SUPPORTING STATEMEMENT

A. Justification:

1. In response to the events of September 11, 2001, the Federal Communications Commission (Commission or FCC) created an Emergency Contact Information System to assist the Commission in ensuring rapid restoration of communications capabilities after disruption by a terrorist threat or attack, and to ensure that public safety, public health, and other emergency and defense personnel have effective communications services available to them in the immediate aftermath of any terrorist attack within the United States. The Commission submitted, and OMB approved, a collection through which key communications providers could voluntarily provide contact information.

The Commission's Public Safety and Homeland Security Bureau (PSHSB) updated the Emergency Contact Information system with a Disaster Information Reporting System (DIRS) that uses electronic forms to collect Emergency Contact Information forms and through which participants may inform the Commission of damage to communications infrastructure and facilities and may request resources for restoration. The Commission updated the process by increasing the number of reporting entities to ensure inclusion of wireless, wireline, broadcast, cable and satellite communications providers.

The Commission is requesting OMB approval for an extension to obtain the full, three year clearance from them. There is a change in the respondents, responses and burden hour reporting requirements, see response to question 15. In recent years, communications have evolved from a circuit-switched network infrastructure to broadband networks. The last revision extended the Disaster Information Reporting System to include interconnected Voice over Internet Protocol and broadband access Internet Service Providers. This revision increases the number of hours needed to update information in the days after the disaster.

Legal authority for this collection of information is contained in 47 U.S.C. 154(i), 218, 303(r) and 47 CFR Section 0.181(h).

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

2. This emergency contact and communications infrastructure/network damage information will be utilized in the event of a major disaster or crisis that results in communications disruption. Respondent wireless, wireline, broadcast, cable, satellite, interconnected Voice over Internet Protocol and broadband Internet Service Providers

will maintain emergency contact information in the DIRS database. In the event of an actual emergency, respondents also may enter infrastructure damage and restoration information into the database. Also in the event of an emergency, Commission staff may contact respondents. The Commission has coordinated with the Department of Homeland Security (DHS) and its component National Communications System (NCS) in the design of this data collection, including the identification of the data that should be collected. Furthermore, the Commission will coordinate DIRS data with NCS in support of NCS's role as primary agency for Emergency Support Function-2 (ESF-2) (Communications) of the National Response Plan (NRP).

- 3. This information is only available to authorized personnel within the Commission and DHS via electronic means. Each respondent may update its information in the database as needed using the web-based forms, but will not have access to view the entire database nor any data input by other respondents.
- 4. This information is not available elsewhere. It was created specifically to meet the requirements in Section 0.181(h) of the Commission's rules. This is a unique collection, and there is no duplication.
- 5. In compliance with the Paperwork Reduction Act of 1995, the FCC is making the effort to minimize the burden on all respondents, regardless of size. The PSHSB has limited the information requested to that which is absolutely necessary to gather emergency contact information and communications infrastructure damage and restoration information. Providing this information will have minimal impact on small business because the information is input over a web-based interface and can be input efficiently at the respondent's convenience. Further, participation in the DIRS is entirely voluntary.
- 6. Failure to collect this information will adversely impact the FCC's ability to carry out its congressionally mandated objective of regulating communications by wire and radio to ensure the national defense, and promoting safety of life and property.
- 7. Information will be collected on occasion and during major disasters or other crises.
- 8. Pursuant to 5 CFFR 1320.8(d) of OMB's rules, the Commission published a 60 day notice in the Federal Register on March 2, 2015 (80 FR 11201). No PRA comments were received as a result of the notice.
- 9. We will address the concerns of the commenting parties, when we receive them.
- 10. No gifts or payments will be received.
- 11. The reporting requirement does not address private matters of a sensitive nature.

12. Respondent wireless, wireline, broadcast, cable, satellite, interconnected Voice over Internet Protocol and broadband Internet Service Provider companies will enter emergency contact information in the DIRS database, and when necessary will enter critical information (*i.e.* related to infrastructure damage and restoration) into DIRS. We anticipate that this data entry will take 0.1 hours for initial entry of contact information; 0.5 hours for initial input of critical information, and 0.1 hour for updates of critical information. This estimate is based on FCC staff's knowledge and familiarity with the availability of the data required.

Total Burden Hours to collect this information is as follows:

4,500 respondents x 0.1 hours (6 minutes) = 450 hours for initial entry and reentry (for those already in the system) of contact information. This is also 4500 responses.

5,000 responses x 0.50 hours (30 minutes) = 2,500 hours for initial input of critical information.

5,000 responses x 0.1 hours (6 minutes) x 6 (the number of updates) = 3000 hours for updates of critical information.

Total number or respondents: 4,500 respondents.

Total number of responses: 4,500 (contact) + 5,000 (initial reports) + 30,000 (updated reports) = 39,500 responses.

Total annual burden: 450+2500+3000 = 5,950 hours.

- 13. There is no cost to the respondents' normal operating costs beyond the staff time required to complete an online entry in the DIRS database.
- 14. There are no costs to the Commission beyond what we consider to be part of the FCC's normal operating costs.
- 15. There are changes to the Commission's respondents/responses, and burden estimates. The Commission has seen a significant increase in the number of responses. The increased burden recognizes that for most disasters we ask companies to update the information submitted to DIRS more than once.
- 16. We do not intend to publish this information for statistical use.
- 17. We are seeking approval to not display the expiration date for OMB approval of the information collection. The information is retained in an electronic format and will be updated regularly. We will use an edition date in lieu of an OMB expiration date. Additionally, all information collection requirements are published in 47 CFR 0.408.

18. There are minimal exceptions from the 60 day notice to the certification statement in Item 19 due to the more accurate estimates contained the in the certificate.

B. Collections of Information Employing Statistical Methods:

This information collection does not employ any statistical methods.