivers.** The FCC will use legal and engineering staff at the GS-14, step 5 level (\$57.70/hour), paraprofessional staff at GS-11, step 5 level (\$34.26/hour) and clerical staff at the GS-5, step 5 level (\$18.69/hour). Staff processing time varies from 0.50 to 1 hour to process.

200 change of address notices x \$18.69 x 0.50 hours =	\$ 1,869.00
1,220 notifications x 57.70 x 1 hour =	\$70,394.00
1,220 notifications x 34.26 x 1 hour =	\$41,979.20
1,220 notifications x \$18.69 x 0.50 hours =	\$11,400.90
2,439 Digital Transition Notifications x 34.26 x .50 hour =	<u>\$41,780.07</u>
<b>Total:</b>	<b>\$167,423.17</b>

**c) Informal Filings, Silent STAs or Extensions.** The FCC will use legal and engineering staff at the GS-14, step 5 level (\$57.70/hour), paraprofessional staff at GS-11, step 5 level (\$34.26/hour) and clerical staff at GS-5, step 5 level (\$18.69/hour). Staff processing time varies from 0.50 to 2 hours to process.

150 Rule 73.1615 Informal Letters x \$57.70 x 2 hours =	\$17,310.00
150 Rule 73.1615 Informal Letters x \$34.26 x 2 hours =	\$10,278.00

OMB Control Number: 3060-0386

September 2014

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150 Rule 73.1615 Informal Letters x \$18.69 x 0.50 hours =	\$ 1,401.75
300 Silent STAs or Extensions x 57.70 x 2 hours =	\$34,620.00
300 Silent STAs or Extensions x \$34.26 x 2 hours =	\$20,556.00
300 Silent STAs or Extensions x \$18.69 x 0.50 hours =	<u>\$ 2,803.05</u>
<b>Total:</b>	<b>\$86,968.80</b>

d) FCC Form 337 Applications. We estimate the government will use professionals at the GS-13, step 5 (\$57.70/hour) to process FCC Form 337 and processing will take four hours per application.

4 hours x 57.70/hour x 1,000 applications = **\$230,800.00**

**Total Cost to the Federal Government:**

\$231,918.00 + \$167,423.17 + \$86,968.80 + \$230,800.00 = **\$717,109.97**

15. There are no program changes or adjustments to this information collection.

16. The data will not be published.

17. OMB approval of the expiration of the information collection will be displayed at 47 C.F.R. Section 0.408.

18. There are no exceptions to the Certification Statement.

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

No statistical methods are employed.