

**Title: 47 CFR 43.62, Annual Reporting Requirements for U.S. Providers of International Services and Circuits**

**SUPPORTING STATEMENT**

**A. Justification:**

1. The Federal Communications Commission (Commission) is requesting that the Office of Management and Budget (OMB) approve a revision of an existing information collection, titled “Annual Reporting of ITS Resale and International Miscellaneous Services.” The purpose of the revision is to obtain OMB approval of the annual reporting requirements stipulated under 47 CFR 43.62 which requires that entities providing international services file annual circuit capacity reports and annual traffic and revenue reports, in a format set out in a Filing Manual.

In order for carriers to comply with annual reporting requirements stipulated in 47 CFR 43.62, the Commission is developing a web-based system for filers to submit their reports. Filers will access the filing system via portal on the FCC website, [www.FCC.gov](http://www.FCC.gov). The software for the web-based system is now under development. The Commission is requesting a revision of OMB Control No. 3060-1156 in order to obtain final approval for the new requirements in 47 CFR 43.62, the new filing manual, and the electronic filing of the data.

Previously, carriers were required to file annual traffic and revenue reports as required by 47 CFR 43.61. Additionally, carriers were required to file annual circuit-status reports under 47 CFR 43.82. Both annual filing requirements were consolidated under a new rule, 47 CFR 43.62. Therefore, rules 47 CFR 43.61 and 43.82 and related existing information collections will be eliminated upon OMB approval of this Supporting Statement. Specifically, the two information collections that will be eliminated from the Commission’s inventory are: (1) OMB Control Number 3060-0106 (re: 47 CFR 43.61 annual traffic and revenue reports) and (2) OMB Control Number 3060-0572 (re: 47 CFR 43.82 annual circuit-status reports).

The current title of OMB Control No. 3060-1156 is “Annual Reporting of ITS Resale and International Miscellaneous Services.” The Commission proposes to change the title to “47 CFR 43.62, Annual Reporting Requirements for U.S. Providers of International Services and Circuits” in order to more accurately describe the information collection requirements stipulated under 47 CFR Section 43.62.

**Background Information**

On May 12, 2011, the Commission adopted a First Report and Order and Further Notice of Proposed Rulemaking in *Reporting Requirements for U.S. Providers of International Telecommunications Services, Amendment of Part 43 of the Commission’s Rules*, IB Docket No. 04-112, FCC 11-76 (rel. May 13, 2011) (*2011 Part 43 Review Order*).

**Title: 47 CFR 43.62, Annual Reporting Requirements  
For U.S. Providers of International  
Services and Circuits**

The Further Notice of Proposed Rulemaking portion of the *2011 Part 43 Review Order* (FNPRM), proposed to modify both the international traffic and revenue reports and the circuit-status reports to streamline them and improve the usefulness of the information the entities filing the reports will submit. The FNPRM also proposed to remove the current sections 43.61 and 43.82 and to consolidate the revised annual traffic and revenue reports and annual circuit-status reports into a new section 43.62. The FNPRM further proposed to replace the existing filing manuals for each report with one new, consolidated filing manual covering both reports.

On July 19, 2011, the Commission published the FNPRM in the Federal Register, and sought comment on the proposed new or modified information collection requirements. See 76 FR 42613. No comments were filed regarding the information collection requirements. OMB pre-approved the proposed information collection requirements and assigned OMB control 3060-1156 to the requirements on September 7, 2011.

On January 9, 2013, the Commission adopted a Second Report and Order in *Reporting Requirements for U.S. Providers of International Telecommunications Services, Amendment of Part 43 of the Commission's Rules*, IB Docket No. 04-112, FCC 13-6 (rel. Jan. 15, 2013) (*2013 Part 43 Review Order*). That Order modified both the traffic and revenue report and the circuit-status report to streamline them and improve the usefulness of the information the entities filing the reports will submit. The Order removed the current sections 43.61 and 43.82 and consolidated the revised annual traffic and revenue reports and annual circuit-status reports into a new section 43.62. The existing filing manuals for each report will be replaced with one new, consolidated filing manual covering both reports.

The Commission was delayed in seeking final approval for the information collection requirements in section 43.62 due to the need to develop software to allow the electronic filing of the data under the new reporting requirements. However in 2013, the Commission sought final OMB approval for certain non-rule requirements regarding the reporting \$5 million revenue reporting threshold for IMTS resale and international miscellaneous services since those changes do not require the development and deployment of the software. OMB approved those information collections on **May 22, 2013**.

The software for the electronic filing system is now under development and the Commission seeks final OMB approval for the new requirements in section 43.62, the new filing manual, and the electronic filing of the data.

Section 43.62 reads as follows:

**§ 43.62 Reporting requirements for holders of international Section 214 authorizations and providers of international services.**

**Title: 47 CFR 43.62, Annual Reporting Requirements  
For U.S. Providers of International  
Services and Circuits**

- (a) *Circuit Capacity Reports.* Not later than March 31 of each year:
- (1) *Satellite and Terrestrial Circuits.* Each facilities-based common carrier shall file a report showing its active common carrier circuits between the United States and any foreign point as of December 31 of the preceding calendar year in any terrestrial or satellite facility for the provision of service to an end user or resale carrier, which includes active circuits used by themselves or their affiliates. Each non-common carrier satellite licensee shall file a report showing its active circuits between the United States and any foreign point as of December 31 of the preceding calendar sold or leased to any customer, including themselves or their affiliates, other than a carrier authorized by the Commission to provide U.S. international common carrier services.
  - (2) *International Submarine Cable Capacity*—(i) The licensee(s) of a submarine cable between the United States and any foreign point shall file a report showing the capacity of the submarine cable as of December 31 of the preceding calendar year. The licensee(s) shall also file a report showing the planned capacity of the submarine cable (the intended capacity of the submarine cable two years from December 31 of the preceding calendar year). Only one cable landing licensee shall file the capacity data for each submarine cable. For cables with more than one licensee, the licensees shall determine which licensee will file the reports. (ii) Each cable landing licensee and common carrier shall file a report showing its capacity on submarine cables between the United States and any foreign point as of December 31 of the preceding calendar year.
- (b) *Traffic and revenue reports.*
- (1) Not later than July 31 of each year, each person or entity that holds an authorization pursuant to section 214 to provide international telecommunications service shall report whether it provided international telecommunications services during the preceding calendar year.
  - (2) Not later than July 31 of each year, each common carrier engaged in providing international telecommunications service, and each person or entity engaged in providing Voice over Internet Protocol service connected to the public switched telephone network, between the United States and any foreign point shall file a report with the Commission showing revenues, payouts, and traffic for such international telecommunications service and Voice over Internet Protocol service connected to the public switched telephone network provided during the preceding calendar year.
  - (3) Entities filing such reports shall submit a revised report by October 31 identifying and correcting any inaccuracies included in the annual report exceeding one percent of the reported figure.

**Title: 47 CFR 43.62, Annual Reporting Requirements  
For U.S. Providers of International  
Services and Circuits**

Note to Paragraphs (a) and (b): United States is defined in section 3 of the Communications Act of 1934, as amended, 47 U.S.C. 153.

- (c)(1) A Registration Form, containing information about the filer, such as address, phone number, email address, etc., shall be filed with each report filed pursuant to paragraphs (a) and (b).
- (2) The Registration Form shall include a certification enabling the filer to check a box to indicate that the filer requests that its circuit capacity data or traffic and revenue data be treated as confidential. If a filer checks that box, the Commission shall treat the data contained in the accompanying report as confidential. Upon receipt of a request for inspection of such information, the Commission shall notify the filer; at that point, the filer must justify continued confidentiality of the information consistent with section 0.459(b) of the Commission's rules.
- (d) *Filing Manual*. Authority is delegated to the Chief, International Bureau to prepare instructions and reporting requirements for the filing of these reports prepared and published as a Filing Manual. The information required under this section shall be furnished in conformance with the instructions and reporting requirements in the Filing Manual.

Note to Paragraph (d): The instructions and reporting requirements prepared by the Chief, International Bureau, shall be consistent with the terms of Reporting Requirements for U.S. Providers of International Telecommunications Services; Amendment of Part 43 of the Commission's Rules, IB Docket No. 04-112, Second Report and Order, FCC 13-6 (rel. January 15, 2013).

The bases for the information collection requirements are listed below for the Annual Circuit Capacity Reports, Annual Traffic and Revenue Reports, Registration Form, and the consolidated Filing Manual as follows:

**Section 43.62(a) Annual Circuit Capacity Reports**

Section 43.82 currently requires carriers to file the number of satellite, submarine cable and terrestrial common carrier circuits they owned or leased on December 31 of the previous year for each foreign point they serve, and whether they are active or idle. For active circuits, carriers must identify the services for which they used each circuit – IMTS, private line, and miscellaneous or other international services. In FNPRM, the Commission proposed to streamline the circuit-status reporting requirements by eliminating the reporting by service categories and the reporting of derived circuits; carriers would still file the number of satellite, submarine cable and terrestrial circuits they own or lease for each foreign point they serve, and whether they are active or idle.

**Title: 47 CFR 43.62, Annual Reporting Requirements  
For U.S. Providers of International  
Services and Circuits**

The Commission also proposed to retain the requirement that circuits be reported on the basis of 64 kbps equivalent circuits in order to keep the reporting standardized. The Commission also sought comment on whether to extend the Circuit Status Reports to include international non-common carrier circuits.

In the *2013 Part 43 Review Order*, the Commission adopted a different approach than proposed in the FNPM. The Commission found that it needs data for satellite and terrestrial circuits in order to administer efficiently the Commission's annual regulatory fees. Thus the Commission simplified the circuit reports for satellite and terrestrial circuits by eliminating the current requirement to report circuits on a route-by-route basis, instead requiring reporting on a world-total basis. The Commission also eliminated the requirement to report the number of idle circuits. Rather, filing entities will be required to report only their total active 64 kilobit per second (KBpS) equivalent circuits. The Commission concluded that this would not be a burden on such entities, because they must file the same information when they pay their annual regulatory fees.

The Commission found it needs more detailed information regarding international submarine cable capacity, however. Thus the Commission will require all cable landing licensees and common carriers that have capacity on an international submarine cable to report that capacity. Filers will no longer report 64 kbps circuits or the destination of the traffic carried over that capacity. Rather, filers will report their capacity on each submarine cable in STM-1 (Synchronous Transport Module level-1) units, the standard commercial unit for the sale and leasing of capacity. Filing entities will also no longer need to report their capacity as active or idle, but rather will report their available capacity as activated or non-activated. The Commission found that getting data on a per-cable basis provides more useful data and should be less burdensome to the reporting entities.

The Commission also will require cable landing licensees to provide information on the overall capacity of the international submarine cables. This information includes the current capacity of each international submarine cable as well as projections of capacity based on the known plans of the cable operators for upgrades to the technology used with the cable. In addition to its usefulness for evaluating market concentration, this information is also needed to implement and monitor the regulatory fees since those fees are now assessed on a per cable system basis and take into consideration the capacity of the cable in determining the fee to be paid. Currently Commission staff obtains this information through the cable license applications, inquiries of the cable operators and monitoring the trade press. In the *2103 Part 43 Review Order*, the Commission codified this filing requirement.

**Section 43.62(b) Annual Traffic and Revenue Reports**

In the *2013 Part 43 Review Order* the Commission largely adopted the proposals in the

**Title: 47 CFR 43.62, Annual Reporting Requirements  
For U.S. Providers of International  
Services and Circuits**

FNPRM to simplify the traffic and revenue reports. As described below, the Commission eliminated numerous reporting requirements and streamlined the data that filing entities must report. The traffic and revenue reports collect information on four classes of international telecommunications services: (1) international calling service (ICS); (2) ICS resale; (3) international private line service; and (4) international miscellaneous services. The Commission made changes to the reporting of each class of service.

**International Calling Service.** The Commission eliminated several requirements that will make it simpler for filing entities to prepare and submit the traffic and revenue report for ICS. Additionally, the Commission modernized the information that filing entities must report to make such information more relevant to current conditions in the ICS market. Finally, the Commission requires certain entities that provide voice over internet protocol (VoIP) also to file traffic and revenue reports. First, the Commission eliminated the need for filing entities to report the number of messages they carry or regional totals for their traffic. The Commission also allows filing entities to include their country-beyond and country-direct traffic in their world total traffic, rather than report it for each route as they currently do. The Commission replaced the current detailed billing codes under which carriers now report their traffic and revenues with a set of simple filing schedules. Second, to modernize the information filing entities report, the Commission requires those entities to break down their world-total traffic and revenues by customer class and routing arrangements. That is, the Commission requires filing entities to break down their revenues into three customer classes: residential and mass market customers; business and government customers; and other carriers. The Commission requires filing entities to disaggregate their ICS minutes and revenue payouts between traffic they terminate on foreign fixed landline networks and those terminated on foreign mobile networks. Finally, the Commission required providers of VoIP that is interconnected to the public switched telephone network (PSTN) also to file the ICS portion of the traffic and revenue report. The Commission noted that, while the providers of these services are not classified as common carriers, customers view the service as a substitute for traditional international calling services. The Commission concluded that recent declines in traditional international calling traffic are attributable to customers' switching to interconnected VoIP and that, without information on such services, it would not have an adequate view of the international voice market.

**ICS Resale.** The Commission established a \$5 million revenue threshold for the reporting of international resale ICS traffic (the provision of ICS by purchasing IMTS from another carrier and selling it to the reseller's customers). OMB approved this part of the information collections on **May 22, 2013**.

**International Private Line Service.** The Commission eliminated the current requirement that filing entities disaggregate their private line services (the provision of channel of communications, usually on a monthly leased basis, into six categories based on speed, allowing them instead to report their private line traffic and services provided over resold

**Title: 47 CFR 43.62, Annual Reporting Requirements  
For U.S. Providers of International  
Services and Circuits**

private lines only on a world-total basis. The Commission also eliminated the requirement for facilities-based carriers to report those lines on a route-by-route basis, allowing them to report them only on a world-total basis.

International Data and Miscellaneous Services. The Commission adopted its proposal to allow carriers that provide certain classes of international data services to include those services in the category of international miscellaneous services, rather than with their private line services as they now do. These services, referred to as virtual private lines, consist of offering customers the use of a carrier's network for a stated period. The Commission concluded that these services closely resemble various new data services that carriers have recently introduced. The Commission also adopted its proposal to allow filing entities to report all their international miscellaneous services on a world-total basis, rather than route by route, as they now report such services. Finally, the Commission adopted a \$5 million revenue threshold below which a provider of an international miscellaneous service need not report its traffic or revenues for that service. OMB approved this part of the information collections on **May 22, 2013**.

Additionally, the Commission requires any entity that files traffic and revenue reports also to file a Services Checklist under which the filing entity would check a series of boxes to provide basic information about its operations during the previous year, such as whether the filing entity provided service in that year, and which would direct the entity as to which schedules it is required to file.

**Section 43.62(c) Registration Form**

The Commission decided to require each entity that files traffic and revenue reports or circuit capacity reports also to file a Registration Form that elicits basic information about the filing entity such as company name, address, contact information and a list of any authorizations under section 214 of the Communications Act that the entity may hold. The Registration Form is also where the filing entity certifies to the accuracy and completeness of its report. The Commission adopted an abbreviated means for the submitter of the data to seek confidential treatment. Specifically, a checkbox on the Registration Form enables the filing entity to indicate that the data is confidential and deferring the need to provide justification for confidential treatment until another party requests access to the data.

**Section 43.62(d) Filing Manual**

The Commission determined that having one consolidated filing manual for both reports would make it easier for entities required to file one or both of the reports to file their data. To this end, the Commission directed the International Bureau to issue and maintain a consolidated Filing Manual that would provide instructions to filing entities for preparing and submitting both reports. The Commission determined that having a

**Title: 47 CFR 43.62, Annual Reporting Requirements  
For U.S. Providers of International  
Services and Circuits**

single Filing Manual, with a single set of definitions would make it easier for the Bureau to keep the instructions for both reports consistent with each other.

**Authority for the proposed, revised information collections:**

The Commission has authority for this information collection under Sections 1, 4(i)-4(j), 11, 201-205, 211, 214, 219, 220, 303(r), 309 and 403 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 154(i)-154(j), 161, 201-205, 211, 214, 219-220, 303(r), 309, 403.

This information collection does not impact individuals. Therefore, there are no impacts under the Privacy Act.

2. The uses to which the Commission puts the information from the annual circuit capacity report, annual traffic and revenue reports, , and the Registration Form are as follows:

(a) Annual Circuit Capacity Reports [Section 43.62 (a)]

The annual circuit capacity reports provide the Commission with the only information it has on the ownership and use of international transmission facilities. The Commission uses this information to analyze the international telecommunications market and to monitor the change of that market to a competitive market. The Commission also uses the information to develop international communications policies and to monitor industry compliance with those policies. The Commission also uses the information to ensure that carriers with market power do not engage in anticompetitive behavior. Additionally, the Commission uses the information to analyze proposed mergers and other transactions. Finally, the Commission uses the information from the circuit-status report to ensure compliance with congressionally mandated regulatory fees.

(b) Annual Traffic and Revenue Reports [Section 43.62 (b)]

The annual traffic and revenue reports provide the Commission the only information the commission has on the operations of the U.S. carriers and other entities that provide international telecommunications services. The Commission uses data this report to analyze the U.S. international telecommunications market, track market developments, and to determine the competitiveness of each service and geographical market. Furthermore, the Commission uses the traffic and revenue data to formulate rules and policies consistent with the public interest, to monitor compliance with those rules and policies, and to gauge the competitive effect of Commission decisions on the international market. Moreover, the reports provide a means by which to determine whether a U.S. carrier's foreign-carrier correspondents are engaging in anti-competitive conduct.



**Title: 47 CFR 43.62, Annual Reporting Requirements  
For U.S. Providers of International  
Services and Circuits**

(c) Registration Form [Section 43.62 (c)]

The Registration Form provides basic information about the filing and about the entity itself – such as address, phone number, email address, and the international Section 214 authorizations and cable landing licenses held by the filer. This information will assist in keeping track of who is offering international service and how to contact them. The Registration Form also includes a certification by the filing entity to certify the accuracy and completeness of its report. The Registration Form provides the means by which the filing entity may request confidential treatment of the data filed in the report.

(d) Filing Manual [Section 43.62(d)]

The Filing Manual sets forth instructions on how to file the reports.

3. The *2013 Part 43 Review Order* did not address the method by which filing entities would file their information under the revised information collection. At present, facilities-based and facilities-resale carriers must file three paper copies and three compact discs (CDs) containing the required traffic and revenue data. Carriers that provide only pure switched resale services are not required to file data on CDs. Carriers are also permitted, but not required, also to submit their traffic and revenue information on a commercially available spreadsheet program. With respect to the circuit-status report, carriers must submit three paper copies of their circuit-status information. Carriers must also submit a copy of their circuit data on CDs. Alternatively, carriers are permitted, but not required, to submit their circuit-status data in the form of Excel files. **Previously, the agency collected no more than fifty percent of the data electronically because carriers submitted hard copies of the data to the Commission.**

The Commission is developing a web-based system for filing entities to submit their reports. Filing entities will access the filing system via a portal on the FCC web-site. Filing entities will be able to provide their data via the web-site. In the case of route specific data for the traffic and revenue reports, the filing entities will be able to download a spreadsheet which they can fill-in off-line and then submit via the portal. **Upon implementation of the web-based system, a total of 100 percent of the information will be filed with the Commission electronically.**

4. This information collection requirement is not duplicated elsewhere in the Commission's rules.

5. The *2013 Part 43 Review Order* continues the overall review of the Commission's international reporting requirements that the Commission initiated in 2004 with a Notice of Proposed Rulemaking (NPRM) (FCC 04-70). In the NPRM, the Commission had proposed a number of ways to simplify the information that the carriers, both small and large, must submit for any traffic and revenue reports. In the *2011 Part 43 Review Order*, the Commission retained the annual traffic and revenue reports and annual circuit

**Title: 47 CFR 43.62, Annual Reporting Requirements  
For U.S. Providers of International  
Services and Circuits**

reports, with a few modifications. The *2013 Part 43 Review Order* further streamlined and modernized the international reporting requirements. These minimize the economic impact on small entities to the greatest extent possible, while ensuring that the Commission gets the complete information it needs to discharge its regulatory obligations.

6. If the information collection were not conducted or were conducted less frequently, the Commission would not be able to ensure compliance with its international rules and policies. Furthermore, the Commission would not have sufficient information to take measures to prevent anticompetitive conduct in the provision of international communications services. The Commission would not have adequate information to respond to failures in the U.S.-international market. The Commission would not be able to promote effective competition in the global market for communications services. The lack of effective competition would adversely affect the U.S. revenues in the telecommunications industry. The agency would not be able to comply with the international regulations stated in the World Trade Organization (WTO) Basic Telecom Agreement. Carriers and other entities outside the Commission, such as other government agencies, international organizations, and academia, use the information to analyze industry trends. Other government agencies use the information in merger analyses and negotiations with foreign countries. If the information collection was not conducted, carriers, government agencies and other entities would not have accurate industry data available in order to conduct analyses.

7. There are no special circumstances that would prevent the Commission from following all guidelines regarding the information collection.

8. On October 6, 2014, a 60-day notice was published in the Federal Register (79 FR 60158) to solicit public comments on this information collection. The 60-day comment period ended on December 5, 2014. No comments were received from the public in response to the notice.

9. The Commission will not provide any payment or gift to respondents.

10 In the *2013 Part 43 Review Order* the Commission adopted an abbreviated means for the submitter of the data to seek confidential treatment, consistent with the current treatment of domestic data on Forms 477 and 499. Specifically, a checkbox will be provided in the Registration Form enabling the filing entity to indicate that the data is confidential and deferring the need to provide justification for confidential treatment until another party requests access to the data. The Commission's rules currently contemplate allowing parties seeking confidential treatment to defer providing justification for such treatment until another party seeks access to the data. Upon receipt of a request for inspection of the data, the Commission will notify the filing entity of the request and the filing entity will be required to justify continued confidential treatment pursuant to our

**Title: 47 CFR 43.62, Annual Reporting Requirements  
For U.S. Providers of International  
Services and Circuits**

rules. At this time, the Commission has not established a time limit for confidential treatment.

11. The Commission does not propose to collect information from the public, only from entities providing international communications services – telecommunications common carriers and other for-profit businesses. As a result, there are no personal questions of a sensitive nature proposed to be from the public.

**Title: 47 CFR 43.62, Annual Reporting Requirements  
For U.S. Providers of International  
Services and Circuits**

**12. Estimate of Burden Hours for Information Collection:**

The following represents the estimated hour burden of the various information collections included in proposed section 43.62. (We note that the burden hour estimates are our best estimate based on our overall experience with the earlier forms of the information collections covered by this Supporting Statement):

<b>Estimate of Burden Hours:<sup>1</sup></b>				
<b>Explanation Of Burden Estimate</b>	<b>Number Of Response s</b>	<b>Frequency Of Responses</b>	<b>Time Per Response</b>	<b>Annual Burden Hours</b>
<b>Section 43.62 (a)</b> Annual Circuit Capacity Reports	22+	Annual	1	22 Hours
	42++	Annual	2	84 Hours
	85+++	Annual	10	850 Hours
43.62(a) Total Hours				<b>956 Hours</b>
<b>Section 43.62(b)</b> Annual Traffic and Revenue Reports	100*	Annual	2 Hours	200 Hours
	75**	Annual	150 Hours	11,250 Hours
	4***	Annual	50 Hours	200 Hours
43.62(b) Total Hours				<b>11,650 Hours</b>
<b>47 CFR 43.62 (c)</b> Registration Form	2,000	Annual#	1 Hour	<b>2,000 Hours</b>
<b>Totals</b>	<b>2,328</b>			<b>14,606 Hours</b>

+ Entities that file world total terrestrial and satellite circuit data.

++ Cable landing licensees that file data on the capacity of the international submarine cable.

+++ Cable landing licenses and common carriers that file data on their capacity on international submarine cables.

<sup>1</sup> There are no burdens attached to § 43.62(d) for the filing manual.

**Title: 47 CFR 43.62, Annual Reporting Requirements For U.S. Providers of International Services and Circuits**

\* Entities that file international resale traffic and revenue information of more than \$5 million.

\*\* Facilities-based international service providers (carriers and providers of interconnected VoIP service) that file country-by-country traffic and revenue information

\*\*\* International service providers that file revisions to their annual reports

# Entities that file both traffic and revenue reports and circuit status reports will file a Registration Form with each filing.

**In-House Costs:** In house staff paid at \$35/hour will fulfill the requirements. Therefore, the in-house costs are as follows: 14,606 hours x \$35/hour = \$511,210.

**Total Number of Respondents: 2,328**

**Total Number of Annual Responses: 2,328**

**Total Annual Burden Hours: 14,606 hours**

**13. Estimated Annual Cost Burden to Respondents to Comply with Information Collection is as follows:**

(a) Total Capital and Start-up Costs: **Zero**

(b) Total Operation and Maintenance and Purchase of Services: **\$2,400**  
 Compliance with the Annual Traffic and Revenue Report will not require respondents to maintain any special equipment. Compliance may require respondents to hire outside attorneys, calculated as follows:

Description	Annual Responses	Costs per Hour	Hourly Processing per Response	Total
Outside Legal Counsel (for 10 percent of 75 filings by facilities-based service providers (8 responses)) [Resale IMTS providers are not likely to require review of their filings by outside legal counsel]	8	\$300 per Hour (Based on industry survey)	1 Hour/Response	<b>\$2,400 (O&amp;M)</b>

**Title: 47 CFR 43.62, Annual Reporting Requirements  
For U.S. Providers of International  
Services and Circuits**

**(c) Total Annual Costs: \$2,400**

14. Estimated Annual Costs to the Federal Government for the information collection requirements are as follows:

<b>Government Staff</b>	<b>Annual Burden Hours</b>	<b>Costs</b>
<b>Section 43.62(a) Annual Circuit Capacity Reports</b>		
GS-13/Step 5 Hourly Rate: \$48.83	22 reports of terrestrial and satellite world total circuits X 1 hour/filing = 22 hours	\$1,074.26
GS-15/Step 5 Telecommunications Specialist @ \$67.88 per hour	127 reports for submarine cable capacity X 3 hours of work per response received = 381 hours for staff	\$25,862.28
<b>Section 43.62(b) Annual Traffic and Revenue Reports</b>		
GS-15/Step 5 Hourly Rate: \$67.88	Review and Process the filings by facilities-based providers = 79 filings x 3 hours/filing = 237 hours for staff	\$16,087.56
GS-13/Step 5 Hourly Rate: \$48.83	Review and Process 100% of filings by Resale providers = 100 filings x 2 hours/filing = 200 hours for staff	\$9,766.00
<b>Section 43.62(c) Registration Form</b>		
GS-13/Step 5 Hourly Rate: \$48.83	Review and Process 100 % of the filings =2,000 filings (@ 1 hour/filing) = 2,000 hours for staff	\$97,660.00
<b>Total Costs to the Federal Government:</b>		<b>\$150,450.10</b>

**Title: 47 CFR 43.62, Annual Reporting Requirements  
For U.S. Providers of International  
Services and Circuits**

15. This Supporting Statement reflects a program change from 1,153 to 2,328 (+1,175) respondents, 1,153 to 2,328 (+1,175) responses, 1,153 to 14,606 (+13,453) annual burden hours, and from zero (\$0) to \$2,400 (+\$2,400) in annual costs. The program changes are the result of information collection requirements associated with 47 CFR 43.62 that were adopted in the *2013 Part 43 Review Order*, FCC 13-6.

There are no adjustments to this information collection.

16. The Federal Communications Commission reviews, consolidates and releases the collected traffic and revenue information and the collected circuit-status information to the public.

17. The Commission is requesting a waiver to not display the OMB control number and expiration date on the new, consolidated filing manual that filing entities will use in submitting their traffic and revenue and circuit-status information. This will relieve the Commission from having to update the OMB expiration date on the section 43.62 consolidated filing manual whenever it is resubmitted to OMB. The Commission will use an edition date in lieu of the OMB expiration date. Finally, all OMB-approved information collections (including this one) will be published in 47 CFR 0.408 that “displays” the title, OMB control number and OMB expiration date.

18. There are no exceptions to the certification statement.

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

There are no statistical methods employed with this collection of information.