

SUPPORTING STATEMENT

A. Justification:

1. The Commission seeks three-year approval requesting a revision of OMB 3060-0813.

The existing approval for OMB 3060-0813 extends back to 2001, when E911 service began to be implemented nationwide. Today, approximately 98.9 percent of the 6,672 PSAPs nationwide have at least some form of E911 service, according to the National Emergency Number Association. This reduces the number of government respondents in this collection to 215. Similarly, the number of affected CMRS providers has dropped to 784. Prior to widespread adoption of E911, several notification requirements aimed at educating consumers about the transition were adopted, including for existing and potential customer base for certain TTY and dispatch services. Because these requirements could be met by including language in a monthly bill about the impacts of E911, and any relevant licensees most likely have already done so, we can safely assume that these requirements no longer represent a burden. The existing approval also covers quarterly reports from CMRS providers that were not collected after 2002, as well as a survey on TTY which was a one-time collection. Additionally, the existing approval approved consultations for the determination of pseudo-ANI and which PSAP a call should be delivered to, which are issues that have been resolved through carrier practices and are addressed by/standardized via call routing protocols. Finally, the approval covered the composition and submission of waiver requests by CMRS providers, which is outside the scope of the PRA definition of information collection. The quarterly reports, administration of the survey, the consultations, and the composition and submission of waivers no longer represent a burden. This results in a significant reduction in the number of respondents and estimated burden hours associated with this information collection.

Statutory authority for this collection is contained in Sections 1, 2, 4(i), 4(j), 4(o), 251(e), 303(b), 303(g), 303(r), 316, and 403 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 152, 154(i), 154(j), 154(o), 251(e), 303(b), 303(g), 303(r), 316, 403.

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

2. The collections listed herein are necessary to ensure that PSAPs requesting E911 Phase I or Phase II information are ready to receive such information at the time that the wireless carrier's obligation to deliver that information becomes due. This will

reduce the possibility of both carriers and PSAPs investing money before the PSAP is actually E911-capable.

3. Most records will be generated, kept, and exchanged electronically. The Commission believes that information technology, including electronic mail, will also reduce the burdens on the public with respect to the notifications required by the rules.
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 requirements to those absolutely necessary for evaluating and processing each application and to deter against possible abuses of the processes. Many commenters supported the need for some criteria to establish that a valid PSAP request has been made. The parties disagreed, however, on the criteria to be adopted. In that regard, some parties believed that the only criteria which should be applied is the funding prerequisite, while others maintained that the PSAP must be entirely ready to receive and utilize the Phase II data elements provided by the carrier before a valid request can be made. The Commission takes the middle course of requiring that, if the wireless carrier challenges a PSAP's E911 capability, the requesting PSAP provide enough information to ensure that it is ready to utilize E911 service, while not requiring the PSAP to be fully capable of receiving and utilizing the information before any request can be made at all. However, a simple showing that a PSAP has a cost recovery mechanism is insufficient to demonstrate that the PSAP will have the capability to receive and utilize the data within six months.
6. The demonstration of the PSAP's capability of utilizing E911 service within six months of the request is necessary to ensure that all parties understand clearly what their responsibility in offering E911 service involves and when that responsibility is triggered. This will minimize the possibility of misunderstanding, which could involve unnecessary expenditures for both PSAPs and carriers.
7. Current data collection is consistent with 5 C.F.R. § 1320.6. Although the Commission does not believe that any confidential information will need to be disclosed in order to comply with the demonstration requirement, covered carriers or manufacturers are free to request that materials or information submitted to the Commission be withheld from public inspection and from the E911 web site. (See section 0.459 of the Commission's rules).
8. The Commission initiated a 60-day public comment period which appeared in the Federal Register on October 21, 2014 (79 FR 62950). No comments were received as a result of the notice

9. No payment or gift to respondents has been or will be made.
10. The Commission is not requesting that respondents submit confidential information to the Commission.
11. There are no requests of a sensitive nature considered or those considered a private matter being sought from the applicants on this collection.

12. HOURLY BURDEN:

The burden adopted in the Order required that when a carrier challenges the E911 capability of a PSAP, the PSAP must demonstrate through the three-pronged approach or through proof that a funding mechanism exists, that the PSAP is using an NCAS technology, and has requested an upgrade to the ALI database.

For purposes of this PRA analysis, the Commission assumes that each PSAP will request service from a minimum of 6 carriers but that only one of the 6 will challenge the PSAP's ability to receive and use E911 data. In any case, either of the demonstration burdens will probably involve copying documents to complete this showing. Whether the PSAP submits this showing to 1 carrier or 6 carriers, all of its copies can be made at the same time and submitted at the same time, meaning that the burden hours and costs will be the same regardless of how many showings the PSAP submits. This amounts to a burden on the PSAPS and is the equivalent of making one submission.

As discussed above, the number of PSAPs that lack E911 service is 215. The total number of potentially affected wireless carriers is 784 (though we believe that each PSAP will request E911 service from no more than 10). Thus, the total number of possible respondents is 999, though we anticipate that fewer than that will be affected by this information collection.

The estimated number of responses is 2,580. To date, only 74 PSAPs lack Phase I E911 service. These 74 PSAPs will need to make one response to request E911 service and potentially another response if the carrier requests that the PSAP make a showing to prove that it is technically ready to receive Phase I service. As discussed below, we estimate that each PSAP will request E911 service from no more than 10 carriers, which would total 740 responses from carriers. For Phase I service, 74 responses + 74 responses + 740 responses = 888 responses. The calculation is the same for Phase II service, although the number of PSAPs that lack Phase II service is 141. For Phase II, 141 responses + 141 responses + 1410 responses = 1692 responses. Together, there are 2,580 responses

Total Respondents: $215+784= 999$ Respondents

Total Responses: $74+74+740+141+141+1410= 2,580$ Responses

The estimate of burden hours on PSAPs for an E911-capability showing is the same regardless of whether the PSAP elects to demonstrate capability through the three-pronged approach or through proof that a funding mechanism exists, that the PSAP is using an NCAS technology, and has requested an upgrade to the ALI database. The Commission estimates that PSAP request for Phase I service will take a staff clerical assistant approximately 1 hour to complete for a total of 74 hours. In addition the Phase II submission is estimated at 141 total burden hours annually. Additionally, the demonstration of capability using either alternative would take a staff clerical assistant approximately 0.5 hours to copy and include in the submission for an additional 108 burden hours. 74 hours for Phase I notification + 141 hours for Phase II notification + 108 hours for capability showing = 323 total burden hours.

For this collection, we assume that a PSAP will make no more than 10 E911 requests for E911, and accordingly, no more than 10 CMRS providers will need to respond to each PSAP. The Commission estimates that CMRS providers for responding to a PSAP E911 for Phase I service will require a staff clerical assistant working for approximately 1 hour to complete for a total of 740 hours. The Commission estimates that CMRS providers for responding to a PSAP E911 for Phase II service will require a staff clerical assistant working for approximately 1 hour to complete for a total of 1,410 hours. 740 hours for Phase I notification + 1,410 hours for Phase II notification = 2,150 total burden hours.

Summary of the total number of burden hours:

Notification and demonstration burden on PSAPs	=	323 hours
<u>Carrier response burden</u>	=	<u>2,150 hours</u>
Total Burden Hours		2,473 hours

13. COST BURDEN FOR RESPONDENTS:

The Commission estimates that PSAPs will use staff assistants at \$17.00 per hour to complete their Phase I and Phase II notifications and the new E911 capability showing. In the previously approved collection request, the cost burden was estimated at \$187,000. As indicated above, the revised total burden for these submissions is 323 burden hours x \$17 = \$5,491.

The Commission estimates that CMRS providers will use staff assistants at \$17.00 per hour to complete the necessary Phase I and Phase II documents for implementing E911 service for a requesting PSAP. The revised total burden for these collections is 2,150 burden hours x \$17 = \$36,550.

The total of all the in house staff cost burdens covered by this information collection is \$42,041.

There will be no start-up or capital costs incurred by the respondents.

14. The cost to the Commission remains none.
15. There are significant reductions in the estimated burden for this collection. Based on data from the National Emergency Number Association, the number of affected government respondents in this collection is reduced to 215. Similarly, the number of affected CMRS providers has dropped to 784. The revised estimated burden also reflects the expiration of quarterly reporting requirements for CMRS providers; elimination of notification requirements for existing and potential customer bases for certain TTY and dispatch services; elimination of TTY survey response requirements; and elimination of consultation requirements for pseudo-ANI and which PSAP a call should be delivered to. Finally, the existing approval covered the composition and submission of waiver requests by CMRS providers, which is outside the scope of the PRA definition of information collection and has been removed.
16. The data will not be published for statistical use.
17. Display of the expiration date for OMB approval is not applicable. All OMB-approved information collections are published in 47 C.F.R. § 0.408 of the Commission's rules.
18. There are no exceptions to Item 19.

B. Collections of Information Employing Statistical Methods:

No statistical methods are employed.