

**SUPPORTING STATEMENT  
FOR PAPERWORK REDUCTION ACT SUBMISSION  
3090-XXXX, Mobile Now Act**

**A. Justification**

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

GSA is required by the MOBILE NOW Act (Section 608(d) of Title VI of Division P of the Consolidated Appropriations Act, 2018 [[P. L. 115-141](#)]) to study: (a) how to incentivize State and local governments to provide GSA with real property data for inclusion in the Federal Real Property Profile (FRPP) database, and (b) the feasibility of establishing or operating a database to which State and local governments can voluntarily submit this data. Section 608(d) directs GSA to consult with State and local governments, or their representatives, to identify the most cost effective options for State and local governments to collect and provide real property data on assets that could support a communications facility installation and make recommendations on ways the Federal Government can assist State and local governments in collecting and providing this data. Section 608(d) also directs GSA to submit a report to Congress on this study within one year of the signing of the Act, which was signed on March 23, 2018. Therefore, GSA must consult with State and local governments, or their representatives, to collect this information and submit a Congressional report by March 22, 2019. GSA is seeking approval to distribute a survey to State and local governments and their representatives in order to solicit the information required by law within the timeframe specified in the Act.

**2. 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.**

The information collected will be reviewed and consolidated by GSA and incorporated into a Congressional report, which is required by Section 608(d) of the Consolidated Appropriations Act, 2018. Specifically, GSA is seeking responses to questions related to the following in the context of real property assets suitable for communications facility installations in a respondent's state, city, region, county, or municipality:

- Current data collection methods for real property assets
- Recommendations for collecting and sharing real property information
- Limitations or barriers to providing real property data
- Benefits of a centralized database of State and local government real property data
- Types of information most relevant/useful for broadband development
- Broadband initiatives currently in place

The responses will be consolidated on a summary level without identifying specific respondents. This is a new collection request and therefore past information has not been received. These responses will assist GSA in studying incentives and database feasibility and will be incorporated into the Congressional report as required by the MOBILE NOW Act.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection.**

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Responses can be submitted online through a survey, or State or local governments, or their representatives, may email GSA. Given that the Congressional report is due in March 2019, GSA must have a draft of the report ready for review by both the consulting agencies, and the internal GSA review process, by January 2019. GSA determined that developing a survey was the most efficient and effective means for studying the items identified in Section 608(d) within this timeframe. Utilizing an online survey and email collection process will reduce the need for one-on-one meetings or phone calls (which would average 45 minutes per interaction), thereby reducing the burden on the respondents and making it easier for them to provide feedback.

**4. 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.**

The MOBILE NOW Act requires GSA to consult with State and local governments on ways to incentive State and local data collection regarding assets suitable for communications facility installations and the feasibility of establishing or operating a database to which real property data can be voluntarily submitted. This information is not already widely available and requires the solicitation of feedback from the relevant stakeholders. GSA is participating in other broadband efforts collecting information related to this topic, but these efforts are not collecting information specific to State and local governments as required by Section 608(d). For example, the Federal Real Property Profile (FRPP) Working Group solicited public comments in relation to specific data elements Federal agencies should report to the FRPP in order to assist industry in identifying Federal assets suitable for communications facility installations, and the Leveraging Federal Assets (LFA) Working Group under the Broadband Interagency Working Group (BIWG) is working with Federal agencies to develop an inventory with geo-location data of assets potentially available to support broadband deployment. Because these efforts have not collected information on incentives or database feasibility on the State and local level, GSA must undertake additional data collection methods to gather this information.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

GSA has minimized the list of survey questions and anticipates the survey will only require 6 minutes to complete, based on data provided by the application the survey was developed in (Qualtrics); versus one-on-one meetings or phone calls which we estimate would average 45 minutes per interaction. This will also allow GSA to ensure that it is reaching small entities to incorporate their feedback and ideas into this congressionally mandated report. Further, responding to the survey is optional and only intended to solicit feedback from entities that are interested in providing their input.

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**6. 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.**

The Act requires GSA to consult with State and local governments or their representatives in order to study incentives and database feasibility. Without this information collection, GSA will not be able to collect the information required to issue a report to Congress and will be in violation of the MOBILE NOW Act. This is a one-time data collection and will not require repeated collection.

**7. Explain any special circumstances.**

This information collection does not require any of these special circumstances.

**8. Describe efforts to consult with persons outside the agency.**

A notice published in the *Federal Register* at 83 FR 52453 on October 17, 2018. GSA has consulted with the National Telecommunications and Information Association (NTIA), National Association of Regulatory Utility Commissioners (NARUC), National League of Cities (NLC) and National Association of Regional Councils (NARC). These have been informal discussions in which OGP solicited general information regarding the State and local contacts that these associations work with and collaboration ideas for reaching their respective memberships in order to solicit the information required by the MOBILE NOW Act. GSA has also contacted representatives from the Office of Management and Budget, the Department of Commerce, and the Federal Communications Commission to consult on our requirements as mandated by the Act.

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

Payments or gifts will not be provided to the respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.**

An assurance of confidentiality will not be provided to the respondents.

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

This information collection will not be soliciting questions of a sensitive nature.

**12. Provide estimates of the hour burden of the collection of information.**

Estimated respondents (includes: state, local and tribal government, private and public

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sector): 1,200

We expect 1 response per estimated respondent; therefore, total annual responses would equal 1,200.

GSA developed the survey using Qualtrics, which provides an estimate of the amount of time it would take respondents to complete the survey. Qualtrics estimates 6 minutes (.10) to complete the survey; however, we believe it could take up to 10 minutes (.166667) total per respondent because there are several options to select “other” and provide a free text response. This would make the total annual burden between 120 and 200 hours.

Number of respondents:	1,200
Responses per respondent:	x <u>1</u>
Number of responses:	1,200
Avg. hours per response:	x <u>.166667</u>
Estimated hours:	200

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

The estimated cost per hour is based on the equivalent of a GS-12, Step 1 rate of \$30.47 (Base Pay and Rest of US Locality Pay) (Salary Table 2018-GS, Effective January 2018), with fringe of 36.25% (OMB Memo M-08-13). The estimated cost per response is \$6.92.

Estimated Responses.....	1,200
Estimated Total Burden Hours.....	200
Cost Per Hour.....	x <u>\$41.52</u>
Estimated Burden Cost to the Public.....	\$8,304

**14. Provide estimates of annualized costs to the Federal Government.**

The survey responses must be reviewed and analyzed for incorporation into the report. This processing time is estimated at approximately 15 minutes (.25) per response.

The estimated cost per hour is based on the equivalent of a GS-15, Step 3 rate of \$68.89 (US Locality Pay Table - WASHINGTON-BALTIMORE-ARLINGTON, DC-MD-VA-WV-PA, Effective January 2018), with fringe of 36.25% (OMB Memo M-08-13).

Total Responses.....	1,200
Reviewing Time/hr .....	x .25
Estimated Total Burden Hours.....	300
Cost Per Hour.....	x <u>\$93.86</u>
Estimated Burden Cost to the Government....	\$28,158

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**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14.**

This is a new data collection.

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

This data collection will not require complex analytical techniques. In order to meet the March 22, 2019 due date, GSA must begin gathering feedback as soon as possible but by no later than the end of September. All outreach and feedback must be concluded by no later than November 30, 2018. This will allow GSA to review and summarize the survey responses and draft a report by the beginning of January 2019. The report must be prepared in consultation with the Office of Management and Budget, the Federal Communications Commission, and the Department of Commerce as congressionally mandated by the Act. The report will be submitted for internal GSA review by early February. The final report to Congress will be submitted on March 22, 2019. The results of the data collection will be made public provided that Congress makes the final report available to the public.

**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.**

GSA is not seeking approval not to display the expiration date for OMB approval.

**18. Explain each exception to the certification statement identified in “Certification for Paperwork Reduction Act Submissions”.**

There are no exceptions identified in the certification statement of the “Certification for Paperwork Reduction Act Submissions.”