

SUPPORTING STATEMENT

A. Justification:

1. The third party disclosure requirement contained in 47 CFR 97.213(d) consists of posting a photocopy of the amateur station license, a label with the name, address, and telephone number of the station licensee, and the name of at least one authorized control operator in a conspicuous place at the location of the station under telecommand (the remotely controlled station.) This requirement is necessary so that quick resolution of any harmful interference problems can be identified and to ensure that notify a third party of the identity of the station's licensee if the station is not operating in accordance with the Communications Act of 1934, as amended.

This information collection affects only individual amateur radio licensees who choose to operate an amateur radio transmitter by telecommand. However, there are few impacts under the Privacy Act because these respondents are required to disclose only information that is currently available to the public in the Commission's Universal Licensing System database (except for the phone number which is not available in ULS). Additionally, the amateur radio service is strictly a non-business service.¹ Such remotely controlled transmitters typically include a repeater station at a remote site or a transmitter aboard a model aircraft or a balloon.

Privacy Act Impact Assessment: Yes. The telephone numbers that are collected in ULS are covered under the System of Records Notice (SORN), FCC/WTB-1, "Wireless Services Licensing Records", to cover the personally identifiable information affected by these information collection requirements. At this time, the Commission (FCC) is not required to complete a Privacy Impact Assessment.

The Commission is seeking approval from the Office of Management and Budget (OMB) in order to obtain the three year clearance for this collection.

The statutory authority for this collection of information is contained in 47 U.S.C. 303, 151-155, 301-609, unless otherwise noted.

2. The information is used by FCC enforcement personnel during inspections and investigations to assure that remotely controlled amateur radio stations are licensed in accordance with applicable rules, statutes and treaties. In the absence of this third party disclosure requirement, field inspections and investigations related to harmful interference could be severely hampered and needlessly prolonged due to inability to quickly determine who the party responsible for the transmitter is.
3. Prior to finalizing rule makings the Wireless Telecommunications Bureau conducts an analysis to insure that improved information technology may be used to reduce the burden on the public. This analysis considers the possibility of obtaining and/or computer-generating the required data from existing data bases in the Commission or other Federal agencies.

¹ The international radio regulations define it as "A radiocommunication service for the purpose of self-training, intercommunication and technical investigations carried out by amateurs, that is, duly authorized persons interested in radio technique solely with a personal aim and without pecuniary interest."

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 that absolutely necessary for evaluating and processing each application and to deter against possible abuses of the processes.
6. If the station license was not posted, the name of authorized operators not maintained, FCC personnel would be unable to efficiently carry out inspections and resolution of cases of harmful interference would be needlessly delayed.
7. Current data collection is consistent with 5 CFR 1320, except that the subject records are required to be retained and posted only for the time the station is operated remotely. The retention and posting of these records imposes a negligible burden on the licensee while providing valuable information to FCC personnel to insure compliance with applicable rules and treaties.
8. The Commission initiated a 60-day public comment period which appeared in the Federal Register on December 1, 2014 (79 FR 71099) seeking comment from the public on the information collection requirements contained in this collection. No comments were received as a result of the notice.
9. Respondents will not receive any payments.
10. There is no need for confidentiality with this collection of information except for respondents' telephone numbers which are not made available to the public and are covered under FCC/WTB-1, "Wireless Services Licensing Records."
11. Respondents may request materials or information submitted to the Commission be withheld from public inspection under 47 CFR §0.459 of the FCC rules.

The respondents' telephone numbers are maintained in the Commission's system of records notice or 'SORN', FCC/WTB-1, "Wireless Services Licensing Records."

The Commission has in place the following policy and procedures for records retention and disposal: records will be actively maintained as long as the license is valid; paper records will be archived after being keyed or scanned into the ULS database and destroyed when 12 years old; electronic records will be backed up and deleted twelve years after the license is no longer valid.

12. We estimate that approximately 40,000² amateur radio operators engage in remote control operation annually. A copy of the station license can be printed from the Commission's licensing database and the label made using information readily available to the licensee. We believe an estimate of 5 minutes (.084 hours) per licensee for a burden of 3,360 hours is reasonable. The burden on respondents will vary depending on each licensee's decision concerning remote control of a station.

² The Commission believes that this number represents a conservative estimate of the number of licensees (respondents) that operate an amateur station under telecommand during a year.

Total number of respondents: 40,000

Total number of annual responses: 40,000

Total Annual Burden Hours: 3,360 hours

Total “in-house cost” to respondents:

We estimate that in-house staff is paid an hourly rate of \$25/hours to fulfill the requirements. Therefore, 3,360 hours x \$25/hour (amateur radio operators) = **\$84,000**

13. *Estimated annual cost to respondents: There is no annualized cost to the respondents for this requirement. Any amateur radio operator would generally, even in the absence of any Federal regulations of radio, want to have FCC enforcement personnel be able to contact them in a case of equipment malfunction.*

14. Estimated annual cost to the Federal Government: None.

15. There are no program changes to this collection. The Commission has adjustments/increases as follows: 39,500 to the number of respondents, 39,500 to the number of annual responses and 3,260 to the annual burden hours. These adjustments are due to the Commission obtaining updated information regarding the number of amateur stations that are capable of being remotely controlled and changes in technology, *i.e.*, control of devices through the internet, implemented by amateur radio operators.

16. The data will not be published for statistical use.

17. No expiration date will be displayed.

18. There were no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods:

No statistical methods are employed.