

**Associate WTB and/or PSHSB Call Signs and Antenna Structure Registration
Numbers with Licensee's FRN
FCC 606**

SUPPORTING STATEMENT

A. Justification:

1. FCC Form 606 is used to associate a licensee's FCC Registration Number (FRN) to licensee's Wireless Telecommunications Bureau and/or Public Safety and Homeland Security Bureau call signs and antenna structure registration numbers with the Federal Communications Commission (FCC) and filed through the Commission's Universal Licensing System (ULS).

Current FCC rules require a mandatory FCC Registration Number (FRN) for all parties and entities doing business with the Commission who file applications with ULS or register towers via Antenna Structure Registration (ASR). As a result of the Commission Registration System (CORES) and the implementation of the FRN, several important changes occurred for filers of ULS and ASR. This requirement is to facilitate compliance with the Debt Collection Improvement Act of 1996 (DCIA).

The Commission is now seeking approval for an extension of a three-year clearance. No revisions are being made to the collection.

Records may include information about individuals or households, *e.g.*, personally identifiable information or PII, and the use(s) and disclosure of this information is governed by the requirements of a system of records notice or 'SORN', FCC/WTB-1, "Wireless Services Licensing Records." There are no additional impacts under the Privacy Act.

2. The information collected in the application will be used to populate the Universal Licensing System (ULS) for licensees and antenna structure registration owners who interact with ULS. This information will also be used to match records in the ULS database to GENESIS (FCC Core Financial System) to validate payment for application and for Debt collection purposes.

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3. The Commission reports 100% of the applications are filed electronically.
4. This agency does not impose a similar information collection on the respondents. There is no similar data available.
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 those absolutely necessary for evaluating and processing each application and to deter against possible abuses of the processes.
6. Respondents are required to obtain a FRN from the Commission. If changes are required after obtaining the FRN, registrants must modify their FRN by submitting another FCC Form 606 or accessing the interactive version of the form and modifying electronically.
7. This collection of information is consistent with the guidelines in 5 CFR § 1320.5.
8. The Commission initiated a 60-day public comment period which appeared in the Federal Register on March 29,

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2017 (82 FR 15523). No comments were received from the public as a result of the notice.

9. Respondents will not receive any payments.
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 Private Land Mobile Radio Service 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. This collection does not address private matters of a sensitive nature, and the PII is covered by the system of records notice or 'SORN', FCC/WTB-1, "Wireless Services Licensing Records".
12. The Commission estimates that there are 1,233,000 existing licensees in the databases. However, most licensees will only need to make a one-time submission of the FCC Registration Number and include all of their call signs and antenna structure registration numbers as part of the single submission.

Since most licenses and antenna structure registrations in ULS are already associated with an FRN, we estimate we receive approximately **5,000 such requests annually**.

The average burden per applicant is estimated to be approximately 15 minutes per response. We expect that respondents will fulfill the requirements of this collection with in-house clerical staff.

Total number of respondents: 5,000

Total number of annual responses: 5,000

Total annual burden hours: 5,000 requests x .25 hour/request = 1,250 hours

In-house Cost: The Commission estimates that clerical staff paid at \$14 per hour will fulfill the requirements.
1,250 hours x \$14/hours = **\$17,500**

13. Cost to the Respondents:

There should be no external costs/contracting costs to respondents for this information collection.

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14. Cost to the Federal Government:

There are no costs to the Federal Government as FCC Form 606 is filed electronically, and staff does not routinely or regularly review the filings.

15. There are no program changes reported in this collection. We are requesting an adjustment in the burden hours to more accurately reflect the number of submission currently being received. ULS has been operational for numerous years and a majority of the calls signs and antenna registrations are already associated with an FCC Registration Number. Therefore, the following decreases are being reported for this collection: -38,000 to the number of respondents, -38,000 to the annual number of responses and -9,500 to the annual burden hours.

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

17. The Commission is requesting a continued waiver from displaying the OMB expiration date on the FCC Form 606. Granting this waiver will prevent the Commission from having to update the electronic version in the ULS. All OMB-approved information collections are published in 47 CFR 0.408. This section includes the OMB control number, title of the collection and the OMB expiration date.

18. There are no exceptions to the "Certification Statement".

B. Collections of Information Employing Statistical Methods:

This information collection does not use any statistical methods.