

**SUPPORTING STATEMENT**

**A. Justification:**

1. 47 CFR Section 73.1680 requires that licensees of AM, FM or TV stations submit an informal request to the FCC (within 24 hours of commencement of use) to continue operation with an emergency antenna. An emergency antenna is one that is erected for temporary use after the authorized main and auxiliary antennas are damaged and cannot be used.

The Commission is seeking a three year extension of this collection from the Office of Management and Budget (OMB).

This information collection does not affect individuals or households; thus, there are no impacts under the Privacy Act.

Statutory authority for this collection of information is contained in Section 154(i) of the Communications Act of 1934, as amended.

2. The FCC staff use the data to ensure that interference is not caused to other existing stations.

3. Most of these requests are filed electronically via the Media Bureau's CDBS system, although paper filing remains an option for licensees.

4. No other agency imposes a similar information collection on the respondents. There are 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. Therefore, this collection of information will not have a significant economic impact on a significant number of small entities/businesses.

6. The frequency for this collection of information is determined by respondents, as necessary.

7. This collection of information is consistent with the guidelines in 5 CFR Section 1320.5(d)(2).

8. The Commission published a Notice (82 FR 23002) in the *Federal Register* on May 19, 2017 seeking comments from the public on the information collection requirements contained in this collection. No comments were received from the public.

9. No payment or gift was provided to respondents in connection with this information collection.

10. There is no need for confidentiality with this collection of information.

11. This information collection does not address any private matters of a sensitive nature.
12. We estimate that 142 informal requests will be filed and processed annually. The average burden on a licensee is 1 hour per request. This estimate is based on FCC staff's knowledge and familiarity with the availability of the data required.

**Total Number of Annual Respondents: 142 Licensees**

**Total Number of Annual Responses: 142 Informal Requests**

**Total Annual Burden Hours:**  
**142 informal requests x 1.0 hour/consultation = 142 hours**

**Annual "In-House Costs":** We assume that the respondents would contract out with an attorney for the completion and filing of the informal request. We estimate that the respondents would spend approximately 1 hour in consultation with this attorney. We estimate that these respondents would have an average salary of \$100,000/year (\$48.08/hour).

142 informal requests x 1hour x \$48.08/hour = **\$6,827.36**

13. **Annual Cost Burden:** We assume that the respondent would contract with an attorney to complete and file the informal request, which we estimate would take the attorney one hour to accomplish (legal research, preparation, and filing). We estimate that this attorney would have an average salary of \$300/hour.

142 informal requests x 1.0 hour/legal research, preparation, and filing x \$300/hour = **\$42,600**

14. **Cost to the Federal Government:** To process these requests, the Commission will use clerical staff at the GS-6, step 5 level, (\$21.96/hr.) and paraprofessionals at the GS-11, step 5 level (\$36.12/hr.). The processing time is estimated at 0.25 hour for the clerical support and 0.50 hour for the paraprofessional activity.

0.25 hours x \$21.96 x 142 informal requests =	\$ 779.58
0.50 hours x \$36.12 x 142 informal requests =	<u>\$2,564.52</u>
	\$3,344.10

**Total Cost to the Federal Government:        \$3,344.10**

15. There are no program changes or adjustments to this collection.

16. The data will not be published.

17. OMB approval of the expiration date of the information collection will be displayed at 47 CFR Section 0.408.

18. There are no exceptions to the Certification Statement.

**B. Collections of Information Employing Statistical Methods:**

No statistical methods are employed.