2017

SUPPORTING STATEMENT
(0572-0134)
Public Television Digital Transition Grant Program

NOTE: A one hour place holder is being used as the current burden for this package. This program is no longer funded and the only remaining activity is the advancement of funds to existing Grantees as they complete construction of their projects. Those Grantees are required to provide Financial Reports during this period.

There are no new applications being submitted, and the forms used for requesting Advancements and Reimbursement, and for the required Financial Reporting have been cleared under other OMB approved Information Collections

A. Justification

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

The Rural Utilities Service (RUS), an agency of United States Department of Agriculture, assists with the nation's completion of the transition to digital television. Congress recognized the need to facilitate the digital transition in public television stations serving rural areas. Beginning in 2003, the Omnibus Appropriations Act (Public Law 108-7) provided for $15,000,000 in grant funds in the Distance Learning and Telemedicine Grant Program budget for public broadcasting systems to meet the digital transition. This amount was awarded to 16 different recipients to finance the conversion of television services to digital broadcasting for small rural public television stations in February 2004.

The Program initially operated under a temporary regulation, however, in FY 2006, RUS wrote new regulations incorporating the statutory requirements and updating the competitive grant program. The regulations codified the grant program and simplified the information collection burden for grant applicants.

The Federal Communications Commission required that all television stations have their transmitters converted to digital broadcast signals by June 12, 2009. While stations must broadcast their main transmitter signal in digital, many rural stations even now have yet to complete a full digital transition of their stations across all equipment. Rural stations often have translators serving small or isolated areas that have not completed the transition to digital. Because the FCC deadline did not apply to translators, they are allowed to continue broadcasting in analog. Some rural stations also have not fully converted production and studio equipment to digital. The digital transition also created some service gaps where households receiving an analog signal are now unable to receive a digital signal. This explains why the grant program has continued past the FCC digital transition deadline of June 2009 extending to 2014.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the Agency has made of the information received from the current collection.

The Public Television Digital Transition Grant Program is no longer funded. However, there are past awardees that remain in the program and the Agency continues to collect information from them. The following is a list of forms that are currently used by 15 existing past awardees for collection purposes. A one hour placeholder is being used in order to account for the common form burden under other packages which are as follows:

SF 425-Federal Financial Report (Approved under OMB Control No. 4040-0014)
This form is used to submit financial information about grant awards.

SF 270-Request for Advance or Reimbursement (Approved under OMB Control No. 4040-0012)
Grantees use this form to request payments.

The following forms have been discontinued from the package and no burden is associated with it.
Application Package
Grant Agreement

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection.

RUS is committed to complying with the requirements of the E-Government Act, to promote the use of the Internet and other information technologies to provide increased opportunities for citizen access to Government information and services, and for other purposes. Electronic fillable versions of the two (2) forms cleared under other OMB collections are available for download.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The information that applicants will submit under this request has not been collected by this or any other Federal Agency. Each grantee and project is unique and the collected information is for new purposes. No duplication exists in the collection of information from grantees.

5. <u>If the collection of information impacts small businesses or other small entities (item 5 of OMB Form 83-1), describe any methods used to minimize burden</u>.

This package is a one hour placeholder to account for 15 existing past awardees using two common forms. A one hour placeholder is being used in order to account for the common form burden under other packages as follows: SF 425-Federal Financial Report (Approved under OMB Control No. 4040-0014) and SF 270-Request for Advance or Reimbursement (Approved under OMB Control No. 4040-0012)

RUS Telecommunication borrowers are members of the “wired telecommunication carriers” (NAICS 517110) and the SBA size standard for this industry is 1,500 employees. All telecommunications borrowers and all applicants for the Public Television Digital Transition Grant Program are considered SBA small business as all have less than 1,500 employees. The grant application process has been designed to have minimal impact on small businesses.

6. <u>Describe the consequences to Federal program or policy activities if the collection is not conducted or conducted less frequently, as well as any technical or legal obstacles to reducing burden</u>.

If this information is not collected, there would be no basis advancing grant funds to the grant recipients or for ensuring that the project funding is used for intended purposes.

7. <u>Explain any special circumstances that would cause an information collection to be conducted in a manner</u>:

a. <u>Requiring respondents to report information more than quarterly</u>.

A collection is required whenever a respondent is requesting an advancement or reimbursement of grant funds.

b. <u>Requiring written responses in less than 30 days</u>.

If an application contains information that appears to be incorrect or incomplete, the Agency could give the applicant an opportunity to provide the correct or complete information. The Agency could place a time limit of less than 30 days for submission of this type of information. Otherwise, there is no such requirement.

c. <u>Requiring more than an original and two copies</u>.

The Agency does not request more than an original and two copies of any document.

d. Requiring respondents to retain records for more than 3 years.

Does not have any additional record keeping.

e. That is not designed to produce valid and reliable results that can be generalized to the universe of study.

This collection does not involve statistical information.

f. Requiring use of statistical sampling which has not been reviewed and approved by OMB.

This collection does not involve statistical sampling.

g. Requiring a pledge of confidentiality.

This collection does not involve a pledge of confidentiality.

h. Requiring submission of proprietary trade secrets.

This collection does not require submission of proprietary trade secrets.

There are no special circumstances. The collection of information is conducted in a manner consistent with the provisions of the Paperwork Reduction Act of 1995 (PRA, 44 U.S.C. chapter 35), set forth in 5 CFR 1320.6.

8. If applicable, identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection. Summarize public comments received and describe actions taken by the agency in response to these comments. Describe 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, reporting format (if any), and on data elements to be recorded, disclosed, or reported.

While the program was funded, as required by 5 CFR 1320.8(d), a 60-day Notice to request comments was published in the *Federal Register* on Thursday, May 19, 2016 at 81 FR 31590 . No comments were received. The Agency is in frequent individual contact with applicants, awardees, and other interested parties and solicits input on the Program. Since the program is no longer funded the one hour place holder is for the 15 existing past awardees to provide information on the common forms. Therefore, there have been no contacts for comments to respond to this question in this current Supporting Statement.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No such decision has been made.

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

There has been no assurance of confidentiality offered. Information submitted to the Agency by applicants and borrowers is covered by provisions of the Freedom of Information Act (5 U.S.C. 552).

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

There is no request for sensitive information.

12. Provide estimates of the hour burden of the collection of information.

The burden for this collection is based on a 1 hour place holder for 15 existing past awardees using two common forms. Based on prior experience RUS is able to project the following cost to respondents:

Number Of Respondents	Number of Responses/ Respondent	Total Annual Responses	Hours per Response	Total Hours
1	1	1	26	26

Cost to respondents

Engineer	1 response	X 4.75 hrs	X	$54.83/hr	= $ 260.44
Mgmt Analyst	1 response	X 4.00 hrs.	X	$38.42/hr.	= $ 153.68
Clerical	1 response	X 15 hrs	X	$ 21.43/hr	= $ 321.45
Total Cost to Respondents					= $ 375.57

The ‘cost to the public’ wage figures used are from the "May 2016 Occupational Employment and Wage Estimates" at http://www.bls.gov/oes/oes_dl.htm.
National 4-digit NAICS Industry-Specific estimates are used. The table (spreadsheet) is nat4d_M2011_dl.xlsm from the zip file oesm11in4.zip. The industry used is Wired Telecommunications Carriers (517100). For ‘professional’ time an hourly wage of $38.42 for ‘Management Analyst, All Other (13-11)’ is used. For ‘Clerical’ time an hourly wage of $21.43 for ‘Office and Administrative Support Workers, All Other (43-

9799)' is used. The estimated wage rates of $54.83/hr. for engineer (Occupation Code 17-2070).[1]

The total cost to respondents is estimated to be $345.77 which is based on information from the Bureau of Labor Statistics, median hourly wages found at http://www.bls.gov/oes/current/oes_nat.htm.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

(a) Total capital and start-up cost component (annualized over its expected useful life); and

There are no capital and start-up cost components associated with this collection.

(**b**) Total operation and maintenance and purchase of services component.

No operations and maintenance or purchase of services are required.

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

The cost to the Federal government is estimated to be $1,656.80. Costs are based on experience and calculated at a rate of $48.35/hr. (GS – 13/5) for professional time and $20.63/hr. (GS-6/5) for clerical time.

Cost to the Federal Government

Professional	1 response	X 30 hours	X	$51.48/hr.	= $1,450.50
Clerical	1 responses	X 10 hours	X	$21.96/hr.	= $ 206.30
	Total Cost to the Government				= $1,656.80

15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of the OMB Form 83-1.

This is an extension of a currently approved information collection with a 1 hour placeholder. There are no new applications being submitted due to the program is no longer being funding. A one hour placeholder is used to account for 15 existing past awardees using two common forms which are the SF 245, approved under OMB Control No. 4040-0014 and the SF 270 approved under OMB Control No.4040-0012. The burden

[1] Historical data provided by the Bureau of Labor Statistics, Employer Cost for Employee Compensation Supplemental Tables Historical Data December 2006-September 2012 was used to calculate the total cost of benefits. Benefits as a percentage of total compensation for Private trade, transportation and utilities industry workers were 29.4% of total hourly compensation. *See*, http://www.bls.gov/ncs/ect/sp/ecsupst.pdf, page 91

for the remaining activities of this unfunded program are accounted for under these two packages.

16. <u>For collection of information whose results will be published, outline plans for tabulation and publication</u>.

There are no plans to publish this information.

17. <u>If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate</u>.

The Agency is not seeking such approval.

18. <u>Explain each exception to the certification statement identified in item 19 on OMB 83-1</u>.

There are no exceptions.

B. <u>Collection of Information Employing Statistical Methods.</u>

This collection does not involve statistical methods.