

## SUPPORTING STATEMENT

### A. Justification:

1. Applicants/licensees/permittees are required to file FCC Form 347<sup>1</sup> when applying for a Low Power Television, TV Translator or TV Booster Station License.

The FCC staff use the data from FCC Form 2100, Schedule D to confirm that the station has been built to terms specified in the outstanding construction permit. Data from Form 2100, Schedule D is also extracted for inclusion in the subsequent license to operate the station.

### **Non-Substantive Change to this Information Collection:**

The Commission is submitting this non-substantive change request to the Office of Budget and Management (OMB) for approval of minor non-substantive changes made to former FCC Form 347. The Commission is implementing a new on-line (electronic) licensing system called “Licensing Management System” (LMS) in which all FCC licensing forms, including former FCC Form 347, will be combined into a single common form - FCC Form 2100. Former FCC Form 347 is encompassed by the LMS and the new common form - FCC Form 2100. General questions, which were formally asked in all licensing applications, will compose the body of FCC Form 2100. The questions pertinent only to former FCC Form 347 applicants will now be contained in Schedule D of FCC Form 2100. The substance of former FCC Form 347 remains the same in the new system/ form. The wording of each question applicable to former FCC Form 347 applicants in FCC Form 2100 is identical to that of the former FCC Form 347. All that is changing is the name of the form and the order, in some cases, in which questions are asked. The burden hours and costs are not impacted by the minor non-substantive changes to the former FCC Form 347, which will now be a part of the LMS and FCC Form 2100. The minor non-substantive changes are highlighted below:

Change #1 – Former FCC Form 347 is now encompassed by FCC Form 2100, Schedule D and the LMS. All submissions are now made on-line (electronically). Questions applicable to all licensing applicants are asked in the body of the common FCC Form 2100, and questions pertinent only to former FCC Form 347 applicants are contained in Schedule D of FCC Form 2100. The substance, burden hours, and costs are not impacted.

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<sup>1</sup> With this non-substantive change, FCC Form 347 is being renamed and encompassed by FCC Form 2100 and the electronic “Licensing and Management System” system. The former FCC Form 346 no longer exists, and its contents are fully contained within FCC Form 2100 and the “Licensing and Management System” system. Herein after former FCC Form 347 is renamed as FCC Form 2100, Schedule D.

**FCC Form 2100, Application for Media Bureau Audio and Video Service Authorization, Schedule D (Former FCC 347)**

**This non-substantive change request to former FCC Form 347, now contained within FCC Form 2100, Schedule D and the LMS, needs OMB review and approval. There are no new burdens or cost associated with this non-substantive change.**

**History:**

On October 22, 1998, the Commission adopted a *Report and Order* in MM Docket No. 98-43, *1998 Biennial Regulatory Review - Streamlining of Mass Media Applications, Rules, and Processes*, and No. 94-149, *Policies and Rules Regarding Minority and Female Ownership of Mass Media Facilities*. Among other things, this *Report and Order* substantially revised the FCC Form 347 to facilitate electronic filing by replacing narrative exhibits with the use of certifications and an engineering technical box. The Commission also deleted and narrowed overly burdensome questions. FCC Form 2100 Schedule D has been supplemented with detailed instructions to explain processing standards and rule interpretations to help ensure that applicants certify accurately. These changes will streamline the Commission's processing of FCC Form 2100 Schedule D applications. The Commission has also adopted a formal program of pre- and post-application grant random audits to preserve the integrity of the streamlined application process.

Statutory authority for this collection of information is contained in Sections 154(i), 307, 308 and 309 of the Communications Act of 1934, as amended.

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

2. The FCC staff use the data from FCC Form 2100, Schedule D to confirm that the station has been built to terms specified in the outstanding construction permit. Data from FCC Form 2100, Schedule D is also extracted for inclusion in the subsequent license to operate the station.
3. The Commission requires applicants to file FCC Form 2100, Schedule D electronically.
4. No other agency imposes 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. Therefore, this information collection will not have a significant economic impact on a number of small entities/businesses.
6. The frequency for this collection of information is determined by the respondent, as necessary.

**OMB Control Number: 3060-0017**

**January 2015**

**FCC Form 2100, Application for Media Bureau Audio and Video Service Authorization, Schedule D (Former FCC 347)**

7. This collection of information is consistent with the guidelines in 5 CFR 1320.5(d)(2).
8. The Commission published a Notice (79 FR 36802) in the *Federal Register* on June 30, 2014. No comments were received from the public as a result of this Notice.
9. No payment or gift was provided to the respondents.
10. There is no need for confidentiality with collection of information.
11. This collection of information does not address any private matters of a sensitive nature.
12. We estimate that 450 applications will be filed and processed. The total average burden for this form is 1.5 hours per request. This estimate is based on FCC staff's knowledge and familiarity with the availability of the data required.

**Total Number of Annual Respondents: 450 Licensees/Permittees**

**Total Number of Annual Responses: 450 FCC Form 2100, Schedule D Applications**

**Total Annual Burden Hours:**

450 FCC Form 2100, Schedule D Applications x 1.5 hours/application = **675 hours**

**Annual "In-house Cost":** We assume that 50% of the estimated applications received will be completed by the respondent. The remaining 50% will be completed by an engineer at the station. The respondent is estimated to have an average salary of \$100,000/year (\$48.08/hour). A station engineer is estimated to have an average salary of (\$65,967) \$31.61/hour.

225 FCC Form 2100, Schedule D (50% of the total applications) x 1.5 hrs x \$48.08/hr = \$16,227

225 FCC Form 2100, Schedule D (50% of the total applications) x 1.5 hrs x \$31.61/hr = \$10,668

**TOTAL ANNUAL "IN-HOUSE COST" = \$26,895**

FCC Form 2100, Application for Media Bureau Audio and Video Service Authorization, Schedule D (Former FCC 347)

13. Annual Cost Burden: An application fee must be submitted with filing of the application (\$120/application).

(a) Total annualized capital/startup costs: **None**

(b) Total annual costs (O&M): \$54,000

450 FCC Form 2100, Schedule D Applications x \$120 filing fee/application = \$54,000

(c) Total annualized cost requested: **\$54,000**

14. Cost to the Federal Government: The Commission will use professionals at the GS-13, Step 5 (\$49.32/hr.) and clerical personnel at the GS-7, Step 5 (\$23.38/hr.) to process the FCC Form 2100, Schedule D applications.

Professional Staff: 2 hours x \$49.32 x 450 applications =	\$44,388
Clerical Staff: 1 hour x \$23.38 x 450 applications =	<u>\$10,521</u>
	\$54,909

**Total Cost to the Federal Government: \$54,909**

15. There are no program changes to this collection. There are adjustments/increases to the collection as follows: 150 to the number of respondents, 150 to the annual number of responses, 225 to the annual burden hours and \$18,000 to the annual cost burden.

16. The data will not be published.

17. An extension of the waiver not to publish the expiration date on the form is requested. This will prevent the Commission from needing to update electronic files upon the expiration of the clearance.

18. There are no exceptions to the Certification Statement.

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

No statistical methods are employed.