

**SUPPORTING STATEMENT**

**A. Justification:**

1. Section 87.219 requires that if airports have control towers or Federal Aviation Administration (FAA) flight service stations, and more than one licensee wants to have an automated aeronautical advisory station (Unicom), they must write an agreement outlining who will be responsible for the Unicom's operation; all licensees must sign the agreement and keep a copy of the agreement with each licensee's station authorization. If the control is to be shared among several operators, how that control will be divided or scheduled must be agreed upon by the licensees.

The Commission is requesting an extension of this information collection from the Office of Management and Budget (OMB) in order to obtain the full three year clearance.

Statutory authority for this collection of information is contained in Sections 47 U.S.C. 154, 303 and 307(e), unless otherwise noted.

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

2. The information will be used by compliance personnel for enforcement purposes and by licensees to clarify responsibility in operating Unicom.
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. This information collection is only required when a licensee enters into an agreement with other licensees to set up an automated Unicom. Therefore, a less frequent collection equates to no collection of such information and the concomitant inability to assure safe and efficient aircraft operations.

7. There are no special circumstances which would require collections to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.
8. The Commission initiated a 60-day public comment period which appeared in the Federal Register on January 3, 2020 (85 FR 314) seeking comment from the public on the information collection requirements contained in this collection. No comments were received from the public.
9. Respondents will not receive any payments as a result of this collection of information.
10. There is no need for confidentiality with this collection.
11. This collection of information does not address any private matters of a sensitive nature.
12. We estimate that approximately **55 licensees** will require 0.7 hours to prepare, file and keep a copy of the agreement required.

| No. of Responses | Hrs. Per Response | Annual Burden                          |
|------------------|-------------------|--|
| <b>55</b>        | <b>0.7</b>        | <b>38.5 hours (rounded to 39 hrs.)</b> |

We estimate an in-house hourly rate of \$40/hour for staff members fulfilling the requirement. Therefore, the in-house costs are 55 agreements x 0.7 hours/agreement x \$40/hour = **\$1,540 (in-house costs)**.

13. Estimate of cost to respondents: There are no capital or start-up costs associated with this collection of information. The Commission assumes that the licensees will require contracting attorneys to review the agreements and it will take the attorney 0.50 hours to review the agreements at \$300/hour. Therefore, the external costs are as follows:

$$55 \text{ agreements} \times 0.5 \text{ hours/agreement} \times \$300/\text{hour} = \mathbf{\$8,250}$$

**Total Annual Costs: \$8,250**

14. Estimate of cost to Federal Government: There is no cost to the Federal Government for this collection of information.
15. There are no program changes to this collection. There are adjustments to this collection as follows: -70 to the number of respondents, -70 to the number of annual responses, -49 to the annual burden hours and -\$10,500 to the annual cost.
16. The data will not be published for statistical use.
17. We do not seek approval to not 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.