

SUPPORTING STATEMENT

A. Justification:

1. 47 CFR Section 73.3544(b) requires an informal application may be filed with the FCC in Washington, DC, Attention: Audio Division (radio) or Video Division (television), Media Bureau, to cover the following changes:

(1) A correction of the routing instructions and description of an AM station directional antenna system field monitoring point, when the point itself is not changed.

(2) A change in the type of AM station directional antenna monitor. See §73.69.

(3) A change in the location of the station main studio when prior authority to move the main studio location is not required.

(4) The location of a remote control point of an AM or FM station when prior authority to operate by remote control is not required.

47 CFR Section 73.3544 (c) requires a change in the name of the licensee where no change in ownership or control is involved may be accomplished by written notification by the licensee to the Commission.

The Commission is requesting an extension of this information collection in order to receive the full three year OMB approval/clearance for this collection.

This information collection does not affect individuals or household; 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. FCC staff use the data to ensure changes are in accordance with FCC rules and regulations and to issue a modified station license.

3. This collection of information is a written request or informal application. We do not believe the use of information technology is feasible in this situation.

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. Therefore, this information collection will not have a significant economic impact on a substantial 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 in the *Federal Register* on November 14, 2017 (82 FR 52723) 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 the respondents.
10. There is no need for confidentiality with this collection of information.
11. This collection of information does not address any private matters of a sensitive nature.
12. We estimate 325 respondents (300 respondents filing information applications + 25 filing notifications). For Section 73.3544(b), we assume that each respondent spends an hour to prepare the application and file it with the Commission, including time in consultation with a engineering consultant, who will review and prepare the engineering work necessary to obtain the station license). For Section 73.3544(c), we estimate that is require about 15 minutes (0.25 hours) for a respondent to complete the written notification for a change to the license (without a change in ownership or control) and submit it to the FCC.

Total Number of Annual Respondents: 325 Licensees

Total Number of Annual Responses:

300 application filings
+25 notification filings
325 filings/responses

Annual Hourly Burden:

300 informal applications x 1 hour = 300 hours
25 notifications x 0.25 hours = 6.25 hours
Total Annual Burden Hours = 306.25 hours (306 rounded)

Title: Section 73.3544, Application to Obtain a Modified Station License

Annual "In-House Cost" Burden: We estimate that the respondent will have an average salary of \$100,000/year (\$48.08/hour).

$$\begin{aligned}
&300 \text{ informal applications} \times 1 \text{ hour} \times \$48.08/\text{hour} = \$14,424.00 \\
&25 \text{ notifications} \times 0.25 \text{ hours} \times \$48.08/\text{hour} = \$ \underline{300.50} \\
&\quad \textbf{Total "In House" Burden Cost} = \textbf{\$14,724.50}
\end{aligned}$$

This estimate is based on FCC staff's knowledge and familiarity with the availability of the data required.

13. Annual Cost Burden: We assume that each respondent will use a consulting engineer to complete the informal applications to modify station licenses. The average cost of a consulting engineer is \$250/hour.

$$\textbf{Total Annual Cost Burden} = 300 \text{ informal applications} \times 1 \text{ hour} \times \$250/\text{hour} = \textbf{\$75,000}$$

14. Cost to the Federal Government: The Commission will use professional staff at the GS-12, step 5 level (\$44.28/hour) and clerical staff at the GS-5, step 5 level (\$20.15/hour) to process these informal applications/notifications.

$$\begin{aligned}
&300 \text{ informal applications} \times 0.5 \text{ hours} \times \$44.28/\text{hour} = \$6,642.00 \\
&300 \text{ informal applications} \times 0.5 \text{ hours} \times \$20.15/\text{hour} = \$3,022.50 \\
&25 \text{ notifications} \times 0.25 \text{ hours} \times \$20.15/\text{hour} = \$ \underline{125.94} \\
&\quad \textbf{Total Annual Cost to the Federal Government} = \textbf{\$9,790.44}
\end{aligned}$$

- 15. There are no program changes or adjustments to this collection.
- 16. The data will not be published.
- 17. OMB approval of the expiration of the information collection will be displayed at 47 C.F.R. Section 0.408.
- 18. There are no exceptions to the Certification Statement.

B. Collections of Information Employing Statistical Methods:

This information collection does not employ any statistical methods.