

SUPPORTING STATEMENT
NOAA SPACE-BASED DATA COLLECTION SYSTEM (DCS) AGREEMENTS
OMB CONTROL NO. 0648-0157

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

This request is for extension of a current information collection.

NOAA operates two space-based data collection systems: the Geostationary Operational Environmental Satellite Data Collection System (GOES DCS) and the Argos Data Collection System (Argos DCS), which is flown aboard NOAA's Polar-orbiting Operational Environmental Satellites (POES). Both the GOES DCS and the Argos DCS are operated to support environmental applications, e.g., meteorology, oceanography, hydrology, ecology, and remote sensing of Earth resources. In addition, the Argos DCS currently supports applications related to protection of the environment, e.g., hazardous material tracking, fishing vessel tracking for treaty enforcement, and animal tracking. Presently, the majority of users of these systems are government agencies and researchers and, in fact, much of the data collected by both the GOES DCS and the Argos DCS are provided to the World Meteorological Organization via the Global Telecommunication System for inclusion in the World Weather Watch Program. Current loading on both of the systems does not use the entire capacity of that system, so NOAA is able to make its excess capacity available to other users who meet certain criteria (see Question 2 below). Accepted applicants use the NOAA DCS to collect environmental data and in limited cases, non-environmental data via the Argos DCS, to support other governmental and non-governmental research or operational requirements, such as for law enforcement purposes.

Regulations at [15 CFR 911](#) explain not only the policy for using the GOES DCS, but also how users may use the Argos DCS. These regulations ensure that the Government will not allow its space-based data collection systems to be used where there are commercial services available that fulfill users' requirements. The regulations contain the minimum information requirements necessary to determine if a user meets these criteria. NOAA enters into an agreement with accepted applicants and gives them access to the system.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

Applications are made in response to the requirements in 15 CFR 911 (under the authority of 15 U.S. C. 313, Duties of the Secretary of Commerce and others), using system use agreement (SUA) forms. The application information received is used to determine if the applicant meets the criteria for use of the system. The system use agreements contain the following information: (1) the period of time the agreement is valid and procedures for its termination, (2) the authorized use(s) of the DCS, and its priorities for use, (3) the extent of the availability of commercial services which met the user's requirements and the reasons for choosing the

government system, (4) any applicable government interest in the data, (5) required equipment standards, (6) standards of operation, (7) conformance with applicable International Telecommunication Union (ITU) and Federal Communications Commission (FCC) agreements and regulations, (8) reporting time and frequencies, (9) data formats, (10) data delivery systems and schedules and (11) user-borne costs.

For both systems, an important prerequisite in reviewing applications for use is that there are no commercial space-based services available which meet the users' requirements in terms of satellite coverage, accuracy, data throughput, platform power consumption, size and weight, platform compatibility, service continuity and reliability. The GOES DCS can be used only for environmental purposes and the user needs to be a government agency or sponsored by one for use, while the Argos DCS can be used for environmental and some very limited non-environmental purposes. The non-environmental use of the Argos system is primarily authorized for government users, for such applications as humanitarian cargo tracking, law enforcement, or national security purposes. For non-governmental, environmental use of the Argos system, a prerequisite has been added that there must be a government interest in the collection of the data. This prerequisite is similar to, but not the same, as the current GOES DCS sponsorship requirement.

Moreover, only government and non-profit users may be allowed to use the Argos DCS for non-environmental uses, except in cases where there is a significant possibility of the loss of life. However, at no time will non-environmental use of the Argos DCS exceed five percent of the system's total use. These criteria are necessary because neither system is intended to compete with private sector services. Details concerning the use of the data are also necessary to rank system use. A standard part of the system use agreement with accepted applicants is that the user must provide free and open access to the data by U.S. Government agencies.

The GOES DCS is managed solely by NOAA; while the Argos DCS is managed cooperatively with the Centre National d'Etudes Spatiales (CNES), the French Space Agency. As a result of the cooperative nature of the Argos DCS, CNES handles more of the daily administration of the system, and thus NOAA does not require the same information from users of the Argos DCS that it requires from users of the GOES DCS. The system use agreement is under the care of the CNES, and NOAA is responsible for collecting the technical information.

NOAA will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. See response to Question 10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Prior to dissemination, the information will be subjected to quality control measures and a pre-dissemination review pursuant to [Section 515 of Public Law 106-554](#).

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

System use agreements are submitted and processed via the DCS Administration and Data Distribution System (DADDS): <https://dcs1.noaa.gov/>

4. Describe efforts to identify duplication.

The information collected relates to a unique benefit and no duplication has been identified.

5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

While small businesses may be respondents, the collection would not have any significant impact upon them and the information requested is the minimum needed to make the necessary determinations.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

If the collection was not conducted, NOAA could not allow potential users access to the system, which would be to the detriment of those potential users and the government agency using their data or services. The term of system use agreements for use of the GOES DCS is five years; for use of the Argos DCS the term is one or three years (depending on type of organization and application). These terms are necessary to ensure that users will periodically canvass the marketplace to determine whether commercial services have developed the capabilities to meet their requirements.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

The collection is consistent with the OMB guidelines.

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A Federal Register Notice, published on January 30, 2017 (82 FR 8726), solicited public comment on this collection. None were received.

The program managers for the GOES and Argos DCS consult with users at annual conferences.

The program managers also solicited comments from six recent SUA renewing respondents, as follows:

Questions Asked:

1. Were the directions easy to understand?
2. Is 68 minutes an accurate estimate for how long it takes to complete an SUA process (whether for Argos or GOES)?
3. Are there other questions that should have been asked, in your opinion?
4. Any other comments or feedback?

Responses were received from four respondents:

Response 1:

All was fine - perhaps since I have done so more than once and keep these as an example.

Response 2:

1. Yes.
2. For GOES the renewal SUA did not take 68 minutes. I would estimate more like 30.
3. No.
4. No, thank you for your efforts to make this process as smooth as possible.

Response 3:

1. Yes a very easy process.
2. I think you were trying to say 6-8 min not 68 but it took me less than 5 min to fill out.
3. No.
4. I love the new way to fill out the Agreement. I wish they were all that cut and dry.

Response 4:

1. Yes.
2. Yes.
3. None that I can think of.
4. We appreciate the use of your system(s). It is an invaluable tool in our organization. Thank you.

This feedback was considered by the program managers and adjustments were made accordingly.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

No payments or gifts are made to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.

No confidentiality is promised or provided.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

No sensitive questions are asked.

12. Provide an estimate in hours of the burden of the collection of information.

The estimated burden for the NOAA DCS is calculated as follows:

	GOES	Argos	Totals
Number of respondents	75	150	225
Number of responses per respondent	1	1	
Total annual responses	75	150	225
Time per response	30 mins	30 mins	
Total annual burden hours for collection	37.5	75	112.5 (113)

Estimating respondent time at \$40 an hour, respondent costs would be \$4,500.

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in Question 12 above).

The estimated operational cost for reporting and record-keeping is \$0.

14. Provide estimates of annualized cost to the Federal government.

The annual cost to the Federal Government to process the information obtained is estimated at \$1,000 for IT support and personnel costs.

15. Explain the reasons for any program changes or adjustments.

Adjustments:

Used number of SUAs processed in 2016.

Average processing time was reduced to from 68 minutes to 30 minutes (based on re-implementation of DADDS, our web-based system from which we had moved away for a few years, and positive feedback from users; see Question 8 above).

16. For collections whose results will be published, outline the plans for tabulation and publication.

The results of the collection will not be published.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

NOAA requests an exemption from displaying the OMB control number and expiration data on the Argos DCS System Use Agreement itself, and will include it on an insert that contains the other PRA information. The Argos DCS is operated through a cooperative program between the United States and France. The French have requested that the PRA guidance be less conspicuous on the form.

18. Explain each exception to the certification statement.

NA.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.