

SUPPORTING STATEMENT

A. Justification:

Part 11 contains rules and regulations addressing the nation's Emergency Alert System (EAS). The EAS provides the President with the capability to provide immediate communications and information to the general public at the national, state and local area level during periods of national emergency. The EAS also provides state and local governments and the National Weather Service with the capability to provide immediate communications and information to the general public concerning emergency situations posing a threat to life and property. State and local use of the EAS is required to be described in State EAS Plans that are administered by State Emergency Communications Committees (SECC) and submitted to the FCC for approval.

The FCC is submitting this information collection to the Office of Management and Budget (OMB) as a revision of the previously approved information collection that established the mandatory Electronic Test Reporting System (ETRS) that EAS Participants must utilize to file identifying and test result data as part of their participation in nationwide EAS testing. This information collection encompasses new amendments to the Part 11 EAS rules that (i) require EAS Participants to notify the Commission (via email to the FCC Ops Center at FCCOPS@fcc.gov) within twenty-four (24) hours of the EAS Participant's discovery that it has transmitted or otherwise sent a false alert to the public, and (ii) include "Live Code Tests" of the EAS as a separate category of alerting exercise that EAS Participants may undertake voluntarily, provided such live code tests are conducted in accordance with specific parameters.

Revisions to Information Collection Requirements Which Require OMB Approval

For the decisions adopted in Order, PS Dockets 15-94, 15-91, FCC 18-94, the Commission assumes an annual cost burden of approximately \$11,600 that would be borne by approximately 290 EAS Participants, with each successive year likely involving a different group of EAS Participants. This is a significantly smaller estimated total burden than that described in the Notice, which estimated an annual cost of \$46,400. The Commission sought comment on the specific costs of compliance with the proposed rules, but no commenting party took issue with our cost estimates in response. The Commission concludes that no costs will result from its decision to codify "Live Code Test" requirements. Accordingly, the following estimate leverages publicly available data on the financial burdens associated with the requirements.

The Commission concludes that the obligation for EAS Participants to notify the Commission (via email to the FCC Ops Center at FCCOPS@fcc.gov) within twenty-four (24) hours of the EAS Participant's discovery that it has transmitted or otherwise sent a false alert to the public will result in an annual cost of approximately \$11,600. In the Notice, the Commission estimated the cost of false alert reporting to be \$46,400, based on an average of 290 EAS participants filing two false alerts per year, with each of those EAS participants spending 15 minutes to file an initial report and 45 minutes to file a final report. Commenters did not take issue with that cost estimate, but the new rules do not require more than one report. Accordingly, the burden estimate is reduced from 1 hour of filing costs (15 minutes plus 45 minutes), to 15 minutes (for

one report only). The Commission therefore concludes that the cost of reporting false alerts will be \$11,600 per year. That figure is based upon following costs: (1/4 hour) x (\$80 hourly salary) x (an estimated 2 incidents per year based on receiving reports of two false alerts in 2013, and one in 2014 and in 2015) x (290 entities estimated to file, which is based on the results of a widely reported false alert in which 290 entities would have been required to file a report, assuming all 290 entities had actual knowledge they had transmitted a false alert) = \$11,600.

The Commission concludes that the codification of “Live Code Tests” of the EAS as a separate category of alerting exercise that EAS Participants may undertake voluntarily, in accordance with the codified parameters, does not impose any new costs. Rather, this rule change codifies requirements that were previously imposed on waivers granted by the Commission. Since 2009, the Commission has received over 150 waiver requests for “Live Code Tests” (for an average of 15 per year). Removing the requirement to file a waiver removes the need for legal and other staff time associated with filing a waiver. The new rule therefore eliminates any legal or administrative costs that were associated with filing waiver requests.

For the decisions adopted in the Order, PS Docket No. 15-94, FCC 18-39, the Commission assumes a one-time cost burden of approximately \$236,000 for EAS Participants. Specifically, SECCs collectively will incur one-time approximate costs of a \$235,000 recordkeeping cost for producing State EAS Plans consistent with updated State EAS Plan requirements and EAS designations and a \$1,000 reporting cost for electronically filing those plans. This is a significantly smaller estimated total burden than that described in the Notice, which estimated a one-time \$5.3 million and an annual cost of \$596,560. The Commission sought comment on the specific costs of compliance with the proposed rules, but received no dollar figure estimates in response. Accordingly, the following estimate leverages publicly available data on the financial burdens associated with the requirements.

The Commission concludes that producing State EAS Plans consistent with the rules will result in approximately \$235,000 as a one-time recordkeeping cost. In the Notice, the Commission estimated that implementing these changes would result in a one-time cost of approximately \$25,000 and that it would take each SECC approximately 20 hours to comply with the new State EAS Plan requirements. Commenters observe that this cost assessment, as well as the Commission’s assessment of the total hourly burden required to update State EAS Plans, was too low. In response to these concerns, the Commission does not require SECCs to include certain proposed elements in State EAS Plans, which will reduce the amount of time required to revise plans. Notwithstanding this revision, the Commission uses a quantification of commenters’ assessment of the time that it would take SECCs to write their plans from scratch (100 hours) as a reasonable ceiling for the time needed to update those plans consistent with our rules. Based on submissions of State EAS Plans to date, we expect that 54 entities will file such plans. The record shows that the individuals most likely to update those plans are broadcast engineers. Crowdsourced employee compensation data indicates that the median hourly compensation for a broadcast engineer is approximately \$29. According to the Bureau of Labor Statistics, employee overhead benefits (including paid leave, supplementary pay, insurance, retirement and savings, and legally required benefits) add 50 percent to an employer’s cost of labor. Thus, the Commission quantifies the value of an hour spent updating a State EAS Plan as approximately \$43.50. The reasonable estimated cost of updating a single State EAS Plan consistent with this Order would be approximately \$4,350, and the estimated total cost of compliance with the State EAS Plan rules would be approximately \$235,000.

Additionally, the Commission anticipates that SECC representatives also will incur a one-time estimated \$1,000 reporting cost to file their revised State EAS Plans in the Alert Reporting System (ARS). The estimated time burden of filing State EAS Plans in the ARS will be one hour, the same burden that OMB approved for filing data in ETRS. Both filing systems present filers with the same user interface, and while State EAS Plans may include more data points than ETRS filings, entering state plan data in the ARS will be simpler because SECCs already have the relevant information on-hand from the process of creating a State EAS Plan. The Commission values the cost of an SECC representative's time spent on this task as approximately \$19, the median hourly salary of a clerical employee plus benefits. Thus, filing state plan data in the ARS will cost approximately \$1,000.

Current Information Collection Requirements Previously Approved by OMB:

With respect to the reporting requirements in the *Multilingual Order*, the FCC estimated that the EAS Participant employees preparing the summary of its multilingual EAS activities to be furnished to the EAS Participant's SECC would have an average salary of \$34 per hour, which is the same hourly labor cost identified in the previously approved information collection for EAS Participant obligations.¹ The FCC estimates that 27,468 EAS Participants would be required to file.² This reporting requirement and associated cost is a one-time obligation; after submitting their summary of multilingual EAS activities to their SECCs, EAS Participants are not required to make any other submissions unless there is a material change to any of the information that the EAS Participant originally reported (EAS Participants are required to describe such material changes in a transmittal to their SECC, copying the Bureau). With respect to the requirement that SECCs compile the summaries of multilingual EAS activities they receive from EAS Participants and include such compilation in the State EAS Plan, the FCC estimated that complying with this reporting requirement will not take SECCs longer than the estimated time to prepare an entire State EAS Plan. Accordingly, the FCC conservatively used the estimated hourly burden, wage and total cost estimate for SECCs to prepare State EAS Plans as its estimate for SECCs to comply with the requirement to compile EAS Participant summaries of multilingual EAS activities and include such compilation in the State EAS Plan (*i.e.*, 50 SECCs x 20 hours each at \$25.00 per hour = \$25,000). This cost is a one-time cost. Once the SECC has compiled the EAS Participant summaries of multilingual EAS activities in the State EAS Plan, it need only update such compilation if it receives a transmittal from an EAS Participant describing a material change to its original report.

In the *Third Report and Order*, the FCC adopted rules establishing a regulatory structure for a national test of the EAS.³ In order for the FCC to determine the extent to which the test, and by extension the EAS, was successful, the FCC adopted rules requiring EAS Participants, within

¹ *Review of the Emergency Alert System; Independent Spanish Broadcasters Association, the Office of Communication of the United Church of Christ, Inc., and the Minority Media and Telecommunications Council, Petition for Immediate Relief; Randy Gehman Petition for Rulemaking*, EB Docket No. 04-296, Order, 31 FCC Rcd 2414 (2016) (*Multilingual Order*).

² *See Review of the Emergency Alert System*, EB Docket No. 04-296, Notice of Proposed Rulemaking, 29 FCC Rcd 8123, 8147, n.162 (2014) (estimating that there are a total of 27,468 EAS Participants).

³ *Review of the Emergency Alert System*, EB Docket No. 04-296, Third Report and Order, 26 FCC Rcd 1460 (2011) (*Third Report and Order*).

forty five (45) days of the date of the first national EAS test, to record and submit to the FCC the following test-related diagnostic information for each alert received from each message source monitored at the time of the national test:

- Whether they received the alert message during the designated test;
- Whether they retransmitted the alert;
- If they were not able to receive and/or transmit the alert, their ‘best effort’ diagnostic analysis regarding the cause(s) for such failure;
- A description of their station identification and level of designation (PEP, LP-1, etc.);
- The date/time of receipt of the EAN message by all stations; the date/time of PEP station acknowledgement of receipt of the EAN message to FOC;
- The date/time of initiation of actual broadcast of the Presidential message;
- The date/time of receipt of the EAT message by all stations;
- Who they were monitoring at the time of the test, and the make and
- Model number of the EAS equipment that they utilized.

The *Third Report and Order* indicates that the national tests of EAS, and related information collections will likely be carried out on an annual basis. On March 10, 2010, OMB approved the collection as indicated by the related Notice of Office of Management and Budget Action notification.

In the *Second Report and Order*, the FCC adopted rules that require states to file new EAS plans with the FCC under certain circumstances, expand the number of private entities covered by EAS, and impose new obligations on private entities.⁴ These rules may impact currently existing paperwork collection requirements as discussed below.

In the *Second Report and Order*, the FCC adopted a rule obligating EAS Participants to accept a message using a common EAS messaging protocol, the Common Alerting Protocol v1.1 (CAP), no later than 180 days after FEMA publicly publishes its adoption of such standard; requires EAS Participants to adopt Next Generation EAS delivery systems no later than 180 days after FEMA publicly releases standards for those systems; expands the number of EAS Participants by including wireline common carriers providing video programming (“wireline video systems”); and requires EAS Participants to transmit state and local EAS alerts that are originated by governors or their designees no later than 180 days after FEMA publishes its adoption of the CAP standard, provided that the state has a FCC-approved EAS state plan that provides for delivery of such alerts.

The following information collection contained in Part 11 may be impacted by these rule amendments:

⁴ *Review of the Emergency Alert System; Independent Spanish Broadcasters Association, the Office of Communication of the United Church of Christ, Inc., and the Minority Media and Telecommunications Council, Petition for Immediate Relief*, EB Docket No. 04-296, Second Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Rcd 13275 (2007) (*Second Report and Order*).

Section 11.21 requires that state and local EAS plans be reviewed and approved by the Chief, Public Safety and Homeland Security, prior to implementation to ensure that they are consistent with national plans, FCC regulations, and EAS operation.

Statutory authority for this collection of information is contained in 47 U.S.C. sections 154(i) and 606 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 false alert reporting obligation is essential to provide the Commission, FEMA and other affected stakeholders with the information necessary to identify and mitigate problems with the EAS, and benefits ongoing EAS reliability. The false alert reporting rules also will provide a significant public safety benefit by allowing the Commission to detect whether there are trends and patterns in false alerts that may indicate weaknesses that require further Commission study and action to strengthen the alerting system. The “Live Code Testing” provisions remove regulatory obstacles and reduce time and cost burdens on EAS Participants by eliminating the need to obtain a waiver to conduct such tests. These testing rules will promote greater proficiency in the use of EAS, both by EAS alert initiators and EAS Participants, which will help address potential gaps in alert originator training. This information collection also will provide a baseline level of uniformity across State EAS Plans, in terms of both format and terminology, while affording sufficient flexibility to accommodate filers’ unique needs. This online State EAS filing platform, combined with the existing ETRS, will form the Alert Reporting System. We believe the ARS will ensure more efficient and effective delivery of Presidential as well as state, local and weather-related alerts as it will provide the Commission, FEMA, and other authorized entities with the means to more easily review and identify gaps in the EAS architectures, detect problems, and take measures to address these shortcomings.

3. Automated logging devices are used by entities to record entries in the station log. In addition, EAS alerts are received electronically via advanced digital signaling equipment. State EAS Plans are collected electronically instead of requiring burdensome paper filings. These plans will not be made available to the public over the Internet due to their contents being presumptively confidential.

4. This agency does not impose a similar information collection on the respondents. There is no similar data available.

5. Part 11 was designed to minimize the burden for all respondents regardless of size.

6. The EAS requirements are designed to benefit the EAS Participants and the people of their community, not the federal government. Any reduction in the frequency of this activity would

result in a proportional loss of benefit and would cause a delay in the detection of equipment failures that would cause the loss of national, state and local emergency messages to the public

and could cause loss of life and property.

7. This collection of information is consistent with the guidelines in 5 CFR 1320.5(d)(2).

8. The Commission published a 60-day notice covering the false alert reporting and “Live Code Test” requirements, which also included the requirements to file revised State EAS Plans in the ARS, in the Federal Register on October 3, 2018 (83 FR 49924) (“60-Day Notice”). Comments were received from Gary E. Timm, Broadcast Chair, Wisconsin SECC; Rodney V. Zeigler, Chairman, Nebraska SECC; and Kenneth R. Evans, Co-Chair, Delaware SECC. Below we provide a summary and address each of the comments.

(The Commission initially published a 60-day notice covering the requirements to file revised State EAS Plans in the ARS in the Federal Register on June 18, 2018 (83 FR 28228). No PRA comments were received. These requirements subsequently were combined with the false alert reporting and “Live Code Test” requirements in the October 3, 2018, 60-day notice identified above.)

(The FCC sought comments on the false alert reporting and “Live Code Test” parameters, and their related costs and benefits, as well as the Alert Reporting System, and its costs and benefits, in its 2016 EAS Notice of Proposed Rulemaking. (*See Amendment of Part 11 of the Commission’s Rules Regarding the Emergency Alert System, Wireless Emergency Alerts*, PS Docket Nos. 15-94 and 15-91, Notice of Proposed Rulemaking, 31 FCC Rcd 594 (2016)). The Commission incorporated the feedback into the final rule.)

The Commission subsequently published a 30-day notice covering the false alert reporting and “Live Code Test” requirements, and the requirements to file revised State EAS Plans in the ARS, in the Federal Register on April 5, 2019 (84 FR 13663) (“30-Day Notice”). In response to the comments received for the 60-Day Notice, the Commission revised the ARS online filing template originally included in the Order, PS Docket No. 15-94, FCC 18-39, and included such revised template in a revised information collection request (ICR) submitted to OMB, which is referenced in the 30-Day Notice. Comments were received on the revised template contained in the revised ICR from Gary E. Timm, Broadcast Chair, Wisconsin SECC; Rodney V. Zeigler, Chairman, Nebraska SECC; Kenneth R. Evans, Co-Chair, Delaware SECC, Richard Petty, Louisiana SECC Chairman, Dave Turnmire Chairman, Idaho SECC, and Ted Buehner, Vice-Chair, State of Washington SECC. Below we provide a summary and address each of the comments.

Gary E. Timm 60-Day Notice Comments

Timm proposed several changes to the ARS online filing template included in the Order, PS Docket No. 15-94, FCC 18-39. Timm suggested over two dozen specific changes to the menu screens contained in the ARS template, covering: the login screen; the registration screen; the State EAS Plan filing screen; the SECC Governance Structure screen; the Alert Origination screens; the Header Codes screen; the Operational Areas screen; the Monitoring Assignments – Presidential Alert screen; the Monitoring Assignments – State and Local Alerts screen; the Alerting Procedures screens; the Multilingual Alerting Information screen; and the Local Area Plans screen.

Rodney V. Zeigler 60-Day Notice Comments

Zeigler proposed several changes to the ARS online filing template included in the Order, PS Docket No. 15-94, FCC 18-39. Zeigler proposed changes to the SECC Governance Structure screen, the Header Codes screen, the Monitoring Assignments – Presidential Alert screens, and the Alerting Procedures screen

Kenneth R. Evans 60-Day Notice Comments

Evans proposed several changes to the ARS online filing template included in the Order, PS Docket No. 15-94, FCC 18-39. Evans proposed changes and/or sought clarification concerning the Alert Origination screens, the Header Codes screen, the Operational Areas screen, and the Monitoring Assignments – Presidential Alert screens.

Gary E. Timm 30-Day Notice Comments

Timm makes several general proposals regarding ARS guidance and completion, including creation of an ARS User Manual; including “help” buttons on each online filing menu screen; providing a means to prepopulate monitoring assignment data based on the county of the EAS Participants’ City of License; a means to upload the required ARS data fields using batch files; providing access to ARS data by EAS Participants; and holding another round of comments or a webinar with SECCs to get additional feedback on template construction. Timm also proposed generic changes to each of the ARS online filing template screens included with the revised ICR, as well as specific changes to: the registration screen; the SECC Governance Structure screen; the Alert Origination screens; the Header Codes screen; the Operational Areas screen; the Monitoring Assignments – Presidential Alert screens; and the Alerting Sources – State and Local Alerts screen.

Rodney V. Zeigler 30-Day Notice Comments

Zeigler proposed that the online filing template screen covering “Alerting Sources-State and Local Alerts” be revised to allow “All” under the entry heading of “EAS Participant (call sign and Facility ID or PSID).”

Kenneth R. Evans 30-Day Notice Comments

Evans makes several general proposals regarding ARS guidance and completion, including creation of an ARS User Manual; adding “help” buttons on each online filing menu screen; and providing “Read-Only” access to ARS content to all entities that originate EAS messages and broadcasters who relay those messages to the public. Evans also suggested specific changes to the menu screens contained in the ARS template covering: SECC Governance Structure; Alert Origination; Header Codes; Operational Areas; Monitoring Assignments – Presidential Alert; Multilingual Alerting Information; and Local Area Plans.

Richard Petty 30-Day Notice Comments

Petty suggests that there should be a way to upload existing state plans so they automatically populate the corresponding ARS template screens.

Dave Turnmire 30-Day Notice Comments

Turnmire makes several general proposals regarding ARS guidance and completion, including creation of an ARS User Manual; addition of “help” buttons for each template screen; providing an instructional webinar for SECCs to better understand how to properly use the ARS; providing a means to upload monitoring assignments via XLSX files and/or CSV files; providing clarity regarding who will have access; and allowing SECC Chairs to assign data entry to other SECC members. Turnmire also proposes several specific changes to the ARS template screens covering: Header Codes; Operational Areas; Monitoring Assignments – Presidential Alert; Local Area Plans; and Submit State Plan for FCC Review.

Ted Buehner 30-Day Notice Comments

Buehner makes several general proposals regarding ARS guidance and completion, including creation of an ARS User Manual; including “help” buttons on each online filing menu screen; providing an instructional webinar for SECCs to better understand how to properly use the ARS; providing “Read-Only” access to ARS content to all entities that originate EAS messages and broadcasters who relay those messages to the public. Buehner also suggested over two dozen specific changes to the menu screens contained in the ARS template covering: SECC Governance Structure; Alert Origination; Header Codes; Operational Areas; Monitoring Assignments – Presidential Alert; Monitoring Assignments – State and Local Alerts; Alerting Procedures; Multilingual Alerting Information; and Local Area Plans.

Commission Response to 60-Day Notice Comments

In the revised ICR, the Commission observed that the suggested changes and clarifications to the ARS online filing template made by Timm, Ziegler and Evans are either addressed by the changes made in response to Timm’s comments, or involved changes outside the scope of this PRA proceeding. The Commission further observed that it addressed and incorporated the comments of Timm, Zeiger and Evans within the screenshots of the ARS template submitted to OMB in its revised ICR; and that ARS users will not necessarily see every iteration of the ARS in the submitted screenshots, as information will be generated dynamically in relation to the user’s choices once the online interface is deployed. The Commission also observed that the template screenshots reflect the proposal by the Commission to revise the current State EAS Plan requirements to remove some of the filing burden on applicants and to provide an easier means for applicants and service providers to use the ARS. Finally, the Commission observed that none of the submitted ICR revisions to the template attached to the Order, PS Docket No. 15-94, FCC 18-39 have any impact on the burden estimates contained in the initial supporting statement.

Commission Response to 30-Day Notice Comments

As a preliminary matter, we observe that commenters' general requests to revise the requirements governing access to the ARS data are beyond the scope of this PRA process. With respect to commenters' general requests to provide a means to prepopulate monitoring assignment and other required ARS data using batch files or other means, that capability will be examined in the final system requirements. With respect to commenters' general requests to include "help" buttons on each online filing menu screen, help buttons will be included on each online filing screen in some form to be determined in the final system requirements. With respect to commenters' general requests to create an ARS User Manual and/or provide an instructional webinar on the ARS for SECCs, we observe that the "help" buttons to be included on each online filing screen should obviate the need for a user manual or other instructional materials. To the extent SECCs require instruction beyond the "help" buttons, however, Commission staff will be available to answer questions, and some form of a user manual may be created in the event that such individual assistance is determined to be insufficient.

With respect to commenters' specific changes proposed for the individual ARS template screens, the Commission has made several revisions to the screens in response to these proposals, primarily to simplify, add clarity and make corrections. For example, the template screens covering "Monitoring Assignments – Presidential Alert" have been reworded in places to clarify the data encompassed by and required for each. These revisions are contained in the revised template screens submitted along with this revised Supporting Statement. We again observe that ARS users or future applicants will not necessarily see every iteration of the ARS in the form of the submitted template screenshots, as information will be generated dynamically in relation to the user's choices once the online interface is deployed. Additionally, as the system pre-populates information from the user's entity profile to reduce the burden on applicants, applicants will not necessarily see the same information presented on the screenshots as they see when using the online interface. None of the submitted ICR revisions or the revisions made in response to the 30-Day Notice Comments, as reflected in the revised ARS template screens submitted with this revised Supporting Statement, have any impact on the burden estimates contained in the initial supporting statement.

9. No payment or gift was provided to the respondents.

10. False alert information filed with the Commission via email to the FCC Ops Center at FCCOPS@fcc.gov will be treated as non-public information that the Commission may share on a confidential basis with other federal agencies and state governmental emergency management agencies that have confidentiality protection at least equal to that provided by the Freedom of Information Act. State EAS Plan data and any aggregation of such data will have the same level of confidentiality as data filed in the ETRS, i.e., the Commission will share individual and aggregated data on a confidential basis with other federal agencies and state governmental emergency management agencies that have confidentiality protection at least equal to that provided by the Freedom of Information Act.

11. This collection of information does not address any private matters of a sensitive nature.

12. The following is provided for burden estimates. The new requirements affect SECCs and EAS Participants. These estimates are based on FCC staff's knowledge and familiarity with the availability of the data required. Burden estimates for the requirements adopted in the two Orders are provided below **in bold typeface**. The totals at the bottom of the table include these estimates and are also provided in bold.

	<u># of Respondents</u>	<u># of Responses per Respondent</u>	<u>Total Responses</u>	<u>Burden per Response</u>	<u>Total Burden</u>	<u>Est. Hourly Wage of Respondent</u>	<u>Total Est. In-House Cost to Respondent</u>
Section 11.15	63,000	1	63,000	0.1 hours	6,300 hours	\$38	\$239,400
Section 11.21	50 (states)	1	50	20 hours	1,000 hours	\$25	\$25,000
11.21	54 (SECCs)	1	54	100 hours	5,400 hours	\$43.50	\$235,000
11.21	54 (SECCs)	1	54	1 hour	54 hours	\$19	\$1,026
Section 11.21	27,468	1	27,468	1 hour	27,468 hours	\$38	\$1,043,784
Section 11.34	10 (manufacturers)	1	10	20 hours	200 hours	\$25	\$5,000
Section 11.35	400	1	400	0.017 hours	7 hours	\$38	\$266
Section 11.35	300	1	300	0.5 hours	150 hours	\$38	\$5,700
Section 11.41	10	1	10	0.5 hours	5 hours	\$38	\$190
Section 11.42	10 (common carriers)	1	10	1 hour	10 hours	\$38	\$380
Section 11.43	10 (voluntary entities)	1	10	0.5 hours	5 hours	\$38	\$190
Section 11.45	290	2	580	0.25 hours	145 hours	\$80	\$11,600
Section 11.51	4,373	1	4,373	0.17 hours	743 hours	\$38	\$28,234
Section 11.51	63,000	1	63,000	0.017 hours	1,071 hours	\$38	\$40,698
Section 11.52	20	1	20	0.5 hours	10 hours	\$38	\$380
Section 11.52	5	1	5	1.0 hour	5 hours	\$38	\$190
Section 11.54	63,000	1	63,000	0.017 hours	1,071 hours	\$38	\$40,698

Section 11.55	63,000	1	63,000	0.017 hours	1,071 hours	\$38	\$40,698
Section 11.55	8	1	8	3 hours	24 hours	\$25	\$600
Section 11.61	63,000	40	2,520,000	0.017 hours	42,840 hours	\$38	\$1,627,920
Section 11.61	63,000	12	756,000	0.034 hours	25,704 hours	\$38	\$976,752
Section 11.61*	27,468	1	27,468	1 hour	27,468 hours	\$38	\$1,043,784
Section 11.61	10	1	10	0	0	0	0
Totals	63,084		3,588,830		140,751 hours		\$5,367,490

13. Annual Cost Burden to the Respondent. The FCC does not anticipate that respondents will need to incur capital or start-up costs, or operation and maintenance and purchase of services costs to respond to these information collections.

14. Cost to the Federal Government: The Commission uses GS-13, Step 5, locality adjusted for the pay area of Washington-Baltimore-Arlington, DC-MD-VA-WV-PA in 2019 (\$53.85/hour) to process the information submitted to the Commission in connection with sections 11.21, 11.35, 11.41, 11.43, and 11.52.

$50 \times 6 \text{ hours} \times \$53.85 = \$16,155$
 $300 \times 0.5 \text{ hours} \times \$53.85 = \$8,077.50$
 $10 \times 0.5 \text{ hours} \times \$53.85 = \$269.25$
 $10 \times 1.0 \text{ hours} \times \$53.85 = \$538.50$
 $20 \times 0.5 \text{ hours} \times \$53.85 = \$538.50$
 $5 \times 1.0 \text{ hours} \times \$53.85 = \$269.25$

Current Total Cost to the Federal Government: \$25,848

The requirements to file false alert reports adopted in Order, PS Docket Nos. 15-94, 15-91 15-94, FCC 18-94, will increase the total cost to the Federal Government. The FCC will use GS-13, Step 5, locality adjusted for the pay area of Washington-Baltimore-Arlington, DC-MD-VA-WV-PA in 2019 (\$53.85/hour) to process the information submitted to the FCC in connection with the reporting requirements adopted in the Order.

$580 \times 0.5 \text{ hours} \times \$53.85 = \$15,616.50$

The requirements to report State EAS Plans in the ARS adopted in the Order, PS Docket No. 15-94, FCC 18-39, will increase the total cost to the Federal Government. The FCC will use GS-13,

Step 5, locality adjusted for the pay area of Washington-Baltimore- Arlington, DC-MD-VA-WV-PA in 2019 (\$53.85 /hour) to process the information submitted to the FCC in connection with the reporting requirements adopted in the Order.

$$54 \times 1 \text{ hour} \times \$53.85 = \$2,907.90$$

Cumulative Total Cost to the Federal Government: \$18,524.40

Total Cost to the Federal Government: \$25,848 + \$15,616.50 + \$2,907.90 = \$44,372.40

15. There are program changes/increases to this information collection, as a result of the reporting requirements adopted in the Orders. The false alert reporting requirement increases the respondent number by 290 and total responses by 580, and total burden by 145. The “Live Code Test” provisions increases the respondent number by 10 and total responses by 10, but do not increase the total burden. By replacing the previous paper filing collection with the electronic Alert Reporting System requirement, the respondent number and total responses increase by four to account for four more SECCs. The total burden decreases by 1,000, but increases by 5,454 (a net of +4,454). The baseline numbers used for calculating the total burdens in the table above were different than the baseline totals listed in OMB’s burden inventory for the 3060-0207 information collection. Specifically, the baseline numbers used herein were from a Non-Substantive Change Request, dated May 16, 2017. The Non-Substantive Change Request made corrections to the previously approved information collection, which changed the total responses and hours for the 3060-0207 information collection from 3,596,546 and 110,476, respectively, to 3,588,182 and 136,152, respectively. OMB approved the Non-Substantive Change Request changes on May 30, 2017, however, the total responses and total hours identified in the inventory for the 3060-0207 information collection were not adjusted to reflect those corrections. Specifically, the Notice of Approval for the Non-Substantive Change Request continued to list the total responses and hours as 3,596,546 and 110,476, respectively, whereas they should be listed as 3,588,182 and 136,152, respectively. Accordingly, this Supporting Statement to OMB corrects that discrepancy by using the corrected burden totals from the Non-Substantive Change Request to calculate the total burden numbers associated with the information collections in Order, PS Dockets 15-94, 15-91, FCC 18-94, and Order, PS Docket No. 15-94, FCC 18-39.

16. The results of this collection will not be publicly released. False alert information filed with the Commission via email to the FCC Ops Center at FCCOPS@fcc.gov will be treated as non-public information that the Commission may share on a confidential basis with other federal agencies and state governmental emergency management agencies that have confidentiality protection at least equal to that provided by the Freedom of Information Act. State EAS Plan data and any aggregation of such data will have the same level of confidentiality as data filed in the ETRS, i.e., the Commission will share individual and aggregated data on a confidential basis with other federal agencies and state governmental emergency management agencies that have confidentiality protection at least equal to that provided by the Freedom of Information Act.

17. The Commission is requesting a waiver of displaying the OMB control number on the on-line application screens because that would require updating each time this collection was submitted to OMB for review and approval. The Commission displays the OMB expiration date, title and OMB control number in 47 CFR 0.408 of the Commission's rules.

18. There are no exceptions to the Certification Statement.

B. Collections of Information Employing Statistical Methods:

No statistical methods are employed.