

SUPPORTING STATEMENT

**A. Justification:**

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

This information collection is being submitted as an extension to the Office of Management and Budget (OMB) in order to obtain the full three year clearance.

Commission Rules, 47 CFR Part 15 requires operators of the Ultra Wideband (UWB) imaging systems to coordinate with other Federal agencies via the FCC before the UWB equipment can be used.

- (a) UWB operators are required to comply with any constraints on equipment usage resulting from this coordination.
- (b) In addition, the users of UWB imaging devices shall supply detailed operational areas to the FCC's Office of Engineering and Technology that shall coordinate this information with the Federal Government through the National Telecommunications and Information Administration (NTIA).
- (c) The UWB operator must provide the following information:

- Applicant name
- Mailing address
- FCC ID number
- Desired geographical operating area
- Miscellaneous UWB device nomenclature data, *i.e.*, trade name and number,
- Any other pertinent user contact information

The collection is authorized under Sections 4(i) 302, 303(e), 303(f), 303(r), 304 and 307 of the Communications Act of 1934, as amended, 47 U.S.C. 154, 302a, 303, 304, 307, 336, 544a. and 549.

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

- 2. Indicate by 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.**

Because of the public safety and security concerns, all UWB operators' imaging systems are subject to coordination with NTIA via the FCC.

This coordination requirement achieves two objectives:

- (a) The FCC can determine whether the imaging devices have the potential to cause harmful interference with authorized transmissions from other Federal agencies' radio operations, and

(b) The FCC uses the coordination data to aid the Commission in its role in international investigations.

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. Also describe any consideration of using information technology to reduce burden.**

The applicants may file this information by fax or mail.

While, we encourage participants to file electronically, those who may not have the option of filing electronically can submit their information by mail to the following address:

Frequency Coordination Branch  
Office of Engineering and Technology  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

ATTN: UWB Coordination

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.**

This information collection requirement is not duplicated elsewhere. Ultra-wideband devices are unique products with provisions for operation only under Subpart F of Part 15 of the Commission's rules.

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

In accordance with the Paperwork Reduction Act of 1995, the Commission is making an effort to minimize the burden on all respondents, regardless of size.

- (a) The Commission has minimized the information requirements to only those, which are necessary to determine the potential for harmful radio frequency interference to authorized Federal Government radio services.
- (b) Once the information requested on the UWB imaging system is submitted to the FCC no additional coordination is required, provided the reported areas of operation do not change.
- (c) If the area of operation changes, updated information shall be submitted to the FCC for additional coordination.

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

If this information is not collected, coordination with potentially affected Federal Government radio services could not be completed. NTIA is concerned that operations that are uncoordinated could result in interference to Federal Government radio service operations, many of which involve safety of life functions.

This is primarily a “one-time” collection of information for UWB imaging system operators, *i.e.*, once the information is submitted to the FCC no additional coordination is required. However, FCC regulations require the UWB imaging system operator to submit new data if there is a change in the imaging system’s area of operation, *i.e.*, “on occasion” reporting requirement.

- 7. Explain any special circumstances that cause an information collection to be conducted in a manner: requiring respondents to report information to the agency more often than quarterly; requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; requiring respondents to submit more than an original and two copies of any document; requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information’s confidentiality to the extent permitted by law.**

UWB imaging system operators are required to make this filing for new equipment generally once, *e.g.*, a “one-time” reporting requirement; unless, as noted above, there is a change in the imaging system’s area of operation, which would necessitate a resubmission to account for the changes/modifications. Thus, the frequency is determined by UWB imaging system operators as the users of the equipment, as needed basis, and consistent with the guidelines in 5 CFR Section §1320.6.

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency’s notice, required by 5 CFR § 1320.8(d), soliciting comments on the information prior to submission to OMB.**

**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, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

The Commission published a notice in the *Federal Register* on August 7, 2017 (82 FR 36766) to solicit the views of industry and the general public. The Commission has received no comments in response to the Notice in the *Federal Register*. The notice is referenced in the submission to the OMB.

The Commission meets with various national and international standard groups, *i.e.*, NTIA, in order to keep abreast of new technology, and the effect of present Commission requirements on the industry.

- 9. Explain any decision to provide any payment or gift to respondents, other than re-numeration of contractors or grantees.**

The respondents will not receive any payments or gifts.

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

Assurance of confidentiality is not being offered to respondents, all information is available for public inspection. See 47 CFR § 0.459 of the Commission's Rules.

**11. Provide additional justification for any questions of a sensitive nature.**

No sensitive information is required for this collection.

**12. Provide estimates of the hour burden of the collection of information. The statement should: indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance.**

The Commission estimates that approximately fifty (50) users/manufacturers (respondents) will need to provide information for this coordination.

We estimate that the length of time to prepare the information for coordination per respondent will be approximately 1 hour.

**Total Number of Respondents: 50 respondents** (users/manufacturers)

**Total Number of Annual Responses: 50 responses**

The Commission estimates that:

90% of respondents will only file one-time; and

10% of respondents may re-file because of changes to the imaging system's area of operation:

$50 \times 0.90 = 45$  "one-time" responses

$50 \times 0.10 = 5$  responses "on occasion" responses

We estimate that to comply with the reporting requirements, it will take each respondent 1 hour to prepare the information for coordination.

**Total Annual Burden Hours:**

$45 \text{ respondents} \times 1 \text{ hour/"one-time" filing} = 45 \text{ hours}$

$5 \text{ respondents} \times 1 \text{ hour/re-filing} = 5 \text{ hours}$

$45 \text{ hours} + 5 \text{ hours} = \mathbf{50 \text{ hours}}$

**13. Provide estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information (Do not include the cost of any hour burden shown in items 12 and 14).**

(a) Total annualized capital/startup costs: \$0.00.

(b) Total annual costs (O&M):

Overhead and maintenance is generally included as part of coordinating this information with Federal Government through the National Telecommunications and Information Administration.

The Commission estimates that the preparation cost for this information is less than \$50 per submission:

\$50.00 per submission x 50 respondents = \$2,500

(c) Total annualized cost requested: **\$2,500.**

**14. Provide estimates of annualized costs to the Federal government. Also provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), any other expenses that would not have been incurred without this collection of information.**

We make the following estimates for the total annual cost to the Federal Government:

(a) This information is completed in-house by a Staff Assistant at an approximate grade of GS-8, Step 5 (approximately \$27.03 per hour).

(b) The Staff Assistant will spend approximately 50 hours of work time each year on the information collection.  $\$27.03 \times 50 = \$1,352.00$

(c) We will also add 30% to this hourly salary for overhead expenses. The total hourly cost to the Federal Government = \$35.14.

**Total Cost to the Federal Government:** 50 respondents x \$35.14/hour = **\$1,756.95**

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

There are no program changes or adjustments.

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

The data will not be published for statistical use.

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

There is no form associated with this collection, therefore, the expiration date for OMB approval is not applicable.

**18. Explain any exceptions to the Certification Statement.**

There are no exceptions to the Certification Statement.

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

This collection of information does not employ statistical methods.