

SUPPORTING STATEMENT

A. Justification

1. This submission is being made to the Office of Management (OMB) for the approval of information collection requirements contained in the Commission's *Incentive Auction Order*¹ and its *Order on Reconsideration*², *Channel Sharing Order on Reconsideration*,³ *Channel Sharing Second Order on Reconsideration*,⁴ which all adopted rules for holding an Incentive Auction, as required by the Middle Class Tax Relief and Job Creation Act of 2012 (Spectrum Act).⁵ The Spectrum Act directs the Commission to hold a "reverse auction" in which broadcasters can voluntarily return some or all of their broadcast spectrum usage rights in exchange for incentive payments.⁶ The Spectrum Act also requires the Commission to reorganize the broadcast television band, which will be accomplished by repacking stations, or moving broadcast stations to different channels.⁷ The Spectrum Act directs the Commission to hold a forward auction of the ultra-high frequency (UHF) spectrum obtained as a result of the reverse auction and channel repacking.⁸ This UHF spectrum will be auctioned as flexible-use licenses suitable for providing mobile broadband service. Broadcast stations that participate in the forward auction can relinquish their spectrum rights, agree to share a channel with another broadcaster or move from the UHF to VHF band or from a high VHF channel to a low VHF channel. For non-participating broadcast stations, the Spectrum Act establishes a TV Broadcaster Relocation Fund (Fund) to reimburse reassigned broadcasters and multichannel video programming distributors (MVPDs) that incur expenses associated with continuing to carry relocated stations, for their reasonable expenses resulting from the post-auction

¹ *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, GN Docket 12-268, Report and Order, FCC 14-50, 29 FCC Rcd 6567 (2014) ("*Incentive Auction R&O*").

² *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, Second Order on Reconsideration, GN Docket No. 12-268, FCC 15-69 (rel. June 19, 2015).

³ *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, First Order on Reconsideration and Notice of Proposed Rulemaking, GN Docket 12-268, MB Docket No. 15-137, FCC 15-67 (rel. June 12, 2015) ("*Channel Sharing Order*").

⁴ *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, Second Order on Reconsideration, GN Docket 12-268, MB Docket No. 15-137, FCC 15-139 (rel. October 21, 2015) ("*Second Channel Sharing Order*").

⁵ Pub. L. No. 112-96, §§ 6402 (codified at 47 U.S.C. § 309(j)(8)(G)), 6403 (codified at 47 U.S.C. § 1452), 126 Stat. 156 (2012) (Spectrum Act).

⁶ Spectrum Act § 6403(a)(1) (mandating "a reverse auction to determine the amount of compensation that each broadcast television licensee would accept in return for voluntarily relinquishing some or all of its broadcast television spectrum usage rights in order to make spectrum available for assignment through a system of competitive bidding under subparagraph (G) of section 309(j)(8) of the Communications Act of 1934, as added by section 6402.").

⁷ Spectrum Act §6403(b)(1) (requiring the FCC to "make such reassignments of television channels as the Commission considers appropriate" and "reallocate such portions of such spectrum as the Commission determines are available").

⁸ Spectrum Act §6403(c)(1)(A) (requiring the FCC to conduct a "forward auction" to assign licenses for the use of spectrum reallocated from broadcast television as part of the incentive auction).

channel reassignment.⁹ The rules governing these processes are codified at 47 C.F.R. Parts 0, 1, 27, 73 and 74.

Description of Information Collection:

The following is a summary of each rule section which contains information collection requirements for which the Commission seeks OMB approval:

- (a) Consumer Education.** 47 C.F.R. section 73.3700(c) requires Licensees of transitioning stations, except for license relinquishment stations, to place a certification of compliance with the requirements in paragraph (c) of this section in their online public file within 30 days after beginning operations on their post-auction channels. Licensees of license relinquishment stations must include the certification in their notification of discontinuation of service pursuant to § 73.1750 of this chapter. Section (c)(1) requires license relinquishment stations that operate on a commercial basis to air at least one Public Service Announcement (PSA) and run at least one crawl in every quarter of every day for 30 days prior to the date that the station terminates operations on its pre-auction channel. One of the required PSAs and one of the required crawls must be run during prime time hours (for purposes of this section, between 8:00 pm and 11:00 pm in the Eastern and Pacific time zones, and between 7:00 pm and 10:00 pm in the Mountain and Central time zones) each day. Noncommercial educational full power television license relinquishment stations may choose to comply with the requirements in subpart (c)(1) or may air 60 seconds per day of on-air consumer education PSAs for 30 days prior to the station's termination of operations on its pre-auction channel. Transitioning stations, except for license relinquishment stations, must air 60 seconds per day of on-air consumer education PSAs or crawls for 30 days prior to the station's termination of operations on its pre-auction channel. Each crawl must run during programming for no less than 60 consecutive seconds across the bottom or top of the viewing area and be provided in the same language as a majority of the programming carried by the transitioning station. Each crawl must include the date that the station will terminate operations on its pre-auction channel; inform viewers of the need to rescan if the station has received a new post-auction channel assignment; and explain how viewers may obtain more information by telephone or online. Each PSA must have a duration of at least 15 seconds. Each PSA must be provided in the same language as a majority of the programming carried by the transitioning station; include the date that the station will terminate operations on its pre-auction channel; inform viewers of the need to rescan if the station has received a new post-auction channel assignment; explain how viewers may obtain more information by telephone or online; and for stations with new post-auction channel assignments, provide instructions to both over-the-air and MVPD viewers regarding how to continue watching the television station; and be closed-captioned.
- (b) Broadcaster Notice to MVPDs.** 47 C.F.R. section 73.3700(d) requires licensees of transitioning stations to provide notice to MVPDs that: (i) No longer will be required to carry the station because it will cease operations or because of the relocation of a channel sharee station; (ii) Currently carry and will continue to be obligated to carry a station that will have a new post-auction channel assignment; or (iii) Will become obligated to carry a station due to the relocation of a channel sharee station. The notice to MVPDs must be provided in the form of a letter notification and must contain the following information: (i) Date and time of any channel changes; (ii) Pre-auction and post-auction channels; (iii) Modification (if any) to

⁹ Spectrum Act §6403(b)(4)(A).

antenna position, location or power levels; (iv) Stream identification information for channel sharing stations; and (v) Engineering staff contact information. Should any of the information in (d)(2) of this section change during the time that the station is transitioning from its pre-auction to its post-auction channel, an amended notification must be sent. For cable systems, the notification letter must be addressed to the system's official address of record provided in the cable system's most recent filing in the Commission's Cable Operations and Licensing System (COALS) Form 322. For all other MVPDs, the notification letter must be addressed to the official corporate address registered with their State of incorporation. Notification letters must be sent within the following time frames: (i) For license relinquishment stations, not less than 30 days prior to terminating operations; (ii) For channel sharee stations, not less than 30 days prior to terminating operations of the pre-auction channel; (iii) For channel sharee and channel sharer stations, not less than 30 days prior to initiation of operations on the shared channel; and (iv) For reassigned stations, UHF-to-VHF stations, and High-VHF-to-Low-VHF stations, not less than 90 days prior to the date on which they will begin operations on their post-auction channel. If a station's anticipated transition date changes due to an unforeseen delay or change in transition plan, the licensee must send a further notice to affected MVPDs informing them of the new anticipated transition date.

- (c) Channel Sharing Agreements.** 47 C.F.R. section 73.3700(h)(5) requires channel sharing agreements (CSAs) to contain provisions outlining each licensee's rights and responsibilities regarding access to facilities, including whether each licensee will have unrestrained access to the shared transmission facilities; allocation of bandwidth within the shared channel; operation, maintenance, repair, and modification of facilities, including a list of all relevant equipment, a description of each party's financial obligations, and any relevant notice provisions; transfer/assignment of a shared license, including the ability of a new licensee to assume the existing CSA; and termination of the license of a party to the CSA, including reversion of spectrum usage rights to the remaining parties to the CSA. CSAs must include provisions: affirming compliance with the channel sharing requirements in paragraph (h)(5) of this section, and all relevant Commission rules and policies, and requiring that each channel sharing licensee shall retain spectrum usage rights adequate to ensure a sufficient amount of the shared channel capacity to allow it to provide at least one Standard Definition (SD) program stream at all times. The Commission will review CSAs filed after the auction to ensure that the CSA contains the required provisions and that any terms beyond those related to sharing of bitstream and related technical facilities comport with its general rules and policies.¹⁰

47 C.F.R. section 73.3700(h)(6) requires that, if the rights under a CSA are transferred or assigned, the assignee or the transferee must comply with the terms of the CSA. If the transferee or assignee and the licensees of the remaining channel sharing station or stations agree to amend the terms of the existing CSA, the agreement may be amended, subject to Commission approval.

- (d) Wireless Notification to LPTV and TV Translator Stations.** 47 C.F.R section 73.3700(g) (4) requires wireless licensees assigned to frequencies in the 600 MHz band under 47 C.F.R. part 27 to notify low power TV and TV translator stations of their intent to commence wireless operations and the likelihood of receiving harmful interference from the low power TV or TV translator station to such operations within the wireless licensee's licensed geographic service area. The new wireless licensees must: (A) Notify the low power TV or TV translator station in the form of a letter, via certified mail, return receipt requested; (B) Indicate the date the new wireless licensee intends to commence operations in areas where

¹⁰ *Channel Sharing Order* at para. 28.

there is a likelihood of receiving harmful interference from the low power TV or TV translator station; and (C) Send such notification not less than 120 days in advance of the commencement date. Low power TV and TV translator stations may continue operating on frequencies in the 600 MHz band assigned to wireless licensees under part 27 of this chapter until the wireless licensee commences operations as indicated in the notification. After receiving notification, the low power TV or TV translator licensee must cease operating or reduce power in order to eliminate the potential for harmful interference before the commencement date set forth in the notification. Low power TV and TV translator stations that are operating on the UHF spectrum that is reserved for guard band channels as a result of the broadcast television incentive auction conducted under section 6403 of the Spectrum Act may continue operating on such channels until the end of the post-auction transition period as defined in 47 C.F.R. § 27.4, unless they receive notification from a new wireless licensee pursuant to the requirements of 47 C.F.R. § 73.3700(g)(4) that they are likely to cause harmful interference in areas where the wireless licensee intends to commence operations, in which case the requirements of 47 C.F.R. § 73.3700(g)(4) will apply.

- (e) License Relinquishment and Termination of Operation.** 47 C.F.R. section 73.3700(b)(4) (i) requires licenses of license relinquishment stations to comply with the notification and cancellation procedures in section 73.1750 and terminate operations on their pre-auction channel within three months of the date that the licensee receives its incentive payment pursuant to section 6403(a)(1) of the Spectrum Act.

Section 73.3700(b)(4)(ii) requires licensees of channel share stations to comply with the notification and cancellation procedures in § 73.1750 and terminate operations on their pre-auction channel within six months of the date that the licensee receives their incentive payment pursuant to section 6403(a)(1) of the Spectrum Act.

Statutory authority for these collections are contained in 47 U.S.C. §§ 151, 154, 301, 303, 307, 308, 309, 310, 316, 319, 325(b), 332, 336(f), 338, 339, 340, 399b, 403, 534, 535, 1404, 1452, and 1454.

The information collections do not affect individuals or households; thus, there is no impact under the Privacy Act.

2. The Commission will use the information to ensure compliance with required filings of notifications, certifications, license renewals, license cancellations, and license modifications as necessitated by the results of the Incentive Auction. Such information will also be used to determine compliance with Commission's rules.
3. The data submission referenced herein will be filed electronically in the Media Bureau's CDBS (or its successor system; the transition to a modernized version of this system is currently underway). Broadcast licensees are accustomed to filing forms via CDBS, which is the system used for submitting all broadcast-related FCC Forms. Other notifications will be sent in the form of a letter, in some cases via certified mail, return receipt requested.
4. The Commission does not impose a similar information collection on the respondents. There is no similar data available. Therefore, the rules referenced do not require duplicative information to be collected.

5. In conformance with the Paperwork Reduction Act of 1995, the Commission is making an effort to minimize burdens on all respondents, regardless of size. The Commission has limited the information requirements to those absolutely necessary for evaluating compliance with Commission rules.

6. Without the notification, certification and licensing requirements, it would be difficult for the Commission to implement the post-Incentive Auction licensing scheme and reorganization of the 600 MHz band, as mandated by the Spectrum Act. The data collection requirements referenced herein will also ensure that licensees are in compliance with FCC rules and policies. In addition, coordination among broadcasters, MVPDs and wireless licensees is essential to a successful band reorganization. As an example, without the requirements that broadcasters notify MVPDs regarding their channel changes, MVPDs would be unable to make the necessary changes to their channel lineups, which would result in a loss of channel viewership to cable subscribers. Therefore, the Commission could not collect the information any less frequently than it proposes to do.

7. There are no special circumstances that exist for this information collection that would make the collection of the information inconsistent with 5 C.F.R § 1320.

8. Pursuant to 5 C.F.R § 1320.5(d), the Commission published a 60-day notice in the Federal Register on November 13, 2015 (80 FR 70209) seeking comments from the public on the information collection requirements contained in this collection. There were no comments received from the public.

9. Respondents will not receive any payments in connection with this collection.

10. There is some need for confidentiality with this collection of information. Respondents will be able to redact confidential or proprietary terms from channel sharing agreements prior to filing.

11. The requirements contained in this collection do not address any private matters of a sensitive nature.

12. Respondent Burden The Commission estimates that between 500 and 1,300 broadcast stations could be reassigned to a new channel in their pre-auction band via the repacking process following the Incentive Auction;¹¹ that an additional 50 to 100 stations that submit winning bids will enter channel sharing agreements (and move to the channel of the station they are sharing with); that 15 to 50 stations that submit winning bids will move from high-VHF to low-VHF channels or from UHF to high-VHF or low-VHF; that between 75 and 500 broadcast stations will be winning bidders that relinquish their licenses post-auction; and that all licensees will comply with all applicable rules. The actual number in each of these categories cannot be known in advance of the auction, including the level of broadcaster participation in the reverse auction, which in turn will impact how much spectrum is repurposed and how many stations need to be assigned new channels. Solely for purposes of preparing the estimated data collection burden, we will use the upper end of these ranges.

¹¹ We note that this estimate does not take into consideration the results of the optimization process, which will be used to determine the final television channel assignment plan. The Commission has determined that maximizing the number of stations assigned to their pre-auction channels is the first objective of its optimization plan. See *Broadcast Incentive Auction to Begin on March 29, 2016, Procedures for Competitive Bidding in Auction 1000, Including Initial Clearing Target Determination, Qualifying to Bid, and Bidding in Auctions 1001 (Reverse) and 1002 (Forward)*, AU Docket No. 14-252, GN Docket 12-268, WT Docket No. 12-269, MB Docket No. 15-146, FCC 15-78, Public Notice, at para. 274 (rel. Aug. 11, 2015). Accordingly, the number of stations reassigned to new channels may be lower than the estimate contained in this submission. We have erred on the side of caution so as not to underestimate the potential burden.

These estimates are based on FCC staff's knowledge and familiarity with the availability of the data required.

12-a. New Data Collection – Consumer Education (Section 73.3700(c)). The Commission requires license relinquishment stations and stations transitioning to a new channel to notify viewers of changes via public service announcement or crawl and to provide a certification that they complied with this requirement. License relinquishment stations must run one PSA and one crawl in every quarter of every day for thirty days. Transitioning stations must run 60 seconds of crawl or PSA one time per day for 30 days. (Non-commercial transitioning stations have the choice of complying with either requirement). Crawls must last at least 60 seconds and PSAs must last at least 15 seconds. The Commission assumes that respondents will use in-house personnel at an average salary of \$100,000 per year (\$48.08 per hour). We estimate that it will take .5 hours to comply with the certification requirement and approximately 0.017 hours to complete the requirements associated with PSAs and crawls.¹² Stations reassigned to a new channel in the repacking process may submit reasonably incurred costs (other than lost revenues) associated with compliance with consumer education requirements for reimbursement from the Reimbursement Fund.¹³ Although winning reverse auction bidders are not eligible for such reimbursement, they will have access to auction proceeds to cover the cost of consumer education requirements.

Certification: 1,950 respondents x 1 response each = **1,950 required responses**

1,950 respondents x 1 response each x .5 hours of internal personnel time per response = **975 hours**

Certification In-House Cost: 1,950 respondents x 1 response each x .5 hours of internal personnel time per response x \$48.08/hour = **\$46,878.**

Total Number of Responses (Certification): **1,950.**

PSA/Crawls:

500 respondents (license relinquishers) x 2 (one PSA and one crawl) x 120 notifications (4 times per day x 30 days) = **120,000 required notifications**

60,000 crawls x .017 hours (rounded) (60 seconds) = 1,020 hours
60,000 PSAs x .004 hours (rounded) (15 seconds) = 240 hours
1,260 hours

1,450 respondents (transitioning to another channel) x (1 time per day x 30 days) 30 notifications = **43,500 required notifications**

43,500 crawls or PSAs x .017 hours (rounded) (60 seconds) = **739.5 hours**

Total PSA/Crawls Annual Burden Hours: 1,260 hours + 739.5 hours = **1,999.5 hours**

Total PSA/Crawls In-House Cost: 1,999.5 hours x \$48.08 = **\$96,136.00 (rounded)**

¹² This estimate is minimal and involves keeping the station's tapes as proof that the requirement was met.

¹³ *Incentive Auction R&O*, 29 FCC Rcd 6807, para. 587 note 1655.

Total Number of Responses for PSA/Crawls: $120,000 + 43,500 = 163,500$.

Total Annual Burden Hours: $975 + 1,999.5 = 2,975$ (rounded)

Total Annual Cost: $\$46,878 + \$96,136 = \$143,014.00$

Total Number of Annual Responses: $1,950 + 163,500 = 165,450$

12-b. New Data Collection – Broadcaster Notice to MVPDs (Section 73.3700(d)). The Commission requires licensees of transitioning stations to provide notice to MVPDs regarding their post-auction status (e.g., either ceasing operations, moving to a new channel or adding a station due to a new channel sharing arrangement). The Commission assumes that respondents will use in-house personnel at an average salary of \$100,000 per year; therefore, the Commission estimates respondents' costs to be about \$48.08 per hour. We also assume that one-quarter (25%) of all transitioning stations will have to make a second notification, either because key information has changed or the date of the transition has changed.

$1,950$ respondents x 1 response each x 2 hours of internal personnel time per response = 3,900 hours.
 488 (rounded, 25%) respondents x 1 response each x 2 hours of internal personnel time per response = 976 hours.

Total hours: $3,900 + 976 = 4,876$ hours

In-House Cost: $1,950$ respondents x 1 response each x 2 hours of internal personnel time per response x $\$48.08/\text{hour} = \$187,512$.

488 respondents x 1 response each x 2 hours of internal personnel time per response x $\$48.08/\text{hour} = \$46,926$ (rounded)

Total Annual Burden Hours: 4,876 hours

Total Annual Cost: $\$187,512 + \$46,926 = \$234,438.00$

Total Number of Annual Responses: 2,438.

12-c. New Data Collection – Channel Sharing Agreements (Section 73.3700(h)(5)-(6)). Channel sharing stations must submit sharing agreements (CSAs) that contain provisions required by the rules. In addition, if the rights under a CSA are transferred or assigned, and the licensees of the remaining channel sharing station or stations agree to amend the terms of the existing CSA, the agreement may be amended, subject to Commission approval. We estimate that 100 stations will share their channels with 100 stations that were winning relinquishment bidders in the auction. Accordingly, the burden associated with these requirements is estimated to affect 200 stations to produce 100 CSAs. We also assume that 30 stations will amend their 15 CSAs, and that the amendments will take 1/3 less time than entering a new CSA. We estimate that stations entering into CSAs will use in-house personnel whose salary is \$100,000 ($\48.08 per hour) and in-house engineers whose salary is \$60,000 ($\30.00 per hour). We estimate the burden for complying with the requirement to create a CSA consistent with the requirements set out in Section 73.3700(h)(5) and (h)(6) as follows:

200 respondents (new CSA) x 1 response each x 10 hours of internal personnel time per response = 2,000 hours.

200 respondents (new CSA) x 1 response each x 15 hours of internal engineer time per response = 3,000 hours

30 respondents (amending terms of CSA) x 1 response each x 3.3 (1/3 of 10 hours) hours of internal personnel time per response = 99 hours

30 respondents (amending terms of CSA) x 1 response each x 5 (1/3 of 15 hours) hours of internal engineer time per response = 150 hours.

In-House Cost: 200 respondents x 1 response each x 10 hours of internal personnel time per response x \$48.08/hour = **\$96,160**

200 respondents x 1 response each x 15 hours of internal engineer time per response x \$30.00/hour = **\$90,000**

30 respondents x 1 response each x 3.3 hours of internal personnel time per response x \$48.08 = **\$4,760** (rounded)

30 respondents x 1 response each x 5 hours of internal engineer time per response x \$30.00 = **\$4,500**

Total Annual Burden Hours: 5,249

Total In-House Cost: \$96,160 + \$90,000 + \$4,760 + \$4,500 = \$195,420.00

Total Number of Responses: 115 (230 respondents producing 115 CSAs).

12-d. *New Data Collection – Wireless Notification to LPTV and TV Translator Stations (Section 73.3700(g)(4)).* The Commission requires wireless licensees assigned to frequencies in the 600 MHz band under part 27 of this chapter to notify low power TV and TV translator stations of their intent to commence wireless operations and the likelihood of receiving harmful interference from the low power TV or TV translator station to such operations within the wireless licensee’s licensed geographic service area. There are 5,628 low power TV and TV translator stations. The Commission estimates that each 117 600 MHz licenses will make these notifications to an average of 48 low power TV and TV translator stations. The Commission believes that complying with this provision will take 2 hours per notification. We estimate that stations entering into CSAs will use in-house personnel whose salary is \$100,000 (\$48.08 per hour) and in-house engineers whose salary is \$60,000 (\$30.00 per hour).

117 respondents x 48 responses each x 1 hour of in-house personnel time per response = 5,616 hours

117 respondents x 48 responses each x 1 hour of in-house engineer time per response = 5,616 hours

117 respondents x 48 responses each x 1 hour of in-house personnel time per response x \$48.08/hour = \$270,017 (rounded)

117 respondents x 48 responses each x 1 hour of in-house engineer time per response x \$30.00/hour = \$168,480

Total Annual Burden Hours: 11,232

Total In-house Cost: \$270,017 + \$168,480 = \$438,497.00

Total Number of Responses: 5,616

12-e. *New Data Collection - License Relinquishment and Termination of Operations (Section 73.3700(b)(4)(i)-(ii)).* The Commission requires license relinquishment stations and channel sharees to comply with the notification and cancellation procedures in § 73.1750 and terminate operations on their pre-auction channel within three months of the date that the licensees receives their incentive payment. The Commission estimates that 500 broadcast stations will relinquish their licenses and 100 stations will become channel sharees post-auction. We assume that each filing will be done by in-house personnel who have an average salary of \$100,000/year (\$48.08/hour).

600 respondents x 1 response each x 1 hours of internal personnel time per response = **600 hours.**

In-House Cost: 600 respondents x 1 response each x 1 hours of internal personnel time per response x \$48.08/hour = **\$28,848.00.**

Total Annual Burden Hours: 600.
Total Number of Responses: 600.
Total In-house Cost: \$28,848.00.

TOTAL NUMBER OF RESPONDENTS: 1,950

TOTAL NUMBER OF ANNUAL RESPONSES: 165,450 + 2,438 + 115 + 5,616 + 600 = 174,219

TOTAL ANNUAL BURDEN HOURS: 2,975 + 4,876 + 5,249 + 11,232 + 600 = 24,932

TOTAL ANNUAL IN-HOUSE COST: \$143,014 + \$234,438 + \$195,420 + \$438,497 + \$28,848 = \$1,040,217.00

13. Annual Costs to the Respondent:

13-a. *New Data Collection – Consumer Education (Section 73.3700(c)).* We estimate that it will take one hour for an outside attorney (\$300/hour) to prepare the viewer notifications that will run as PSAs or crawls as required by Section 73.3700(c).

1,950 respondents x 1 PSA/crawl x 1 hour x \$300/hour = **\$585,000**

13-b. *New Data Collection – Broadcaster Notice to MVPDs (Section 73.3700(d)).* We do not expect licensees to incur any external expenses related to this data collection.

13-c. *New Data Collection – Channel Sharing Agreement (Section 73.3700(h)(5)).* We estimate that 100 stations will share their channels with 100 stations that were winning relinquishment bidders in the auction. Accordingly, the burden associated with these requirements is estimated to affect 200 stations to produce 100 CSAs. We also assume that 30 stations will amend their 15 CSAs, and that the amendments will take 1/3 less time than entering a new CSA. We assume that channel sharing stations would use an outside attorney (\$300/hour) and a consulting engineer (\$250/hour) to review their CSAs.

200 respondents x 5 hours outside attorney time x \$300/hour = \$300,000

200 respondents x 6 hours outside engineering time x \$250/hour = \$300,000

30 respondents (amending terms of CSA) x 1.6 (rounded) hours outside attorney time x \$300/hour = \$14,400

30 respondents (amending terms of CSA) x 2 hours outside engineering time x \$250/hour = \$15,000

Total External Consultant Cost to Respondent: **\$629,400.**

13-d. *New Data Collection – Wireless Notification to LPTV and TV Translator Stations (Section 73.3700(g)(4)).* We do not expect licensees to incur any external expenses related to this data collection.

13-e. *New Data Collection - License Relinquishment and Termination of Operations (Section 73.3700(b)(4)(i)-(ii)).* We do not expect licensees to incur any external expenses related to this data collection.

TOTAL EXTERNAL COST: \$585,000 + \$629,400 = \$1,214,400.00.

14. Government Costs:

14-a. *New Data Collection – Consumer Education (Section 73.3700(c)).* We do not anticipate any costs to the government.

14-b. *New Data Collection – Broadcaster Notice to MVPDs (Section 73.3700(d)).* We do not anticipate any costs to the government.

14-c. *New Data Collection – Channel Sharing Agreement (Section 73.3700(h)(5)-(6)).* The Commission will review CSAs filed post-auction to confirm that the CSA contains the required provisions and that any terms beyond those related to sharing of bitstream and related technical facilities comport with its general rules and policies regarding licensee agreement. We assume that the same amount of review time will be necessary for original and revised CSAs. The Commission will use legal and engineering staff at the GS-14/Step 5 level (\$59.13/hour), paraprofessional staff at the GS-11/Step 5 level (\$35.11/hour), and clerical staff at the GS-5 level/Step 5 level (\$19.15/hour) to review CSAs.

100 CSAs x \$59.13/hour x 1 hour =	\$ 5,913
100 CSAs x \$35.11/hour x 1 hour =	\$ 3,511
100 CSAs x \$19.15/hour x .5 hours =	\$ 958
15 amended CSAs x \$59.13/hour x 1 hour =	\$ 887
15 amended CSAs x \$35.11/hour x 1 hour =	\$ 527
15 amended CSAs x \$19.15/hour x .5 hours =	<u>\$ 144</u>
Total Cost to the Federal Government =	\$11,940

14-d. *New Data Collection – Wireless Notification to LPTV and TV Translator Stations (Section 73.3700(g)(4)).* We do not anticipate any costs to the government.

14-e. *New Data Collection - License Relinquishment and Termination of Operations (Section 73.3700(b)(4)(i)-(ii)).* We estimate that the Commission will use legal and engineering staff at the GS-14/Step 5 level (\$59.13/hour) and paraprofessional staff at the GS-11/Step 5 level (\$35.11/hour).

600 responses x 0.5 hours/review x \$59.13/hour =	\$17,739
600 responses x 0.5 hours/review x \$35.11/hour =	<u>\$10,533</u>
Total Cost to the Federal Government:	\$28,272

TOTAL COST TO THE GOVERNMENT: \$11,940 + \$28,272 = \$40,212

15. This is a new information collection. It will add the following numbers/program changes to OMB’s inventory once approved: 1,950 to the number of respondents, 174,219 to the annual number of responses, 24,932 to the annual burden hours and \$1,214,400 to the annual cost.

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

17. We do not request OMB approval to not display the expiration date for OMB approval of the information collection. The Commission publishes a comprehensive listing of all OMB-approved information collections in 47 C.F.R. § 0.408. This listing “displays” the title of the collection, its OMB control number and OMB expiration date.

18. There are no exceptions to the Certification Statement.

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

No statistical methods are employed.