

SUPPORTING STATEMENT

**A. Justification:**

1. Each licensee in the private land mobile radio service must comply with the recordkeeping requirements of this section pursuant to 47 C.F.R. § 90.443 of the Commissions rules. Specifically, Section 90.443(b) requires that the dates and pertinent details of any maintenance performed on station equipment, and the name and address of the service technician who did the work be entered in the station records. These records will reflect whether or not maintenance of the licensee's equipment has been performed.

Section 90.443(c) requires that at least one licensee participating in the cost arrangement must maintain cost sharing records.

Statutory authority for this collection of information is contained in 47 U.S.C. Section 303(j), as amended.

There are no impacts under the Privacy Act.

2. The records may be used by the licensee or Commission field personnel to note any recurring equipment problems or conditions that may lead to degraded equipment performance and/or interference generation. Tower lighting records required are to ensure that the licensee is aware of the tower light condition and proper operation, in order to prevent and/or correct any hazards to air navigation. Cost distribution records must be maintained to ensure that the detailed description of how interconnection was accomplished.
3. Prior to finalizing rule makings the Wireless Telecommunications Bureau conducts an analysis to ensure that improved information technology may be used to reduce the burden on the public. This analysis considers the possibility of obtaining and/or computer-generating the required data from existing data bases in the Commission or other federal agencies.
4. This agency does not impose a similar collection on the respondent. No similar information is available.
5. In conformance with the Paperwork Reduction Act of 1995, the Commission is making an effort to minimize the burden on all respondents, regardless of size. The Commission has limited the information requirements to that absolutely necessary for evaluating and processing the application and to deter against possible abuses of the processes.

6. Licensees meeting these record-keeping requirements generate only documentation as circumstances warrant, and not on a regular schedule. Accordingly, a reduction in the frequency of collection is not feasible.
7. This collection is inconsistent with 5 CFR 1320.5 because licensees are required to maintain paper and electronic records for at least eleven years.
8. Notice of the information collection appeared in *Federal Register* on August 29, 2018 (83 FR 44049), in compliance with 5 C.F.R. Section 1320.8(d). No comments were received.
9. There are no payments or gifts to respondents.
10. There is no need for confidentiality with this collection of information.
11. The Commission believes that this collection of information will not raise any questions or issues of a sensitive nature for respondents.
12. The recordkeeping requirements regarding equipment maintenance records and cost distribution records would be typically generated when equipment malfunctions and not on a regular basis. The information required is likely maintained as part of a licensee's routine operating procedures or is otherwise readily available to the licensee, such as through a service company's billing invoices, and thus it should take a licensee only a few minutes on average to meet the information collection requirement.

There are approximately 52,383 licensees subject to these recordkeeping requirements. These licensees will be required to preserve equipment maintenance and cost distribution records annually, with an average burden of 15 minutes.

52,383 (licensees) x .25 hours (15 mins.) (recordkeeping) = 13,096 hours (rounded) per annum.

**Total Annual Hour Burden is: 13,096 hours.**

**Total Number of Respondents: 52,383 licensees.**

**Total Number of Annual Responses: 52,383.**

**In-house Cost:** The Commission presume that each licensee will use in-house clerical personnel at the GS-8 Step 5 level, earning (average \$27.65 per hour) to file and maintain this information.

13,096 hours x \$27.65/hr. (clerical) = 362,104.40

13. There are no Contracting/External cost for this information collection.

14. The government review time is estimated at 5 minutes per response with review being performed by personnel at the GS-12 Step 5 level. The Commission is estimated to review only 9,506 records annually. These reviews will be done by field personnel.

$$9,506 \times .084 \text{ (5 mins.)} = 799 \text{ hours} \times \$44.28/\text{hr (examiner)} = \mathbf{\$35,379.72.}$$

15. The Commission does not have any program changes for this collection. However, there are adjustments of -10,992 to the number of respondents, -10,992 to the annual number of responses and -2,748 to the annual burden hours for this collection. These adjustments are due to a reduction of licensees operating in these services.

16. The data will not be published for statistical purposes.

17. We do not seek approval to not display the expiration date for OMB approval of the information collection.

18. There are no exceptions to the certification statement.

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

No statistical methods were employed.