

Supporting Statement

Website for web based Frequency Coordination Request Information Collection Request

INTRODUCTION

This information collection is submitted to the Office of Management and Budget (OMB) to request a new Information Collection Request (ICR) clearance for the information collection entitled, Website for Frequency Coordination Request, previously associated with OMB Control No. 2120-0001.

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

1. Circumstances that make collection of information necessary.

49 U.S.C. Section 44718(c) Under Broadcast Applications and Tower Studies states, “In carrying out laws related to a broadcast application - the Administrator of the Federal Aviation Administration and the Federal Communications Commission shall take action necessary to coordinate efficiently—

- (1) The receipt and consideration of, and action on, the application; and
- (2) The completion of any associated aeronautical study

The prior ICR efforts worked to meet the requirement of all elements of 49 U.S.C. Section 44718 inclusive of broadcast radio frequency data via OMB Control 2120-0001, associated with filing a Notice of Proposed Construction or Alteration. Due to the limitations imposed by the “Structure Construction or Alteration” factor, several broadcast applications were not being properly captured with the required consideration data or aeronautical study initiated.

The Federal Aviation Administration (FAA) Order 6050.32.B, Chapter 3, Section 302 outlines the US National Organizations, and the role of the National Telecommunications and Information Administration (NTIA) is assigning the Aviation Assignment Group (AAG) of the radio spectrum to FAA which support aeronautical services. Hence, FAA must “authorize” aeronautical frequencies of broadcast applications which impact the AAG bands. The Federal Aviation Administration (FAA) Order 6050.32.B, Chapter 3, Sections 303 and 304 and Chapter 4, outline how the FAA will use the ICR data for spectrum engineering evaluations, analysis, and assignment and processing. These actions are required to address the proponent and FAA objectives of providing reliable communications, navigation, and surveillance in support of the National Airspace System (NAS). The information collected is needed to perform the aeronautical studies, technical evaluations required and to meet the specified requirements for the radio frequency engineering pursuant to the FAA Order. This submission for clearance will support the FAA’s collection of the radio frequency information by the Web based Frequency Coordination Request (WebFCR) application, located at FAA.Gov. FAA Order 6050.32.B is attached to this submission.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

Submission of a request for FAA frequency coordination is required “on occasion to request and/or continue frequency use” as needed by the proponent. Reporting of this information by respondents is mandatory upon each occasion.

The information is used by the FAA Spectrum Engineering and Assignment Organization (AJW-1C2) to complete the engineering required to adequately evaluate and engineer the proponent’s request. a.) The response to this data collection is required for the proponent to obtain FAA concurrence to use a radio frequency that impacts civil aviation. b.) Those entities who respond to this collection are proponents (individuals, corporations, organizations or agencies) who are seeking to broadcast on a radio frequency within the AAG frequencies as defined by the National Telecommunications and Information Agency (NTIA). c.) The information collected is used for analysis of the impact to aviation only, and the concurrence is disclosed to the requester and the Federal Communications Commission (FCC) via the requester. d.) The FCC issued licenses for radio frequency transmission authorization must be renewed typically every 10 years, this requires the proponent to resubmit to the FAA under this collection, to extend the license period, if required every 10 years. Hence, the collection period is five years. e.) Information under this collection from proponents is comprised of technical specifications regarding the radio frequency transmitter (i.e. power, coordinates, signal characteristics, manufacturer) and is placed in the record which is sent to the NTIA and FCC as a part of its license process, along with the engineered frequency and the concurrence number generated by FAA. f.) The information collected through the WebFCR portal supports the engineering, modeling, validation and workflow management of the request to evaluate if the request interferes or impacts civil aviation operations pursuant to FAA Order 6050.32B. g) The record which is sent to the NTIA and FCC as a part of its license process, when approved by NTIA is added to the official Government Master File (GMF) by NTIA, as an official part of its record keeping process. FAA does not retain the information submitted via WebFCR in any FAA data record or information record, but maintains an updated copy of the GMF from NTIA for engineering purposes.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

The information collected by the FAA Spectrum Engineering and Assignment Organization (AJW-1C2) is automated through the use of the Web based Frequency

Coordination Request (WebFCR) Application hosted on the internet at the FAA.Gov public external environment. The proponent is allowed to enter or upload directly the frequency coordination request information and submit the data for evaluation. The WebFCR application directly transfers the data to the FAA's server-based Automated Frequency Manager (AFM) System and alerts the responsible AJW-1C spectrum engineer. The data entered into WebFCR supports the engineering, modeling, validation and workflow management of the request through to completion. Automated email communications to the proponents and defined stakeholders is manifest in AFM system via email and is presented to the proponent on real-time dashboards to show the progress and status of a given request. These automated tools significantly reduce the burden and the time required to complete a request, while providing the proponent relevant status information. The public, nor any other internal or external organization has access to the proponent information which is in the process. When a radio frequency is approved by NTIA, then NTIA adds the record to the official Government Master File (GMF) as an official part of NTIA's record keeping process. The collection in the WebFCR application is fully (100%) electronic for the required FAA engineering concurrence process of AAG bands.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The prior ICR efforts worked via FAA Form 7460-1 attempted to include radio frequency data associated with filing a Notice of Proposed Construction or Alteration. Due to the limitations imposed by the "Structure Construction or Alteration" factors, several of the frequency applications were not being properly captured. Hence, the move to electronic processing via WebFCR.

The proponents and/or stakeholders, now, who have a requirement to coordinate frequencies with the FAA have been asked to utilize the WebFCR internet application to enter or upload directly their frequency coordination request information, in lieu of the prior FAA Form 7460-1 or free format email communications. Organizations and/or documentation now directs all entities seeking to broadcast on radio frequencies which impact the AAG bands, to access and obtain coordination via the FAA WebFCR internet application at FAA.GOV. Further, such proponents and users are allowed to upload with their request, a PDF document explaining and/or containing additional spectrum related information outlining the nature and circumstances of their request at the discretion of the user.

5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

Individuals as well as small businesses and large corporations may require to broadcast on a radio frequency impacting aviation. The information collected has been designed to fully minimize the burden on all respondents by limiting the amount of information required to the basic data needed, generalizing the formats in which it is submitted

(electronic/on-line), allowing multiple methods of data entry and by providing clear and concise instructions, inclusive of dynamic helpdesk accessible via telephone.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Submission of the requested information to the FAA for frequency coordination is required to allow for the engineering and analysis of the broadcast at that proposed frequency at that given location and its impact on U.S. civil aviation operations. Not collecting the information, prior to operation could directly affect the safety of civil aviation.

How often information is collected is relative to the proponent continuing needs or: "On occasion to continue frequency use" as needed by the proponent. The AAG frequencies as referenced in Section 1 above, require FAA review every 10 years, while the FCC also grants licenses for typically 10 years, at which point an extension can be requested. Thus, how often such information is required is determined by the requesters, not by the FAA.

There are no specific technical or legal obstacles to reducing the reporting burden.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- *requiring respondents to report information to the agency more often than quarterly;*
- *requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;*
- *requiring respondents to submit more than an original and two copies of any document; requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;*
- *in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;*
- *requiring the use of a statistical data classification that has not been reviewed and approved by OMB;*
- *that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which*

unnecessarily impedes sharing of data with other agencies for compatible confidential use; or

- *requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.*

There are no special circumstances.

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A Federal Register Notice published on April 19, 2019 (84 FR 16557) solicited public comment. No comments were received.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

No payments or gifts will be provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.

No assurances of confidentiality are provided to respondents.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

The burden incurred in requesting a coordination for the proposed frequency request would only include the administrative burden of submitting the data request online or approximately 0.2 hours. Typically the same user is applying to the FCC for a license to broadcast, hence no additional data or documents are required.

The number of WebFCR Frequency Coordination Request annually by each IC category is:

IC 1 - Federal and Military Agencies

Summary (Annual numbers)	Reporting	Recordkeeping
# of Respondents	1100	0
# of Responses per respondent	1	0
Time per Response	0.2Hrs	0
Total # of responses	1100	0
Total burden (hours)	220	0

IC 2 - Private Sector

Summary (Annual numbers)	Reporting	Recordkeeping
# of Respondents	600	0
# of Responses per respondent	1	0
Time per Response	0.2hrs	0
Total # of responses	600	0
Total burden	120	0

(hours)		
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IC 3 - Individuals

Summary (Annual numbers)	Reporting	Recordkeeping
# of Respondents	400	0
# of Responses per respondent	1	0
Time per Response	0.2hrs	0
Total # of responses	400	0
Total burden (hours)	80	0

IC 4 – State, Local and Municipalities

Summary (Annual numbers)	Reporting	Recordkeeping
# of Respondents	300	0
# of Responses per respondent	1	0
Time per Response	0.2hrs	0
Total # of responses	300	0
Total burden (hours)	60	0

Total for WebFCR ICs

Summary (Annual numbers)	Reporting	Recordkeeping
# of Respondents	2400	0
# of Responses per respondent	1	0
Time per	0.2hrs	0

Response		
Total # of responses	2400	0
Total burden (hours)	480	0

The total estimated hour burden for WebFCR as outlined in the ICs above (determined through consultation with stakeholders) is:

Fiscal 2020 FAA WebFCR .20 hours x 2,400 = 480 hr. (estimated)
Total WebFCR Request 2019 480 hr. (estimated)

The respondents are either two generic arenas: Government oriented, which includes Federal, state and municipal or Private which includes corporate and individuals.

The government respondents: Typically respondents most familiar with aviation facility systems would be equivalent to the GS-13 level technical personnel. Generally, these technical support staff can be averaged at GS-13 (General GS-13, Step 5 hourly wage, Kansas City Locality Pay) for an average wage of \$48.56 per hour¹ with 31.4%² fringe benefits cost for a total of \$63.81 per hour. Kansas City was used as the locality pay as it is the mid-point in terms of cost for locality pay. With the required 17%³ overhead added, the total estimated salary is \$74.66 per hour.

The estimated labor cost for Federal, Military, State and Municipal respondents:

$$1100(\text{IC-1}) + 300(\text{IC-4}) = 1400 \times 0.2 \text{ hours} \times \$74.66 = \$20,904.80$$

The Private and individual respondents: The estimated hourly rate for the respondents is approximately \$25.12 per hour, based on a civilian worked earning FG-9, Step 5 (Kansas City Locality Pay).¹ Kansas City locality pay was utilized as it is a mid-point, cost wise, for locality pay. A 31.4 percent multiplier was then applied to account for fringe benefits which brings the salary to \$33.01 per hour.⁴ To account for overhead, a multiplier of 17%³ was applied. The total salary with fringe and overhead is \$38.62.

The estimated labor cost for private and individual respondents:

$$600(\text{IC-2}) + 400(\text{IC-3}) = 1000 \times 0.2 \text{ hours} \times \$38.62 = \$7,724.00$$

¹ https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/KC_h.pdf

² Bureau of Labor Statistics, <https://www.bls.gov/news.release/ecec.nr0.htm>

³ Source: Cody Rice, U.S. Environmental Protection Agency, "Wage Rates for Economic Analyses of the Toxics Release Inventory Program" (June 10, 2002), <https://www.regulations.gov/document?D=EPA-HQ-OPPT-2014-0650-0005>.

⁴ <https://www.bls.gov/news.release/ecec.nr0.htm>

The total labor cost for the WebFCR Collections are: \$20,904.80 + \$7,724.00 = \$28,628.80

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.

There are no additional costs that have not already been included in item 12. There are no material, capital or maintenance costs.

14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

All submissions for this collection are processed by the government through the automated WebFCR System application. In prior years planning, FAA Spectrum asked an engineer to prepare an internal limited "Time on Projects" study designed to estimate the approximate time it takes a government employee to process a frequency application for a given frequency band. Although each band is different, the average time and number of technical steps, by the spectrum engineer can be considered similar as referenced in the FAA Order 6050.32B Change 3.

The mean hourly wage of the Federal Spectrum Engineers involved in processing WebFCR Coordination Request are 1) Service Area Level Frequency Management Officers at nominally, Kansas City was used as the locality pay again, GS-14 Step 5 at \$57.38 per hour⁵, 2) The next Level analysis is a review per NTIA Manual⁶ is by Spectrum Engineers which are Band Subject Matter Experts at a higher grade, nominally, GS-15 Step 5 at \$67.49⁶ per hour, and 3) similar Spectrum Frequency Assignment Subcommittee (FAS) representatives. As in item 12, the 31.4 percent multiplier is applied to account for fringe benefits and the 17 percent factor for overhead³. The total respective hourly rates are \$88.21 for FMO and \$103.76 for SME and FAS level personnel.

For Non-Federal WebFCR records, approximately 50% of the submissions required an engineering analyst to coordinate and research specific data from external sources to complete processing of the records by FAA. This work also address cases for all WebFCR records where international coordination is required due to proximity to the

⁵ https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/KC_h.pdf

⁶ NTIA Manual Annex F, https://www.ntia.doc.gov/files/ntia/publications/redbook/2017-09/F_17_9.pdf

border and/or other complex conditions. The analysts are GS-13 step 5 technical personnel category¹ referenced in item 12 at \$74.66 per hour rounded.

Accordingly, these rates are inclusive of benefits plus other overhead costs such as rent, utilities, and office equipment, the equations are:

- Analyst Nominal cost rate $\$48.56 \times 1.314 \times 1.17 = \74.66
- FMO Nominal cost rate $\$57.38 \times 1.314 \times 1.17 = \88.21
- SME/FAS Nominal cost rate $\$67.49 \times 1.314 \times 1.17 = \103.76

Once the data is received, it must be processed by 3 Spectrum Engineers, one at the FAA Service Area level by the Frequency Management Officer (FMO), and then one (1) Spectrum Engineer band subject matter expert (SME) review at the FAA HQ level. A final quality, policy and protocol review is completed by the Spectrum Frequency Assignment Subcommittee (FAS) representative prior to export to the NTIA for final approval.

The table below estimates the WebFCR Engineer support and analysis work by the processing team.

See Tables 14a Summary below for calculations.

Table 14a – WebFCR Processing & Costing Estimated

Federal government Employee by general labor category description	Avg. Approx. Wage Rate/hour	Fully Burden Rates	Process time for each IC	Total records Processed for all ICs	Total hours required for All ICs.	Approximate Annualized cost to the Government
Coord/Analyst	\$48.56	\$74.66	0.5	1086	543	\$40,540.38
Spectrum/FMO	\$57.38	\$88.21	0.5	2400	1200	\$105,852
Spectrum/SME	\$67.49	\$103.76	0.4	2400	960	\$99,609.60
Spectrum/FAS	\$67.49	\$103.76	0.25	2400	600	\$62,256.00
Total						\$308,258.40

In addition to these labor costs associated with processing these Information Collections, during CY2018, the FAA invested funds totaling \$2,087,235.35 to maintain and enhance the group of Spectrum Engineering System applications inclusive of WebFCR. This maintenance and enhancement process continues on an annual basis for these systems.

Therefore the total WebFCR system annualized processing, maintenance and sustainment cost to the government is estimated as \$2,395,493.75 annually.

15. Explain the reasons for any program changes or adjustments.

This information collection is to request a new Information Collection Request (ICR) clearance for the FAA Spectrum Engineering and Policy Organization for information collection (IC) entitled, Website for Frequency Coordination Request, which was previously associated with OMB Control No. 2120-0001, relative to the form 7460-1. As outlined earlier, the inherent limitations imposed by the "Structure Construction or Alteration" factor, of the 7460 form, caused proponents to fail to respond for several broadcast applications when not directly associated with such cases and use or requirement for a radio frequency was not being properly captured and the required consideration data or aeronautical study initiated by FAA for the frequency engineering. This new ICR removes, Web Based Frequency Coordination Request (WEBFCR), from the previously listed collection of information.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

There is no plan for tabulation or publication.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

No such approval is being sought.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions.