

August 2015

SUPPORTING STATEMENT

**A. Justification:**

1. The Wireless Telecommunications Bureau (WTB) of the Federal Communications Commission (FCC) periodically conducts audits of the construction and/or operational status of various Wireless radio stations in its licensing database that are subject to rule-based construction and operational requirements. The Commission's rules for these Wireless services require construction within a specified time frame and require a station to remain operational in order for the license to remain valid. Therefore, this collection requires the licensees to review their authorizations that are listed in the audit letter and to certify that they are operating in accordance with their license.

Records of the Wireless Radio Services may include information about individuals or households, and the use(s) and disclosure of this information is governed by the requirements of a system of records, FCC/WTB-1, "Wireless Services Licensing Records". However, the Commission makes all information within the Wireless Radio Services publicly available on its Universal Licensing System (ULS) webpage. The public is entitled to download this public information.

The Commission is now requesting an extension of this collection from the Office of Management and Budget (OMB) for three years.

Statutory authority for this information collection is contained in 47 U.S.C. §§ 151, 152, 154(i), 155(c), 157, 201, 202, 208, 214, 301, 302a, 303, 307, 308, 309, 310, 311, 314, 316, 319, 324, 331, 332, 333, 336, 534, and 535.

2. This requirement will be used by Commission personnel to assure that licensees' stations are constructed and currently operating in accordance with the parameters of the current FCC authorization and rules.

Again, information about individuals or households, and the use(s) and disclosure of this information is governed by the requirements of system of records, FCC/WTB-1. All information within Wireless Radio Services is publicly available.

3. The Commission encourages the use of electronic filing. With the advent of ULS, 93% of all responses submitted to the FCC are now being filed electronically. Electronic filing is mandatory for certain categories of respondents and others have the choice of filing manually or electronically. (These types of requirements are identified by various public notices as the radio services are implemented in ULS.)

4. No other federal agency collects this data.
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 to minimize the burden on all respondents.
6. This information is collected only once, accordingly, less frequent collections are not feasible.
7. Current data collection is consistent with the guidelines in 5 CFR 1320.
8. Pursuant to 5 CFR 1320.8(d), a notice was published in the Federal Register on June 26, 2015 (80 FR 36810) seeking comments from the public on the information collection. No PRA comments were received from the public.
9. Respondents will not receive any payments associated with this collection.
10. Respondents may request materials or information submitted to the Commission be withheld from public inspection under 47 CFR §0.459 of the FCC rules.

Information within Wireless Radio Services is maintained in the Commission's system of records notice or 'SORN', FCC/WTB-1, "Wireless Services Licensing Records." These licensee records are publicly available and routinely used in accordance with subsection b. of the Privacy Act, 5 U.S.C. 552a(b), as amended. Material that is afforded confidential treatment pursuant to a request made under 47 CFR §0.459 will not be available for public inspection.

The Commission has in place the following policy and procedures for records retention and disposal: Records will be actively maintained as long as the individual remains a licensee. Paper records will be archived after being keyed or scanned into the system. Electronic records will be backed up on tape. Electronic and paper records will be maintained for at least twelve years and three months.

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. This collection requires the licensees to review their authorizations that are listed in the audit letter and to certify that they are operating in accordance with their license. In most circumstances we require the licensee to respond electronically by accessing a website. Those that respond manually do so by using a form that is sent with the audit letter. The Commission encourages the use of electronic filing. Electronic filing is mandatory for certain categories of respondents and others have the choice of filing manually or electronically. The Commission expects approximately 93% will respond electronically. Audits are not conducted on a regular

basis and except in rare instances less than 25,000 letters will be sent with an estimated response time of .50 hours each, for a total annual burden of **12,500 hours**. The Commission equates the occurrence to happen once for each respondent.

**Total Number of Respondents: 25,000.**

**Total Number of Annual Responses: 25,000 letters (responses).**

**Estimated Annual Burden Hours:** 25,000 letters/responses x .50 hours/response = **12,500 hours.**

**Estimated “in-house cost” to respondents:** We assume that the respondents would use administrative personnel to prepare the information at an hourly wage of \$20 per hour. \$20/hour x 25,000 responses x .50 hour = **\$250,000.**

13. Estimate of cost to respondents.

- a. There are no capital or start-up costs.
- b. There are no operational or maintenance costs.
- c. There are no costs to the respondents.

14. Estimate of cost to Federal Government:

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|------------------|--|
| \$ 23.38         | per hour (GS-7/5 Legal Instruments Examiner) |
| X .50            | hours per letter examined                    |
| <u>X 25,000</u>  | letters reviewed per year                    |
| <b>\$292,250</b> |  |

15. There are no program changes or adjustments to this collection.

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

17. We seek continued OMB approval to not display the OMB expiration date on the License Audit letters. This is not in the Commission’s interest as the letter would have to have the OMB expiration date changed each time this collection were submitted to OMB for renewal or revision. Additionally, the Commission publishes a list of OMB-approved collections including their associated OMB control number, title of the collection and the OMB expiration date in 47 CFR 0.408 of the Commission’s rules.

18. There are no exceptions to the “Certification Statement.”

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

No statistical methods are employed.