

SUPPORTING STATEMENT

**A. Justification:**

1. Section 87.103 states the following: a) Stations at fixed locations. The license or a photocopy must be posted or retained in the station's permanent records. (b) Aircraft radio stations. The license must be either posted in the aircraft or kept with the aircraft registration certificate. If a single authorization covers a fleet of aircraft, a copy of the license must be either posted in each aircraft or kept with each aircraft registration certificate. (c) Aeronautical mobile stations. The license must be retained as a permanent part of the station records.

The recordkeeping requirement contained in Section 87.103 is necessary to demonstrate that all transmitters in the Aviation Service are properly licensed in accordance with the requirements of Section 301 of the Communications Act of 1934, as amended, 47 U.S.C. 301, No. 2020 of the International Radio Regulation, and Article 30 of the Convention on International Civil Aviation.

The Commission is now seeking approval from the Office of Management and Budget (OMB) a three-year extension for this information collection.

Statutory authority for this information collection is 47 U.S.C. 303.

This information collection does not affect individuals or households; thus, there are no impacts under the Privacy Act.

2. The information is used by FCC personnel during inspections and investigations to insure the particular station is licensed and operated in compliance with applicable rules, statutes, and treaties. In the case of aircraft stations, the information may be utilized for similar purposes by appropriate representatives of foreign governments when the aircraft is operated in foreign nations.

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 bases in the Commission or other Federal agencies.

4. This agency does not impose a similar information collection on the respondents. There is 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 information requirements to those absolutely necessary.
6. If the station license was not required to be posted or retained with station records, FCC Field Operations Bureau personnel and, where applicable foreign government representatives would be unable to determine whether a station was licensed and operated in compliance with appropriate rules, statues, and treaties. The Commission's enforcement efforts would be severely handicapped.
7. Current data collection is consistent with 5 CFR 1320.5, except that the subject records (i.e., station authorization and transmitter identification) are required to be retained for 5 years to coincide with the station license term. The retention of these records for 5 years imposes a negligible burden on the licensee while providing valuable information to FCC personnel insure compliance with applicable rules and treaties.
8. The Commission published a Notice in the Federal Register on April 22, 2019 (84 FR 16671), seeking comments from the public on the information collection requirements contained in this collection, as required by 5 CFR § 1320.8(d). The Commission received one comment from the public on the information collection requirements contained in this collection from Bruce D. Grimm of Mercury Service-ARM on April 24, 2019. Mr. Grimm recommended that the Commission consider retaining the requirements contained in Section 87.103 as an essential practice. The Commission agrees with his recommendation.
9. Respondents will not receive any payments associated with this collection.
10. There is no need for confidentiality with this collection of information.
11. This collection does not address any private matters of a sensitive nature.
12. According to the ULS database, there are approximately 33,622 licensees of aircraft radio station licenses and we estimate that they all are respondents to this collection. We estimate that an average of 0.25 hours per year per station is required to maintain this documentation, and that in-house personnel will be responsible for maintaining it. We estimate that the in-house staff are paid \$45 per hour.

**Total Number of Respondents: 33,622 licensees.**

**Total Number of Responses: 33,622 records kept.**

**Total Annual Burden Hours:  $33,622 \times 0.25 \text{ hours/record} = 8,405.5 \text{ hours}$  (rounded to 8,406 hours).**

**In-House Cost:  $33,622 \times 0.25 \text{ hours/record} \times \$45/\text{hour} = \$378,247.50$ .**

13. Estimate of cost to respondents: There are no external costs to respondents.
14. Cost to the Federal Government. There are no costs to the Federal Government.
15. There are no program changes or adjustment to this collection.
16. The data will not be published for statistical use.
17. The Commission is not requesting OMB approval to not display the OMB expiration date for this information collection. This is a recordkeeping requirement, therefore, display of the OMB expiration date is not applicable.
18. There are no exceptions to the certification statement.

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

No statistical methods are employed.