

**Section 87.287(b), Aeronautical Advisory Stations  
(Unicom) – “Squitters”**

**OMB 3060-1190  
April 2019**

**SUPPORTING STATEMENT**

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**A. Justification:**

1. On March 1, 2013, the Federal Communications Commission, released a *Report and Order* (R&O) in the *Airport Equipment* proceeding, in WT Docket Nos. 10-61 and 09-42; FCC 13-30. In the R&O, the Commission amends its Part 87 rules to permit ground testing of aviation data link test systems. The adopted rule (Section 87.287(b)), requires that before submitting an application for an aircraft data link land test station, an applicant must obtain written permission from the licensee of the aeronautical enroute stations serving the areas in which the aircraft data link land test station will operate on a co-channel basis. The Commission may request an applicant to provide documentation as to this fact.

The Commission is requesting an extension of this information collection from the Office of Management and Budget (OMB) for a period of three years.

This information collection does affect individuals or households.

Statutory authority for this collection of information is contained in 15 U.S.C. 79 *et seq.*; 47 U.S.C. sections 151, 154(i), 154(j), 155, 157, 225, 303(r), and 309 of the Communications Act of 1934, as amended.

2. The written permission will aid the Commission in ensuring that licensees are complying with its policies and rules, while allowing the owners of antenna structures and other aviation obstacles to use Audio Visual Warning (AVWS) stations, thereby helping aircraft avoid potential collisions and enhancing aviation safety, without causing harmful interference to other communications.
3. Prior to finalizing rule makings, the Wireless Telecommunications Bureau conducts an analysis to ensure that improved information technology cannot 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 basis in the Commission or other federal agencies.
4. This agency does not impose a similar information collection on the respondents. There are no similar data 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 requirements to that absolutely necessary for evaluating and processing each application and to deter against possible abuses of the processes.

6. This information is considered essential to the implementation of the Act as described above.
7. Current data collection is consistent with 5 CFR 1320.5.
8. The Commission initiated a 60-day public comment period which appeared in the Federal Register on February 8, 2019 (84 FR 2864) seeking comments from the public on the information collection requirements contained in collection. No PRA comments were received as a result of the notice.
9. Respondents will not receive any payments associated with this collection.
10. There is no need for confidentiality with this collection of information.
11. There are no requests of a sensitive nature considered or those considered a private matter being sought from the applicants in this collection.
12. There are approximately 170 airlines flying in the U.S. and we estimate there to be 30 aircraft maintenance companies doing this type of data link testing, for a total of 200 licensees and 200 annual responses.

We estimate that approximately 115 will contract the work out, and the remaining 85 will be using in-house engineering personnel to meet this requirement @ 1 hour per respondent. The in-house engineer is estimated to have an hourly salary of \$60/hour.

**TOTAL NUMBER OF RESPONDENTS: 200.**

**TOTAL NUMBER OF ANNUAL RESPONSES: 200.**

85 responses x 1 hour/response = **85 hours**

**TOTAL ANNUAL HOUR BURDEN IS: 85 hours.**

**IN-HOUSE COST:** 85 responses x 1 hour/response x \$60/hour = **\$5,100.**

13. **Estimate of cost to respondents:** We estimate that approximately 115 will contract the work out and the salary of a contract engineer is estimated to be \$250.00/hour.

115 responses x \$250.00/hour = \$28,750.

**TOTAL ANNUAL OUTSIDE CONTRACTING COST BURDEN IS: \$28,750.**

- 14. There are no cost to the Federal Government.
- 15. There are program changes or adjustments to this collection.
- 16. The data will not be published for statistical use.
- 17. We do not seek approval to 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 are employed.