

DEPARTMENT OF TRANSPORTATION

INFORMATION COLLECTION SUPPORTING STATEMENT NONDISCRIMINATION ON THE BASIS OF DISABILITY IN AIR TRAVEL OMB CONTROL NO: 2105-0571

INTRODUCTION

This is to request that the Office of Management and Budget (OMB) approve and clear the three-year renewal for the information collection entitled, “Nondiscrimination on the Basis of Disability in Air Travel”.

Part A. Justification

1. Circumstances that make the collection of information necessary. EXPLAIN THE CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY. IDENTIFY ANY LEGAL OR ADMINISTRATIVE REQUIREMENTS THAT NECESSITATE THE COLLECTION. ATTACH A COPY OF THE APPROPRIATE SECTION OF EACH STATUTE AND REGULATION MANDATING OR AUTHORIZING THE COLLECTION OF INFORMATION.

The Air Carrier Access Act (ACAA, 49 U.S.C. § 41705) prohibits discriminatory treatment of persons with disabilities in air transportation. The Department of Transportation’s rule implementing the ACAA (14 CFR Part 382, Nondiscrimination on the Basis of Disability in Air Transportation) requires U.S. and foreign air carriers that operate at least one aircraft having a seating capacity of more than 60 passengers to make their primary Web sites that market air transportation to the general public in the U.S. accessible to individuals with disabilities. Among the features carriers must have on their accessible web sites is an online service request form for passengers to request disability accommodations required by Part 382 to enable access to air transportation. These carriers must also provide an electronic disclosure to users of their websites who click to link to external or third party Web sites or applications. The disclosure must notify the user that the external or third party Web site or applications may lack the same accessibility features as the carrier’s website.

These information collections support the DOT strategic goal of increasing access to transportation services for all by 1) providing passengers with disabilities an effective and convenient mechanism to communicate in advance the accommodations they need to access air transportation, and 2) notifying users accessing a third-party application or external web site from the carrier’s Web site that the same accessibility features and policies may not be available. In addition, the latter information collection is necessary to comply with the Web Content Accessibility Guidelines (WCAG) standard 2.0, Level AA, mandated by the Department’s rules in Part 382.

2. How, by whom, and for what purpose the information is to be used. INDICATE HOW, BY WHOM, AND FOR WHAT PURPOSE THE INFORMATION IS TO BE USED. EXCEPT FOR A NEW COLLECTION, INDICATE THE ACTUAL USE THE AGENCY HAS MADE OF THE INFORMATION RECEIVED FROM THE CURRENT COLLECTION.

Online service request form

The Department's rules require U.S. and foreign air carriers to make an online service request form available on their Web sites for passengers with disabilities to request services required by Part 382, including but not limited to, wheelchair assistance, seating accommodation, escort assistance for a visually impaired passenger, and stowage of an assistive device. At their discretion, carriers may require passengers with disabilities making an online service request to provide personal information (e.g., telephone number, email address) that the carrier can use to contact passengers about their accommodation needs. The electronic request form is intended to allow passengers to create and transmit a service request directly to a carrier before a flight. Carriers should use the service request information to facilitate appropriate, timely assistance to their passengers. Carriers may also use their online service request data in aggregated form to plan for the types and volume of service requests they receive across time periods and routes.

Web Site disclaimer notice

The Department's rules require that an electronic disclaimer notice be displayed when a user clicks a link on a carrier's accessible Web site to access a third-party Web site or software application. The disclaimer notice serves to notify individuals with disabilities that such third-party Web sites and applications are not within the carrier's control and may not be accessible. The notice to users provided by the disclaimer also ensures that the carrier remains in compliance with the WCAG 2.0 standard should the third-party Web site or application not meet the accessibility standards.

3. Extent of automated information collection. DESCRIBE WHETHER, AND TO WHAT EXTENT, THE COLLECTION OF INFORMATION INVOLVES THE USE OF AUTOMATED, ELECTRONIC, MECHANICAL, OR OTHER TECHNOLOGICAL COLLECTION TECHNIQUES OR OTHER FORMS OF INFORMATION TECHNOLOGY, E.G. PERMITTING ELECTRONIC SUBMISSION OF RESPONSES, AND THE BASIS FOR THE DECISION FOR ADOPTING THIS MEANS OF COLLECTION. ALSO DESCRIBE ANY CONSIDERATION OF USING INFORMATION TECHNOLOGY TO REDUCE BURDEN.

Online service request form

The online service request form enables passengers to create an electronic record of their accommodation request and transmit it directly to the carrier, reducing the risk of miscommunication or loss of information that may occur when a service request is made over the

phone through a customer service representative. It also enables the carrier to transmit the service request more efficiently to staff members responsible for providing the service.

Web Site disclaimer notice

The electronic disclaimer notice is the most direct and efficient way to inform individuals with disabilities that a third-party Web site or application accessed from a carrier's Web site is not within the carrier's control and may not be accessible.

4. Describe efforts to identify duplication. DESCRIBE EFFORTS TO IDENTIFY DUPLICATION. SHOW SPECIFICALLY WHY ANY SIMILAR INFORMATION ALREADY AVAILABLE CANNOT BE USED OR MODIFIED FOR USE FOR THE PURPOSES DESCRIBED IN ITEM 2 ABOVE.

Online service request form

Most carriers provide a reservations or customer service telephone number that passengers may call to make a service request through an agent. Carrier staff reductions and long call queues to reach an agent have made requesting service by phone a formidable and time consuming process. The web site form provides an alternative, not a duplicate, method for passengers to independently request and electronically submit to the carrier their requests for flight-related disability accommodations.

Web Site disclaimer notice

There is no equivalent method for notifying users of a carrier's Web site that third-party Web sites or applications accessed from the carrier's Web site are not within the carrier's control and may not be accessible.

5. Efforts to minimize the burden on small businesses. IF THE COLLECTION OF INFORMATION IMPACTS SMALL BUSINESSES OR OTHER SMALL ENTITIES, DESCRIBE ANY METHODS USED TO MINIMIZE BURDEN.

The Department certified that the rule that requires the information collections does not impact a substantial number of small businesses or other small entities. The Department tailored the online service request form and Web site disclaimer notice requirements to apply only to larger carriers (U.S. and foreign carriers that use at least one aircraft with a design capacity of more than 60 passengers).

6. Impact of less frequent collection of information. DESCRIBE THE CONSEQUENCE TO FEDERAL PROGRAM OR POLICY ACTIVITIES IF THE COLLECTION IS NOT CONDUCTED OR IS CONDUCTED LESS FREQUENTLY, AS WELL AS ANY TECHNICAL OR LEGAL OBSTACLES TO REDUCING BURDEN.

Online service request form

Without an electronic service request form, passengers will rely on a phone call to the carrier's customer service or reservation line to request a disability accommodation in advance or will make their requests initially upon arriving at the check-in counter on the day of the flight.

Web Site disclaimer notice

There is no simpler, more straightforward alternative for notifying Web site users about the potential accessibility limitations of a third party Web site or software than the disclaimer notice.

7. Special Circumstances. EXPLAIN ANY SPECIAL CIRCUMSTANCES THAT WOULD CAUSE AN INFORMATION COLLECTION TO BE CONDUCTED IN A MANNER:

- REQUIRING RESPONDENTS TO REPORT INFORMATION TO THE AGENCY MORE OFTEN THAN QUARTERLY;**
- REQUIRING RESPONDENTS TO PREPARE A WRITTEN RESPONSE TO A COLLECTION OF INFORMATION IN FEWER THAN 30 DAYS AFTER RECEIPT OF IT;**
- REQUIRING RESPONDENTS TO SUBMIT MORE THAN AN ORIGINAL AND TWO COPIES OF ANY DOCUMENT;**
- REQUIRING RESPONDENTS TO RETAIN RECORDS, OTHER THAN HEALTH, MEDICAL, GOVERNMENT CONTRACT, GRANT-IN-AID, OR TAX RECORDS FOR MORE THAN THREE YEARS;**
- IN CONNECTION WITH A STATISTICAL SURVEY, THAT IS NOT DESIGNED TO PRODUCE VALID AND RELIABLE RESULTS THAT CAN BE GENERALIZED TO THE UNIVERSE OF STUDY;**
- REQUIRING THE USE OF A STATISTICAL DATA CLASSIFICATION THAT HAS NOT BEEN REVIEWED AND APPROVED BY OMB;**
- THAT INCLUDES A PLEDGE OF CONFIDENTIALITY THAT IS NOT SUPPORTED BY AUTHORITY ESTABLISHED IN STATUTE OR REGULATION, THAT IS NOT SUPPORTED BY DISCLOSURE AND DATA SECURITY POLICIES THAT ARE CONSISTENT WITH THE PLEDGE, OR WHICH UNNECESSARILY IMPEDES SHARING OF DATA WITH OTHER AGENCIES FOR COMPATIBLE CONFIDENTIAL USE; OR**
- REQUIRING RESPONDENTS TO SUBMIT PROPRIETARY TRADE SECRET, OR OTHER CONFIDENTIAL INFORMATION UNLESS THE AGENCY CAN**

DEMONSTRATE THAT IT HAS INSTITUTED PROCEDURES TO PROTECT THE INFORMATION'S CONFIDENTIALITY TO THE EXTENT PERMITTED BY LAW.

There are no special circumstances requiring information to be collected in any manner stated above.

8. Compliance with 5 CFR 1320.8(d). IF APPLICABLE, PROVIDE A COPY AND IDENTIFY THE DATE AND PAGE NUMBER OF 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 PUBLIC COMMENTS RECEIVED IN RESPONSE TO THAT NOTICE AND DESCRIBE ACTIONS TAKEN BY THE AGENCY IN RESPONSE TO THOSE COMMENTS. SPECIFICALLY ADDRESS COMMENTS RECEIVED ON COST AND HOUR BURDEN.

DESCRIBE EFFORTS TO CONSULT WITH PERSONS OUTSIDE THE AGENCY TO OBTAIN THEIR VIEWS ON THE AVAILABILITY OF DATA, FREQUENCY OF COLLECTION, THE CLARITY OF INSTRUCTIONS AND RECORDKEEPING, DISCLOSURE, OR REPORTING FORMAT (IF ANY), AND ON THE DATA ELEMENTS TO BE RECORDED, DISCLOSED, OR REPORTED.

CONSULTATION WITH REPRESENTATIVES OF THOSE FROM WHOM INFORMATION IS TO BE OBTAINED OR THOSE WHO MUST COMPILE RECORDS SHOULD OCCUR AT LEAST ONCE EVERY 3 YEARS--EVEN IF THE COLLECTION OF INFORMATION ACTIVITY IS THE SAME AS IN PRIOR PERIODS. THERE MAY BE CIRCUMSTANCES THAT MAY PRECLUDE CONSULTATION IN A SPECIFIC SITUATION. THESE CIRCUMSTANCES SHOULD BE EXPLAINED.

Comments were solicited for the subject information collection requirements with the publication in the Federal Register of a Supplemental Notice of Proposed Rulemaking (SNPRM) in Docket DOT-OST-2011-0177 entitled "Nondiscrimination on Basis of Disability in Air Travel: Accessibility of Web Sites and Automated Kiosks at U.S. Airports" on September 26, 2011, (76 Fed. Reg. 59307; September 26, 2011). This SNPRM followed a Notice of Proposed Rulemaking (NPRM) entitled "Nondiscrimination on the Basis of Disability in Air Travel" issued on November 4, 2004 (69 Fed. Reg. 64364-64395; November 4, 2004). Approximately 84 comments were received on the SNPRM. These comments were analysed and considered when drafting the Final Rule that contained the subject requirements. See 78 Fed. Reg. 67882; November 12, 2013. The preamble discussion of the Final Rule addressed comments regarding the online disability accommodation request specifically. See 78 Fed. Reg. 67900.

On November 12, 2013, the Department gave 60 day notice of its intent to obtain OMB control numbers authorizing the new information collections in the final rule. The Department did not receive any public comment on this notice. On September 28, 2015, the Department published a 30 notice intended to give the public additional time to comment. The Department is not aware that OIRA received any comments with respect to this notice.

To renew this control number, notice and comment were solicited with publication of a 60-Day notice in the Federal Register (83 Fed. Reg. 17221, April 18, 2018). The Department received one public comment on the information collection.¹ The Commenter, Paralyzed Veterans of America (PVA), supported both information collections. The Department responded to the PVA comment in the 30-day notice included with this renewal package. A 30-day notice was published on July 24, 2018 (83 FR 35054).

9. Payment or gifts to respondents. EXPLAIN ANY DECISION TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS, OTHER THAN REMUNERATION OF CONTRACTORS OR GRANTEEES.

No payment or gift of any kind has been or will be provided to any respondents in the public sector or to carriers that must accomplish these changes to their Web sites pursuant to this rule.

10. Assurance of confidentiality. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS AND THE BASIS FOR THE ASSURANCE IN STATUTE, REGULATION, OR AGENCY POLICY.

¹The Department has authority to regulate unfair and deceptive practices or unfair methods of competition in air transportation or the sale of air transportation. Violating the privacy of airline passengers is an unfair and deceptive practice if the airline violates the terms of its stated privacy policy or gathers or discloses private information in a way that violates public policy, is immoral, or causes substantial consumer injury not offset by any countervailing benefits.

11. Justification for collection of sensitive information. PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE, SUCH AS SEXUAL BEHAVIOR AND ATTITUDES, RELIGIOUS BELIEFS, AND OTHER MATTERS THAT ARE COMMONLY CONSIDERED PRIVATE. THIS JUSTIFICATION SHOULD INCLUDE THE REASONS WHY THE AGENCY CONSIDERS THE QUESTIONS NECESSARY, THE SPECIFIC USES TO BE MADE OF THE INFORMATION, THE EXPLANATION TO BE GIVEN TO PERSONS FROM WHOM THE INFORMATION IS REQUESTED, AND ANY STEPS TO BE TAKEN TO OBTAIN THEIR CONSENT.

Online service request form

¹ The Department received another public comment in response to the 60-day notice, but that comment did not address any issue related to the information collections that are the subject of this renewal package.

Potentially sensitive information that a carrier may collect is about a passenger's disability accommodation needs. Disclosure of a passenger's disability is not required under this information collection request; however, a passenger may disclose his/her disability in the online request form. A carrier may require passengers to include their contact information in their online service requests, information already available to the carrier in the passengers' reservation records, so that the carrier can contact the passenger for further instruction or clarification if needed.

Web Site disclaimer notice

No questions regarding sensitive information of any kind are required in connection with this information collection request

12. Estimate of burden hours for information requested. PROVIDE ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION. THE STATEMENT SHOULD:

- INDICATE THE NUMBER OF RESPONDENTS, FREQUENCY OF RESPONSE, ANNUAL HOUR BURDEN, AND AN EXPLANATION OF HOW THE BURDEN WAS ESTIMATED. UNLESS DIRECTED TO DO SO, AGENCIES SHOULD NOT CONDUCT SPECIAL SURVEYS TO OBTAIN INFORMATION ON WHICH TO BASE HOUR BURDEN ESTIMATES. CONSULTATION WITH A SAMPLE (FEWER THAN 10) OF POTENTIAL RESPONDENTS IS DESIRABLE. IF THE HOUR BURDEN ON RESPONDENTS IS EXPECTED TO VARY WIDELY BECAUSE OF DIFFERENCES IN ACTIVITY, SIZE, OR COMPLEXITY, SHOW THE RANGE OF ESTIMATED HOUR BURDEN, AND EXPLAIN THE REASONS FOR THE VARIANCE. GENERALLY, ESTIMATES SHOULD NOT INCLUDE BURDEN HOURS FOR CUSTOMARY AND USUAL BUSINESS PRACTICES.**

- IF THIS REQUEST FOR APPROVAL COVERS MORE THAN ONE FORM, PROVIDE SEPARATE HOUR BURDEN ESTIMATES FOR EACH FORM AND AGGREGATE THE HOUR BURDENS.**

- PROVIDE ESTIMATES OF ANNUALIZED COST TO RESPONDENTS FOR THE HOUR BURDENS FOR COLLECTIONS OF INFORMATION, IDENTIFYING AND USING APPROPRIATE WAGE RATE CATEGORIES. THE COST OF CONTRACTING OUT OR PAYING OUTSIDE PARTIES FOR INFORMATION COLLECTION ACTIVITIES SHOULD NOT BE INCLUDED HERE. INSTEAD, THIS COST SHOULD BE INCLUDED IN ITEM 14.**

Respondents: U.S. and foreign air carriers that operate at least one aircraft having a designed seating capacity of more than 60 passengers and own or control a primary Web site that markets passenger air transportation to the general public in the United States.²

Requirements	Number of Respondents	Frequency (per year)	Burden Per Respondent	Estimated Total Annual Burden (all respondents)	Estimated Total Annual Burden Cost (all respondents)
Online disability service request form	165 already compliant from a prior year ³ and 3 newly complying ⁴	One time only to create form, unless carrier voluntarily elects to add new information	One time burden of 32 hours for 3 newly complying carriers	96 hours	\$7,651.20
Web site disclaimer notice	165 already compliant from a prior year and 3 per year newly complying	One time to establish and recurrent burden to associate disclaimer with each new link to an external Web site or to a third party software application	One time burden of 6 hours for 3 newly complying carriers + 30 minutes per already compliant carriers	100.5 hours	\$0

² While there are approximately 190 U.S. and foreign air carriers that conduct passenger-carrying service to, from, or in the United States with at least one aircraft having a designed seating capacity of more than 60 seats, not all of those carriers have a primary Web site that markets passenger air transportation to the general public in the U.S. The Department estimates that approximately 165 of those 190 carriers are subject to the Department's Web-accessibility requirements as they operate such aircraft and have a primary Web site that markets to U.S. consumers.

³ DOT rules required covered carriers to have a service request form on their primary website no later than December 12, 2015. The rules required covered carriers to provide disclaimers in connection with links to external locations no later than December 12, 2016.

⁴ The Department expects that covered carriers will incur the hourly burdens associated with creating the required online request form and disclaimer notice during the 1 year prior to the carrier activating its website, which would qualify it as a respondent carrier. The Department estimates that there will be 3 new respondents each year based on its analysis of the yearly changes over the last 14 years in the total number of U.S. and foreign air carries that conduct passenger-carrying service to, from, or in the United States with at least on aircraft having a designed seating capacity of more than 60 seats.

		added to the carrier's Web site.			
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Estimated Number of Respondents: 165 already compliant from a prior year and 3 new respondent carriers per year.

Frequency:

- One time burden on carriers to create, post, and test the service request form on their Web sites; and one time burden on carriers to create, post and test the disclaimer notice on their Web sites; recurring burden on carriers to associate the disclaimer notice with new links to external Web sites and third party software added to their Web sites.

Burden Per Respondent:

- For the requirement to create, post, and test the service request form on their Web sites, we estimate a one time burden of 32 hours per respondent and no additional annual burden unless the carrier voluntarily elects to modify or improve the form.
- For the requirement to create, post, and test the disclaimer notice on their Web sites, we estimate and one time burden of 6 hours per respondent.
- Less than 30 minutes a year to associate the notice with any new links to external Web sites and third party software added to their Web sites.

Estimated Total Annual Burden:

- For the requirement to create, post, and test the service request form on their Web sites, we estimate a total annual burden of 96 hours. This estimate was calculated by multiplying the total number of labor hours per year that each covered carrier is estimated to spend to develop, implement, integrate, connect, and test the online request form (32) by the estimated number of new respondent carriers each year (3).
- For the requirement to create, post, and test the disclaimer notice on their Web sites, we estimate a total annual burden of 100.5 hours. This estimate was calculated by multiplying the total number of labor hours per year that each covered carrier is estimated to spend to develop, test, and deploy the disclaimer notice (6) by the number of new respondent carriers each year (3). To that total we added the product of the number of hours that we estimated carriers may spend associating the notice with new weblinks (.5 hours) and the number of carriers that are expected to have achieved compliance in a prior year (165). Even though we expect the number of already compliant carriers to increase each year, we believe our reliance on 165, which is the current number of carriers expected to have achieved compliance, provides a reasonable estimate

of the burden as we do not expect all of the previously compliant carriers will have new links that will need to be associated with the disclaimer each year.

ESTIMATED ANNUALIZED COST TO RESPONDENTS

- For the requirement to create, post, and test the service request form on their Websites, we estimate the total annual cost to be \$7,651.20. This estimate was calculated by multiplying the total number of total burden hours (96) by the median hourly wage, including benefits, for software developers and programmers in the air transportation industry (\$79.70).⁵
- For the requirement to create, post, and test the disclaimer notice on their Websites, we estimate the total annual cost to be \$0, as Web site development and maintenance tasks are normal tasks performed by carrier personnel and any additional work related to this collection of information is minimal (e.g., attaching an existing disclaimer to a new link).

13. Estimate of the total annual costs burden. PROVIDE AN ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS OR RECORDKEEPERS RESULTING FROM THE COLLECTION OF INFORMATION. (DO NOT INCLUDE THE COSTS OF ANY HOUR BURDEN SHOWN IN ITEMS 12 AND 14).

-THE COST ESTIMATES SHOULD BE SPLIT INTO TWO COMPONENTS: (A) A TOTAL CAPITAL AND START-UP COST COMPONENT (ANNUALIZED OVER ITS EXPECTED USEFUL LIFE); AND (B) A TOTAL OPERATION AND MAINTENANCE AND PURCHASE OF SERVICES COMPONENT. THE ESTIMATES SHOULD TAKE INTO ACCOUNT COSTS ASSOCIATED WITH GENERATING, MAINTAINING, AND DISCLOSING OR PROVIDING THE INFORMATION. INCLUDE DESCRIPTIONS OF METHODS USED TO ESTIMATE MAJOR COSTS FACTORS INCLUDING SYSTEM AND TECHNOLOGY ACQUISITION, EXPECTED USEFUL LIFE OF CAPITAL EQUIPMENT, THE DISCOUNT RATE(S), AND THE TIME PERIOD OVER WHICH COSTS WILL BE INCURRED. CAPITAL AND START-UP COSTS INCLUDE, AMONG OTHER ITEMS, PREPARATIONS FOR COLLECTING INFORMATION SUCH AS PURCHASING COMPUTERS AND SOFTWARE; MONITORING, SAMPLING, DRILLING AND TESTING EQUIPMENT; AND RECORD STORAGE FACILITIES.

-IF COST ESTIMATES ARE EXPECTED TO VARY WIDELY, AGENCIES SHOULD PRESENT RANGES OF COST BURDENS AND EXPLAIN THE REASONS FOR THE VARIANCE. THE COST OF PURCHASING OR CONTRACTING OUT INFORMATION COLLECTION SERVICES SHOULD BE A PART OF THIS COST BURDEN ESTIMATE. IN DEVELOPING COST BURDEN

⁵ Wage estimates in this section are based on The Bureau of Labor Statistics' (BLS) May 2017 National Industry-Specific Occupational Employment and Wage Estimates as related to Air Transportation.

ESTIMATES, AGENCIES MAY CONSULT WITH A SAMPLE OF RESPONDENTS (FEWER THAN 10), UTILIZE THE 60-DAY PRE-OMB SUBMISSION PUBLIC COMMENT PROCESS AND USE EXISTING ECONOMIC OR REGULATORY IMPACT ANALYSIS ASSOCIATED WITH THE RULEMAKING CONTAINING THE INFORMATION COLLECTION, AS APPROPRIATE.

-GENERALLY, ESTIMATES SHOULD NOT INCLUDE PURCHASES OF EQUIPMENT OR SERVICES, OR PORTIONS THEREOF, MADE (1) PRIOR TO OCTOBER 1, 1995, (2) TO ACHIEVE REGULATORY COMPLIANCE WITH REQUIREMENTS NOT ASSOCIATED WITH THE INFORMATION COLLECTION, (3) FOR REASONS OTHER THAN TO PROVIDE INFORMATION OR KEEP RECORDS FOR THE GOVERNMENT, OR (4) AS PART OF CUSTOMARY AND USUAL BUSINESS OR PRIVATE PRACTICES.

Not applicable. The costs to respondents are covered in the previous section..

14. Estimates of costs to the Federal Government. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT. ALSO, PROVIDE A DESCRIPTION OF THE METHOD USED TO ESTIMATE COSTS, WHICH SHOULD INCLUDE QUANTIFICATION OF HOURS, OPERATIONAL EXPENSES SUCH AS EQUIPMENT, OVERHEAD, PRINTING, AND SUPPORT STAFF, AND ANY OTHER EXPENSE THAT WOULD NOT HAVE BEEN INCURRED WITHOUT THIS COLLECTION OF INFORMATION. AGENCIES ALSO MAY AGGREGATE COST ESTIMATES FROM ITEMS 12, 13, AND 14 IN A SINGLE TABLE.

No cost anticipated to the Federal government.

15. Explanation of the program change or adjustments. EXPLAIN THE REASONS FOR ANY PROGRAM CHANGES OR ADJUSTMENTS REPORTED IN ITEMS 13 OR

There are one-time burdens associated with these required collections and carriers achieved compliance with the requirements in prior years. One time burden on carriers to create, post, and test the service request form on their Web sites; and one time burden on carriers to create, post and test the disclaimer notice on their Web sites; recurring burden on carriers to associate the disclaimer notice with new links to external Web sites and third party software added to their Web sites. For the requirement to create, post, and test the service request form on their Web sites, we estimate a one time burden of 32 hours per respondent and no additional annual burden unless the carrier voluntarily elects to modify or improve the form.

16. Publication of results of data collection. FOR COLLECTIONS OF INFORMATION WHOSE RESULTS WILL BE PUBLISHED, OUTLINE PLANS FOR TABULATION, AND PUBLICATION. ADDRESS ANY COMPLEX ANALYTICAL TECHNIQUES THAT WILL BE USED. PROVIDE THE TIME SCHEDULE FOR THE ENTIRE

PROJECT, INCLUDING BEGINNING AND ENDING DATES OF THE COLLECTION OF INFORMATION, COMPLETION OF REPORT, PUBLICATION DATES, AND OTHER ACTIONS.

Not applicable.

17. Approval for not displaying the expiration date of OMB approval. IF SEEKING APPROVAL TO NOT DISPLAY THE EXPIRATION DATE FOR OMB APPROVAL OF THE INFORMATION COLLECTION, EXPLAIN THE REASONS THAT DISPLAY WOULD BE INAPPROPRIATE.

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Not applicable.

18. Exceptions to the certification statement. EXPLAIN EACH EXCEPTION TO THE CERTIFICATION STATEMENT "CERTIFICATION FOR PAPERWORK REDUCTION ACT SUBMISSIONS."

Not applicable.