

**DEPARTMENT OF HOMELAND SECURITY
SUPPORTING STATEMENT A. FOR**

Project 25 Compliance Assessment Program (P25 CAP)

(OMB No. 1640-0015)

**Suppliers Declaration of Compliance (SDoC) form
Summary Test Report (STR) report**

A. Justification

1. The following is a request for a review of the Suppliers' Declaration of Compliance (SDoC) form for the Department of Homeland Security (DHS) Science and Technology (S&T) Directorate Project 25 Compliance Assessment Program (P25 CAP). The September 11 attacks and Hurricane Katrina made apparent the need for public safety radio systems to interoperate, regardless of who manufactured the equipment. The Intelligence Reform and Terrorism Prevention Act of 2004, Public Law 108-458, codified at 6 U.S.C. § 194, established the Office for Interoperability and Compatibility (OIC), within the S&T Directorate, to enhance public safety interoperable communications at all levels of government.

The Homeland Security Appropriations Act, 2007, Public Law 109-295, codified at 6 U.S.C. §§ 195 and 195a further authorized OIC to focus on research, development, testing, and evaluation and acceleration of the development of standards to improve interoperable communications. As part of these responsibilities and in response to specific Congressional direction, DHS developed the P25 CAP to improve public safety confidence in purchasing land mobile radio (LMR) equipment built to Project 25 LMR (P25) standards, especially those P25 standards related to improving interoperability between different manufacturers' radio systems.¹ A key part of the program involves informing the emergency response community of products that comply with P25 standards. The DHS needs to be able to collect essential information from manufacturers on their products that have met P25 standards as demonstrated through the P25 CAP.

It is important to note that the P25 CAP has had an impact on over a *\$1 billion in Federal grants*, including;

- The Public Safety Interoperable Communications (PSIC) grant program being administered jointly by the Department of Commerce and DHS;
- A discretionary grant program for public safety interoperability to be administered by the DHS Office of Emergency Communications; and

¹ Congressional direction for a P25 compliance assessment program can be found in the House of Representative Conference Report language dating back to H.R. Report 109-241 for the Department of Homeland Security Appropriations Act, 2006, Public Law 109-90. The most recent instance of congressional direction can be found in H.R. Report 113-481 for Department of Homeland Security Appropriations Bill, 2015, Public Law 113-235.

- Directed grants for public safety interoperable equipment to be administered by the Department of Justice (DoJ) Office of Community Oriented Policing Services.

It should also be understood that because it can take up to a year or more for Federal grant dollars to be made available to the ultimate grant recipient (the local entity after being administered by the State), in addition to the amount of time required for agencies to develop Requests for Proposals (RFPs) for vendors, it is very likely that since the launch of the P25 CAP, Federal grant dollars from FY06 and FY07 (potentially another \$1-\$3 billion in Federal grants) have been impacted.²

These estimates do not include the significant amount of funds spent every year by Federal public safety agencies procuring equipment for their own activities, or the billions spent annually by State and local governments using their own tax dollars to buy LMR equipment. It is expected that many of these agencies would also leverage the P25 CAP for their procurements.

2. Equipment suppliers provide the information to publicly attest to their products' compliance with a specific set of P25 standards. The SDoC, and an accompanying summary test report which substantiates the declaration, constitutes a company's formal, public attestation of compliance with the standards for the equipment. In turn, first responders at local, tribal, state, and federal levels across multiple disciplines including law enforcement, fire, and emergency medical services personnel, will use this information to identify P25 compliant communications system products. The P25 CAP Program Manager performs a simple administrative review to ensure the documentation is complete and accurate in accordance with the current P25 CAP processes.

This information is collected, maintained, and used in a way that is consistent with the applicable DHS CIO Information Quality Guidelines and Standards. Information quality is ensured through the effective implementation of the DHS Management System, which is documented through a quality manual and supporting procedures, instructions and forms. The template is based on requirements in ISO/IEC 17050:2004.

3. The Suppliers' Declaration of Compliance (SDoC) will be posted on the dhs.gov website (<https://www.dhs.gov/science-and-technology/p25-cap>). The Summary Test Report (STR) will be made available upon request (P25CAP@hq.dhs.gov). The supplier may complete the forms electronically or by hand. The completed form may then be submitted via email (P25CAP@hq.dhs.gov) to the OIC P25 CAP Program Manager.

² Information collected by the Department of Justice's Office of Community Oriented Policing Services regarding communications technology grants shows that, on average, it takes 24-36 months for agencies to have communications equipment delivered and installed from the time that the local procurement process begins. Thus, many agencies that have received Federal grants over the last two years to purchase P25 equipment will not have taken final delivery of systems/products being procured, and could use the P25 CAP information to determine that the products delivered meet P25 specifications, per contract requirements.

4. This information is not collected in any form, and therefore is not duplicated elsewhere.
5. The collection of this information does not impact small business or other small entities.
6. If the information is not collected or not collected on a regular interval, P25 CAP could not operate in conformance with the Charter for the Project 25 Compliance Assessment Program: December 2016, International Organization for Standardization/International Electrotechnical Commission (ISO/IEC) 17050:2004, and National Institute of Science and Technology (NIST) Handbook 153:2009.

If the information is collected less frequently, then the P25 CAP is at risk that equipment suppliers will be unable to publicly attest to their products' compliance with a specific set of P25 standards through a rigorous assessment process. In addition, the emergency response community will be unable to identify P25 compliant communications system products as attested by a rigorous assessment process.

If not conducted, DHS S&T would be unable to comply with the specific Congressional direction previously mentioned (see footnote 1).

7. This information collection is conducted in a manner consistent with guidelines 5 CFR 1320.5(d)(2).
8. In accordance with 5 CFR 1320.8(d), a 60-day notice for public comment was published in the Federal Register on 21 March 2019 at 84 FR 10524 and no public comments were received. Further, a second Federal Register Notice soliciting public comment for a 30-day period was published on 1 July 2019 at 84 FR 31327 and public comments are not anticipated..
9. DHS S&T does not provide payments or gifts to respondents in exchange for a benefit sought.
10. DHS has no assurances of confidentiality. There is an existing Privacy Impact Assessment (DHS/ALL/PIA-006 DHS General Contact Lists) for this collection. The DHS Privacy Office has determined that no System of Records Notice is required in connection with this collection.
11. There are no questions of a sensitive nature.
12. Estimated Annualized Burden Hours and Costs

Type of Respondent	Form Name/ Form Number	No. of Respondents	Total No. of Responses	**Avg. Burden per Response (in hours)	Avg. Annual Burden (in hours)	*Avg. Hourly Wage Rate	Total Annual Respondent
Electrical Engineers	Suppliers' Declaration of Compliance (SDoC) form	12	144	1	144	\$65.94	\$ 9,495.36
Electrical Engineers	Summary Test Report (STR) form	12	12	1	12	\$65.94	\$ 791.28
Total:		24	156	2	156		\$10, 286.64

The estimated annual public cost is \$10, 286.64. This figure was derived by summing the estimated annual respondent costs for all forms.

NOTES ON HOUR BURDEN:

* The above Average Hourly Wage Rate for “*Electrical Engineers*”, is the median hourly wage rate, \$43.10, times the wage rate benefit multiplier of 1.4 (to account for benefits provided) equaling \$65.94 fully-loaded wage rate. The median hourly wage rates was taken from the May 2017 Bureau of Labor Statistics (<https://www.bls.gov/oes/current/999001.htm#33-0000>), Occupational Employment Statistics.

** P25 CAP has estimated average time required to complete each of the forms as 1 hour (60 minutes). This time includes:

- Reviewing document – 10 minutes
- Completing the form/request to include contact information, test results, attestation statements, etc. – 40 minutes
- Reviewing the inputted information for accuracy - 10 minutes

13. There are no record keeping, capital, start-up or maintenance costs associated with this information collection.

The estimated annual non-labor costs to respondents is \$0.

14.

The estimated annual cost to the federal government in relation to this information collection is \$10,427.70

The following method was used to estimate the cost (based on General Schedule Grade 14, step 10, [2018 WASHINGTON-BALTIMORE-NORTHERN VIRGINIA, DC-MD-VA-WV-PA](#) locality, fully loaded annual pay of \$148,967 (\$148,967 x 1.4 benefit multiplier = \$208,554)):

- Cost of the Federal Employee to review Summary Test Report_ Form: 1 personnel x 1% annual time = \$ 2,085.54
- Cost of the Federal Employee to review Suppliers' Declaration of Compliance Form: 1 personnel x 4% annual time = \$ 8,342.16.

Annualized Cost Analysis:

a. Printing cost:	\$ <u>0</u>
b. Collecting and processing:	\$ <u>0</u>
c. Total cost to program:	\$ <u>10,427.70</u>
d. Fee charge:	\$ <u>0</u>
e. Total annual cost to the government	\$ <u>10,427.70</u>

15. This is a renewal of an information collection. There are revisions to that collection that are included in the package as a supplementary document.
This is a reinstatement of collection OMB-1640-0015. There has been an adjustment in the estimated annual burden hours previously stated burdens for this Information Collection. The previous collection inaccurately calculated the annualized burden hours and costs. This collection corrects the calculations.
16. DHS S&T does not intend to employ the use of statistics or the publication thereof for this information collection.
17. DHS S&T will display the expiration date of OMB approval for this information collection.
18. DHS S&T does not request an exception to the certification of this information collection.