

**3060-XXXX**  
**3.7 GHz Band Relocation Payment Clearinghouse;**  
**3.7 GHz Band Relocation Coordinator; 3.7 GHz**  
**Band Space Station Operators**

**July 2020**

SUPPORTING STATEMENT

*New Collection Titled: 3.7 GHz Band Relocation Payment Clearinghouse; 3.7 GHz Band Relocation Coordinator; 3.7 GHz Band Space Station Operators*

**A. Justification:**

1. ***Circumstances that make this collection necessary.*** The Commission seeks approval for this new information collection from the Office of Management and Budget (OMB) for a three-year time period.

Under this new information collection, the Commission will collect information that will be used to ensure that 3.7-4.2 GHz band stakeholders adopt practices and standards in their operations to ensure an effective, efficient, and streamlined transition. Status reports and other information required in this collection will be used to ensure that the process of clearing the lower portion of the band is efficient and timely, so that the spectrum can be auctioned for flexible-use service licenses and deployed for next-generation wireless services, including 5G, as quickly as possible. The collection is also necessary for the Commission to satisfy its oversight responsibilities and/or agency specific/government-wide reporting obligations.

On February 28, 2020, in furtherance of the goal of releasing more mid-band spectrum into the market to support and enabling next-generation wireless networks, the Commission adopted a Report and Order, FCC 20-22, (*3.7 GHz Report and Order*), in which it reformed the use of the 3.7-4.2 GHz band, also known as the C-band.<sup>1</sup> Currently, the 3.7-4.2 GHz band is allocated in the United States exclusively for non-Federal use on a primary basis for Fixed Satellite Service (FSS) and Fixed Service. Domestically, space station operators use the 3.7-4.2 GHz band to provide downlink signals of various bandwidths to licensed transmit-receive, registered receive-only, and unregistered receive-only earth stations throughout the United States.

The *3.7 GHz Report and Order* calls for the relocation of existing FSS operations in the band into the upper 200 megahertz of the band (4.0-4.2 GHz) and making the lower 280 megahertz (3.7-3.98 GHz) available for flexible use throughout the contiguous United States through a Commission-administered public auction of overlay licenses that is scheduled to occur later this year.<sup>2</sup> The Commission adopted a robust transition schedule to achieve a prompt relocation of FSS operations so that a significant amount of spectrum could be made available quickly for next-generation wireless deployments. At the same time, the Commission sought to ensure the effective accommodation of relocated incumbent users. To facilitate an efficient transition, the Commission adopted a process for fully reimbursing existing operators for the costs of this relocation and for offering accelerated relocation payments to encourage a timely transition. Flexible-use licensees will be required to reimburse eligible space station operators for their actual relocation costs associated with clearing the lower 300 megahertz of the band while ensuring continued operations for their customers. The *3.7 GHz Report and Order* establishes a Relocation Payment Clearinghouse to oversee the cost-related aspects of the transition and establishes a Relocation

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<sup>1</sup> See MOBILE NOW Act, Pub. L. No. 115-141, Division P, Title VI, § 601 *et seq.* (2018) (requiring the Commission to evaluate “the feasibility of allowing commercial wireless services, licensed or unlicensed, to use or share use of the frequencies between 3700 megahertz and 4200 megahertz”).

<sup>2</sup> The 20 megahertz from 3.98-4.0 GHz is being reserved as a guard band.

Coordinator to establish a timeline and take actions necessary to migrate and filter incumbent earth stations to ensure continued, uninterrupted service during and following the transition.

The Commission concluded in the *3.7 GHz Report and Order* that a Relocation Payment Clearinghouse and Relocation Coordinator are critical to ensuring that the reconfiguration is administered in a fair, transparent manner and that the transition occurs as expeditiously as possible. To accomplish these goals most effectively, the Commission is seeking approval for a new information collection to collect information from the Relocation Payment Clearinghouse, the Relocation Coordinator, and incumbent space station operators and allow the Relocation Payment Clearinghouse and Relocation Coordinator to collection information, as described below:

#### Relocation Payment Clearinghouse

The Commission concluded in the *3.7 GHz Report and Order* that an independent Relocation Payment Clearinghouse is necessary to administer the cost-related aspects of the transition in a fair, transparent manner, pursuant to Commission rules and oversight, to mitigate financial disputes among stakeholders, and to collect and distribute payments in a timely manner. The Relocation Payment Clearinghouse will be responsible for collecting and distributing relocation and accelerated relocation payments, auditing incoming and outgoing invoices, mitigating cost disputes among parties, and generally acting as a clearinghouse. To that end, the *3.7 GHz Report and Order* calls for the Relocation Payment Clearinghouse to create and submit the following information:

- (1) written procedures for its operations, using the Government Accountability Office's Green Book to serve as a guide in satisfying such requirements;
- (2) quarterly reports that detail the status of reimbursement funds available for clearing obligations, the relocation and accelerated relocation payments issued, the amounts collected from overlay licensees, and any certifications filed by incumbents;<sup>3</sup>
- (3) 30 days' notice to 3.7 GHz Service licensees to provide licensees with of the additional pro-rata shares they must contribute;
- (4) an estimate of the amounts that the overlay licensees owe every six months;
- (5) requests for additional documentation from a party seeking reimbursement of compensable relocation costs to determine whether they are reasonable and to ensure they comply with the requirements adopted in section 27.1416(a) of the Commission's rules;
- (6) notice to a party seeking reimbursement that the amount sought for reimbursement is unreasonable, and notice of the amount it deems eligible for reimbursement;
- (7) following a determination of the reimbursable amount, invoices of approved claims, which it shall issue to each licensee indicating the amount to be paid;<sup>4</sup>

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<sup>3</sup> Specifically, the Relocation Payment Clearinghouse must (i) submit to the Office of Management and Budget and the Wireless Telecommunications Bureau an audited statement of funds expended to date, including salaries and expenses of the Clearinghouse; (ii) provide additional information requested by the Wireless Telecommunications Bureau; and (iii) report the results of an independent audit of its compliance with privacy and information security requirements.

<sup>4</sup> If the Relocation Payment Clearinghouse determines that the amount sought for reimbursement is unreasonable, it shall notify the party of the amount it deems eligible for reimbursement. The Relocation Payment Clearinghouse

- (8) the entire record on any disputed records submitted to the Chief of the [Wireless Telecommunications] Bureau, when referring an unresolved matter; and
- (9) prompt notice to 3.7 GHz Service licensees following submission of the Certification of Accelerated Relocations as set forth in section 27.1412(g).

The Relocation Payment Clearinghouse will also collect the following information from parties seeking reimbursement of compensable costs, as required by the *3.7 GHz Report and Order*: documentation of actual expenses, and an objection by parties disputing a cost estimate, cost invoice, or payment or cost-sharing obligation. The Relocation Payment Clearinghouse will collect payments from overlay licensees to reimburse incumbents and will notify overlay licensees when incumbents file a Certification of Accelerated Relocation. The Relocation Payment Clearinghouse must provide additional financial information as requested by the Wireless Telecommunications Bureau (Bureau) and refer unresolved disputes to the Bureau. Finally, the Relocation Payment Clearinghouse must file a request with the Bureau to wind-down and suspend operations.

#### Relocation Coordinator

The *3.7 GHz Report and Order* sets forth specific obligations, filing requirements, and deadlines for eligible space station operators that select to clear by the Accelerated Relocation Deadlines, and it adopts additional requirements for eligible space station operators that do not elect to clear by the Accelerated Relocation Deadlines in order to ensure that incumbent earth station operators, other C-band satellite customers, and prospective flexible-use licensees are adequately informed and accommodated throughout the transition.

The Commission found that making eligible space station operators individually responsible for all space station clearing obligations would promote an efficient and effective space station transition process. Nevertheless, in light of the complicated interdependencies involved in transitioning earth station operations to the upper 200 megahertz of C-band spectrum, as well as the extensive number of registered incumbent earth stations, the Commission determined that a Relocation Coordinator is necessary to ensure that all incumbent space station operators relocate in a timely manner.

The Relocation Coordinator will be responsible for performing several duties, which will include: (1) coordinating the schedule for clearing the band; (2) performing engineering analysis, as necessary, to determine necessary earth station migration actions; (3) assigning obligations, as necessary, for earth station migrations and filtering; (4) coordinating with overlay licensees throughout the transition process; (5) assessing the completion of the transition in each PEA and determining overlay licensees' ability to commence operations; and (6) mediating scheduling disputes. In short, the Relocation Coordinator may establish a timeline and take actions necessary to migrate and filter incumbent earth stations to ensure uninterrupted service during and following the transition. Accordingly, the *3.7 GHz Report and Order* requires that the Relocation Coordinator create, collect, and/or provide the following:

- (1) to the extent that incumbent earth stations are not accounted for in eligible space station operators' Transition Plans, the Relocation Coordinator must prepare an Earth Station Transition Plan for such incumbent earth stations and may require each associated space station operator to file the information needed for such a plan with the Relocation Coordinator;

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shall pay approved claims within 30 days of invoice submission, and shall also include its own reasonable costs in the invoices.

- (2) description and recommendation of the respective responsibility of each party for earth station migration obligations in the Earth Station Transition Plan;
- (3) collection of notices from earth station operators or other satellite customers of any disputes related to comparability of facilities, workmanship, or preservation of service during the transition, which it shall notify to the Wireless Telecommunications Bureau and provide recommendation for resolution;
- (4) status reports on the overall status of clearing efforts, on a quarterly basis, beginning December 31, 2020; and
- (5) any documentation requested by the Wireless Telecommunications Bureau, in connection with the Office of Managing Director, necessary to provide guidance or carry out oversight.

If eligible space station operators elect accelerated relocation so that a supermajority (80%) of accelerated relocation payments are accepted (and thus accelerated relocation is triggered), a search committee of such operators shall select a Relocation Coordinator. Specifically, each electing space station operator may select one representative for the search committee, and the committee shall work by consensus to the extent possible or by supermajority vote (representing 80% of electing operators' accelerated relocation payments) to the extent consensus cannot be reached. In the event that the search committee fails to select a Relocation Coordinator and to notify the Commission by July 31, 2020, the search committee will be dissolved without further action by the Commission and the Commission will initiate a procurement of the Relocation Coordinator to facilitate the transition.

#### Space Station Operators

The *3.7 GHz Report and Order* establishes rules to transition incumbent C-band users out of the band made available for flexible-use and to reimburse incumbent space station operators for the costs of transitioning their services. The Commission's approach will permit all incumbents to maintain comparable service for existing customers and to obtain future customers in the upper part of the band, while making more efficient use of the band as a whole. To this end, the Commission requires the following information from space station operators:

- (1) status of its clearing efforts on a quarterly basis, beginning December 31, 2020;<sup>5</sup>
- (2) timely certification that it has completed the necessary clearing actions to satisfy each Accelerated Relocation Deadline. The certification must be filed once the eligible space station operator completes its obligations but no later than the applicable Accelerated Relocation Deadline. The Wireless Telecommunications Bureau will prescribe the form of such certification;
- (3) notice of any incumbent earth station transition delays, which must be submitted to the Wireless Telecommunications Bureau within 7 days of discovering an inability to accomplish the assigned earth station transition task. Such a request must include supporting documentation to allow for the resolution as soon as practicable and must be submitted before the Accelerated Relocation Deadlines.

Statutory authority for this information collection is contained in sections 1, 2, 4(i), 4(j), 5(c), 201, 302, 303, 304, 307(e), 309, 316 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 152, 154(i), 154(j), 155(c), 201, 302, 303, 304, 307(e), 309, 316.

This collection does not have any impacts under the Privacy Act.

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<sup>5</sup> Eligible space station operators may file joint status reports.

2. **Use of Information.** The information that will be collected under this new information collection is designed to ensure that the framework adopted by the Commission in the *3.7 GHz Report and Order* will occur in an efficient, timely, and transparent manner. The information collection will promote transparency and increase efficiency by ensuring that all relevant stakeholders have access to information regarding the necessary steps, costs, respective obligations of each party, and overall timeline for transitioning existing C-band services to the upper 200 megahertz of the band.

The information provided by the Relocation Payment Clearinghouse will facilitate an efficient transition with appropriate Commission oversight. Specifically, the information provided to and by the Relocation Payment Clearinghouse will ensure that the cost-related aspects of the transition are administered in a fair, transparent manner. For instance, this information will facilitate the resolution of cost disputes among stakeholders and ensure that payments are collected and distributed in a timely manner. The information submitted to and by the Relocation Coordinator will ensure that all incumbent space station operators are relocating in a timely manner, which ensures that mid-band spectrum is made available for deploying next-generation services to the American public as quickly as possible. This collection will allow incumbent earth station and space station operators to evaluate the necessary aspects and costs of the transition to facilitate an efficient clearing process. The transition involves multiple stakeholders and diverse incumbents; therefore, the information submitted by the incumbent earth stations and space station operators is crucial to streamlining the transition process and ensuring an efficient administration of the transition by the Relocation Payment Clearinghouse and Relocation Coordinator.

3. **Technological collection techniques.** Entities required to submit information under this new information collection will file the required information electronically using the Commission's existing systems. This collection mechanism is being used to reduce the technological burden on the public and the Commission. Moreover, the Commission expects stakeholders involved in the transition to communicate and submit information through electronic mechanisms, as this is the most accurate and efficient means of relaying this information.

4. **Efforts to identify duplication.** There will be no duplicative information collected. This information collection is a new information collection to collect specific information needed to implement the framework for reforming the 3.7-4.2 GHz band recently adopted by the Commission in the *3.7 GHz Report and Order*. Thus, the information being collected under this collection is not already available.

5. **Impact on small entities.** In conformance with the Paperwork Reduction Act of 1995, the Commission has made an effort to minimize the burden on all respondents regardless of size by limiting the information collected under this collection to that which is necessary to obtain the information needed to implement the framework for reforming the 3.7-4.2 GHz band recently adopted by the Commission in the *3.7 GHz Report and Order*.

The Commission has taken several actions to minimize the burden on small businesses, organizations, or other small entities. For instance, to ensure that small entities and all eligible interests are included in the Transition Plans and compensated for the transition to the upper 200 megahertz of the band, the transition obligations the Commission adopt require a showing that the space station transmissions and receiving earth station operations have been sufficiently cleared such that the new flexible-use licensee could begin operating without causing harmful interference to registered incumbent earth stations. In addition, if a Small Satellite Operator satisfies the definition of eligible space station operators such that it has incumbent earth station customers that will need to be transitioned to the upper portion of the band, then it would be entitled to reimbursement of reasonable relocation costs and potential accelerated relocation payments. This ensures that any small space station operator incumbent affected by the transition will have an opportunity to participate. Moreover, several rule changes adopted in the *Report and Order* are

consistent with and mirror existing requirements for other bands, which should minimize the economic impact for small entities who may already be familiar with such requirements and have the processes and procedures in place to facilitate compliance resulting in minimal incremental costs to comply with the *Report and Order*.

6. ***Consequences if information is not collected.*** This new information collection is critical for the Commission to be able to clear a substantial amount of C-band spectrum in a short timeframe. The information collected by and from the Relocation Payment Clearinghouse will be used to audit incoming and outgoing invoices to ensure a transparent transition process; to collect and distribute payments in a timely manner to promote an efficient clearing of the band; and to mitigate financial disputes among stakeholders to minimize the risks of delay. The Commission will use the information collected by and from the Relocation Coordinator to ensure that all incumbent space station operators are relocating in a timely manner. Without this information, transition of this spectrum would be delayed longer than necessary and would have significant negative effects for the American consumer and American leadership in 5G. Moreover, without this information, the Commission would be constrained in its ability to provide the oversight needed to facilitate a speedy, fair, and efficient transition process. The information collected reduces the risk of delays and protracted cost disputes by providing critical safeguards and oversight. In addition, the Commission will use the information collected from space station operators to ensure that incumbents are prepared to transition efficiently and expeditiously to the upper portion of the 3.7-4.2 GHz band, and that those plans are implemented accordingly. Without this information, the transition would be challenging to accomplish and take significantly longer than necessary, which would delay auction winning bidders from gaining access to their new overlay licenses and deploying services—resulting in a corresponding delay in providing important next-generation communication services to consumers and businesses.

7. ***Special circumstances.*** The new information collection does not have any of the characteristics that would require separate justification under 5 C.F.R § 1320.5(d)(2).

8. ***Federal Register notice; efforts to consult persons outside the Commission.*** The Commission has met the notice requirements of 5 C.F.R. § 1320.8. The public has been given the opportunity to comment via publication of the Notice in the Federal Register on (*see* 85 FR 29717) (May 18, 2020).

9. ***Payments or gifts to respondents.*** No payment or gift will be given to respondents.

10. ***Assurance of confidentiality.*** The information collected under this collection will be made publicly available. However, to the extent information submitted pursuant to this information collection is determined to be confidential, it will be protected by the Commission. If a respondent seeks to have information collected pursuant to this information collection withheld from public inspection, the respondent may request confidential treatment pursuant to section 0.459 of the Commission's rules for such information. *See* 47 C.F.R. § 0.459.

11. ***Questions of a sensitive nature.*** The information collection requirements do not ask questions of a sensitive nature.

12. ***Estimates of the hour burden of the collection to respondents.***

a. **Number of estimated annual respondents:** Approximately **3,007 respondents**.

b. **Total number of annual responses:** **9,362 responses**.

c. **Frequency of response:** The frequency of responses vary depending on the information required. Some responses require a one-time filing, including the Relocation Payment Clearinghouse's written operational procedures and request to wind-down operations. Most responses require regular filings, including: annual filings of the Relocation Payment Clearinghouse's audited statement of funds and information security audit, the Relocation Payment Clearinghouse's notice of pro-rata shares to the wireless licensees, and the Relocation Payment Clearinghouse's, Relocation Coordinator's, and eligible space station operators' quarterly status reports. Other responses, such as requests for reimbursement, responses to information requests by the Wireless Telecommunications Bureau, and Office of Managing Director, and information related to unresolved disputes, will vary due to the differences in the complexity of relocation task, the size of the entity, and the nature of the dispute.

d. **Total estimated annual burden: 77,754 hours**, calculated as follows:

*Relocation Payment Clearinghouse*

1. *The Relocation Payment Clearinghouse must create written procedures for its operations, using the Government Accountability Office's Green Book to serve as a guide in satisfying such requirements. (47 C.F.R. § 27.1414(b)(3))*

32 hours per respondent for 1 respondent filing once. Total estimated annual hours burden is calculated as follows:

**1 estimated response x 32 hours per response = 32 total estimated burden hours.**

2. *The Relocation Payment Clearinghouse must provide quarterly reports detailing the status of reimbursement funds available for clearing obligations, the relocation and accelerated relocation payments issued, the amounts collected from overlay licensees, and any certifications filed by incumbents. (47 C.F.R. § 27.1414(c)(1))*

32 hours per respondent for 1 respondent filing 4 times per year. Total estimated annual hours burden is calculated as follows:

**4 estimated responses x 32 hours per response = 128 total estimated burden hours.**

3. *The Relocation Payment Clearinghouse shall provide to the Office of Managing Director and the Wireless Telecommunications Bureau, by March 1 of each year, an audited statement of funds expended to date, including salaries and expenses of the Clearinghouse. (47 C.F.R § 27.1414(c)(2))*

40 hours per respondent for 1 respondent filing once a year. Total estimated annual hours burden is calculated as follows:

**1 estimated response x 40 hours per response = 40 total estimated burden hours.**

4. *The Relocation Payment Clearinghouse shall provide information to the Wireless Telecommunications Bureau upon request. (47 C.F.R. § 27.1414(c)(3))*

2 hours per respondent for 1 respondent filing 12 times per year. Total estimated annual hours burden is calculated as follows:

**12 estimated responses x 2 hours per response = 24 total estimated burden hours.**

5. *The Relocation Payment Clearinghouse must hire a third-party firm to independently audit and verify, on an annual basis, the Relocation Payment Clearinghouse's compliance with privacy and information security requirements and report the results to the Wireless Telecommunications Bureau. (47 C.F.R. § 27.1414(b)(4)(iii))*

2 hours per respondent for 1 respondent filing once a year. Total estimated annual hours burden is calculated as follows:

**1 estimated response x 2 hours per response = 2 total estimated burden hours.**

6. *The Relocation Payment Clearinghouse shall provide 3.7 GHz Service licensees with 30 days' notice of the additional pro-rata shares the licensees must contribute (47 C.F.R. § 27.1417), and shall provide an estimate to the overlay licensees of the amounts they owe every six months (47 C.F.R. § 27.1417).*

64 hours per respondent for 1 respondent filing 490 estimated responses annually. We estimate that 420 responses are required for the monthly notifications to the licensees, which reflects 35 licensees receiving notices 12 times per year. We estimate that 70 responses are required for the bi-annual estimates to the overlay licenses, which reflects 35 licenses receiving a notice twice a year. Total estimated annual hours burden is calculated as follows:

**490 estimated responses x 64 hours per response = 31,360 total estimated burden hours.**

7. *Parties receiving reimbursement of compensable relocation costs must document their actual expenses (47 C.F.R. § 27.1415).*

2 hours per respondent for 3,005 respondents. 3,000 earth station operators will file 1 time per year; five space station operators will file 52 times per year. Total estimated annual hours burden is calculated as follows:

3,000 estimated responses for 2 hours per response = 6,000 total estimated burden hours for earth station operators.

260 estimated responses for 2 hours per response = 520 total estimated burden hours for space station operators.

**6,000 total estimated burden hours for earth station operators + 520 total estimated burden hours for space station operators = 6,520 total estimated burden hours.**

8. *The Relocation Payment Clearinghouse, or a third-party on behalf of the Relocation Payment Clearinghouse, may conduct audits of entities that receive reimbursements (47 C.F.R. § 27.1415). The Relocation Payment Clearinghouse shall review reimbursement requests to determine whether they are reasonable and to ensure they comply with the requirements adopted in this sub-part (47 C.F.R. § 27.1416(a)).*

2 hours per respondent for 1 respondent reviewing 3,260 estimated responses per year. Total estimated annual hours burden is calculated as follows:

**3,260 estimated responses x 2 hours per response = 6,520 total estimated burden hours.**



9. *Following a determination of the reimbursable amount, the Relocation Payment Clearinghouse shall incorporate approved claims into invoices, which it shall issue to each licensee indicating the amount to be paid. (47 C.F.R. § 27.1416(b))*

We expect that the Relocation Payment Clearinghouse coordinator will send invoices to each licensee on a weekly basis and it will take 16 hours per response for 1 respondent sending an invoice to 35 licensees. Total estimated annual hours burden is calculated as follows:

**1,820 estimated responses (35 invoices x 52 times per year) x 16 hours per response = 29,120 total estimated burden hours.**

10. *In the case that the Wireless Telecommunications Bureau selects the Relocation Coordinator, overlay licensees will, collectively, pay for the services of the Relocation Coordinator and staff. The Relocation Coordinator shall submit its own reasonable costs to the Relocation Clearinghouse, who will then collect payments from overlay licensees. (47 C.F.R. § 27.1413(a)(2))*

2 hours per respondent for 1 respondent filing 12 times per year. Total estimated annual hours burden is calculated as follows:

**12 estimated responses x 2 hours per response = 24 total estimated burden hours.**

11. *The Relocation Payment Clearinghouse may mediate any disputes regarding cost estimates or payments that may arise in the course of band reconfiguration; or refer the disputant parties to alternative dispute resolution fora. (47 C.F.R. § 27.1421). Should any issues still remain unresolved, they may be referred to the Bureau within ten days of recommended decision or advice of the Relocation Payment Clearinghouse or other mediator and any decision of the Relocation Payment Clearinghouse can be appealed to the Chief of the Bureau. (47 C.F.R. § 27.1421(c)). When referring an unresolved matter, the Relocation Payment Clearinghouse shall forward the entire record of any disputed issues, including such dispositions thereof that the Relocation Payment Clearinghouse has considered. (47 C.F.R. § 27.1421(c)(i)).*

8 hours per respondent for 1 respondent filing 37 times per year. Total estimated annual hours burden is calculated as follows:

**37 estimated responses x 8 hours per response = 296 total estimated burden hours.**

12. *Parties disputing costs must file an objection with the RPC (47 C.F.R. § 27.1421; para. 304)*

8 hours per respondent for 37 respondents filing once a year. Total estimated annual hours burden is calculated as follows:

**37 estimated responses x 8 hours per response = 296 estimated burden hours.**

13. *The Relocation Payment Clearinghouse shall promptly notify 3.7 GHz band licensees following submission of the Certification of Accelerated Relocation (47 C.F.R § 27.1422(c))*

0.5 hours per respondent for 1 respondent filing 175 times. We anticipate that the RPC will be required to send 5 notifications of Certification of Accelerations to 35 licensees because there are

approximately five eligible space station operators. Total estimated annual hours burden is calculated as follows:

**175 estimated responses x 0.5 hours per response = 87.5 estimated burden hours.**

Relocation Coordinator

1. *To the extent that incumbent earth stations are not accounted for in eligible space station operators' Transition Plans, the Relocation Coordinator must prepare an Earth Station Transition Plan for such incumbent earth stations (47 C.F.R. §§ 27.1412(d)(2); 27.1413(c)(3)); the Relocation Coordinator may require each associated space station operator to file the information needed for such a plan with the Relocation Coordinator (47 C.F.R. § 27.1413(c)(3)(i)); the Relocation Coordinator will describe and recommend the respective responsibility of each party for earth station migrations in the Earth Station Transition Plan (47 C.F.R. § 27.1414(c)(3)(ii)).*

600 hours per respondent for 1 respondent filing once. Total estimated annual hours burden is calculated as follows:

**1 estimated response x 600 hours per response = 600 estimated burden hours.**

2. *The Relocation Coordinator will be responsible for receiving notice from earth station operators or other satellite customers of any disputes related to comparability of facilities, workmanship, or preservation of service during the transition and shall subsequently notify the Wireless Telecommunications Bureau of the dispute and provide recommendations for resolution. (47 C.F.R. § 27.1414(c)(6))*

8 hours per respondent for 1 respondent filing 37 times per year. Total estimated annual hours burden is calculated as follows:

**37 estimated responses x 8 hours per response = 296 estimated burden hours.**

3. *On a quarterly basis, beginning December 31, 2020, the Relocation Coordinator must provide a report on the overall status of clearing efforts. (47 C.F.R. § 27.1412(d))*

32 hours per response for 1 respondent filing 4 times per year. Total estimated annual hours burden is calculated as follows:

**4 estimated responses x 32 hours per response = 128 estimated burden hours.**

Space Station Operators

1. *On a quarterly basis, beginning December 31, 2020: Each eligible space station operator must provide a status report of its clearing efforts. (47 C.F.R. § 27.1412(f))*

32 hours per response for 5 respondents filing 4 times per year. Total estimated annual hours burden is calculated as follows:

**20 estimated responses x 32 hours per response = 640 estimated burden hours.**

2. *Each eligible space station operator must file a timely certification that it has completed the necessary clearing actions to satisfy each Accelerated Relocation Deadline. The certification must be filed once the eligible space station operator completes its obligations but no later than the applicable Accelerated Relocation Deadline. The Wireless Telecommunication Bureau will prescribe the form of such certification. (47 C.F.R. § 27.1412(g))*

32 hours per response for 5 respondents filing once. Total estimated annual hours burden is calculated as follows:

**5 estimated responses x 32 hours per response = 160 estimated burden hours.**

3. *An eligible space station operator must submit a notice of any incumbent earth station transition delays to the Wireless Telecommunications Bureau within 7 days of discovering an inability to accomplish the assigned earth station transition task. Such a request must include supporting documentation to allow for resolution as soon as practicable and must be submitted before the Accelerated Relocation Deadlines. (47 C.F.R. § 27.1412(b)(3)(i))*

8 hours per response for 5 respondents filing 37 times per year. Total estimated annual hours burden is calculated as follows:

**185 estimated responses x 8 hours per response = 1,480 estimated burden hours.**

- e. **Total estimate of annual in-house cost to respondents for the estimated hours burden: \$2,468,787.02.**

- f. **Explanation of calculation of in-house costs to respondents for the estimated hours burden:**

Relocation Payment Clearinghouse

1. *The Relocation Payment Clearinghouse must create written procedures for its operations, using the Government Accountability Office's Green Book to serve as a guide in satisfying such requirements. (47 C.F.R. § 27.1414(b)(3))*

The Commission estimates that it will take two in-house attorneys approximately 16 hours each to prepare the required information, with one of these attorneys at a rate equivalent to the hourly rate of a GS-15, Step 5 government staff member (\$77.49/hour) and one at a rate equivalent to the hourly rate of a GS-12, Step 5 government staff member (\$46.88/hour). We expect there will be a one-time filing of written procedures. Therefore, the estimated annual in-house cost is as follows:

1 attorney at \$77.49/hour x 16 hours per response x 1 estimated respondents/responses = \$1,239.84

1 attorney at \$46.88/hour x 16 hours per response x 1 estimated respondents/responses = \$750.08.

**Total In-House Cost for Written Operational Procedures: \$1,239.84 + \$750.08 = \$1,989.92.**

2. *The Relocation Payment Clearinghouse must provide quarterly reports detailing the status of reimbursement funds available for clearing obligations, the relocation and accelerated relocation payments issued, the amounts collected from overlay licensees, and any certifications filed by incumbents. (47 C.F.R. § 27.1414(c)(1))*

The Commission estimates that it will take two in-house attorneys approximately 16 hours each to prepare the required information, with one of these attorneys at a rate equivalent to the hourly rate of a GS-15, Step 5 government staff member (\$77.49/hour) and one at a rate equivalent to the hourly rate of a GS-12, Step 5 government staff member (\$46.88/hour). This report will be submitted four times a year for three years. Therefore, the estimated annual in-house cost is as follows:

1 attorney at \$77.49/hour x 16 hours per response x 4 estimated respondents/responses = \$4,959.36.

1 attorney at \$46.88/hour x 16 hours per response x 4 estimated respondents/responses = \$3,000.32.

**Total In-House Cost for Quarterly Progress Reports: \$4,959.36 + \$3,000.32= \$7,959.68.**

3. *The Relocation Payment Clearinghouse shall provide to the Office of Managing Director and the Wireless Telecommunications Bureau, by March 1 of each year, an audited statement of funds expended to date, including salaries and expenses of the Clearinghouse. (47 C.F.R § 27.1414(c) (2))*

The Commission estimates that it will take two in-house attorneys approximately 20 hours each to prepare the required information, with one of these attorneys at a rate equivalent to the hourly rate of a GS-15, Step 5 government staff member (\$77.49/hour) and one at a rate equivalent to the hourly rate of a GS-12, Step 5 government staff member (\$46.88/hour). This report will be submitted once a year for three years. Therefore, the estimated annual in-house cost is as follows:

1 attorney at \$77.49/hour x 20 hours per response x 1 estimated respondents/responses = \$1,549.80.

1 attorney at \$46.88/hour x 20 hours per response x 1 estimated respondents/responses = \$937.60.

**Total In-House Cost for Audited Statement of Funds: \$1,549.80 + \$937.60 = \$2,487.40.**

4. *The Relocation Payment Clearinghouse shall provide information to the Wireless Telecommunications Bureau upon request (47 C.F.R. § 27.1414(c)(3))*

The Commission estimates that it will take one in-house attorney at an hourly rate of a GS-15, Step 5 government staff member (\$77.49/hour) approximately two hours to prepare the required information. We estimate that Relocation Payment Clearinghouse will be required to provide information once a month for three years. Therefore, the estimated annual in-house cost is as follows:

1 attorney at \$77.49/hour x 2 hours per response x 12 estimated respondents/responses = \$1,859.76.

**Total In-House Cost for WTB-Requested Information: \$1,859.76.**

5. *The Relocation Payment Clearinghouse must hire a third-party firm to independently audit and verify, on an annual basis, the Relocation Payment Clearinghouse's compliance with privacy and*

*information security requirements and report the results to the Wireless Telecommunications Bureau. (47 C.F.R. § 27.1414(b)(4)(iii))*

The Commission estimates that it will take one in-house attorney at an hourly rate of a GS-15, Step 5 government staff member (\$77.49/hour) approximately two hours to prepare the required information. This report will be submitted annually for three years. Therefore, the estimated annual in-house cost is as follows:

1 attorney at \$77.49/hour x 2 hours per response x 1 estimated respondents/responses = \$154.98.

**Total In-House Cost for Information Security Reporting: \$154.98.**

- 6. The Relocation Payment Clearinghouse shall provide 3.7 GHz Service licensees with 30 days' notice of the additional pro-rata shares the licensees must contribute (47 C.F.R. § 27.1417), and shall provide an estimate to the overlay licensees of the amounts they owe every six months (47 C.F.R § 27.1417).*

The Commission estimates that it will take two in-house attorneys 16 hours each to prepare the required information, with one of these attorneys at a rate equivalent to the hourly rate of a GS-15, Step 5 government staff member (\$77.49/hour) and one at a rate equivalent to the hourly rate of a GS-12, Step 5 government staff member (\$46.88/hour). We estimate that the RPC will provide 30 days' notice of the additional pro-rata shares that the approximately 35 licensees must contribute once a month for three years (420 estimated annual responses). We estimate that the RPC will provide an estimate to approximately 35 overlay licensees of the amounts they owe twice a year for three years (70 estimated annual responses). We therefore expect that there will be 420 estimated annual responses for the pro-rata share notification, 70 estimated annual responses for the bi-annual estimates, and 1 respondent. Therefore, the estimated annual in-house cost is as follows:

1 attorney at \$77.49/hour x 16 hours per response x 420 estimated responses based on 35 licensees receiving notices 12 times per year x 1 estimated respondent = \$520,732.80 for the monthly notifications to the licensees.

1 attorney at \$46.88/hour x 16 hours per response x 420 estimated responses x 1 estimated respondent = \$315,033.60 for the monthly notifications to the licensees.

1 attorney at \$77.49/hour x 16 hours per response x 70 estimated responses based on 35 licensees receiving a notice twice a year x 1 estimated respondent = \$86,788.80 for the bi-annual estimates to the overlay licensees.

1 attorney at \$46.88/hour x 16 hours per response x 70 estimated responses x 1 estimated respondent = \$52,505.60 for the bi-annual estimates to the overlay licensees.

**Total In-House Cost for Pro-Rata Share Notices: \$520,732.80 + \$315,033.60 + \$86,788.80 + \$52,505.60 = \$975,060.80.**

- 7. Parties receiving reimbursement of compensable relocation costs must document their actual expenses (47 C.F.R. § 27.1415).*

The Commission estimates that it will take one attorney at a rate equivalent to the hourly rate of a GS-15, Step 5 government staff member (\$77.49/hour) approximately two hours to prepare the

required information. We expect that space station operators, as larger entities, will need to submit their costs and expenses on a weekly basis for three years. We expect that earth station operators, as smaller entities, will likely only need to submit their costs one time per year on average. However, we recognize that there is a range of earth station operators. While some operators may only have a one-time submission, others may have a rolling transition and therefore may submit more than one submission. The numbers provided herein reflect an average of these estimates and are inclusive of the time to respond to any additional information requested by the Relocation Payment Clearinghouse. Therefore, the estimated annual in-house cost is as follows:

1 attorney at \$77.49 x 2 hours per response x 5 respondents x 52 estimated responses = \$40,294.80 for space station operators.

1 attorney at \$77.49 x 2 hours per response x 3,000 respondents x 1 estimated responses = \$464,940 for earth station operators.

**Total In-House Cost for Documentation of Expenses: \$40,294.80 + \$464,940 = \$505,234.80.**

8. *The Relocation Payment Clearinghouse, or a third-party on behalf of the Relocation Payment Clearinghouse, may conduct audits of entities that receive reimbursements (47 C.F.R. § 27.1415). The Relocation Payment Clearinghouse shall review reimbursement requests to determine whether they are reasonable and to ensure they comply with the requirements adopted in this sub-part (47 C.F.R. § 27.1416(a)).*

The Commission estimates that it will take one attorney at a rate equivalent to the hourly rate of a GS-15, Step 5 government staff member (\$77.49/hour) approximately two hours to prepare the required information. We expect there will be approximately 3,052 reimbursement requests to review each year. Therefore, the estimated annual in-house cost is as follows:

1 attorney at \$77.49 x 2 hours per response x 3,052 estimated respondents/responses = \$472,998.96 for the Relocation Coordinator.

**Total In-House Cost for Review of Reimbursement Costs: \$472,998.96.**

9. *Following a determination of the reimbursable amount, the Relocation Payment Clearinghouse shall incorporate approved claims into invoices, which it shall issue to each licensee indicating the amount to be paid. (47 C.F.R. § 27.1416(b))*

The Commission estimates that it will take one in-house attorney at a rate equivalent to the hourly rate of a GS-12, Step 5 government staff member (\$46.88/hour) 16 hours to prepare the required information. We expect this report to be submitted approximately 12 times per year by 35 respondents, reflecting the approximate number of licensees. Therefore, the estimated annual in-house cost is as follows:

1 attorney at \$46.88/hour x 16 hours per response x 35 estimated respondents x 12 estimated responses per year = \$315,033.60.

**Total In-House Cost for Invoices for Reimbursement: \$315,033.60.**

10. *In the case that the Wireless Telecommunications Bureau selects the Relocation Coordinator, overlay licensees will, collectively, pay for the services of the Relocation Coordinator and staff.*

*The Relocation Coordinator shall submit its own reasonable costs to the Relocation Clearinghouse, who will then collect payments from overlay licensees. (47 C.F.R. § 27.1413(a)(2))*

The Commission estimates that it will take one in-house attorney at a rate equivalent to the hourly rate of a GS-12, Step 5 government staff member (\$46.88/hour) two hours prepare the required information. This report will be submitted once a month for three years. Therefore, the estimated annual in-house cost is as follows:

1 attorney at \$46.88/hour x 2 hours per response x 12 estimated respondents/responses = \$1,125.12.

**Total In-House Cost for Reporting of Reasonable Costs: \$1,125.12.**

11. *The Relocation Payment Clearinghouse may mediate any disputes regarding cost estimates or payments that may arise in the course of band reconfiguration; or refer the disputant parties to alternative dispute resolution fora. (47 C.F.R. § 27.1421). Should any issues still remain unresolved, they may be referred to the Bureau within ten days of recommended decision or advice of the Relocation Payment Clearinghouse or other mediator and any decision of the Relocation Payment Clearinghouse can be appealed to the Chief of the Bureau. (47 C.F.R. § 27.1421(c)). When referring an unresolved matter, the Relocation Payment Clearinghouse shall forward the entire record of any disputed issues, including such dispositions thereof that the Relocation Payment Clearinghouse has considered. (47 C.F.R. § 27.1421(c)(i)).*

The Commission estimates that it will take one in-house attorney at a rate equivalent to the hourly rate of a GS-15, Step 5 government staff member (\$77.49/hour) 8 hours to prepare the required information. We expect there will be approximately 37 disputes per year for three years. Therefore, the estimated annual in-house cost is as follows:

1 attorney at \$77.49 x 8 hours per response x 37 respondents/responses: \$22,937.04.

**Total In-House Cost for Resolving Cost Disputes: \$22,937.04.**

12. *Parties disputing costs must file an objection with the RPC (47 C.F.R. § 27.1421; para. 304)*

The Commission estimates that it will take one in-house attorney at a rate equivalent to the hourly rate of a GS-12, Step 5 government staff member (\$46.88/hour) 8 hours to prepare the required information. We expect there will be approximately 37 disputes per year for three years. Therefore, the estimated annual in-house cost is as follows:

1 attorney at \$46.88/hour x 8 hours per response x 37 estimated respondents/responses = \$13,876.48.

**Total In-House Cost for Reporting Cost Disputes: \$13,876.48.**

13. *The Relocation Payment Clearinghouse shall promptly notify 3.7 GHz band licensees following submission of the Certification of Accelerated Relocation (47 C.F.R § 27.1422(c))*

The Commission estimates that it will take one in-house attorney at a rate equivalent to the hourly rate of a GS-12, Step 5 government staff member (\$46.88/hour) 0.5 hours to prepare the required

information. The Relocation Payment Clearinghouse will be expected to make a one-time filing of this report to 35 respondents. Therefore, the estimated annual in-house cost is as follows:

1 attorney at \$46.88/hour x 0.5 hours per response x 35 estimated responses: \$820.40.

**Total In-House Cost for Notification of Submission of Certification: \$820.40.**

Relocation Coordinator

1. *To the extent that incumbent earth stations are not accounted for in eligible space station operators' Transition Plans, the Relocation Coordinator must prepare an Earth Station Transition Plan for such incumbent earth stations (47 C.F.R. §§ 27.1412(d)(2); 27.1413(c)(3)); the Relocation Coordinator may require each associated space station operator to file the information needed for such a plan with the Relocation Coordinator (47 C.F.R. § 27.1413(c)(3)(i)); the Relocation Coordinator will describe and recommend the respective responsibility of each party for earth station migrations in the Earth Station Transition Plan (47 C.F.R. § 27.1414(c)(3)(ii)).*

The Commission estimates that it will take five in-house engineers approximately 120 hours each to prepare the required information, with two of those engineers at a rate equivalent to the hourly rate of a GS-15, Step 5 government staff member (\$77.49/hour) and three at a rate equivalent to the hourly rate of a GS-11, Step 5 government staff member (\$39.12/hour). Therefore, the estimated annual in-house cost is as follows:

2 engineers at \$77.49/hour each x 120 hours per engineer per response x 1 respondents/responses = \$18,597.60.

3 engineers at \$39.12/hour each x 120 hours per engineer per response x 1 respondents/responses = \$14,083.20.

**Total In-House Cost for Transition Plans: \$18,597.60 + \$14,083.20 = \$32,680.80.**

2. *The Relocation Coordinator will be responsible for receiving notice from earth station operators or other satellite customers of any disputes related to comparability of facilities, workmanship, or preservation of service during the transition and shall subsequently notify the Wireless Telecommunications Bureau of the dispute and provide recommendations for resolution. (47 C.F.R. § 27.1414(c)(6))*

The Commission estimates that it will take one in-house attorney at a rate equivalent to the hourly rate of a GS-15, Step 5 government staff member (\$77.49/hour) approximately 8 hours to prepare the required information. We expect this report to be submitted 37 times per year for three years. Therefore, the estimated annual in-house cost is as follows:

1 attorney at \$77.49/hour x 8 hours per response x 37 respondents/responses = \$22,937.04.

**Total In-House Cost for Notification of Disputes: \$22,937.04.**

3. *On a quarterly basis, beginning December 31, 2020, the Relocation Coordinator must provide a report on the overall status of clearing efforts. (47 C.F.R. § 27.1412(d))*



The Commission estimates that it will take one in-house engineer at a rate equivalent to the hourly rate of a GS-15, Step 5 government staff member (\$77.49/hour) approximately 24 hours to prepare the required information, and that it will take one in-house attorney at a rate equivalent to the hourly rate of a GS-15, Step 5 government staff member (\$77.49/hour) approximately 8 hours to prepare the required information. The report will be submitted on a quarterly basis, beginning December 31, 2020, for three years. Therefore, the estimated annual in-house cost is as follows:

1 engineer at \$77.49/hour x 24 hours per response x 4 respondents/responses = \$7,439.04.

1 attorney at \$77.49/hour x 8 hours per response x 4 respondents/responses = \$2,479.68.

**Total In-House Cost for Status of Clearing Efforts: \$7,439.04 + \$2,479.68 = \$9,918.72.**

### Space Station Operators

1. *On a quarterly basis, beginning December 31, 2020: Each eligible space station operator must provide a status report of its clearing efforts. (47 C.F.R. § 27.1412(f))*

The Commission estimates that it will take one in-house engineer at a rate equivalent to the hourly rate of a GS-15, Step 5 government staff member (\$77.49/hour) approximately 24 hours to prepare the required information, and that it will take one in-house attorney at a rate equivalent to the hourly rate of a GS-15, Step 5 government staff member (\$77.49/hour) approximately 8 hours to prepare the required information. The report will be submitted by approximately 5 eligible space station operators on a quarterly basis, beginning December 31, 2020, for three years. Therefore, the estimated annual in-house cost is as follows:

1 engineer at \$77.49/hour x 24 hours per engineer x 5 estimated respondents x 4 estimated responses = \$37,195.20.

1 attorney at \$77.49/hour x 8 hours per attorney x 5 estimated respondents x 4 estimated responses = \$12,398.40.

**Total In-House Cost for Status of Clearing Efforts: \$37,195.20 + \$12,398.40 = \$49,593.60.**

2. *Each eligible space station operator must file a timely certification that it has completed the necessary clearing actions to satisfy each Accelerated Relocation Deadline. The certification must be filed once the eligible space station operator completes its obligations but no later than the applicable Accelerated Relocation Deadline. The Wireless Telecommunication Bureau will prescribe the form of such certification. (47 C.F.R. § 27.1412(g))*

The Commission estimates that it will take one in-house engineer at a rate equivalent to the hourly rate of a GS-15, Step 5 government staff member (\$77.49/hour) approximately 24 hours to prepare the required information, and that it will take one in-house attorney at a rate equivalent to the hourly rate of a GS-15, Step 5 government staff member (\$77.49/hour) approximately 8 hours to prepare the required information. We expect this report will be a one-time filing. Therefore, the estimated annual in-house cost is as follows:

1 engineer at \$77.49/hour x 24 hours per engineer x 5 estimated respondents/responses = \$9,298.80.

1 attorney at \$77.49/hour x 8 hours per attorney x 5 estimated respondents/responses = \$3,099.60.

**Total In-House Cost for Filing Certification of Accelerated Relocation: \$9,298.80 + \$3,099.60 = \$12,398.40.**

3. *An eligible space station operator must submit a notice of any incumbent earth station transition delays to the Wireless Telecommunications Bureau within 7 days of discovering an inability to accomplish the assigned earth station transition task. Such a request must include supporting documentation to allow for resolution as soon as practicable and must be submitted before the Accelerated Relocation Deadlines. (47 C.F.R. § 27.1412(b)(3)(i))*

The Commission estimates that it will take one in-house attorney at a rate equivalent to the hourly rate of a GS-13, Step 5 government staff member (\$55.75/hour) approximately 4 hours to prepare the required information, and that it will take one in-house engineer at a rate equivalent to the hourly rate of a GS-15, Step 5 government staff member (\$77.49/hour) approximately 4 hours to prepare the required information. We expect this report to be submitted 37 times per year. Therefore, the estimated annual in-house cost is as follows:

1 attorney at \$55.75/hour x 4 hours per response x 37 estimated respondents/responses = \$8,251.

1 engineer at \$77.49/hour x 4 hours per response x 37 estimated respondents/responses = \$11,468.52.

**Total In-House Cost for Notification of Delays: \$8,251 + \$11,468.52 = \$19,719.52.**

13. ***Estimates of the annual cost burden of the collection to respondents.*** As explained in Item 1 above, the *3.7 GHz Report and Order* established a Relocation Payment Clearinghouse to oversee the cost-related aspects of the transition and establishes a Relocation Coordinator to establish a timeline and take actions necessary to migrate and filter incumbent earth stations to ensure continued, uninterrupted service during and following the transition, and adopted specific duties and responsibilities for each entity. As newly-created entities, the Relocation Payment Clearinghouse and Relocation Coordinator will each incur capital and start-up costs for establishing their respective organizational and operational structures and management and program processes, hiring staff, and acquiring the infrastructure (e.g., computers and other equipment, software and program management tools, etc.) necessary to generate, maintain, and disclose or provide information required by the information collection in carrying out their duties in support of the transition/relocation process. The Relocation Payment Clearinghouse and Relocation Coordinator will also incur ongoing operation and maintenance costs associated with generating, maintaining, and disclosing or providing information required by the information collection in carrying out their duties until the transition/relocation process is completed. We estimate that the Relocation Payment Clearinghouse and Relocation Coordinator will incur capital and start-up costs and operation and maintenance costs as follows under this information collection:

<b>CAPITAL AND START-UP COSTS</b>		
	<b>Total</b>	<b>Annualized (over 5 years)<sup>6</sup></b>
Relocation Coordinator start-up costs	\$2,544,880	\$508,976
Relocation Payment Clearinghouse start-up costs	\$1,001,721	\$200,344
Relocation Coordinator and Relocation Payment Clearinghouse combined overhead start-up costs	\$2,019,126	\$403,825

<b>OPERATION AND MAINTENANCE (O&amp;M) COSTS</b>		
	<b>5-Year Total O&amp;M Costs</b>	<b>Annualized (over 5 years)</b>
Relocation Coordinator O&M costs	\$23,071,980	\$4,614,396
Relocation Payment Clearinghouse O&M costs	\$14,861,467	\$2,972,293
Relocation Coordinator and Relocation Payment Clearinghouse combined O&M overhead costs	\$8,857,596	\$1,771,519

TOTAL ESTIMATED ANNUAL CAPITAL AND START-UP COSTS: \$1,113,145.

TOTAL ESTIMATED ANNUAL OPERATION AND MAINTENANCE (O&M) COSTS: \$9,358,208.

In addition, the Commission expects that the Relocation Payment Clearinghouse will require the assistance of a third-party firm to independently audit and verify, on an annual basis, the Relocation Payment Clearinghouse's compliance with privacy and information security requirements, whose reports it will submit to the Wireless Telecommunications Bureau. The Commission estimates that the Relocation Payment Clearinghouse will require 240 hours of time from an outside consulting firm annually for this work, at a rate of \$325 per hour:

1 consultant at \$325/hour x 240 hours per response x 3 estimated respondents/responses = \$234,000.

**Total Annual External Cost: \$10,705,353.**

14. *Estimates of the annual cost burden to the Commission.* The new information collection will be administered by Commission attorneys and engineers. Based on its experience managing similar collections, the Commission estimates that its costs for administering this collection will be as follows, and does not envision other costs, e.g., personnel or other resources from other government agencies or from the private sector:

*Relocation Payment Clearinghouse*

- a. *The Commission will review the Relocation Payment Clearinghouse's written procedures for its operations. (47 C.F.R. § 27.1414(b)(3))*

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<sup>6</sup> The *3.7 GHz Report and Order* establishes a deadline of December 5, 2025, for full relocation, but provides an opportunity for accelerated clearing of the band by allowing incumbent space station operators to commit to voluntarily relocate on a two-phased accelerated schedule (with additional obligations and incentives for such operators), with a Phase I deadline of December 5, 2021, and a Phase II deadline of December 5, 2023. This cost estimate assumes that the transition/relocation will proceed based on the regular schedule with completion deadline of December 5, 2025, for full relocation.

The Commission estimates that it will take one Commission staff attorney at the GS-15, Step 5 level and one Commission staff attorney at the GS-12, Step 5 level approximately 4 hours each to review the Relocation Payment Clearinghouse's written procedures for its operations.

1 respondents/responses x 4 hours x 77.49/hour (Attorney, GS-15, Step 5) = **\$309.96.**

1 respondents/responses x 4 hours x 46.88/hour (Attorney, GS-12, Step 5) = **\$187.52.**

- b. *The Commission will review the Relocation Payment Clearinghouse's quarterly reports. (47 C.F.R. 27.1414(c)(1))*

The Commission estimates that it will take one Commission staff attorney at the GS-15, Step 5 level and one Commission staff attorney at the GS-12, Step 5 level approximately 4 hours each to review the Relocation Payment Clearinghouse's quarterly reports.

4 respondents/responses x 4 hours x 77.49/hour (Attorney, GS-15, Step 5) = **\$1,239.84.**

4 respondents/responses x 4 hours x 46.88/hour (Attorney, GS-12, Step 5) = **\$750.08.**

- c. *The Commission will review the Relocation Payment Clearinghouse's audited statement of funds. (47 C.F.R. § 27.1414(c)(2))*

The Commission estimates that it will take one Commission staff attorney at the GS-15, Step 5 level and one Commission staff attorney at the GS-12, Step 5 level approximately 4 hours each to review the Relocation Payment Clearinghouse's audited statement of funds.

1 respondents/responses x 4 hours x 77.49/hour (Attorney, GS-15, Step 5) = **\$309.96.**

1 respondents/responses x 4 hours x 46.88/hour (Attorney, GS-12, Step 5) = **\$187.52.**

- d. *The Commission will review information provided by the Relocation Payment Clearinghouse upon the Commission's request. (47 C.F.R. § 27.1414(c)(3))*

The Commission estimates that it will take one Commission staff attorney at the GS-15, Step 5 level approximately two hours to review the information requested by the Wireless Telecommunications Bureau from the Relocation Payment Clearinghouse.

12 respondents/responses x 2 hours x \$77.49/hour (Attorney, GS-15, Step 5) = **\$1,859.76.**

- e. *The Commission will review the Relocation Payment Clearinghouse's privacy and information security audit. (47 C.F.R. § 27.1414(c)(2))*

The Commission estimates that it will take one Commission staff attorney at the GS-15, Step 5 level and one Commission staff attorney at the GS-12, Step 5 level approximately 4 hours each to review the Relocation Payment Clearinghouse's privacy and information security audit.

1 respondents/responses x 4 hours x 77.49/hour (Attorney, GS-15, Step 5) = **\$309.96.**

1 respondents/responses x 4 hours x 46.88/hour (Attorney, GS-12, Step 5) = **\$187.52.**

- f. *The Commission will review disputes regarding cost estimates or payments. (47 C.F.R. § 27.1421(c))*

The Commission estimates that it will take one Commission staff attorney at the GS-15, Step 5 level and one Commission staff attorney at the GS-12, Step 5 level approximately 24 hours each to resolve disputes regarding cost estimates or payments.

37 respondents/responses x 4 hours x 77.49/hour (Attorney, GS-15, Step 5) = **\$11,468.52.**

37 respondents/responses x 4 hours x 46.88/hour (Attorney, GS-12, Step 5) = **\$6,938.24.**

- g. *The Wireless Telecommunications Bureau shall issue a Public Notice upon receipt of a request of the Clearinghouse to wind down and suspend operations. (Para. 278)*

The Commission estimates that it will take one Commission staff attorney at the GS-15, Step 5 level approximately 8 hours to issue a Public Notice upon receipt of a request of the Clearinghouse to wind down and suspend operations.

1 respondents/responses x 9 hours x 77.49/hour (Attorney, GS-15, Step 5) = **\$697.41.**

#### Relocation Coordinator

- a. *The Commission will review the Relocation Coordinator's Earth Station Transition Plan, to the extent that incumbent earth stations are not accounted for in eligible space station operators' Transition Plans. (47 C.F.R. §§ 27.1412(d)(2); 27.1413(c)(3))*

The Commission estimates that it will take one Commission staff attorney at the GS-15, Step 5 level and one Commission staff attorney at the GS-12, Step 5 level approximately 8 hours each to review the Relocation Coordinator's Earth Station Transition Plan.

1 respondents/responses x 8 hours x 77.49/hour (Attorney, GS-15, Step 5) = **\$619.92.**

1 respondents/responses x 8 hours x 46.88/hour (Attorney, GS-12, Step 5) = **\$375.04.**

- b. *The Wireless Telecommunications Bureau will review notices of disputes related to comparability of facilities, workmanship, or preservation of service during the transition, filed on behalf of the Relocation Coordinator. (47 C.F.R. § 27.1414(c)(6))*

The Commission estimates that it will take one Commission staff attorney at the GS-15, Step 5 level and one Commission staff attorney at the GS-12, Step 5 level approximately 24 hours each to review and resolve disputes related to comparability of facilities, workmanship, or preservation of service during the transition.

37 respondents/responses x 4 hours x 77.49/hour (Attorney, GS-15, Step 5) = **\$11,468.52.**

37 respondents/responses x 4 hours x 46.88/hour (Attorney, GS-12, Step 5) = **\$6,938.24.**

- c. *The Commission will review the Relocation Coordinator's quarterly reports on the overall status of clearing efforts. (47 C.F.R. § 27.1412(d))*

The Commission estimates that it will take one Commission staff attorney at the GS-15, Step 5 level and one Commission staff attorney at the GS-12, Step 5 level approximately 4 hours each to review the Relocation Coordinator's quarterly reports.

4 respondents/responses x 4 hours x 77.49/hour (Attorney, GS-15, Step 5) = **\$1,239.84.**

4 respondents/responses x 4 hours x 46.88/hour (Attorney, GS-12, Step 5) = **\$750.08.**

- d. *The Wireless Telecommunications Bureau, in consultation with the Office of Managing Director, may request any documentation from the Relocation Coordinator necessary to provide guidance or carry out oversight. (47 C.F.R. § 27.1412(h))*

The Commission estimates that it will take one Commission staff attorney at the GS-15, Step 5 level approximately 2 hours to request information necessary to provide guidance or carry out oversight.

1 respondents x 12 responses x 2 hours x \$77.49/hour (Attorney, GS-15, Step 5) = **\$1,859.76.**

- e. *In the event that the search committee fails to select a Relocation Coordinator and to notify the Commission by July 31, 2020, or in the case that at least 80% of accelerated relocation payments are not accepted (and thus accelerated relocation is not triggered), the committee will be dissolved and the Commission will initiate a procurement of a Relocation Coordinator by seeking proposals (47 C.F.R. § 27.1413(a)(3); 47 C.F.R. 27.1413(b))*

The Commission estimates that it will take five in-house engineers approximately 120 hours each to prepare the required information, with two of these engineers at the GS-15, Step 5 level and three at the GS-11, Step 5 level to initiate a procurement of a Relocation Coordinator.

2 respondents/responses x 120 hours x \$77.49/hour (Engineer, GS-15, Step 5) = **\$18,597.60.**

3 respondents/responses x 120 hours x \$39.12/hour (Engineer, GS-12, Step 5) = **\$14,083.20.**

### Space Station Operators

- a. *The Wireless Telecommunications Bureau will prescribe the form of the certification filed by each eligible space station operator to establish that it has completed the necessary clearing actions to satisfy each Accelerated Relocation Deadline. (47 C.F.R. § 27.1412(g))*

The Commission estimates that it will take two attorneys approximately 8 hours each to prepare the required information, with one of these attorneys at the GS-15, Step 5 level and one at the GS-12, Step 5 level to prescribe the form of the certification.

1 respondents/responses x 8 hours x 77.49/hour (Attorney, GS-15, Step 5) = **\$619.92.**

1 respondents/responses x 8 hours x 46.88/hour (Attorney, GS-12, Step 5) = **\$375.04.**

- b. *The Wireless Telecommunications Bureau will review notices of delays submitted by eligible earth station operators. (47 C.F.R. § 27.1412(b)(3)(i))*

The Commission estimates that it will take one Commission staff attorney at the GS-15, Step 5 level and one Commission staff attorney at the GS-12, Step 5 level approximately 4 hours each to review notices of delays submitted by eligible earth station operators.

4 respondents/responses x 4 hours x 77.49/hour (Attorney, GS-15, Step 5) = **\$1,239.84.**

4 respondents/responses x 4 hours x 46.88/hour (Attorney, GS-12, Step 5) = **\$750.08.**

**Total Estimated Annual Cost to the Federal Government: \$83,363.37.**

15. *Program changes or adjustment.* This is a new information collection resulting in a program change increase of 3,007 respondents, 9,362 responses, 77,754 total estimated burden hours, and \$10,705,353 in total estimated burden cost.

16. *Collections of information whose results will be published.* The information collection will not be published for statistical use.

17. *Display of expiration date for OMB approval of information collection.* The Commission seeks an exemption from the requirement to display the OMB expiration date for this information collection. The Commission publishes a list of all OMB-approved information collections and their corresponding expiration dates in 47 C.F.R. 0.408 of the Commission's rules, 47 C.F.R. § 0.408, and will publish the OMB control number and OMB expiration date for this collection in the list contained in section 0.408 of its rules.

18. *Exception to certification statement for Paperwork Reduction Act submissions.* There are no exceptions to the certification statement.

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

The Commission does not anticipate that this new collection of information will employ statistical methods, and the use of such methods would not reduce the burden or improve accuracy of results.