

## **SUPPORTING STATEMENT**

### **A. Justification:**

1. *Circumstances that make collection necessary.* The Federal Communications Commission requests that the Office of Management and Budget (OMB) approve a revision of the information collection titled "Part 25 of the Federal Communications Commission's Rules Governing the Licensing of, and Spectrum Usage By, Commercial Earth Stations and Space Stations" under OMB Control No. 3060-0678, as a result of a recent rulemaking discussed below.

On September 27, 2017, the Commission released a Report and Order in IB Docket No. 16-408, FCC 17-122, titled "Update to Parts 2 and 25 Concerning Non-Geostationary, Fixed-Satellite Service Systems and Related Matters." In the Report and Order, the Commission updated and streamlined its rules concerning non-geostationary, fixed-satellite service systems. For example, the Commission allowed NGSO FSS applicants to certify compliance with certain power limits, rather than require them to provide detailed technical demonstrations as done previously. The Commission also expanded the set of frequency bands available to NGSO FSS and geostationary FSS satellite operators. While the Report and Order overall reduced the paperwork burdens per applicant, because of the additional opportunities that were made available to applicants, we expect more applications to be filed and therefore the overall burden to increase due to the growth in interest. In addition, this updated supporting statement incorporates certain information collection burdens on NGSO FSS applicants and Ka-band earth station applicants that were inadvertently omitted from previous supporting statements.

The forms that are included in this collection are FCC Forms 312, 312 EZ, 312-R, and Schedules A, B, and S.

The statutory authority for this information collection is contained in 47 U.S.C. §§ 154, 301, 302, 303, 307, 309, 310, 319, 332, 605, and 721.

The information collection requirements do not affect individuals or households; therefore, there are no impacts under the Privacy Act.

2. *Use of information.* This collection is used by the Commission's staff in carrying out its statutory duties to regulate satellite communications in the public interest, as generally provided under 47 U.S.C. §§ 154, 301, 302, 303, 307, 309, 310, 319, 332, 605, and 721. This collection is also used by staff in carrying out United States treaty obligations under the World Trade Organization Basic Telecom Agreement. The information collected is used for the practical and necessary purposes of assessing the legal, technical, and other qualifications of applicants; determining compliance by applicants, licensees, and other grantees with Commission rules and the terms and conditions of their grants; and concluding whether, and under what conditions, grant of an authorization will serve the public interest, convenience, and necessity.

For example, collected information is used by the Commission:

- To determine the qualifications of applicants and petitioners to provide satellite service, including applicants that are affiliated with foreign entities and petitioners that seek to provide service to the U.S. market from non-U.S.-licensed satellites.
- To facilitate technical coordination of systems among applicants and licensees in various frequency bands. Without such information, the Commission could not implement band plans as set forth in the Table of Allocations, 47 C.F.R. § 2.106.
- To facilitate the Commission's efforts to use spectrum more efficiently and to better accommodate the operational needs of licensees.

**Part 25 of the Federal Communications Commission's Rules    OMB Control No. 3060-678**  
**Governing the Licensing of, and Spectrum Usage by,        March 2018**  
**Commercial Earth Stations and Space Stations**

- To provide operators with greater flexibility while ensuring that their operations do not cause harmful interference to the operations of other service providers.
- To examine requests for authority to change a controlling interest in the ownership of a space station or earth station licensee.
- To assist the Commission in considering whether its rules require modification to accommodate the changing market.
- To ensure that licensees comply with all Commission rules and the terms and conditions of their licenses.

3. *Technological collection techniques.* Applicants are required to complete and file the "Application for Satellite Space and Earth Station Authorizations" (FCC Form 312, including associated Schedules A, B, or S where appropriate), FCC Form 312 EZ, or FCC Form 312-R with the Commission electronically via the International Bureau Filing System (IBFS). Applicants seeking to assign an authorization, or to transfer control of an authorization holder, must complete FCC Form 312, Schedule A. Earth station applicants must complete Form 312, Schedule B. Space station applicants must complete Form 312, Schedule S.

In addition, applicants are required to file narrative information that describes how they have met or will meet certain requirements. For example, applicants file narratives to describe what measures they have undertaken and will undertake to mitigate the creation of orbital debris. The majority of this narrative information can be filed electronically in IBFS.

In December 2006, the Commission received approval for mandatory electronic filing of surrenders of authorizations under Part 25. In September 2007, the OMB approved mandatory electronic filing of consummations of assignments and transfers of control of licenses for all satellite services. A total of 100% of that collection involves the use of electronic collection techniques. In addition, Satellite Digital Audio Radio Service (SDARS) licensees may provide required notification of terrestrial repeater deployment to Wireless Communications Services licensees via electronic mail or other electronic media. If requested to do so, SDARS licensees may also transmit inventories of their repeater networks to Commission staff via electronic mail or other electronic media. Consequently, 100% of the information provided under those rules can be submitted electronically.

4. *Efforts to identify duplication.* The Commission does not impose similar information collection requirements on the respondents.

5. *Impact on small entities.* In conformance with the PRA, the Commission is making an effort to minimize the burden on all respondents, regardless of size. The Commission has endeavored to limit the information collection requirements to those that are necessary to evaluate and process an application, to deter possible abuses of the licensing process, and otherwise to fulfill the Commission's statutory obligations. Further, the changes in the Report and Order benefit licensees by streamlining the regulatory processes and reducing the costs associated with obtaining and maintaining authority to operate the NGSO FSS systems. However, because we expect more applicants to be filed under our new, streamlined rules than previously, we estimate an overall increase of [56] annualized burden hours.

6. *Consequences if information is not collected.* If the various data in this collection were collected less frequently or not filed in accordance with our rules, then, among other harms:

- The Commission would not be able to carry out its mandate to determine that grant of an application is in the public interest, as required by statute.
- The Commission would not be able to ensure that licensees are operating in accordance with Commission rules.

**Part 25 of the Federal Communications Commission's Rules    OMB Control No. 3060-678**  
**Governing the Licensing of, and Spectrum Usage by,                    March 2018**  
**Commercial Earth Stations and Space Stations**

- The Commission would not be able to determine whether a satellite system could operate without causing harmful interference to stations in other services.
- The Commission would not be able to advance its goals of managing spectrum efficiently and promoting broadband technologies to benefit American consumers throughout the United States.
- The Commission would not be able to mitigate the potential harmful effects of orbital debris accumulation. Without such information collection requirements, the growth in the orbital debris population may limit the usefulness of space for communications and other uses in the future by raising the costs and lowering the reliability of space-based systems.
- The Commission would not have essential information to determine whether approval of a change in a controlling interest in the ownership of a license serves the public interest, as required by statute.

7. *Special circumstances.* The Commission does not have any new or amended information collection requirements that are inconsistent with the general information collection guidelines in 5 C.F.R. § 1320.5.

8. *Federal Register notice; efforts to consult with persons outside the Commission.* On January 12, 2018, the Commission published a notice in the Federal Register seeking comments from the public on the information collection requirements contained in this collection (see 83 FRR 1614). No comments were received from the public.

9. *Payments or gifts to respondents.* No payment or gift will be given to respondents in connection with these information collection requirements.

10. *Assurances of confidentiality.* Certain information collected regarding international coordination of satellite systems is not routinely available for public inspection pursuant to 5 U.S.C. § 552(b) and 47 C.F.R. § 0.457(d)(vii).

11. *Questions of a sensitive nature.* This information collection does not address any matters of a private or sensitive nature.

12. *Estimates of the hour burden of the collection to respondents.* The following represents the frequency of response,<sup>1</sup> time per response, total annual burden hours, and an explanation for the estimated 4,924 respondents and 4,972 responses to this information collection. To provide these estimates, we reviewed filings with the Commission over the past several years.

## **I. Applications for Initial Licenses or Registrations and Requests for U.S. Market Access**

### **A. Space Stations (Form 312, Schedule S)**

#### **1. General requirements (47 C.F.R. §§ 25.110(b), 25.111(b) or (c), (d), 25.114(a)-(c), (d)(1)-(6), (d)(14); see also 47 C.F.R. § 0.457(d)(1)(vii)(C))**

- (1) Number of respondents: 38. Fifteen applications per year for U.S. space station licenses, 13 requests per year to serve the U.S. market with a non-U.S.-licensed space station, and 10 applications per year for a U.S. earth station to communicate with a non-U.S.-licensed space station that has not been previously granted U.S. market access.

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<sup>1</sup> Throughout this document, we report the frequency of response for each information requirement. This reflects the number of times a particular respondent is required to submit that particular information. Thus, the term “one time” refers to a collection where a respondent need only submit that particular information once. Over the course of any year, however, one or more other respondents will be required to submit the same type of information. We use the term “on occasion” to refer to a collection where each respondent may be required to submit particular information more than once, but there is no requirement that they submit that information on a regular basis. We use the term “annually” to describe information that respondents must submit to us once each year.

- (2) Number of responses: 38.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual burden is 2,242 hours (38 responses x 59 hours/response = 2,242 hours).

**2. Additional Service-Specific Requirements**

**a. Geostationary-Satellite Orbit (GSO) Fixed-Satellite Service (FSS) Applications** (47 C.F.R. § 25.140(a))

- (2) Number of respondents: 20.
- (3) Number of responses: 20.
- (4) Frequency of response: One time.
- (5) Annual hour burden: The total annual hour burden is 40 hours (20 responses x 2 hours/response = 40 hours).

**b. NGSO FSS Applications** (47 C.F.R. §§ 25.114(d)(12), 25.146)

- (1) Number of respondents: 10.
- (2) Number of responses: 10.
- (3) Frequency of response: One time and on occasion.
- (4) Annual hour burden: The total annual hour burden is 50 hours (10 response x 5 hours/response = 50 hours).

**c. Direct Broadcast Satellite (DBS) Applications** (47 C.F.R. §§ 25.114(d)(11), (13), (18), 25.148)

- (1) Number of respondents: 1.
- (2) Number of responses: 1.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 8 hours (1 response x 8 hours/response = 8 hours).

**d. 17/24 GHz Broadcasting-Satellite Service (BSS) Applications** (47 C.F.R. §§ 25.114(d)(7), (15)-(18), 25.140(b), (c), 25.264)

- (1) Number of respondents: 2.
- (2) Number of responses: 2.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 156 hours (2 responses x 78 hours/response = 156 hours).

**e. SDARS Applications** (47 C.F.R. § 25.144(a))

- (1) Number of respondents: 1.
- (2) Number of responses: 1.
- (3) Frequency of response: One time.

**Part 25 of the Federal Communications Commission's Rules**    **OMB Control No. 3060-678**  
**Governing the Licensing of, and Spectrum Usage by,**    **March 2018**  
**Commercial Earth Stations and Space Stations**

- (4) Annual hour burden: The total annual hour burden is 1 hour (1 respondent x 1 hour/response = 1 hour).

**f. GSO MSS Applications** (47 C.F.R. § 25.143(b))

- (1) Number of respondents: 1.  
(2) Number of responses: 1.  
(3) Frequency of response: One time.  
(4) Annual hour burden: The total annual hour burden is 4 hours (1 response x 4 hours/response = 4 hours).

**g. NGSO MSS Applications** (47 C.F.R. §§ 25.142(a), (b)(2)(ii), 25.143(b), 25.250(b), 25.279)

- (1) Number of respondents: 2.  
(2) Number of responses: 2.  
(3) Frequency of response: One time.  
(4) Annual hour burden: The total annual hour burden is 12 hours (2 responses x 6 hours/response = 12 hours).

**h. Ancillary Terrestrial Component (ATC) Applications** (47 C.F.R. §§ 25.149, 25.252, 25.253, 25.254)

- (1) Number of respondents: 1.  
(2) Number of responses: 1.  
(3) Frequency of response: One time.  
(4) Annual hour burden: The total annual hour burden is 50 hours (1 response x 50 hours/response = 50 hours).

**3. Request for Filing of Advance Publication Information** (Letter, 47 C.F.R. § 25.111(e); see also 47 C.F.R. § 0.457(d)(1)(vii)(C))

- (1) Number of respondents: 5.  
(2) Number of responses: 5.  
(3) Frequency of response: One time.  
(4) Annual hour burden: The total annual hour burden is 10 hours (5 responses x 2 hours/response = 10 hours).

**B. Earth Stations** (Form 312, Schedule B)

**1. General Requirements** (47 C.F.R. §§ 25.110, 25.115(j), 25.130, 25.132, 25.138, 25.209, 25.211, 25.212, 25.218, 25.220, 25.203, 25.204(e)(1))

- (5) Number of respondents: 743.  
(6) Number of responses: 743.  
(7) Frequency of response: One time and Third Party Disclosure in accordance with 47 C.F.R. § 25.203.<sup>2</sup>

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<sup>2</sup> Of the estimated 8 hours per response, the one-time filing accounts for approximately 7 hours per response and the third party disclosure accounts for approximately 1 hour per response.

**Part 25 of the Federal Communications Commission's Rules    OMB Control No. 3060-678**  
**Governing the Licensing of, and Spectrum Usage by,                    March 2018**  
**Commercial Earth Stations and Space Stations**

(8) Annual hour burden: The total annual hour burden is 5,944 (743 responses x 8 hours/response = 5,944 hours).

**2. Applications Eligible for Autogrant Licensing** (Form 312 EZ, 47 C.F.R. § 25.115(a)(2))

(1) Number of respondents: 39.

(2) Number of responses: 39.

(3) Frequency of response: One time.

(4) Annual hour burden: The total annual hour burden is 234 hours (39 responses x 6 hours = 234 hours).

**3. Applications Not Eligible for Autogrant Licensing** (47 C.F.R. § 25.115(a)(1), (f); *see also* General Requirements above)

(1) Number of respondents: 704.

(2) Number of responses: 704.

(3) Frequency of response: One time.

(4) Annual hour burden: The total annual hour burden is 2,816 hours (704 responses x 4 hours/response = 2,816 hours).

**4. Applications Requesting Market Access for Non-U.S. Licensed Space Stations** (Form 312, Schedule S, 47 C.F.R. §§ 25.114, 25.137)

(1) Number of respondents: 10.

(2) Number of responses: 10.

(3) Frequency of response: One time.

(4) Annual hour burden: The total annual hour burden is 780 hours (10 responses x 78 hours/response = 780 hours).

**5. Applications to Register Receive-Only Earth Stations** (47 C.F.R. §§ 25.115(b), 25.131(a), (d), (j))

(1) Number of respondents: 69.

(2) Number of responses: 69.

(3) Frequency of response: One time.

(4) Annual hour burden: The total annual hour burden is 138 hours (69 responses x 2 hours/response = 138 hours).

**6. Additional Application Requirements for Other Types of Earth Stations**

**a. Blanket Licensed Earth Station Networks in the 3700-4200 MHz and 5925-6425 MHz Bands** (47 C.F.R. § 25.115(c)(2)(i))

(2) Number of respondents: 10.

(3) Number of responses: 10.

(4) Frequency of response: One time.

(5) Annual hour burden: The total annual hour burden is 400 hours (10 responses x 40 hours/response = 400).

**b. Blanket Licensed Earth Station Networks within the 10.7-30 GHz GHz Bands (47 C.F.R. § 25.115(c)(1), (e), (f))**

- (1) Number of respondents: 50.
- (2) Number of responses: 50.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual burden hours is 1,000 hours (50 responses x 20 hours/response = 1,000).

**c. Earth Stations on Vessels (ESV) (47 C.F.R. §§ 25.221, 25.222)**

- (1) Number of respondents: 2.
- (2) Number of responses: 2.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 120 hours (2 responses x 60 hours/response = 120 hours).

**d. Vehicle-Mounted Earth Stations (VMES) (47 C.F.R. § 25.226)**

- (1) Number of respondents: 4.
- (2) Number of responses: 4.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 240 hours (4 responses x 60 hours/response = 240 hours).

**e. Earth Stations aboard Aircraft (ESAA) (47 C.F.R. § 25.227)**

- (1) Number of respondents: 6.
- (2) Number of responses: 6.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 480 hours (6 responses x 80 hours/response = 480 hours).

**f. Temporary-Fixed (47 C.F.R. §§ 25.110, 25.277)**

- (1) Number of respondents: 20.
- (2) Number of responses: 20.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 160 hours (20 responses x 8 hours/response = 160 hours).

**g. MSS (47 C.F.R. §§ 25.115(d), 25.129(c), 25.135, 25.257, 25.258(c))**

- (1) Number of respondents: 20.
- (2) Number of responses: 20.
- (3) Frequency of response: One time.

**Part 25 of the Federal Communications Commission's Rules**    **OMB Control No. 3060-678**  
**Governing the Licensing of, and Spectrum Usage by,**    **March 2018**  
**Commercial Earth Stations and Space Stations**

(4) Annual hour burden: The total annual hour burden is 160 hours (20 responses x 8 hours/response = 160 hours).

**h. 17/24 GHz BSS** (47 C.F.R. §§ 25.115(g), 25.223)

(1) Number of respondents: 3.

(2) Number of responses: 3.

(3) Frequency of response: One time.

(4) Annual hour burden: The total annual hour burden is 24 hours (3 responses x 8 hours/response = 24 hours).

**i. 17/24 GHz DBS** (47 C.F.R. §25.203(m))

(1) Number of respondents: 3.

(2) Number of responses: 3.

(3) Frequency of response: One time.

(4) Annual hour burden: The total annual hour burden is 24 hours (3 responses x 8 hours/response = 24 hours).

**j. SDARS Terrestrial Repeaters** (47 C.F.R. §§ 25.144(e), 25.263(b), (c), 25.403, 25.404;  
*see also* FCC 10-82, para. 278)

(1) Number of respondents: 1.

(2) Number of responses: 1.

(3) Frequency of response: One time.

(4) Annual hour burden: The total annual hour burden is 4 hour (1 response x 4 hours/response = 4 hours).

**II. Modifications of Existing Licenses and Market Access Grants** (Form 312)

**A. Space Station** (47 C.F.R. § 25.117)

(1) Number of respondents: 32.

(2) Number of responses: 32.

(3) Frequency of response: On occasion.

(4) Annual hour burden: The total annual hour burden is 512 hours (32 responses x 16 hours/response = 512 hours).

**B. Earth Station** (47 C.F.R. § 25.117)

(1) Number of respondents: 211.

(2) Number of responses: 211.

(3) Frequency of response: On occasion.

(4) Annual hour burden: The total annual hour burden is 4,220 hours (211 responses x 20 hours/response = 4,220 hours).

**III. Amendments of Pending Applications and Petitions** (Form 312)

**A. Space Station** (47 C.F.R. §§ 25.116, 25.137(e))



- (1) Number of respondents: 25.
- (2) Number of responses: 25.
- (3) Frequency of response: On occasion.
- (4) Annual hour burden: The total annual hour burden is 137.5 hours (25 responses x 5.5 hours/response = 137.5 hours).

**B. Earth Station** (47 C.F.R. §§ 25.116, 25.137(e))

- (1) Number of respondents: 62.
- (2) Number of responses: 62.
- (3) Frequency of response: On occasion.
- (4) Annual hour burden: The total annual hour burden is 248 hours (62 responses x 4 hours/response = 248 hours).

**IV. Transfers of Control or Assignments** (Form 312 and Schedule A)

**A. Transfers of Control** (47 C.F.R. §§ 25.119, 25.137(g))

**1. Space Station**

- (1) Number of respondents: 10.
- (2) Number of responses: 10.
- (3) Frequency of response: On occasion.
- (4) Annual hour burden: The total annual hour burden is 90 hours (10 responses x 9 hours/response = 90 hours).

**2. Earth Station**

- (1) Number of respondents: 181.
- (2) Number of responses: 181.
- (3) Frequency of response: On occasion.
- (4) Annual hour burden: The total annual hour burden is 1,629 hours (181 responses x 9 hours/response = 1,629 hours).

**B. Assignments** (47 C.F.R. §§ 25.119, 25.137(g))

**1. Space Station**

- (1) Number of respondents: 4.
- (2) Number of responses: 4.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 36 hours (4 operators x 9 hours/response = 36 hours).

**2. Earth Station**

- (1) Number of respondents: 170.
- (2) Number of responses: 170.

**Part 25 of the Federal Communications Commission's Rules Governing the Licensing of, and Spectrum Usage by, Commercial Earth Stations and Space Stations**      **OMB Control No. 3060-678**  
**March 2018**

- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 1,530 hours (170 responses x 9 hours/response = 1,530 hours).

**V. Applications for Special Temporary Authority (Form 312) (47 C.F.R. § 25.120)**

**A. Space Station**

- (1) Number of respondents: 127.
- (2) Number of responses: 127.
- (3) Frequency of response: On occasion.
- (4) Annual hour burden: The total annual hour burden is 1,016 hours (127 responses x 8 hours/response = 1,016 hours).

**B. Earth Station**

- (5) Number of respondents: 453.
- (6) Number of responses: 453.
- (7) Frequency of response: On occasion.
- (8) Annual hour burden: The total annual hour burden is 3,624 hours (453 responses x 8 hours/response = 3,624 hours).

**VI. Earth Station License Renewals (FCC Form 312-R) (47 C.F.R. §§ 25.121(e), 25.131(h))**

- (1) Number of respondents: 482.
- (2) Number of response: 482.
- (3) Frequency of response: On occasion.
- (4) Annual hour burden: The total annual hour burden is 4,820 hours (482 operators x 10 hours/response = 4,820 hours).

**VII. Surrenders of Authorizations**

**A. Space Station**

- (1) Number of respondents: 1.
- (2) Number of responses: 1.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 1 hour (1 response x 1 hour/response = 1 hour).

**B. Earth Station**

- (1) Number of respondents: 133.
- (2) Number of responses: 133.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 133 hours (133 responses x 1 hour/response = 133 hours).

**VIII. Annual Reporting Requirements for Space Station Operators (47 C.F.R. § 25.170)**

- (1) Number of respondents: 34.
- (2) Number of responses: 34.
- (3) Frequency of response: Annual.
- (4) Annual hour burden: The total annual hour burden is 272 hours (34 responses x 8 hours = 272 hours).

#### **IX. General Notification Requirements**

##### **A. Commence Construction at Own Risk** (47 C.F.R. §§ 25.113(b) and (f))

- (1) Number of respondents: 4.
- (2) Number of responses: 4.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 4 hours (4 responses x 1 hour/response = 4 hours).

##### **B. Bringing In-Orbit Spare into Use** (47 C.F.R. § 25.113(h))

- (1) Number of respondents: 3.
- (2) Number of responses: 3.
- (3) Frequency of response: On occasion.
- (4) Annual hour burden: The total annual hour burden is 1.5 hours (3 responses x .5 hours/response = 1.5 hours).

##### **C. NGSO Replacement Satellites** (47 C.F.R. § 25.113(i))

- (1) Number of respondents: 4.
- (2) Number of responses: 4.
- (3) Frequency of response: On occasion.
- (4) Annual hour burden: The total annual hour burden is 8 hours (4 responses x 2 hours/response = 8 hours).

##### **D. Modification of Space Station Operation Not Requiring Prior Authorization** (47 C.F.R. § 25.118(e), (f))

- (1) Number of respondents: 4.
- (2) Number of responses: 4.
- (3) Frequency of response: On occasion.
- (4) Annual hour burden: The total annual hour burden is 8 hours (4 responses x 2 hours/response = 8 hours).

##### **E. Modifications of Earth Station Operation Not Requiring Prior Authorization** (47 C.F.R. § 25.118(a))

- (1) Number of respondents: 10.
- (2) Number of responses: 10.
- (3) Frequency of response: On occasion.

**Part 25 of the Federal Communications Commission's Rules**    **OMB Control No. 3060-678**  
**Governing the Licensing of, and Spectrum Usage by,**        **March 2018**  
**Commercial Earth Stations and Space Stations**

- (4) Annual hour burden: The total annual hour burden is 80 hours (10 responses x 8 hours/response = 80 hours).

**F. Temporary-Fixed Operation Local Coordination Reports** (47 C.F.R. § 25.277(c))

- (1) Number of respondents: 100.  
(2) Number of responses: 100.  
(3) Frequency of response: On occasion.  
(4) Annual hour burden: The total annual hour burden is 800 hours (100 responses x 8 hours/response = 800 hours).

**G. Completion of Earth Station Construction** (47 C.F.R. §§ 25.133(b) and (d))

- (1) Number of respondents: 699.  
(2) Number of responses: 699.  
(3) Frequency of response: One time.  
(4) Annual hour burden: The total annual hour burden is 699 hours (699 responses x 1 hour/response = 699 hours).

**H. ATC Service Initiation Notice** (47 C.F.R. § 25.149(f))

- (1) Number of respondents: 2.  
(2) Number of responses: 2.  
(3) Frequency of response: One time.  
(4) Annual hour burden: The total annual hour burden is 2 hours (2 responses x 1 hour/response = 2 hours).

**I. Ka-Band Space Station Operators' Notification** (47 C.F.R. § 25.258; *see also* FCC 96-311)

- (1) Number of respondents: 6.  
(2) Number of responses: 6.  
(3) Frequency of response: Third party disclosure.  
(4) Annual hour burden: The total annual hour burden is 6 hours (6 responses x 1 hour/response = 6 hours).

**J. Consummation of Transfer and Control or Assignment** (47 C.F.R. § 25.119(f))

- (1) Number of respondents: 365.  
(2) Number of responses: 365.  
(3) Frequency of response: One time.  
(4) Annual hour burden: The total annual hour burden is 365 hours (365 responses x 1 hour/response = 365 hours).

**K. Results of In-Orbit Testing** (47 C.F.R. § 25.173)

- (1) Number of respondents: 5.  
(2) Number of responses: 5.

- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 5 hours (5 responses x 1 hour/response = 5 hours).

**L. Contact Information Update** (47 C.F.R. §§ 25.171, 25.172, 25.259(b), 25.260(b), 25.271(f))

- (1) Number of respondents: 25.
- (2) Number of responses: 25.
- (3) Frequency of response: On occasion.
- (4) Annual hour burden: The total annual hour burden is 12.5 hours (25 responses x .5 hour/response = 12.5hours).

**M. Notification of Non-Routine Space Station Operation** (47 C.F.R. § 25.140(d))

- (1) Number of respondents: 25.
- (2) Number of responses: 25.
- (3) Frequency of response: On occasion.
- (4) Annual hour burden: The total annual hour burden is 50 hours (25 responses x 2 hours/response = 50 hours).

**N. Third Party Disclosures Requirements**

**1. SDARS** (47 C.F.R. § 25.263(b))

- (1) Number of respondents: 1.
- (2) Number of responses: 25.
- (3) Frequency of response: Third party disclosure.
- (4) Annual hour burden: The total annual hour burden is 25 hours (1 respondent x 25 responses x 1 hour/response = 25 hours).

**2. ATC** (47 C.F.R. § 25.149)

- (1) Number of respondents: 1.
- (2) Number of responses: 25.
- (3) Frequency of response: Third party disclosure.
- (4) Annual hour burden: The total annual hour burden is 25 hours (1 respondent x 25 responses x 1 hour/response = 25 hours).

**3. ESV** (47 C.F.R. § 25.221(a)(11))

- (1) Number of respondents: 4.
- (2) Number of responses: 4.
- (3) Frequency of response: Third party disclosure.
- (4) Annual hour burden: The total annual hour burden is 4 hours (4 responses x 1 hour/response = 4 hours).

**4. VMES** (47 C.F.R. § 25.226(c))

- (1) Number of respondents: 4.
- (2) Number of responses: 4.
- (3) Frequency of response: Third party disclosure.
- (4) Annual hour burden: The total annual hour burden is 4 hours (4 responses x 1 hour/response = 4 hours).

**5. ESAA (47 C.F.R. § 25.227(c)(1))**

- (1) Number of respondents: 6.
- (2) Number of responses: 6.
- (3) Frequency of response: Third party disclosure.
- (4) Annual hour burden: The total annual hour burden is 6 hours (6 responses x 1 hour/response = 6 hours).

**6. 17/24 GHz DBS (47 C.F.R. §25.203(m))**

- (1) Number of respondents: 3.
- (2) Number of responses: 3.
- (3) Frequency of responses: Once.
- (4) Annual hour burden: The total annual hour burden is 12 hours (3 responses x 4 hours = 12 hours).

**X. Milestones and Bonds**

**A. GSO Launch and Operate Milestone (47 C.F.R. § 25.164(f))**

- (1) Number of respondents: 5.
- (2) Number of responses: 5.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 5 hours (5 responses x 1 hour/response = 5 hours).

**B. NGSO Launch and Operate Milestone (47 C.F.R. § 25.164(f))**

- (1) Number of respondents: 1.
- (2) Number of responses: 2.
- (3) Frequency of response: Two time.
- (4) Annual hour burden: The total annual hour burden is 2 hours (2 response x 1 hour/response = 2 hours).

**C. Application-Stage Bond (47 C.F.R. § 25.165(f))**

- (1) Number of respondents: 29.
- (2) Number of responses: 29.
- (3) Frequency of response: One time.
- (4) Annual hour burden per respondent: The total annual hour burden is 58 hours (29 responses x 2 hours/response = 58 hours).

**D. Post-Licensing Bond** (47 C.F.R. § 25.165(a))

- (1) Number of respondents: 5.
- (2) Number of responses: 5.
- (3) Frequency of response: On occasion.
- (4) Annual hour burden: The total annual hour burden is 10 hours (5 responses x 2 hours/response = 10 hours).

**XI. Global Mobile Personal Communications by Satellite/E911 Call Centers** (47 C.F.R. § 25.284)

- (1) Number of respondents: 4.
- (2) Number of responses: 4.
- (3) Frequency of response: Annual.
- (4) Annual hour burden: The total annual hour burden is 4 hours (4 responses x 1 hour/response = 4 hours).

**XII. Recordkeeping Requirement** (47 C.F.R. §§ 25.221(a)(4), 25.221(a)(5), 25.221(a)(11), 25.222(a)(4), 25.222(a)(5), 25.226(a)(6), 25.227(a)(6), 25.263(c), 25.284)

- (1) Number of respondents: 40.
- (2) Number of responses: 40.
- (3) Frequency of response: Recordkeeping requirement.
- (4) Annual hour burden: The total annual hour burden is 60 hours (40 responses x 1.5 hours = 60 hours).

**XIII. TOTALS:**

Total number of respondents: **5,036**.

Total number of responses: **5,094**.

Range of hours per response: **.5-80**.

Total number of burden hours: **35,622 (rounded)**.

**TOTAL "In-house Cost"** – In-house staff who will be working on the information collection requirements contained in the chart above is estimated to have an hourly salary of \$60/hour. Therefore, the in-house costs to respondents are 35,622 (total burden hours) x \$60/hour = **\$2,137,320.00**.

13. *Estimates of the cost burden of the collection to respondents.* Respondents are assumed to use outside legal or engineering assistance to complete their filing with the Commission. This is because, in addition to their in-house legal and engineering staffs, space station and earth station operators often rely on outside attorneys and engineers to assist with some of the information collection requirements in Part 25. We estimate that the hourly rates for outside legal and engineering assistance are \$300/hour and \$250/hour, respectively. These figures are based on a small survey of local firms in the Washington, D.C. area and are conservative estimates. Because outside attorneys and engineers are used in approximately equal proportions, we use an average rate of \$275/hour to arrive at the cost burden for outside assistance. The amount of hourly work performed by outside parties varies with the type and complexity of the application. Based on our experience, we estimate that operators will engage outside attorneys and engineers in preparing

**Part 25 of the Federal Communications Commission's Rules Governing the Licensing of, and Spectrum Usage by, Commercial Earth Stations and Space Stations**      **OMB Control No. 3060-678**  
**March 2018**

1,167 of the total number of responses filed annually, with an average of 8.8 hours spent per response. Consequently, the total cost burden for outside assistance is **\$2,824,140** (\$275 x 1,167 responses x 8.8 hours per response).

**Application Filing Fees<sup>3</sup>: \$9,586,980.00.** This estimate is based on actual Commission filings over the past several years. For earth station application filing fees, an average of the range of application filing fees was used. A statutorily mandated increase in application fees has caused an increase in this estimate from the previous Supporting Statement.

**Total Annualized Cost:**

<b>Total Costs to the Industry</b>	<b>Totals</b>
Estimated Application Filing Fees	<b>\$9,586,980.00</b>
Estimated Cost of Outside Legal/Engineering Assistance	<b>\$2,824,140.00</b>
<b>Total Cost to Respondents</b>	<b>\$12,411,120.00</b>

14. *Estimate of Annualized Cost to the Federal Government.*

The estimate of annualized cost to the Federal government is summarized in the chart below.

As shown in the chart, the annualized costs to the Federal government are **\$2,157,873.80**.

The chart contains total staff salaries, burden hours, and annualized costs.

<b>Federal Government Staff</b>	<b>Number of Staff</b>	<b>Salary Per Hour</b>	<b>Annual Burden Hours</b>	<b>Annualized Costs</b>
GS-15/Step 5 Attorney	6	\$73.20	1,506	<b>\$661,435.20</b>
GS-14/Step 5 Attorney	3	\$62.23	1,500	<b>\$280,035.00</b>
GS-13/Step 5 Attorney	1	\$52.66	1,500	<b>\$78,990.00</b>
GS-12/Step 5 Attorney	1	\$44.28	1,500	<b>\$66,420.00</b>
GS-15/Step 5 Engineer	11	\$73.20	686	<b>\$552,367.20</b>
GS-14/Step 5 Engineer	3	\$62.23	2,000	<b>\$373,380.00</b>
GS-12/Step 5 Paralegal	1	\$44.28	500	<b>\$22,140.00</b>
GS-12/Step 5 Industry Analyst	1	\$44.28	1,500	<b>\$66,420.00</b>

<sup>3</sup> See Appendix A for a table of calculations.



**Part 25 of the Federal Communications Commission's Rules**    **OMB Control No. 3060-678**  
**Governing the Licensing of, and Spectrum Usage by,**    **March 2018**  
**Commercial Earth Stations and Space Stations**

GS-12/Step 5 Telecom. Specialist	2	\$44.28	2,006	\$177,651.36
<b>Total</b>	<b>29</b>		<b>12,698</b>	<b>\$2,278,838.76</b>

15. *Program changes or adjustments.* The Commission has program changes to this information collection. There are as follows:

- 1) an increase of 112 to the annual number of respondents (from 4,924 to 5,036);
- 2) an increase of 113 to the annual number of responses (from 4,981 to 5,094);
- 2) an increase of 1,482 to the annual burden hours (from 34,140 to 35,622); and
- 3) an increase of \$1,786,000 to the annual cost burden (from 10,625,120 to 12,411,120).

These program changes are due to the greater number of NGSO FSS applications filed, owing in part to the greater opportunities provided by the Commission in FCC 17-122.

16. *Collections of information whose results will be published.* The data will not be published for statistical use.

17. *Display of expiration date for OMB approval of information collection.* We continue to seek a waiver of the requirement to display the expiration date of OMB approval on the FCC Form 312 (including associated Schedules A, B, and S), FCC Form 312 EZ, and FCC Form 312-R and wish to instead display an edition date. If these forms remain unchanged when it is time to renew OMB approval for this collection, the Commission would be required to destroy all stock on hand displaying the old expiration dates and then reprint and redistribute the forms with the new expiration date. Additionally, it would require the Commission to modify the electronic versions as well. This would be an undue burden on Commission resources and may lead to confusion among licensees.

18. *Exceptions to the certification statement for Paperwork Reduction Act submissions.* There are no exceptions to the Certification Statement.

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

No statistical methods are employed.

APPENDIX  
 Application Costs (in Dollars)<sup>4</sup>

Type of Filing	No. of Applications	Filing Fee	Subtotals	Totals
<b>I. Applications for Initial Licenses</b>				
a. Space Stations:				
FSS GSO	10	129,645.00	1,296,450.00	
FSS NGSO	5	446,500.00	2,232,500.00	
				3,528,950.00
b. Earth Stations:				
Single		2,825.00		
Lead		6,260.00		
Blanket		10,430.00		
(average earth station application fee)	699	6,505.00		4,546,995.00
<b>II. Modifications of Existing Licenses</b>				
a. Space Station				
GSO	29	9,265.00	268,685.00	
NGSO	3	31,895.00	95,685.00	
				364,370.00
b. Earth Station	211	195.00		41,145.00
<b>III. Amendments of Pending Applications</b>				
a. Space Station				
GSO	23	1,855.00	42,665.00	
NGSO	2	6,385.00	12,770.00	
				55,435.00
b. Earth Station	211	195.00		41,145.00
<b>IV. Transfers of Control and Assignments</b>				

<sup>4</sup> See 47 C.F.R. § 1.1107.

**Part 25 of the Federal Communications Commission's Rules  
Governing the Licensing of, and Spectrum Usage by,  
Commercial Earth Stations and Space Stations**

**OMB Control No. 3060-678  
March 2018**

<b>A. Transfers of Control (T/C)</b>				
a. Space Station				
GSO	9	9,265.00	83,385.00	
NGSO	1	12,765.00	12,765.00	
				96,150.00
b. Earth Station		560.00		
		2,790.00		
(average earth station T/C fee)	181	1,675.00		303,175.00
<b>B. Assignments</b>				
a. Space Station	4	9,265.00		37,060.00
b. Earth Station	170	1,427.50		242,675.00
<b>V. Applications for Special Temporary Authority</b>				
a. Space Station				
GSO	114	930.00	106,020.00	
NGSO	13	3,195.00	41,535.00	
				147,555.00
b. Earth Station	453	195.00		88,335.00
<b>VI. Earth Station License Renewals</b>	482	195.00		93,990.00
<b>Totals</b>				<b>\$9,586,980.00</b>