

**SUPPORTING STATEMENT**

**A. Justification:**

1. The FCC maintains Internet software used by the public to apply for licenses, participate in auctions for spectrum, maintain license information and other related electronic systems. In this mission, FCC customer support 'help desk' that answers questions related to these systems as well as resetting and/or issuing user passwords for access to these systems uses this form to allow electronic filers to request assistance. The form is available at: <https://esupport.fcc.gov/request.htm>.

This form electronically categorizes requests to allow for more efficient routing internally and continuing streamlining processes within the Commission. This increases the speed of disposal of these requests.

Customers may check the status of their request using a "request number" given to the user upon submission of the request on the website. No privileged or confidential information is retrievable by this form. The help request form screens are attached to this submission.

Privacy Impact Assessment - Records 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-7, "Remedy Action Request System" (RARS). Submission of the form is voluntary. Individuals may decline to provide the information requested in the online form; however, support will not be funneled via electronic means into the Commission. The customer will have to call the Commission to request support in lieu of submitting an electronic submission. Individuals grant consent for collection of the information by submitting the completed request form via the internet.

The Commission is now seeking Office of Management and Budget (OMB) approval for an extension of a three-year clearance.

There is no statutory authority for this information collection. The Commission developed this information collection on its own motion to assist users of the Universal Licensing System (ULS) or other FCC electronic systems.

2. The data collected by this collection is used by:
  - FCC staff to trouble-shoot problems the public has with the FCC's systems,
  - Software development staff to improve the development of FCC public facing systems and plan for software enhancements, issues, or requests from the public,
  - FCC auction participants and licensees to determine the status of their request for support, and
  - FCC management to make decisions concerning the success of its programs.
3. Information is collected via an electronic form on the FCC Internet website. This is the only means of collecting this information. No paper forms are available for submitting request for electronic system customer support. This form replaced free-form e-mails submitted to the Support Center for help. Electronic submission of these requests from the website using a standardized format speeds delivery of service and relieves FCC staff from manually processing and tracking e-mail.
4. This information is not available from any other source these requests are specific customer support needs being experienced by the system users. This form actually eliminates duplication and streamlines FCC's processes to utilize one form as opposed to e-mail, therefore, eliminating e-mails and maintaining a database of these records, categorized and easily accessible by FCC staff for trouble shooting problems and improving response time to the customer. This data is also accessible to the customer where appropriate to monitor their requests.
5. This collection of information does not affect small businesses or small entities.
6. Generally, the frequency of filing this help request form is determined by the filer whenever assistance is required. This process results in an quicker response time to auctions, licensing and other customers experiencing difficulties with FCC electronic filing systems, questions about licensing and/or issues. Elimination of this form would increase the burden on FCC customers seeking assistance. The form standardize the information requested and provides the customer support staff with the information they need to processes most requests requiring minimal follow-up contact with the customers to resolve their questions and concerns.
7. There are no special circumstances for this collection of information.

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8. As required by 5 CFR 1320.8(d), the Commission published a 60-day notice which appeared in the Federal Register on December 11, 2015 (80 FR 76981) seeking comments from the public on the information collection requirements contained in this collection. No PRA comments were received as a result of the notice.
9. There are no provisions for payment or gifts 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 on the electronic help request form is maintained in the Commission's system of records, FCC/WTB-7, "Remedy Action Request System (RARS)." These licensee records are not generally publicly available and routinely used in accordance with subsection b. of the Privacy Act, 5 U.S.C. 552a (b), as amended. TINs and 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. Electronic records will be backed up on tape. Electronic records will be maintained for at least eleven years.

11. This collection does not address private matters of a sensitive nature.
12. We estimate that approximately 36,300 requests for help will be received through this form each year. We estimate that it will take users approximately 8 minutes (0.14 hours) to complete the form.

- **Total Annual Burden Hours** = 8 minutes (0.14 hours)/response X 36,300 responses = **5,082 hours.**
- **Total Number of Respondents** = **36,300.**
- **Total Number of Annual Responses** = **36,300.**
- **The annual "in-house cost":**

The customer base for responses consists of amateur radio licenses and administrative personnel for private and public corporation.

The following computation was used to average the in-house cost to respondents. Each response is estimated to take eight (8) minutes (0.14 hours).

<u>Breakdown of Respondents</u>	<u>Cost Per Hour</u>	<u>Number of Responses</u>	<u>In-House Cost</u>
60% Amateur Licenses and Administrative Personnel:	\$35.00/hr .	21,780	<b>\$106,722.00</b>

(8 minutes (0.14 hours) x \$35.00/response x 21,780 responses = \$106,722)

**Total Annual "In-House" Cost: \$106,722.00**

13. The cost estimate for respondents is based on the following variables:

The Commission estimates that outside attorneys will make 40% of the filing on behalf of licensees.

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The following computation was used to average the cost to respondents. Each response is estimated to take eight (8) minutes (0.14 hours).

<u>Breakdown of Respondents</u>	<u>Cost Per Hour</u>	<u>Number of Responses</u>	<u>Cost</u>
40% Attorneys filing on Behalf of Licensees:	\$300.00/hr.	14,520	<b>\$609,840 Annual Cost</b>

(8 minutes (0.14 hours) x \$300.00/response x 14,520 responses = \$609,840.00)

**Total Annual Cost: \$609,840.00**

14. The government cost estimate should be split into two components:

- a) Estimated costs to include costs for changes to the maintenance of the Internet web form reflecting new licensing and customer requirements that the Commission tracks and uses internally in the Remedy System that tracks these customer requests. As the Remedy system is already implemented and supported by the FCC by current staff, development and maintenance costs are inclusive of the current contracts at the FCC. This effort will utilize current hardware and software at the Commission. Estimated costs include:

40 hours of one contractor's time @ \$80.00/hr. = \$3,200.00 one time cost.  
2 hours per month of contractor's time for maintenance @ \$80.00/hr. x 12 months = \$1,920.00/yr.  
10 hours of a staffed contractor's time for analysis @ \$80.00/hr. = \$800.00  
20 hours of government's time for reviewing analysis and developing @ \$75.00/hr. = \$1,500.00/yr.  
Total Cost: \$7,420.00

- b) Estimated costs to the Federal Government annually include costs for maintenance of the Internet web form. As the Remedy system is already implemented and supported at the FCC by current staff, development and maintenance costs are inclusive of the current contracts at the FCC. This effort will utilize current hardware and software at the Commission. Estimated annual costs include:

2 hours per month of contractor's time for maintenance @ \$80.00/hr. x 12 months = \$1,920.00/yr.  
8 hours per month of contractor's time for reviewing and analyzing data @ \$80.00/hr x 12 months = \$7,680.00  
20 hours of government's time for reviewing analysis and development @ \$75.00/hr. = \$1,500.00  
Total Cost: \$11,100.00

**Total Cost to the Federal Government: \$7,420.00 + \$11,100.00 = \$18,520.00**

15. There are no program changes to this collection. There are adjustments of 242 to the annual burden hours which are due to the Commission recalculating the burden for this collection. There are also adjustments to the annual cost of \$222,640. These adjustments/increases are due to an increases in the hourly rate for outside attorneys (from \$200/hour to \$300/hour).

16. Information will not be published from this collection of information.

17. We are requesting a continued waiver of the requirement to display the OMB expiration date. Since this is an electronic form, respondents will only have access to the currently approved OMB collection electronically.

18. There are no exceptions to the Certification Statement.

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**Collections of Information Employing Statistical Methods:**

No statistical methods are employed.