

**NON-SUBSTANTIVE CHANGE REQUEST JUSTIFICATION**  
**OMB CONTROL NUMBER 3060-0920**

Form 2100, Schedule 318 – Low Power FM Station Construction Permit Application<sup>1</sup>

The Commission is submitting this non-substantive change request to the Office of Management and Budget (OMB) for approval of minor non-substantive changes made to (current) FCC Form 318, Application for Construction Permit for a Low Power FM Broadcast Station. FCC Form 318 is used to apply to construct a new LPFM broadcast station, to make changes in an authorized LPFM broadcast station, or to amend a pending LPFM construction permit application in the current Media Bureau database system, the “Consolidated Database System” (CDBS).

The Media Bureau is transitioning to a new on-line, electronic licensing database system called the “Licensing Management System” (LMS) in which all Media Bureau broadcast applications and reporting forms will eventually be filed. In effect, the database transition requires a corresponding design conversion of all existing CDBS forms. The Media Bureau is currently developing electronic, LMS-compatible versions of various broadcast station application and reporting forms, such as this Form 2100, Schedule 318 – Low Power FM Station Construction Permit Application (LMS LPFM Construction Permit Application) as part of the database transition.

In general, the new LMS LPFM Construction Permit Application will replicate the current FCC Form 318. The form sections and substance of the individual questions essentially remain the same. As with the FCC Form 318, the LMS LPFM Construction Permit Application requires applicants to certify compliance with statutory and regulatory requirements. The application is presented primarily in a “Yes/No” certification format and contains places for submitting explanatory exhibits where appropriate.

The respondents, burden hours and costs of this Information Collection are not impacted by the minor non-substantive changes to the FCC Form 318, which will now be a part of the LMS LPFM Construction Permit Application. The minor non-substantive change is highlighted below:

Change #1 – To accommodate the Media Bureau’s database transition from CDBS to LMS, FCC Form 318 will be replaced by an LMS-compatible LMS LPFM Construction Permit Application. The certification-based questions and explanatory exhibit format remains the same. The substance, respondents, burden hours, and costs of Information Collection OMB Control No. 3060-0920 are not impacted.

Also, the Supporting Statement for OMB Control No. 3060-0920 has been updated accordingly.

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<sup>1</sup> Pursuant to this non-substantive change, CDBS-based FCC Form 318 - Application for Construction Permit for a Low Power FM Broadcast Station” will be renamed “Form 2100, Schedule 318- Low Power FM Station Construction Permit Application” and encompassed within the new on-line, electronic licensing database system called the Licensing Modernization System. Accordingly, the title of this Information Collection is also being changed.