

**SUPPORTING STATEMENT**

**A. Justification:**

1. The Federal Communications Commission ("Commission") is requesting that the Office of Management and Budget (OMB) approve a three-year extension of OMB Control No. 3060-1054 titled, "Application for Renewal of an International Broadcast Station License (FCC Form 422-IB)."

The Federal Communications Commission ("Commission") plans to implement and release to the public an "Application for Renewal of an International Broadcast Station License (FCC Form 422-IB)." The form has not been implemented yet due to a lack of budget resources and technical staff. After the FCC Form 422-IB has been implemented and the Commission receives final approval from OMB, applicants will complete the FCC Form 422-IB in lieu of the "Application for Renewal of an International or Experimental Broadcast Station License," (FCC Form 311). In the interim, applicants will continue to file the FCC Form 311 with the Commission. (Note: The OMB approved the FCC Form 311 under OMB Control No. 3060-1035).

The FCC Form 311 is shared between the International Bureau and the Media Bureau. The International Bureau and Media Bureau have different information collection requirements and automation goals. The FCC Form 311 is used by the Media Bureau in connection with renewals of experimental broadcast station licenses. The form is also used by the International Bureau with respect to renewals of licenses for international broadcast stations.

The Commission submitted a non-substantive change request to the Office of Management and Budget (OMB) which was approved to allow international high frequency (IHF) and 325(c) applicants the option to upload a completed .PDF copy of their applications in the International Bureau Filing System (IBFS) and make their payment of the application filing fees electronically. This option saves time for the applicant, the bank and Commission staff. The non-substantive change request did not impact the burden estimates.

The Commission stated previously that the FCC Form 422-IB will be available to applicants in the International Bureau Filing System ("IBFS") after it is implemented. However, the Commission plans to develop a new licensing system within the next five years that will replace IBFS, including the FCC Form 422-IB, will be made available to the public in the system. After the FCC Form 422-IB is implemented, the FCC Form 311 will continue to be used by the Media Bureau in connection with renewals of experimental broadcast licenses.

The FCC Form 422-IB does not affect individuals and, therefore, is not subject to the Privacy Act of 1974, as amended.

The Commission has authority for this collection pursuant to Section 325(c) of the

Communications Act of 1934, as amended.

2. The information collected pursuant to the rules set forth in Section 325(c) of the Communications Act of 1934, as amended, and in 47 CFR Part 73, Subpart F, is used by the Commission to assign frequencies for use by international broadcast stations, to grant authority to operate such stations and to determine if interference or adverse propagation conditions exist that may impact the operation of such stations. If the Commission did not collect this information, it would not be in a position to effectively coordinate spectrum for international broadcasters or to act for entities in times of frequency interference or adverse propagation conditions. The orderly nature of the provision of international broadcast service would be in jeopardy without the Commission's involvement.
3. IHF and 325(c) applicants have the option to upload a completed .PDF copy of their applications in the International Bureau Filing System (IBFS) and make their payment of the application filing fees electronically. It is estimated that 90 percent of applicants elect to use the electronic filing option because it saves time. Approximately 10 percent of applicants submit the application to the Commission in paper form. The FCC Form 422-IB has not been implemented yet due to a lack of budget resources and technical staff. The Commission plans to automate the FCC Form 422-IB in the future. The automation of this form is contingent upon the availability of budget funds in the upcoming fiscal years.
4. These information collection requirements are not duplicated elsewhere in the Commission's rules.
5. These information collection requirements do not have a significant impact on a substantial number of small entities. The total number of entities subject to the Commission's international broadcast rules is approximately 10 and only a small percentage, if any, of the 10 could be categorized as a small entity. Also, the paperwork burdens accounted for in this collection are minimal.
6. If the Commission did not collect this information, it would not be in a position to effectively coordinate spectrum for international broadcasters or to act for entities in times of frequency interference or adverse propagation conditions. The orderly nature of the provision of international broadcast service would be in jeopardy without the Commission's involvement.
7. This information collection is conducted in a manner inconsistent with the guidelines in 5 C.F.R 1320 in the following ways:

The report filed pursuant to Section 73.702(e) is to be filed by entities within 14 days after the end of each broadcast season.

Section 73.759(g) states that changes or modifications of transmission systems not specified in that rule section can be made at any time without the authority of the Commission provided that

the Commission shall be immediately notified thereof.

Section 73.761(b) requires that entities immediately notify the Commission in writing of limitations and discontinuances of operation and that the Commission shall subsequently be notified when the station resumes regular operation.

Section 73.782 requires that logs involving communications incident to a disaster or which include communications incident to or involved in an investigation by the Commission and concerning which the licensee has been notified, shall be retained by the licensee until he/she is specifically authorized in writing by the Commission to destroy them.

8. On December 12, 2017, a 60-day notice was published in the Federal Register (82 FR 58388) to solicit public comments on the extension of this information collection. The 60-day comment period ended on February 12, 2018. No comments were received from the public in response to the notice.

9. The Commission does not provide any payment or gift to respondents.

10. There is no need for confidentiality pertaining to the information collection requirements in this collection.

11. This collection does not contain questions of a sensitive nature.

12. An estimate of the annual hour burden hours for the 10 respondents to this information collection is as follows:

<b>FCC Form 422-IB</b>	<b>Responses</b>	<b>Hours and Frequency of Response</b>	<b>Burden Hours</b>
<b>Section 325(c) Communications Act of 1934, as amended</b> FCC Form 422-IB	10	1 hour On-occasion	10
<b>47 CFR 73.702</b> Reports filed by international broadcasters within 14 days after the end of each broadcast season.	10	2 hours (2 times per year for a total of 2 hours)	40
<b>47 CFR 73.759(g)</b> International broadcasters must notify the Commission immediately of changes or modifications not specified in the rule section.	10	1 hour On-occasion	10
<b>47 CFR 73.761(b)</b> International broadcasters must immediately notify the Commission in writing of limitations and discontinuances of operation and that the Commission will subsequently be notified when the station resumes regular operation.	10	2 hours On-occasion	20
<b>47 CFR 73.782</b> Reporting Requirement – Logs involving communications incident to a disaster or which include communications incident to or involved in an investigation by the Commission and concerning which the licensee has been notified, shall be retained by the licensee until he/she is specifically authorized in writing by the Commission to destroy them.	10	8 hours On-occasion	80
<b>Total:</b>	50 Responses	1-8 Hours Average	160 Annual Burden Hours Average

The annual “in-house costs” for this collection of information is as follows: 160 annual burden

hours x \$60/hour = \$9,600.00. Therefore, the total annual “in-house cost” to the respondents for this collection of information is \$9,600.00.

13. The estimated costs of **\$36,000** are summarized in the chart below.

<b>FCC Form 422-IB</b>	<b>Responses</b>	<b>Hours</b>	<b>Costs</b>	<b>Total</b>
Application Fees	10	N/A	\$2,500 per application	\$25,000
Outside Legal Assistance	10	2 hours/response	\$300 per hour	\$6,000
Outside Engineering Assistance	10	2 hours/response	\$250 per hour	\$5,000
<b>Total:</b>				<b>\$36,000 Total estimated costs</b>

**Please note that the licensees do not incur any costs related to their compliance with the information collection requirements contained in 47 CFR 73.702, 73.759(g), 73.761(b) and 73.782.**

14. The estimated annualized costs to the Federal government is \$263,520 and is calculated as follows:

10 international broadcast license applications X 360 annual hours = 3,600 annual hours

GS-855-15/Step 5 Electronics Engineer @ \$73.20 per hour X 3,600 annual hours = \$263,520

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

16. The results of this information collection requirement will not be published for statistical use.

17. We are seeking approval to not display the expiration date for OMB approval of this information collection. The Commission will use an edition date in lieu of the OMB expiration

date. Additionally, the OMB expiration date and OMB control number are “displayed” in 47 CFR 0.408.

18. There are no exceptions to the certification statement.

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

Not applicable. This information collection does not employ statistical methods.