

SUPPORTING STATEMENT

A. Justification:

1. Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214, requires that a carrier must first obtain FCC authorization either to (1) construct, operate, or engage in transmission over a line of communication, or (2) discontinue, reduce, or impair service over a line of communication. Part 63 of Title 47 of the C.F.R. implements Section 214. Part 63 also implements provisions of the Cable Communications Policy Act of 1984 pertaining to video approved under OMB control number 3060-0149. See Attachment A for information collection requirements for which continued clearance is requested.

On July 14, 2016 the Federal Communications Commission (Commission or FCC) adopted a Declaratory Ruling, Second Report and Order, and Order on Reconsideration (2016 Technology Transitions Order), FCC 16-90, that modifies recordkeeping or recording requirements identified below that relate to the obligations of carriers seeking streamlined treatment of an application to discontinue legacy voice service as part of a technology transition from TDM service to IP service or wireline service to wireless service. The specific requirements that the *2016 Technology Transitions Order* modified are detailed below. Otherwise, all requirements described below were previously approved by the Office of Management and Budget (OMB) and have not been modified.

History

In the *Report and Order* for Implementation of Section 402(b)(2)(A) of the Telecommunications Act of 1996 (*214 Streamlining Order*), released on June 30, 1999, the Commission modified Part 63 to eliminate information submission requirements entirely for some categories of communications carriers and to reduce the submission requirements for other categories. As part of the *214 Streamlining Order*, the Commission created a streamlined process that would allow carriers' affected customers to object to the proposed discontinuance, and, in the absence of sufficient grounds for denial, would allow an application to discontinue service to be automatically granted thirty-one (31) days after the Commission released public notice of the application for non-dominant carriers, and sixty (60) days afterwards for dominant carriers. Grounds for denial include if customers or other end users would be unable to receive service or a reasonable substitute from another carrier, or if the public convenience and necessity would be otherwise adversely affected. But even in the face of filed objections the application may be granted automatically unless the Commission finds sufficient grounds for denial and notifies the applicant. In that Order, the Commission extended to providers of interconnected Voice over Internet Protocol (VoIP) service the discontinuance obligations that apply to domestic non-dominant telecommunications carriers under Section 214 of the Communications Act of 1934, as amended.

In November 2014, the Commission initiated a rulemaking to help guide and accelerate the technological revolutions that are underway involving the transitions from networks based on TDM circuit-switched voice services running on copper loops to all-IP multi-media networks using copper, co-axial cable, wireless, and fiber as physical infrastructure. In the *Notice of Proposed Rulemaking (NPRM)*, the Commission sought comment on how to measure what would constitute an adequate substitute for a service that a carrier seeks to discontinue as part of a technology transition. In the *Further Notice of Proposed Rulemaking (FNPRM)*, the Commission sought comment on specific proposals for possible criteria against which to measure what would constitute a so-called "adequate replacement" for a legacy service.

The Commission's 2016 Technology Transitions Order concluded that the public interest requires that applicants seeking to discontinue a legacy time division multiplexing (TDM)-based voice service as part of a transition to a new technology, whether Internet Protocol (IP), wireless, or another type (technology transition discontinuance application) must demonstrate that an adequate

replacement for the legacy service exists in order to be eligible for streamlined treatment.¹ For any other domestic service for which a discontinuance application is filed, the existing framework shall continue to govern automatic grant procedures.

1.

Unlike traditional applicants, technology transition discontinuance applicants seeking streamlined treatment will be required to submit with their application either a certification or a showing as to whether an “adequate replacement” exists in the affected service area. Applications either (i) certifying or (ii) demonstrating successfully through their showing that an adequate replacement exists will be eligible for automatic grant as long as the existing requirements for automatic grant are satisfied, absent alternative Commission streamlining actions. The Commission stressed that attempting to satisfy this “adequate replacement” test to establish eligibility for streamlined treatment is entirely voluntary for an applicant. Voice technology transition, discontinuance applicants that decline to pursue this path are not eligible for streamlined treatment² and will have their applications evaluated on a non-streamlined basis under the traditional five factor test.³

The Commission concluded that an applicant for a technology transition discontinuance may demonstrate that a service is an adequate replacement for a legacy voice service by certifying or showing that one or more replacement service(s) offers all of the following: (i) substantially similar levels of network infrastructure and service quality as the service being discontinued; (ii) compliance with existing federal and/or industry standards required to ensure that critical applications such as 911, network security, and applications for individuals with disabilities remain available; and (iii) interoperability and compatibility with an enumerated list of applications and functionalities determined to be key to consumers and competitors. One replacement service must satisfy all the criteria to retain eligibility for automatic grant.

To reduce burdens on carriers, the Commission adopted a more streamlined approach for discontinuances involving services that are substantially similar to those for which a Section 214 discontinuance has previously been approved.

Information Collection Requirements

¹ Time division multiplexing (TDM) is a multiplexing technique whereby two or more channels are derived from a transmission medium by dividing access to the medium into sequential intervals. Each channel has access to the entire bandwidth of the medium during its interval. The Internet Protocol (IP) is designed for use in interconnected systems of packet-switched computer communication networks. Packets are transmitted via a medium that may be shared by multiple simultaneous communication sessions. In recent years, the Commission has focused closely on the ongoing transitions from networks based on TDM circuit-switched voice services running on copper loops to all-IP multi-media networks using copper, co-axial cable, wireless, and/or fiber as physical infrastructure.

² Under long-standing Commission rules, all discontinuance applications are automatically granted after a set period of time unless the Commission notifies the applicant otherwise. See 47 CFR § 63.71(f).

³ In evaluating whether the discontinuance will harm the public interest, the Commission has for many years employed a five factor balancing test to analyze: (1) the financial impact on the common carrier of continuing to provide the service; (2) the need for the service in general; (3) the need for the particular facilities in question; (4) increased charges for alternative services; and (5) the existence, availability, and adequacy of alternatives. Moreover, the showing made regarding an adequate alternative under the five factor test does not require the network performance testing and other specific showings required under the adequate replacement test for streamlined treatment.

The requirements governing technology transition applications described below, with the exception of subsections (a) and (d), are voluntary in nature and are only required if the applicant seeks streamlined treatment of such an application pursuant to the adequate replacement test.

(a) Identification of the application as a technology transition discontinuance application: Applications seeking to discontinue a legacy TDM-based voice service as part of a transition to a new technology, whether IP, wireless, or another type (“technology transition discontinuance”), indicate that a technology transition is implicated.

(b) Certification or demonstration of compliance with the adequate replacement test. An applicant for a technology transition discontinuance may demonstrate that a service is an adequate replacement for a legacy voice service by certifying or showing that one or more replacement service(s) offers all of the following: (i) substantially similar levels of network infrastructure and service quality as the applicant service; (ii) compliance with existing federal and/or industry standards required to ensure that critical applications such as 911, network security, and applications for individuals with disabilities remain available; and (iii) interoperability and compatibility with an enumerated list of applications and functionalities determined to be key to consumers and competitors. One replacement service must satisfy all the criteria to retain eligibility for automatic grant. Technology transition applicants can either demonstrate compliance with these objective criteria or make a demonstration that, despite not being able to meet the criteria, the totality of the circumstances demonstrates that an adequate replacement nonetheless exists. If an applicant cannot certify or make that showing, or declines to pursue the voluntary path of streamlined treatment, it must comply with the Commission’s general discontinuance requirements and demonstrate that its proposed discontinuance will not harm the public interest, with particular emphasis on the adequate replacement factor. A repeat applicant for a 214 discontinuance application in the technology transition context can rely on its successful certification of compliance with all three prongs of the adequate replacement test in a previously approved application involving a substantially similar service relying on the same technology and utilizing a comparable network infrastructure. Applicants relying on a third-party service should be allowed to make a *prima facie* showing based on publicly available information as to whether the third-party service meets the test as an adequate replacement.

(i) *The First Prong: Network Infrastructure and Service Quality*. To satisfy the first prong of the adequate replacement test, an applicant must demonstrate that at least one service provides:

- substantially similar network performance as the service being discontinued;
- substantially similar service availability as the service being discontinued; and
- coverage to the entire affected geographic service area.

Applicants can demonstrate adequacy: (i) through performance testing that demonstrates satisfaction of each of the benchmarks, or (ii) a demonstration, based on the totality of the circumstances, the network still provides substantially similar performance and availability. “Substantially similar” in this context means that the network operates at a sufficient level with respect to the metrics identified below, such that the network platform will ensure adequate service quality for interactive and highly-interactive applications or services, in particular voice service quality, and support applications and functionalities that run on those services. Under either approach, the applicant initially provides the results of network testing, as well as outage and repair reporting, that demonstrate achievement of the benchmarks, although it may rely in subsequent applications on testing data from a previously approved discontinuance application.

Applicants provide test results with respect to two metrics: latency and data loss. In order for a replacement service to meet this aspect of the network performance prong and be eligible for streamlined treatment, latency must be limited to 100 milliseconds or less. In order for a replacement service to meet

this aspect of the network performance prong, data loss should be less than 1 percent for packet-based networks. The same metrics are applicable to both wireline and wireless networks, when we examine whether a mobile or fixed wireless network can qualify as an adequate replacement.

In order to comply, applicants filing their first technology transition discontinuance application will need to begin testing at least 30 days prior to filing that application. The 30-day test period is intended to ensure that the network is in a stable state and to allow for long-term projection of network infrastructure performance. To demonstrate that replacement services will have adequate network performance and thereby remain eligible for streamlined treatment for a technology transition discontinuance, the provider must perform the following actions, which are summarized below and detailed in Appendix B to the *2016 Technology Transitions Order*:

- Conduct 30 days of performance testing.
- Use a randomly selected sample group of a total of 50 residential and 50 enterprise customer locations per potential replacement service for testing, to ensure a representative sample.
- Report results to the Commission.
- Host a website or websites where all test data, results, test plan and all associated documentation that is not subject to a confidentiality request or confidential pursuant to Section 0.441 *et seq.* of our rules are available publicly.

Carriers with 100,000 or fewer subscriber lines, aggregated across all affiliates, may remain eligible for automatic grant without compliance with the specific testing requirements of the network performance criterion we articulate today.

In order to meet this aspect of the network performance prong and be eligible for automatic grant, an applicant must demonstrate a service availability of 99.99 percent or greater. The replacement service's availability will be calculated using data regarding customer trouble reports, the average repair interval in responding to those reports, the number of lines in the service area, and the duration of the observation period to reach a representative measurement of a "four 9s" benchmark used to measure service availability.

To measure voice-based congestion on non-packet wireless networks, the provider must calculate the probability of congestion-based voice call failure for every hour. For each of the 30 days measured, the provider must then determine the hour that had the highest probability of congestion-based voice call failure that day. The probability of congestion-based voice call failure each hour should be determined by dividing the number of failed calls during the hour by the total number of call attempts during the hour. For 95 percent of the total days, the failure probability during the hour with the highest failure probability must be less than one percent, *i.e.*, for at least 95 percent of the total days, less than one percent of all calls may be blocked in the worst hour due to unavailability of a radio access channel. These measurements would not be taken on a sample basis, but would be collected at each cell tower over all call attempts to or from customers for a 30-day period. In addition, if there are seasonal differences in traffic load—for example, if the area is a summer resort community—measurements to determine probability of call failure must be taken during the busy season.

In order to demonstrate sufficient network coverage, the applicant must demonstrate that either: (i) a single replacement service reaches the entire geographic footprint of the service area subject to discontinuance; or (ii) there are multiple providers who collectively cover the entirety of the affected service area.

(ii) The Second Prong: Critical Applications. Under the second prong, to remain eligible for automatic grant for a technology transition discontinuance application, an applicant must certify or show that at least one replacement service complies with regulations regarding availability and functionality of 911 service

for consumers and public safety answering points (PSAPs), industry standards regarding communications security, and regulations governing compatibility with assistive technologies.

Applicants must certify or show that a replacement service complies with Commission requirements pertaining to accessible, accurate, and reliable 911 service. In particular, applicants seeking streamlined treatment must certify compliance with: (i) 911 accessibility and location accuracy requirements; (ii) reliability and continuity of 911 service requirements with respect to backup power; and (iii) any other applicable emergency service requirements. In order to satisfy this prong of the adequate replacement test and thus remain eligible for automatic grant, the replacement service must offer a dispatchable address capability. In order to ensure that consumers are aware of technology transitions with sufficient time to take action, we also require applicants to provide to consumers the initial notice containing the information elements of Section 12.5 pursuant to Section 63.71.

Applicants also must certify or show that the replacement service offers comparably effective protection from network security risks. If relying on its own service, the applicant must demonstrate that the replacement service offers comparably effective protection from network security risks to remain eligible for automatic grant. That demonstration can be made in one of two ways. If the applicant's network security management practices are enterprise-wide, i.e., the enterprise safeguards availability, integrity, and confidentiality without differentiation between services, geographic areas, or service-providing affiliates, a certification to that effect will be sufficient to demonstrate that the replacement service offers comparably effective protection from network security risks. Alternatively, the applicant must show that: (i) it has evaluated any known risks and vulnerabilities of the replacement service; (ii) it has taken measures to address and mitigate the enumerated risks and vulnerabilities; (iii) it will inform consumers as part of the discontinuance notice required pursuant to Section 63.71 what security measure(s) the consumers should take vis-à-vis the replacement service (e.g., downloading and maintaining up-to-date anti-virus software) and other steps consumers may take to ensure safe use of the replacement service; and (iv) it will undertake best efforts to identify any vulnerable facilities (e.g., fire, EMS, law enforcement and other critical infrastructure facilities) and users, and work to address and mitigate the enumerated risks and vulnerabilities (e.g., the use of diverse IP paths for critical infrastructure). Where an applicant provides written guidance or Public Service Announcements to consumers (whether those consumers are individuals or organizations) in accordance with (iii) and (iv) above, the applicant should provide a generic copy of such guidance to the Commission. An applicant relying on a third-party service instead must exercise reasonable diligence to identify the security profile of the technology of the replacement service, based on the replacement technology's ability to provide availability, integrity, and confidentiality.

Applicants also must certify that at least one replacement service complies with the Commission's applicable accessibility, usability, and compatibility requirements governing services benefiting individuals with disabilities as a means to ensure that the replacement service offers accessibility levels at least as effective as those offered by the legacy voice service. The rules govern standards for accessibility, usability, and compatibility for: (i) telecommunications services and functionalities; (ii) voicemail and interactive menu functionalities; and (iii) advanced communications services (ACS), defined by statute to include both interconnected and non-interconnected VoIP service.

(iii) Third Prong: Interoperability with Key Applications. Applicants must ensure that replacement services are compatible with a defined list of devices, subject to sunset in 2025. These widely adopted low-speed modem devices—in particular, fax machines, home security alarms, medical monitoring devices, analog-only caption telephone sets, and point-of-sale terminals—make up the initial list of key applications for which applicants seeking automatic grant must demonstrate that any replacement service offers interoperability. To maintain eligibility for potential automatic grant status, applicants must certify or make an appropriate showing that a replacement service offers interoperability and compatibility of the replacement service with the list of key applications and functionalities. Applicants should only certify

compliance with this prong if the replacement service allows the key application to function or perform in a substantially similar manner as it did on the legacy voice service. Compliance with specific standards such as the as the ITU T.38 standard or the Managed Facilities-Based Voice Network (MFVN) standard would be persuasive evidence of compliance with this prong should the underlying certification be challenged.

(c) Price Information. In order to be considered for streamlined processing, applicants must include information about the price of replacement services compared to the legacy service in their application.

Statutory authority for this collection of information is contained in 47 U.S.C. sections 214 and 402 of the Communications Act of 1934, as amended.

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

2. The Commission will use the information to ensure that the public interest is protected as part of technology transitions and to ensure that applicants relying on the adequate replacement test only receive streamlined treatment if they have demonstrated fully that an adequate replacement for the discontinued service is available in the service area.
3. In an effort to reduce any burden created by these information collections, the Commission has adopted a streamlined approach for technology transition discontinuances involving services that are substantially similar to those for which a Section 214 discontinuance has previously been approved. Applicants are also able to file their discontinuance applications and accompanying exhibits electronically.
4. The Commission sought to eliminate duplicative efforts by allowing carriers to rely on previous showings that satisfy the adequate replacement test as a basis for supporting future applications involving substantially similar services. Moreover, the certification- and rules- based approach to the adequate replacement test allows applicants to rely on existing compliance efforts to satisfy the standards at issue here.
5. The Commission undertook numerous efforts to limit the burden on small businesses from this collection in order to advance technology transitions. This item adopted clear, streamlined criteria that will eliminate uncertainty that could potentially impede the industry from a prompt transition to newer technologies. As an initial note, the standards established under the adequate replacement test are all entirely voluntary and only necessary to achieve streamlined treatment when carriers seek to rely on this test. Allowing transition applicants to either demonstrate compliance with objective criteria *or* make a demonstration that, despite not being able to meet the criteria, the totality of the circumstances demonstrates that an adequate replacement exists, while remaining eligible for automatic grant gives applicants flexibility and decreases the burdens associated with strict compliance rules. Small business carriers with 100,000 or fewer subscriber lines, aggregated across all affiliates, may remain eligible for automatic grant without compliance with the specific testing requirements of the network performance criteria. The Commission's actions further promote speedy transitions and decrease compliance burdens by allowing applicants to rely on their successful certification of compliance with the adequate replacement test in a previously approved application involving a substantially similar service.
6. Failing to collect the information, or collecting it less frequently, would prevent the Commission from implementing Section 214 of the 1996 Act and reducing the compliance burdens and economic impact of the Commission's discontinuance requirements on carriers.

7. The collections are not being conducted in any manner inconsistent with the guideline of 5 CFR Section 1320.5(d)(2).
8. The Commission published a notice in the *Federal Register* to solicit public comment as required by 5 CFR §1320.8. See 81 FR 75054, October 28, 2016. No PRA comments were received from the notice.
9. The Commission does not presently provide and does not plan to provide any payment or gifts to the respondents.
10. Information filed in section 214 applications has generally been non-confidential. Requests from parties seeking confidentiality are considered by Commission staff pursuant to agency rules. See 47 CFR § 0.459.
11. There are no questions of a sensitive nature involved, nor are there any privacy issues.
12. The new estimates listed here are related to technology transition discontinuance applications seeking streamlined treatment under the adequate replacement test and do not disturb the existing estimates regarding all other Section 214 applications. Although Section 214 discontinuance applications related to technology transitions are a new type of application that is voluntary in nature, the Commission has made best efforts to estimate the number of applications it will likely receive. These new estimates are independent of the burdens governing traditional 214 discontinuance applications (also shown below), which we do not anticipate will be disturbed by this new category of application.

The Commission makes several assumptions regarding technology transitions discontinuance applications:

- We estimate that the number of respondents that will file technology transitions discontinuance applications annually will be 5.
- We estimate that the total number of applications/responses from those five respondents annually will be 25.
- Because repeat technology transition discontinuance applicants can rely on their successful certification of compliance with the adequate replacement test in a previously approved application involving a substantially similar service, cost and burden hours for repeat technology transitions applicants will be reduced.
- We estimate that approximately 40 percent of applications will involve packet-based networks using an internal performance measurement system, 40 percent will involve packet-based networks using an external performance measurement system, and 20 percent will involve non-packet based networks for which the call blocking test will apply.
- The Commission believes that most of these respondents will use their “in-house” staff to comply with these requirements, since, complex section 214 applications such as those related to technology transitions are generally prepared by high level in-house staff attorneys and engineers of applicants supported by lower categories of staff.

SUMMARY OF ANNUAL HOUR BURDEN AND COSTS

The following table summarizes respondents’ overall hour burdens and costs for their submission (responses or applications) for the technology transitions stream-lined application process. Detailed breakouts are provided in the following sections.

Subject	Number of Respondents	Number of Responses Annually	Annual Hour Burden Per Respondent	Total Annual Hour Burden	In-house Cost Per Respondent	Total In-house cost to Respondent
Adequate Replacement Test, First Prong, First Criteria	5	25	79	395	\$6,585	\$32,925
Adequate Replacement Test, First Prong, Second Criteria	5	25	45	225	\$3,845	\$19,225
Adequate Replacement Test, First Prong, Third Criteria	5	25	10	50	\$880	\$4,400
Adequate Replacement Test, Second Prong	5	25	10	50	\$880	\$4,400
Adequate Replacement Test, Third Prong	5	25	155	775	\$12,590	\$62,950
Price Information	5	25	16	80	\$1,220	\$6,090
TOTALS (New Information Collection Requirements)	5	25	315	1,575	\$26,000	\$129,990
Total – Other 214 Discontinuance Applications (Existing Information Collection Requirements)⁴	58	58	6	348	\$1,200	\$69,600

⁴ These figures represent existing respondents, responses, burden hours and in-house cost which have not changed since last approved by OMB for other Section 214 discontinuance applications that are not a part of the technology transitions stream lined application process.

CUMULATIVE TOTALS	63	83	321	1,923	\$27,200	\$199,590
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**ANNUAL BURDEN HOURS AND COST – FIRST PRONG, FIRST CRITERION
(NETWORK PERFORMANCE)**

This estimate is for the testing requirements under the first criteria—network performance--under the first prong of the test. Three types of measurements could apply based on the type of replacement network and the performance measurement system used by the applicant. As noted above, we estimate that approximately 40 percent of applications will involve packet-based networks using an internal performance measurement system, 40 percent will involve packet-based networks using an external performance measurement system, and 20 percent will involve non-packet based networks for which the call blocking test will apply.

Summary: This summary reflects our assumptions regarding the number and type of applications that will be received on an annual basis and the efficiencies we anticipate will be achieved for repeat applicants.

(1) Number of Respondents: 5

(2) Total Number of Responses Annually: 25

(3) Frequency of Response: One-time reporting requirement.

(4) Total Annual Hour Burden Per Respondent: 79

- We provide the following estimates for the average hour burdens associated with applications under each testing regime: 30 hours (packet-based, internal); 6 hours (packet-based, external); 7 hours non-packet based per response.
- We estimate that 40 percent of applications will involve packet-based replacement services and utilize an internal testing regime, 40 percent will involve packet-based replacement services and utilize an external testing regime, and 20 percent will involve non-packet based replacement services and use the voice call congestion testing regime.
- In reaching the estimated burden, we weighted the number of applications we expect to receive as follows: $(30 \text{ hours} \times 40) + (6 \text{ hours} \times 40) + (7 \text{ hours} \times 20) = 1,580 \text{ hours}$; 1,580 hours divided by 100 equals 15.8 hours. 15.8 hours times an estimated 5 responses per respondent equals 79 hours.

(5) Total Annual Hour Burden: 395

- An estimated 15.8 hours per response times 25 responses per year equals 395 hours.

(6) In-house Cost Per Respondent: \$6,585

- We provide the following estimates for the average cost burdens associated with applications under each testing regime: \$2,434 (packet-based, internal); \$517 (packet-based, external).
- We estimate that 40 percent of applications will involve packet-based replacement services and utilize an internal testing regime, 40 percent will involve packet-based replacement services and utilize an external testing regime, and 20 percent will involve non-packet based replacement services and use the voice call congestion testing regime.
- In reaching the estimated burden, we weighted the number of applications we expect to receive as follows: $\$97,360 (\$2,434/\text{response} \times 40) + \$20,680 (\$517 \times 40) + \$13,660 (\$683 \times 20) = \$131,700$; $\$131,700$ divided by 100 equals $\$1,317$, times 5 equals $\$6,585$.

(7) Total In-house Cost to Respondent: \$32,925

- $\$6,585$ times 5 equals $\$32,925$

The average overall estimates described in the preceding section are based on the calculations that follow below for each of the three discrete testing regimes envisioned.

Approach 1: Packet-Based Networks with an Internal Performance Measurement System

(1) Number of Respondents: 3

(2) Total Number of Responses Annually: 10

(3) Frequency of Response: One-time reporting requirement.

(4) Annual Hour Burden Per Response: 30

- The burden hour estimates are for setting up engineering processes for performance measurement systems; panelist lists; web presentation of associated material; and legal review.
- We are also assuming that a certain percentage of applications (10 percent) will concern replacement networks that have not met the performance benchmark required for a certification, and have included additional burden hours in our estimates for developing engineering and legal arguments to support claims that, in the “totality of circumstances,” these networks are still providing adequate service.
- Overall, we estimate the average burden per first application is 90 hours, which includes:
 - o 84 engineer hours + 2 web administrator hours + 4 attorney hours.
- We estimate that the average burden for subsequent applications is 2 attorney hours and 2 engineer hours.
- To find the average hour burden per response:
 - o $90 \text{ hours} \times 3 \text{ respondents' first applications} = 270 \text{ hours}$
 - o $4 \text{ hours} \times 7 \text{ subsequent applications} = 28 \text{ hours}$
 - o $270 \text{ hours} + 28 \text{ hours} = 298/10 \text{ responses} = \text{approximately } 30 \text{ hours per response}$

(5) In-House Cost Per Response: \$2,434 (rounded up)

- We assume that applicants will use in-house, senior engineers (equivalent to federal GS14, step 5, plus 30 percent overhead ($\$62.23/\text{hour} \times 1.3 = \$80.90/\text{hour}$)); web administrators (equivalent to federal GS12, step 5, plus 30 percent overhead ($\$44.28/\text{hour} \times 1.3 = \$57.56/\text{hour}$)); and attorneys (equivalent to federal GS15, step 5, plus 30 percent overhead ($\$73.20/\text{hour} \times 1.3 = \$95.16/\text{hour}$)) for these applications.
- We are also assuming that a certain percentage of applications (10 percent) will concern replacement networks that have not met the performance benchmark required for a certification, and have included additional burden hours in our estimates for developing engineering and legal arguments to support claims that, in the “totality of circumstances,” these networks are still providing adequate service.
- To find the average cost per response:
 - o $84 \text{ engineer hours at } \$80.90/\text{hour} + 2 \text{ web administrator hours at } \$57.56/\text{hour} + 4 \text{ attorney hours at } \$95.16/\text{hour} = \$7,291 \text{ per first application}$
 - o $\$7,291 \times 3 \text{ respondents' first applications} = \$21,873 \text{ for respondents' first applications}$

- o 2 attorney hours at \$95.16/hour + 2 engineer hours at \$80.90/hour = \$352 x 7 subsequent applications = \$2,464 for subsequent applications
- o $\$21,873 + \$2,464 = \$24,337/10$ responses = approximately \$2,434 per response (rounded up)

Approach 2: Packet-Based Networks with an External Performance Measurement System

(1) Number of Respondents: 2

(2) Total Number of Responses Annually: 10

(3) Frequency of Response: One-time reporting requirement.

(4) Annual Hour Burden Per Response: 6

- The burden hour estimates are for setting up engineering processes for external Latency & Packet Loss performance measurement systems; contacts; panelist lists; Web presentation of associated material; and legal review.
- We are also assuming that a certain percentage of applications (10 percent) will concern replacement networks that have not met the performance benchmark required for a certification, and have included additional burden hours in our estimates for developing engineering and legal arguments to support claims that, in the “totality of circumstances,” these networks are still providing adequate service.
- Overall, we estimate the average internal burden per first response is 11 hours, which includes:
 - o 5 engineer hours + 2 web administrator hours + 4 attorney hours.
- We estimate that the average burden for subsequent applications is 2 attorney hours and 2 engineer hours.
- To find the average hour burden per response:
 - o 11 hours x 3 respondents’ first applications = 33 hours
 - o 4 hours x 7 subsequent applications = 28 hours
 - o 33 hours + 28 hours = 61/10 responses = approximately 6 hours per response

(5) In-House Cost Per Response: \$517

- We assume that applicants will use in-house, senior engineers (equivalent to federal GS14, step 5, plus 30 percent overhead ($\$62.23/\text{hour} \times 1.3 = \$80.90/\text{hour}$)); web administrators (equivalent to federal GS12, step 5, plus 30 percent overhead ($\$44.28/\text{hour} \times 1.3 = \$57.56/\text{hour}$)); and attorneys (equivalent to federal GS15, step 5, plus 30 percent overhead ($\$73.20/\text{hour} \times 1.3 = \$95.16/\text{hour}$)) for these applications.
- We are also assuming that a certain percentage of applications (10 percent) will concern replacement networks that have not met the performance benchmark required for a certification, and have included additional burden hours in our estimates for developing engineering and legal arguments to support claims that, in the “totality of circumstances,” these networks are still providing adequate service.
- Although the Commission expects most reporting requirements for Performance metrics (Latency & Packet Loss) will be met by respondents’ “in-house” staff as noted above, some of the larger respondents (we estimate approximately half of respondents) may have external costs for deploying their own performance measurement testing program. These external costs will be

further described in Item 13 of the supporting statement. To find the average cost per response:

- o 5 engineer hours at \$80.90/hour + 2 web administrator hours at \$57.56/hour + 4 attorney hours at \$95.16/hour = \$900 per first application
- o \$900 x 3 respondents' first applications = \$2,700 for respondents' first applications
- o 2 attorney hours at \$95.16/hour + 2 engineer hours at \$80.90/hour = \$352 x 7 subsequent applications = \$2,464 for subsequent applications
- o \$2,700 + \$2,464 = \$5,164/10 responses = approximately \$517 annual per response

Approach 3: Non-Packet-Based Networks: Voice-Based Congestion Testing

The blocking test is applied only for technology transitions in which the applicant's copper loop is being replaced by a non-packet, wireless technology. To measure voice-based congestion on non-packet wireless networks, the provider must calculate the probability of congestion-based voice call failure for every hour. For each of the 30 days measured, the provider must then determine the hour that had the highest probability of congestion-based voice call failure that day. The probability of congestion-based voice call failure each hour should be determined by dividing the number of failed calls during the hour by the total number of call attempts during the hour. For 95 percent of the total days, the failure probability during the hour with the highest failure probability must be less than one percent (i.e., for at least 95 percent of the total days, less than one percent of all calls may be blocked in the worst hour due to unavailability of a radio access channel). These measurements would not be taken on a sample basis, but would be collected at each cell tower over all call attempts to or from customers for a 30-day period. In addition, if there are seasonal differences in traffic load—for example, if the area is a summer resort community—measurements to determine probability of call failure must be taken during the busy season.

(1) Number of Respondents: 2

(2) Total Number of Responses Annually: 5

(3) Frequency of Response: One-time reporting requirement.

(4) Annual Hour Burden Per Response: 7

- We assume that applicants are already collecting the data needed for calculating blocking probability as a routine part of managing their networks. No additional burden hours are assumed for making blocking-related measurements. The burden hour estimates are for compiling and processing the data, which may come from multiple management systems; performing the blocking probability calculations needed for certifications; and legal review.
- The burden hour estimates are for setting up engineering processes for application interoperability tests; web presentation of associated material; and legal review.
- We are also assuming that a certain percentage of applications (10 percent) will concern replacement networks that have not met the performance benchmark required for a certification, and have included additional burden hours in our estimates for developing engineering and legal arguments to support claims that, in the "totality of circumstances," these networks are still providing adequate service.
- Overall, we estimate the average burden per first response is 29 hours, which includes:
 - o 23 engineer hours + 2 web administrator hours and + 4 attorney hours.
- We estimate that the average burden for subsequent applications is 2 attorney hours and 2 engineer hours.

- To find the average hour burden per response:
 - 29 hours x 2 respondents' first applications = 58 hours
 - 4 hours x 3 subsequent applications = 12 hours
 - 58 hours + 12 hours = 70/10 responses = 7 hours per response

(5) In-House Cost Per Response: \$682

- We assume that applicants will use in-house, senior engineers (equivalent to federal GS14, step 5, plus 30 percent overhead (\$62.23/hour x 1.3 = \$80.90/hour)); web administrators ((equivalent to federal GS12, step 5, plus 30 percent overhead (\$44.28/hour x 1.3 = \$57.56/hour)); and attorneys (equivalent to federal GS15, step 5, plus 30 percent overhead (\$73.20/hour x 1.3 = \$95.16/hour)) for these applications.
- We are also assuming that a certain percentage of applications (10 percent) will concern replacement networks that have not met the performance benchmark required for a certification, and have included additional burden hours in our estimates for developing engineering and legal arguments to support claims that, in the "totality of circumstances," these networks are still providing adequate service.
- To find the average cost per response:
 - 23 engineer hours at \$80.90/hour + 2 web administrator hours at \$57.56/hour + 4 attorney hours at \$95.16/hour = \$2,356 per first application
 - \$2,356 x 2 respondents' first applications = \$4,712
 - 2 attorney hours at \$95.16/hour + 2 engineer hours at \$80.90/hour = \$352 x 3 subsequent applications = \$1,056 for subsequent applications
 - \$2,356 + \$1,056 = \$3,412/5 responses = approximately \$682 per response

**ANNUAL BURDEN HOURS AND COST – FIRST PRONG, SECOND CRITERIA
(AVAILABILITY TESTS)**

This estimate is for the second criteria of the first prong. In order to meet this aspect of the network performance prong and be eligible for automatic grant, an applicant must demonstrate a service availability of 99.99 percent or greater. The replacement service's availability will be calculated using data regarding customer trouble reports, the average repair interval in responding to those reports, the number of lines in the service area, and the duration of the observation period to reach a representative measurement of a "four 9s" benchmark used to measure service availability.

- (1) Number of Respondents: 5
- (2) Total Number of Responses Annually: 25
- (3) Frequency of Response: One-time reporting requirement.
- (4) Total Annual Hour Burden Per Respondent: 45

- We assume that respondents are already collecting the data needed for calculating network availability as a routine part of managing their networks. No additional burden hours are assumed for making availability-related measurements. The burden hour estimates are for compiling and processing the data, which may come from multiple management systems; performing the availability calculations needed for certifications; and legal review.

- The burden hour estimates are for setting up engineering processes for application interoperability tests; web presentation of associated material; and legal review.
- We are also assuming that a certain percentage of applications (10 percent) will concern replacement networks that have not met the performance benchmark required for a certification, and have included additional burden hours in our estimates for developing engineering and legal arguments to support claims that, in the “totality of circumstances,” these networks are still providing adequate service.
- Overall, we estimate that the burden per first response is 30 hours, which includes:
 - o 24 engineer hours + 2 web administrator hours + 4 attorney hours.
- We estimate that the average hour burden for subsequent applications is 2 attorney hours and 2 engineer hours.
- To find the average hour burden per response/respondent:
 - o 30 hours x 5 respondents’ first applications = 150 hours
 - o 4 hours x 20 subsequent applications = 80 hours
 - o 150 hours + 80 hours = 230/25 responses = approximately 9 hours per response
 - o 9 hours per response x 5 responses per respondent = 45 hours per respondent

(5) Total Annual Hour Burden: 225

- Based on 9 hours per response x 25 responses = 225 hours annually

(6) In-house Cost Per Respondent: \$3,846

- We assume that applicants will use in-house, senior engineers (equivalent to federal GS14, step 5, plus 30 percent overhead (\$62.23/hour x 1.3 = \$80.90/hour)); web administrators ((equivalent to federal GS12, step 5, plus 30 percent overhead (\$44.28/hour x 1.3 = \$57.56/hour)); and attorneys (equivalent to federal GS15, step 5, plus 30 percent overhead (\$73.20/hour x 1.3 = \$95.16/hour)) for these applications.
- We are also assuming that a certain percentage of applications (10 percent) will concern replacement networks that have not met the performance benchmark required for a certification, and have included additional burden hours in our estimates for developing engineering and legal arguments to support claims that, in the “totality of circumstances,” these networks are still providing adequate service.
- To find the average cost per response/respondent:
 - o 24 engineer hours at \$80.90/hour + 2 web administrator hours at \$57.56/hour + 4 attorney hours at \$95.16/hour = \$2,437 per first application
 - o \$2,437 x 5 respondents’ first applications = \$12,185 for respondents’ first applications
 - o 2 attorney hours at \$95.16/hour + 2 engineer hours at \$80.90/hour = \$352 x 20 subsequent applications = \$7,040 for subsequent applications
 - o \$12,185 + \$7,040 = \$19,225 annually/25 responses = approximately \$769 per response x 25 responses = \$19,225 annually/5 respondents = \$3,845 per respondent

(7) Total In-house Cost to Respondent: \$19,225

- Based on \$769 x 25 responses = \$19,225

ANNUAL BURDEN HOURS AND COST – FIRST PRONG, THIRD CRITERIA (NETWORK COVERAGE TESTS)

This estimate is for the third criteria of the first prong. In order to demonstrate sufficient network coverage, the applicant must certify or demonstrate that either: (i) a single replacement service reaches the entire geographic footprint of the service area subject to discontinuance; or (ii) there are multiple providers who collectively cover the entirety of the affected service area.

(1) Number of Respondents: 5

(2) Total Number of Responses Annually: 25

(3) Frequency of Response: One-time reporting requirement.

(4) Total Annual Hour Burden Per Respondent: 10

- We assume that respondents are already collecting the data needed for certifying sufficient network coverage as a routine part of managing their networks. The burden hour estimates are for engineers to compile, process, and review the data, and for legal review. We estimate the same number of hours will be needed for each certification and therefore did not discount the hours for a respondents' subsequent applications.
- We are also assuming that a certain percentage of applications (10 percent) will concern replacement networks that have not met the performance benchmark required for a certification, and have included additional burden hours in our estimates for developing engineering and legal arguments to support claims that, in the "totality of circumstances," these networks are still providing adequate service.
- Overall, we estimate that the burden per response is 2 hours, which includes:
 - o 1 engineer hours + 1 attorney hours.
- To find the hour burden per respondent:
 - o $2 \text{ hours} \times 25 \text{ responses per year} = 50 \text{ hours annually} / 5 \text{ respondents} = 10 \text{ hours per respondent}$

(5) Total Annual Hour Burden: 50

- Based on 2 hours per response x 25 responses = 50 hours annually

(6) In-house Cost Per Respondent: \$880

- We assume that applicants will use in-house, senior engineers (equivalent to federal GS14, step 5, plus 30 percent overhead ($\$62.23/\text{hour} \times 1.3 = \$80.90/\text{hour}$); and attorneys (equivalent to federal GS15, step 5, plus 30 percent overhead ($\$73.20/\text{hour} \times 1.3 = \$95.16/\text{hour}$)) for these applications.
- We are also assuming that a certain percentage of applications (10 percent) will concern replacement networks that have not met the performance benchmark required for a certification, and have included additional burden hours in our estimates for developing engineering and legal arguments to support claims that, in the "totality of circumstances," these networks are still providing adequate service.
- To find the average cost per response/respondent:
 - o 1 engineer hour at $\$80.90/\text{hour}$ + 1 attorney hour at $\$95.16/\text{hour}$ = $\$176$ per application
 - o $\$176 \text{ per application} \times 25 \text{ responses} = \text{approximately } \$4,400 \text{ annually} / 5 \text{ respondents} = \$880 \text{ per respondent}$

(7) Total In-house Cost to Respondent: \$4,400

- Based on \$176 per application x 25 responses = \$4,400 annually

ANNUAL BURDEN HOURS AND COST – SECOND PRONG (CRITICAL APPLICATIONS)

This estimate is for the second prong of the test. Under the second prong, to remain eligible for automatic grant for a technology transition discontinuance application, an applicant must certify or show that at least one replacement service complies with regulations regarding availability and functionality of 911 service for consumers and public safety answering points (PSAPs), industry standards regarding communications security, and regulations governing compatibility with assistive technologies. The specific requirements are described above.

(1) Number of Respondents: 5

(2) Total Number of Responses Annually: 25

(3) Frequency of Response: One-time reporting requirement.

(4) Total Annual Hour Burden Per Respondent: 10

- We assume that respondents are already complying with these requirements as a routine part of their business management. The burden hour estimates are for engineers and attorneys to review the requirements and certify compliance. We estimate the same number of hours will be needed for each certification and therefore did not discount the hours for a respondents' subsequent applications.
- Overall, we estimate that the burden per response is 2 hours, which includes:
 - o 1 engineer hours + 1 attorney hours = 2 hours.
- To find the hour burden per respondent:
 - o 2 hours x 25 responses per year = 50 hours annually/5 respondents = 10 hours per respondent

(5) Total Annual Hour Burden: 50

- Based on 2 hours per response x 25 responses = 50 hours annually

(6) In-House Cost Per Respondent: \$880

- We assume that applicants will use in-house, senior engineers (equivalent to federal GS14, step 5, plus 30 percent overhead (\$62.23/hour x 1.3 = \$80.90/hour); and attorneys (equivalent to federal GS15, step 5, plus 30 percent overhead (\$73.20/hour x 1.3 = \$95.16/hour)) for these applications.
- To find the average cost per response/respondent:
 - o 1 engineer hour at \$80.90/hour + 1 attorney hour at \$95.16/hour = \$176 per application
 - o \$176 per application x 25 responses = approximately \$4,400 annually/5 respondents = \$880 per respondent

(7) Total In-House Cost to Respondent: \$4,400

- Based on \$176 per application x 25 responses = \$4,400 annually

ANNUAL BURDEN HOURS AND COST- THIRD PRONG (APPLICATION INTEROPERABILITY TEST)

This estimate is for the third prong of the test. Applicants must ensure that replacement services are compatible with a defined list of devices, subject to sunset in 2025. These low-speed modem devices—in particular, fax machines, home security alarms, medical monitoring devices, analog-only caption telephone sets, and point-of-sale terminals—make up the initial list of applications for which applicants seeking automatic grant must demonstrate that any replacement service offers interoperability.

(1) Number of Respondents: 5

(2) Total Number of Responses Annually: 25

(3) Frequency of Response: One-time reporting requirement.

(4) Total Annual Hour Burden Per Respondent: 155

- The burden hour estimates are for setting up engineering processes for application interoperability tests; web presentation of associated material; and legal review.
- We are also assuming that a certain percentage of applications (10 percent) will concern replacement networks that have not met the performance benchmark required for a certification, and have included additional burden hours in our estimates for developing engineering and legal arguments to support claims that, in the “totality of circumstances,” these networks are still providing adequate service.
- Overall, we estimate the average hour burden per response is 31 hours. Please see the more detailed breakout below.
 - 25 engineer hours + 2 web administrator hours + 4 attorney hours = 31 hours
- To find the hour burden per respondent:
 - 31 hours per response x 25 responses = 775/5 respondents = 155 hours per respondent

(5) Total Annual Hour Burden: 775

- Based on 31 hours per response x 25 responses = 775 hours annually

(6) In-house Cost Per Respondent: \$12,590

- We assume that applicants will use in-house, senior engineers (equivalent to federal GS14, step 5, plus 30 percent overhead (\$62.23/hour x 1.3 = \$80.90/hour)); web administrators (equivalent to federal GS12, step 5, plus 30 percent overhead (\$44.28/hour x 1.3 = \$57.56/hour)); and attorneys (equivalent to federal GS15, step 5, plus 30 percent overhead (\$73.20/hour x 1.3 = \$95.16/hour)) for these applications.
- We are also assuming that a certain percentage of applications (10 percent) will concern replacement networks that have not met the performance benchmark required for a certification, and have included additional burden hours in our estimates for developing engineering and legal arguments to support claims that, in the “totality of circumstances,” these networks are still providing adequate service.
- To find the average cost per response/respondent:
 - 25 engineer hours at \$80.90/hour + 2 web administrator hours at \$57.56/hour + 4 attorney hours at \$95.16/hour = approximately \$2,518 per application
 - \$2,518 x 25 applications = approximately \$62,950 annually/5 respondents = approximately \$12,590 per respondent

(7) Total In-house Cost to Respondent: \$62,950

- Based on \$2,518 per application x 25 responses = \$62,950 annually

ANNUAL BURDEN HOURS AND COST – PRICE INFORMATION

In order to be considered for streamlined processing, applicants must include information about the price of replacement services compared to the legacy service in their application.

(1) Number of Respondents: 5

(2) Total Number of Responses Annually: 25

(3) Frequency of Response: One-time reporting requirement.

(4) Total Annual Hour Burden Per Respondent: 16

- The burden hour estimates are for engineers to gather and compare pricing information and for legal review.
- Overall, we estimate the average burden per first response is 8 hours, which includes:
 - o 6 engineer hours + 2 attorney hours = 8 hours
- We estimate that the average burden for subsequent applications is 1 engineer hour and one attorney hour.
- To find the average hour burden per response/respondent:
 - o 8 hours x 5 respondents' first applications = 40 hours
 - o 2 hours x 20 subsequent applications = 40 hours
 - o 80 hours/25 applications = 3.2 hours per application
 - o 40 hours + 40 hours = 80 hours/5 respondents = 16 hours per respondent

(5) Total Annual Hour Burden: 80

- Based on 3.2 hours per response x 25 responses = 80 hours annually

(6) In-House Cost Per Respondent: \$1,220

- We assume that applicants will use in-house, senior engineers (equivalent to federal GS14, step 5, plus 30 percent overhead (\$62.23/hour x 1.3 = \$80.90/hour)); and attorneys (equivalent to federal GS15, step 5, plus 30 percent overhead (\$73.20/hour x 1.3 = \$95.16/hour)) for these applications.
- To find the average cost per response/respondent:
 - o 4 engineer hours at \$80.90/hour + 2 attorney hours at \$95.16/hour = \$514 per first application
 - o \$514 x 5 respondents' first applications = \$2,570 for respondents' first applications
 - o 1 attorney hours at \$95.16/hour + 1 engineer hours at \$80.90/hour = \$176 x 20 subsequent applications = \$3,520 for subsequent applications
 - o \$2,570 + \$3,520 = \$6,090 /25 responses = approximately \$244 annual per response
 - o \$244 annual cost per response x 5 responses per respondent = \$1,220

(7) Total In-House Cost to Respondent: \$6,090

- Based on \$244 per application x 25 responses = \$6,090 annually

13. Estimates of annualized costs to respondents for the hour burdens for providing these applications:

- The Commission makes the following estimate for external costs for the first applications or responses of mid to large wireline carriers. Those costs would not be repeated for future applications. Therefore, we estimate \$27,900 in one-time costs but averaged over five applications (thus reducing the cost per application to \$5,580) and only applied to half of respondents, making an approximate burden per response for external costs of \$2,790
 - *Equipment & Implementation Costs Per Respondent* = \$7,500
 - 100 measurement devices x \$75 per device = \$7,500 cost per respondent to include shipping and other associated implementation costs. This includes residential and enterprise testing. We assume that Respondents will re-use or re-deploy these devices and reduce total costs over multiple transitions.
 - Annualized costs are not applicable as the testing is for 1 month\
 - *Operations and Management Costs Per Respondent* = \$20,400
 - \$14,400 server lease costs + \$6,000 consumer panel maintenance costs = \$20,400 costs per respondent. We assume these costs will be spread
 - across several responses by each Respondent.

Total External Costs: \$7,500 + 20,400 = \$27,900

14. The estimates listed here are related to technology transition discontinuance applications seeking streamlined treatment and the existing estimates regarding all other Section 214 applications. Estimated annual cost to the Federal government is **\$179,015** based on the current requirements and is estimated as follows:

- We will use FCC engineers (equivalent to an average of federal GS10-14, step 5, plus 30 percent overhead ($\$45.95/\text{hour}^5 \times 1.3 = 59.73$) and attorney advisors (equivalent to federal GS13-15, step 5, plus 30 percent overhead; including locality pay ($\$62.69/\text{hour}^6 \times 1.3 = \$81.50/\text{hour}$)) for these applications.
- Technology Transition Discontinuance Applications Seeking Streamlined Treatment:
 - Overall, we estimate the average hours per response is 42 hours.
 - 2 engineer hours at \$59.73/hour + 40 attorney hours at \$81.50/hour = \$3,379 per application
 - Total Annual Hour Burden: 1,050
 - Based on 42 hours per response x 25 responses.
 - Total Annual Cost: \$84,475
 - Based on \$3,379 per response x 25 responses.
- All Other 214 Applications:

⁵ This hourly rate represents the average for step 5 for each of grades 10 through 14.

⁶ This hourly rate represents the average for step 5 for each of grades 13 through 15.

- o Overall, we estimate the average hours per response is 20 hours.
 - 20 attorney hours at \$81.50/hour = \$1,630 per application
 - o Total Annual Hour Burden: 1,160
 - Based on 20 hours per response x 58 responses.
 - o Total Annual Cost: \$94,540
 - Based on \$1,630 per response x 58 responses.
 - The total cost to the Federal government for Section 214 applications is **\$84,475 + \$94,540 = \$179,015.**
15. The Commission is reporting program changes/increases to the number of respondents, responses and burden hours with this revised collection. The total number of respondents increased from 58 to 63 (3), and the total number of responses increased from 58 to 83 (25) and the total annual burden hours increased from 348 to 1,923 (1,575). Additionally, the total annual cost burden increased from \$0 to \$27,900. These program changes/increases are due to the Commission adopting the *2016 Technology Transitions Order*.
16. No information is proposed to be published.
17. Approval to not display the expiration date for OMB approval is not sought since this information collection does not include any forms, etc.
18. The Commission's estimates of the total number of respondents, annual responses, and total annual burden hours associated with this collection stated in the 30-day notice differ from the estimates in the 60-day notice published in the Federal Register on October 28, 2016 (81 FR 75054). These revised estimates are the result of the Commission separately seeking OMB approval of four other revisions to the section 214 discontinuance rules adopted in the *2016 Technology Transitions Order*, section 214 discontinuance rule revisions adopted in November 2017 in the *Wireline Infrastructure Order* (FCC 17-154), and not seeking OMB approval herein of the consumer education and outreach requirements adopted in the *2016 Technology Transitions Order*.

There are no other exceptions the Certification Statement.

B. Collections of Information Employing Statistical Methods:

The Commission does not anticipate that the collection of information will employ statistical methods.