

**SUPPORTING STATEMENT**

This submission is made pursuant to 44 U.S.C. § 3507 to extend an existing collection to the Office of Management and Budget (OMB) in order to obtain the three-year approval.

**A. Justification:**

1. Section 68.110(c) requires that any available technical information concerning carrier-installed wiring on the customer's side of the demarcation point, including copies of existing schematic diagrams and service records, shall be provided by the provider of wireline telecommunications services upon request of the building owner or agent thereof. The provider may charge a reasonable fee for this service, which shall not exceed the cost involved in locating and copying the documents. In the alternative, the wireline telecommunications services provider may make these documents available for review and copying by the building owner. In this case, the wireline telecommunications service provider may charge a reasonable fee, which shall not exceed the cost involved in making the documents available, and may also require the building owner to pay a deposit to guarantee the documents' return. *See* 47 CFR § 68.110(c).

The statutory authority for this collection is contained in sections 151, 154(i), 201 (b), and 202(a) of the Communications Act of 1934, as amended, that provides the Commission authority to promulgate rules and regulations in Part 68 of the FCC rules, 47 C.F.R. Part 68, to prevent the degradation of the telephone network. *See* 47 U.S.C. §§ 151, 154(i), 201(b) and 202(a).

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

2. Section 68.110(c) requires providers of wireline telecommunications services to disclose any available technical information concerning inside wiring, including existing schematic diagrams and service records, for duplication by building owners or their agents for a reasonable fee, which is to be determined by the wireline telecommunications service provider. This information disclosure is required so that building owners may choose to contract with an installer of their choice for inside wiring maintenance and installation service, or elect to contract with the wireline telecommunications services provider to modify existing wiring or assist with the installation of additional inside wiring. *See* 47 CFR § 68.110(c).

3. The Commission does not collect any of the records of this records keeping requirement. Wireline telecommunications services providers are free to determine the appropriate method for complying with the requirement. They may charge the building owners a reasonable fee for copying the documents; or in the alternative, they may charge a reasonable fee to make the documents available for copying by the owners. *Id.*

4. Requiring the wireline telecommunications services providers to maintain already existing company technical records concerning carrier-installed inside wiring will not cause a duplication of information.

5. This collection is designed to minimize the burden on all providers of wireline telecommunications services, regardless of size, and provides two options for compliance.
6. Building owners who have access to schematic diagrams and other technical records concerning carrier-installed inside wiring are afforded the opportunity to select any contractor to modify and maintain their buildings' inside wiring. The non-disclosure of such information by wireline telecommunications services providers limits the choice of contractors for these services, potentially resulting in additional expenses for the building owner and possible delays by building owners in obtaining needed maintenance, which could cause network services provided via the inside wiring to be degraded.
7. The Commission has not determined the length of time for such record retention by wireline telecommunications service providers.
8. A 60-day notice was published in the Federal Register pursuant to 5 C.F.R. § 1320.8 (d) on November 21, 2017. *See* 82 FR 55363. No PRA comments were received.
9. The Commission does not anticipate providing any payment or gifts to respondents.
10. The Commission is not requesting respondents to provide confidential, trade secrets or proprietary information.
11. There are no questions of a sensitive nature with respect to the information collection.
12. The following represents the best estimate of annual burden hours and the cost burden for the collection of information. The following represents our best estimate of this information collection requirement:

(a) Number of respondents: **200**.

We are estimating 4 respondents for each of the 50 states.

(b) Frequency of response: Recordkeeping requirement and occasional third party disclosure requirement. We estimate that each respondent receives an average of six requests for such disclosures during the course of a year.

(c) Total Number of Responses Annually: **1,200 responses**.

50 states x 4 respondents per state x 6 requests/annually = 1,200 responses

(d) Total Annual Hourly Burden: **1,200 hours**.

This estimate is based on a retrieval time for business records available at any of wireline telecommunication carriers' business offices. In a case where such records are stored at an off-site location, the amount of time required to retrieve records will vary with each carrier's unique records management program.

1,200 responses x 1 hour per response = 1,200 hours

(e) Total Estimated Industry Costs: **\$35,040**

The Commission estimates that it will take the carriers using in-house staff equivalent to a GS 7/Step 5 federal employee, plus 30% overhead <sup>1</sup> to comply with the requirements.

1,200 (number of respondents) x 1 (hour per filing) x \$29.20 per hr. = \$35,040.

13. The following represents the Commission's estimate of the annual cost burden to respondents or record keepers resulting from the collection or retention of existing information:

(a) Total capital and start up cost component: **\$0.00**

The requirement will not require the purchase of additional equipment.

(b) Total operation and maintenance and purchase of services component: **\$5,000**

The Commission estimates that the annual cost to all respondents to maintain existing records for future disclosure upon request is estimated at \$5,000 which is a *de minimis* amount. Based on an estimated 200 carriers, this represents \$25 per carrier in additional storage and retrieval costs. These costs cover the schematics and documents that are available and have not been destroyed through a carrier's normal recordkeeping, records management program and common business practice.

14. There is no annual cost to the Federal government.

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

16. The Commission does not anticipate that it will publish any of the information collected pursuant to this requirement.

17. The Commission does not seek approval not to display the expiration date for OMB approval based on the Commission's rules. The Commission publishes a list of all OMB-approved information collections with their associated OMB control numbers, titles and OMB expiration dates under 47 C.F.R. 0.408 of the Commission's rules.

18. There are no exceptions to the Certification Statement.

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

This collection does not employ statistical methods.

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<sup>1</sup>

From the Salary Table 2018 – RUS, Incorporating the 1.4% General Schedule Increase and a Locality Payment Of 15.37% for the Locality Pay Area of Rest of U.S., we estimate an hourly salary of \$22.46/hr., plus 30% overhead or \$6.74 for a total cost per hour of \$29.20.