SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS

National 911 Profile Database 2127-0679

A. Justification

1. Explain the circumstances that make the collection of information necessary.

NHTSA is proposing to continue to collect and aggregate information from state level reporting entities that can be used to measure the progress of 9-1-1 authorities across the country in upgrading and enhancing their existing operations and migrating to more advanced - digital, Internet-Protocol-enabled emergency networks. The data will be maintained in a "National 9-1-1 Profile Database." One of the objectives of the National 9-1-1 Program is to develop, collect, and disseminate information concerning practices, procedures, and technology used in the implementation of 9-1-1 services and to support 9-1-1 Public Safety Answering Points (PSAPs) and related state and local public safety agencies' 9-1-1 deployment and operations upgrades. The National 9-1-1 profile database can be used to follow the progress of 9-1-1 authorities in enhancing their existing systems and implementing next-generation networks to more current functionality. This information collection supports the Department's strategic goal of safety by ensuring emergency responses to crashes of all nature (i.e., planes, trains, automobiles, and maximizing the chances of survival for crash victims.

2. Indicate how, by whom, and for what purpose the information is to be used.

The goal of the data collection process is to support a national 9-1-1 profile that will be used to help accurately measure and depict the current status and planned capabilities of 9-1-1 systems across the United States. Evaluations, based upon the data collected, will help draw attention to key roadblocks and solutions in the deployment process and to target possible future activities and resources consistent with the goals of the program. The information in aggregated form will be available to national, federal, state and local stakeholders in the public safety community.

The information to be collected includes data useful to evaluating the status of 9-1-1 programs across the country, along with their progress of implementing upgraded and advanced systems and capabilities. The data elements involved will fall within two major categories: baseline and progress benchmarks.

 "Baseline" data elements reflect the current status and nature of 9-1-1 operations from state to state. These elements are largely descriptive in nature, are intended to provide a general view of existing 9-1-1 services across the country, and are grouped within three categories: administrative, system, and fiscal data. "Progress benchmarks" reflect the status of state efforts to implement advanced next generation 9-1-1 systems and capabilities. As titled, these data elements are largely implementation or deployment benchmarks against which progress can be measured.

Under this proposed effort, NHTSA would specifically request reporting entities to voluntarily collect and annually report the data described above utilizing the described web-based data collection tool. Reporting entities are state level 9-1-1 program officials, and the data reported will reflect state-level aggregated data. Where a state statute has not established a state-level 9-1-1 program, the authorized entity is the state E9-1-1 Coordinator designated under 47 U.S.C. 942(b)(3)(A)(ii).

The total maximum number of respondents is identified at fifty-six (56), including the fifty states and the six U.S. Territories of Guam, U.S. Minor Outlying Islands, American Samoa, Mariana Islands, U.S. Virgin Islands, and Puerto Rico.

The reporting entities will be requested to submit data annually relating to their state or territory using a web-based tool. The 9-1-1 authorities who manage the approximately 6,000 9-1-1 Public Safety Answering Points (PSAPs) nationwide, and related national, federal, state and local public safety agencies will be the users of these data.

3. Describe whether, and to what extent, the collection of information involves the use of technological collection techniques or other forms of information technology.

In order to collect information needed to develop and implement effective strategies that meet the Program's goal of providing leadership, coordination, guidance and direction to the enhancement of the Nation's 9-1-1 services, NHTSA proposes to utilize a web-based, data reporting and collection tool accessible through the website: www.911.gov.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used.

The National 9-1-1 Program facilitates coordination and communication among Federal, State, and local emergency communications systems, emergency personnel, public safety organizations, telecommunications carriers, and telecommunications equipment manufacturers and vendors involved in the implementation of E9-1-1 services. While the Federal Communications Commission (FCC) does have jurisdiction over private sector entities such as telecommunications service providers, the National 9-1-1 Program coordinates efforts among private and public entities at the Federal, State and local levels specifically involved with 9-1-1 services, and the access to emergency services. While the data collected by the FCC are useful, these limited excursions into issues related to 9-1-1 services do not provide sufficient information to meet the needs of the public safety community for service evaluation and programmatic decision making.

The Office of Emergency Communications within the Department of Homeland Security collects no data related to the demographic characterization of 9-1-1 agencies or their progress in implementing next generation technologies as part of the 9-1-1 infrastructure.

The National Association of State 9-1-1 Administrators (NASNA) does compile some information from its members that may contribute to the goal of this effort. However, NASNA membership does not include all states, and such collection is ad hoc and not currently part of any organized periodic effort.

The National Emergency Number Association (NENA) likewise periodically collects information and data that may contribute to this effort. However, like NASNA, those efforts are voluntary, largely ad hoc in nature, and not comprehensive. This proposed collection will not duplicate those efforts.

While such data does exist at state and sub-state levels, no other source of aggregated data exists in any comprehensive way at a national level. Nor is such data readily accessible to the public safety agencies involved across the country.

Overall, the following criteria were applied to determine whether existing information may be duplicative:

- Currency of information the data must be current in order to have utility for the program purposes described above.
- Nationwide For the sake of national evaluation, the data involved must comprehensively reflect state and local activity across the country.
- Consistency For the sake of aggregation and comparison, the data must be consistent with comparable elements.
- 5. If the collection of information impacts small businesses or other small entities, describe methods used to minimize burden.

The collection of information has been limited to state reporting entities, and has minimum impact on small businesses or other small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently.

The technology impacting 9-1-1 services continues to evolve substantially. Both public and private sectors have increasingly focused on addressing the need to upgrade and enhance the technology utilized by 9-1-1 services across the Nation. In addition, emergency responders are in the midst of updating their own part of the emergency communications network and it is essential that they are able to coordinate and collaborate with 9-1-1 agencies via comprehensive and seamless emergency communication system. Without up-to-date information, the

National 9-1-1 Program, along with state and local public safety entities will not be able to adequately gauge progress towards implementing more current and advanced 9-1-1 systems in any comparative fashion. While the National 9-1-1 Program will benefit from this information, it is anticipated that the greatest benefit will accrue to the state and local public safety community faced with the challenge of migrating to the next generation of 9-1-1.

7. Explain any special circumstances that would cause the information collection to be conducted in a manner inconsistent with the guidelines set forth in 5 CFR 1320.6.

No special circumstances require the collection of information to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.

8. Provide a copy and identify the date and page number of the publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize the public comments received in response to that notice and describe actions to consult with persons outside the agency to obtain their views.

FEDERAL REGISTER NOTICES: Copies of Federal Register Notices are provided. The 60 Day Notice published in the Federal Register, October 20, 2017 82FR48891. While two comments were received, the content of neither comment related to the proposed data collection. One comment discussed "Environmentalism is a politics of fear" at great length, and another expressed opinions related to tax reform and stopping the regulations and cost of regulation enforcement. The 30 Day Notice published in the Federal Register February 14th of 2018 83FR6730.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payment of gifts will be offered to state reporting entities involved in this process.

10. Describe any assurance of confidentiality provided to respondents.

No assurances of confidentiality are given by the agency. All information submitted by respondents is done so on a voluntary basis and is intended for the program purposes described above. As described, this program will utilize a secure web-based, data collection utility. As part of adopted program policies and procedures, data reported by each state will only be released subject to provisions of the Freedom of Information Act (FOIA), as amended. Annual summary reports will be available to the public.

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

The data reporting and collection process involved in this request will not contain any questions related to matters that are commonly considered sensitive or private.

12. Provide estimates of the hour burden of the collection of information on the respondents.

NHTSA estimates that submitting responses to the questions included in the proposed survey instrument utilizing the Web-based tool would require an average of 98 hours per state to collect, aggregate and submit. Estimating the maximum number of respondents at 56, this would result in a total burden of 5,488 hours. The respondents would not incur any reporting costs from the information collection beyond the time it takes to gather the information, prepare it for reporting and then populate the Web-based data collection tool. The respondents also would not incur any recordkeeping burden or recordkeeping costs from the information collection.

The total estimated costs to respondents or record-keepers are based on the following:

The total hour burden of the collection of information equaling 5,488 hours

Respondents will be State, territory, and tribal government management personnel. To estimate reasonable staff expenses to respond to this information collection, the Agencies reviewed the Bureau of Labor Statistics (BLS) Occupational Outlook Handbook and determined that the Administrative Services Manager description closely aligns with the positions of recipient staff responsible for completing this request. BLS lists a median salary of \$86,100 annually, amounting to \$41.40 per hour.

There are no capital, start-up, or annual operation and maintenance costs involved in the collection of information.

Total cost based on hour's burden equals \$227,203.20.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.

The respondents would not incur any reporting costs from the information collection beyond the time it takes to gather the information, prepare it for reporting and then populate the webbased data collection tool. The respondents also would not incur any recordkeeping burden or recordkeeping costs from the information collection.

14. Provide estimates of annualized cost to the Federal government.

Total estimated cost to the government for maintaining the data reporting and collection process is as follows:

Contractor costs associated with collection, analysis, and report development total: \$86,565.00.

This estimate is based on the total cost for contractor supported collection, analysis and report of information obtained in the data collection process, including 597 fully loaded hours at \$145.00 per hour.

15. Explain the reasons for any program changes or adjustments report on Items 13 or 14 of the OMB form 83-1.

There is an increase adjustment in the burden hours from 168 hours to 5,488 hours because the data elements were revised. As the implementation of NG911 progresses and nearly all 911 agencies have reached a common level of deployment, the data elements had to be revised to better reflect the current status of NG911 implementation.

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

Based on the results of the data annually reported by state reporting entities, the NHTSA plans to generate an annual summary report describing the progress of public entities across the country in implementing more advanced 9-1-1 systems and services. This report would be made available to public and private entities for use in their program development activities. The proposed data reporting and collection process will comply with the federal Data Quality Act (amends PRA. 44 U.S.C. 3501 et seq).

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.

Approval is not sought to not display the expiration date.

18. Explain each exception to the certification statement identified in Item 19, Certification for Paperwork Reduction Act Submissions," of OMB Form 83-1.

No exceptions to the certification statement are made.