

SUPPORTING STATEMENT – PART A

Army Military Auxiliary Radio System (MARS)

A. JUSTIFICATION

1. Need for the Information Collection

This collection of information is required to support of the following requirements per:

- a. 10 U.S.C. Chapter 303 “Department of the Army”, § 3013 “Secretary of the Army”.
- b. Department of Defense Instruction 4650.02, “Military Auxiliary Radio System” contains the policy and guidance for this program.
- c. Army Regulation 25-6, “Military Auxiliary Radio System and Amateur Radio Program”, contains the membership qualification that an applicant must possess in order to volunteer for the program and a provision for reporting serious incidents within the Department of the Army prescribes responsibilities and updates policy and timelines.

2. Use of the Information

The following information is collected on the electronic application form and sent to the Army MARS program via email:

- Name
- Mailing address
- Email address
- Telephone numbers (work, home, cell)
- Date of Birth
- FCC Amateur Radio Call-sign

The information collection requirement is necessary to maintain an accurate roster of civilians who join the Army Military Auxiliary Radio System (MARS) for the purpose of providing contingency communications support to the Department of Defense. The collected information (application found and filled at <http://www.netcom.army.mil/mars/>) is used by the program manager to determine an individual’s eligibility (based on the qualifications set forth in the Army Regulation 25-6) to join the Army MARS program and may be used to conduct a background investigation if a security clearance is required. This information is also used to show the geographic dispersion of the members who participate in the global High Frequency radio network in support of the Department of Defense and to ensure our radio spectrum authorizations cover the geographic areas from which our members will operate. The mailing

address is used to send the hard copy MARS authority to operate certificate and other recognition certificates that the member may achieve. The telephone numbers and email address are used to contact the member on a periodic basis with informational updates and to send other types of general correspondence, as needed, to ensure the member remains up to date on the latest information regarding the MARS program. The electronic form itself is deleted after all relevant information is transferred into the MARS database (excel spreadsheet).

The date of birth (DOB) is used to establish that the applicant is at least 18 years of age in order to join the MARS program. Thereafter, the DOB is only used to identify those who are senior members in the program and to celebrate significant age milestones while in the MARS program.

The FCC Amateur Radio Call-sign is used to verify that the applicant holds a valid amateur radio license and to determine the operator class of the license. Army MARS requires members to achieve the "General Class" Amateur Radio license within one year of joining the program.

The membership database is reviewed annually to ensure that members' contact information (mailing address, email address, and phone numbers) are current.

A Privacy Act Statement (PAS) is included on the MARS application form.

3. Use of Information Technology

All (100%) of applicants for membership into the Army MARS program must fill out the on-line fillable .pdf form available at <http://www.netcom.army.mil/mars/> which is then electronically transmitted to the Army MARS headquarters administrative section for review and processing. Once the application is approved, the member's data is input into a database maintained by the MARS administrative manager at Fort Huachuca, AZ and the original application form is deleted.

4. Non-duplication

There is no duplication of effort for the Army MARS application; there is no other similar information currently available that can be used for this purpose. The required information is used to maintain a current membership database and to contact the member on a periodic basis to inform of changes to the MARS program.

5. Burden on Small Business

There is no impact to Small Business.

6. Less Frequent Collection

The “Form AM-1” (application for MARS operator) is the minimum amount of information needed to review an applicant’s suitability and qualifications for the program and to

adequately support AR 25-6 requirements. Member’s data is reviewed annually for currency of contact information, required certifications, and participation in the program.

7. Paperwork Reduction Act Guidelines

The “Form AM-1” application, its collection, and inclusion into the MARS database are completely electronic via a web-based .pdf fillable form and follows the 5 CFR 1320.5(d)(2) guidelines which is to avoid unnecessary duplication of effort, use simple language easily understood by the applicant, ease the recordkeeping responsibilities required by AR 25-400-2, and reduce the collection burden to all parties.

The “Form AM-1” when approved by OMB and published on the NETCOM.Army.mil/MARS site will meet all of the requirements of 5 CFR 1320.8(b)(3) as they pertain to this information collection instrument.

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

a. DA, Docket ID: USA-205-0010, Vol. 81 Federal Register page 9459 (No. 37, Thursday, February 25, 2016).

b. Two public comments received; both of which misidentify the intent and purpose of the MARS program (the author of the comments believes the FRN is an announcement for a manned expedition to the planet Mars, and how (he) would like to volunteer).

A 30-Day Federal Register Notice for the collection published on Monday, January 23, 2017. The 30-Day FRN citation is 82 FRN 7805.

Part B: CONSULTATION

a. AR 25-6 Information Management MARS (03January, 2014), Appendix B (Internal Control Evaluation), pg. 12, B-1 through b-3, includes key controls for Army MARS, missions, responsibilities, administration, and logistics. These key controls must be evaluated at least once every five years. Certification that this evaluation has been conducted must be accomplished on DA Form 11-2 (Internal Control Evaluation Certification).

9. Gifts or Payment

There are no payments or gifts to respondents.

10. Confidentiality

a. Does the collection instrument require a Privacy Act Statement (PAS)?

1. Yes, “**Authority:** 10 U.S.C. 3013, Secretary of the Army: DoD Directive 4650.2, Military Affiliate Radio System; Army Regulation 25-6, Military Affiliate Radio System. **Purpose:** To provide a potential reserve of trained radio communications personnel for military duty when needed and/or to provide auxiliary communications for military, civil, and/or disaster officials during periods of emergency. **Routine Use:** In addition to those disclosures generally permitted under 5 U.S.C. 552a(b) of the Privacy Act, the information contained therein may specifically be disclosed outside the DoD as a routine use pursuant to 5 U.S.C. 552a(b)(3) as follows: Information may be disclosed to Federal, State, and local agencies in connection with individual's participation in the Army MARS Equipment Program. The DoD 'Blanket Routine Uses' set forth at the beginning of the Army's compilation of systems of records notices also apply to this system. **Disclosure:** Information is provided voluntarily; however, failure to provide identifying information may impede processing of this application and ultimate acceptance into the MARS program. “

2. DA Privacy has reviewed and approved PAS for Form AM 1.

b. If a SORN is required:

1. A0025-6 USASC, Military Affiliate Radio System, January 08, 2001, 66 FR 1315 (<http://dpcl.d.defense.gov/Home.aspx>).

2. The MARS database does not require a Privacy Impact Assessment. Data is held within and excel spreadsheet on a DoDI 5015.2 compliant system.

3. Address the Records Retention and Disposition Schedule.

a. Per the SORN (A0025-6 USASC) the retention and disposition requirements (Destroy on each renewal or two years after termination of membership) have been annotated in the Records Retention System-Army (RSS-A).

11. Sensitive Questions

There are no questions of a sensitive nature.

12. Respondent Burden, and its Labor Costs

a. Estimation of Respondent Burden

Estimation of Respondent Burden Hours					
Name	Number of Respondents (annually)	Number of Responses per Respondent	Number of Total Annual Responses	Response Time (Amount of time needed to complete the collection instrument)	Respondent Burden Hours (annually)
Form AM-1 (Application to Operate a MARS Station)	550	1	550	15 min.	<u>138 hrs. total</u>

b. Labor Cost of Respondent Burden

Labor Cost of Respondent Burden					
	Number of Responses	Response Time per Response	Respondent Hourly Wage	Labor Burden per Response (Response Time multiplied by Respondent Hourly Wage)	Total Labor Burden (Number of Respondents multiplied by Response Time multiplied by Respondent Hourly Wage)
Army MARS Form-1	550	15 min	\$23.00	\$5.75	\$3,162.50

* MARS volunteers professional backgrounds are varied (from college students to executives and everything in-between). Participation in this study is voluntary, thus any monies associated with the participants time/attendance to this program is absorbed by the individual.

The Respondent hourly wage was determined by using the Bureau of Labor Statistics website: <https://www.bls.gov/oes/current/oes274013.htm>

13. Respondent Costs Other than Burden Hour Costs

a. Assumptions:

Qualified volunteers for the MARS program must already be in possession of requisite radio transmitters and receivers (as well as the periphery equipment need to support this equipment); therefore no additional costs to applicants are assumed in meeting all AR 25-6 requirements for inclusion into this program.

14. Cost to the Federal Government (annual)

		Army MARS Form -1				
Number of Responses		550				
Processing Time Per Response (in hours)		.5 hours				
Hourly Wage of Worker(s) Processing Responses		\$19*				
		* Current dBase administrators contracted hourly wage				
Cost to Process Each Response (Processing Time Per Response multiplied by Hourly Wage of Worker(s) Processing Responses)		\$9.50				
Total Cost to Process Responses (Cost to Process Each Response multiplied by Number of Responses)		\$5,225				
Operational and Maintenance Costs						
Equipment	Printing	Postage	Software Purchases	Licensing Costs	Other	Total
\$500	\$200	\$400	\$0	\$0	\$0	\$1100

Total Cost to the Federal Government

Operational and Maintenance Costs	Labor Cost to the Federal Government	Total Cost (O&M Costs + Labor Cost)
\$1100	\$5,225	\$6,325

15. Reasons for Change in Burden

This is a new information collection request. This request seeks approval of 550 hours of respondent burden to complete the required application process per AR 25-6 requirements for inclusion into the MARS program.

16. Publication of Results

Monthly and annual reports on regional participation and Army frequencies used will be made monthly and annually by Army MARS leadership via NETCOM per AR 25-6.

17. Non-Display of OMB Expiration Date

No, OMB control number and expiration date will be displayed on the Army MARS Form 1.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

There are no exceptions being requested with regards to this information collection.