**Alaska Plan End of Term Commitments 3060-XXXX**

**August 2020**

SUPPORTING STATEMENT

This new information collection is being submitted to obtain the Office of Management and Budget (OMB) approval for a new one-time information collection requirement as a result of a Federal Communications Commission (FCC or Commission) order as explained below.

1. **Justification:**
2. *Circumstances that make the collection necessary.* On August 23, 2016, the Commission adopted the *Alaska Plan Order*. *See* *Connect America Fund et al.,* WC Docket Nos. 10-90, 16-271, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 10139 (2016) (*Alaska Plan Order*). In that order, the Commission adopted a plan for providing Alaskan rate-of-return carriers and competitive Eligible Telecommunications Carriers (ETCs) the option to obtain a fixed level of funding for a defined term in exchange for committing to deployment obligations that are tailored to each Alaskan carrier’s circumstances. A requirement adopted in the *Alaska Plan Order* requires that participating carriers update their end-of-term commitments no later than the end of the fourth year of support, i.e., by December 31, 2020. *See id.* at 10158, 10166-67, paras. 61, 85. The purpose of this information collection is to collect from the participating carriers their updated end-of-term commitments.

***Requirement for which the Commission seeks OMB approval:***

The information requirements in this collection will be used to collect updated end-of-term commitments from Alaskan rate-of-return carriers and competitive ETC carriers.

Statutory authority for this information collection is contained in 47 U.S.C. §§ 151, 152, 154(i), 155, 201-206, 214, 218-220, 251, 252, 254, 256, 303(r), 332, 403, and 1302.

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

1. *Use of information.* The Commission will use the information requirement to determine what the deployment obligations will be at the end of the support term, i.e., December 31, 2026, for Alaska Plan participants. In the *Alaska Plan Order*, the Commission delegated authority to the Wireline Competition Bureau and the Wireless Telecommunications Bureau to review updated deployment obligations in light of any new developments, including newly available infrastructure, and require revised obligations if it serves the public interest. *See id.* at 10158, 10166-67, paras. 61, 85.
2. *Technological collection techniques.* In an effort to reduce any burden created by these information collection requirements, respondents will need to file responses in the Commission’s Electronic Comment Filing System (ECFS) (<https://www.fcc.gov/ecfs/filings>) in WC Docket No. 16-271.
3. *Efforts to identify duplication.* There will be no duplication of information. The information sought is unique to each carrier or respondent and similar information is not already available.
4. *Impact on small entities.* The collection of information may affect small entities as well as large entities. The requirement this collection proposes is necessary to ensure compliance with high-cost universal service support requirements and is designed to limit the burden on small entities as much as possible.
5. *Consequences if information is not collected.* The information collected is used to determine that each Alaska Plan participant has deployment obligations for the remainder of the Alaska Plan term consistent with the current conditions in the participant’s eligible service areas. If this information is not collected, deployment obligations would not necessarily reflect current conditions and could therefore not be in the public interest.
6. *Special circumstances.* We do not foresee any special circumstances with this information collection.
7. *Federal Register notice; efforts to consult with persons outside the Commission.* A 60-day notice was also published in the *Federal Register* pursuant to 5 C.F.R. § 1320.8(d) on June 2, 2020, *See* 85 FR 33665. No comments were received from the public.
8. *Payments or gifts to respondents.* The Commission does not anticipate providing any payment or gifts to respondents.
9. *Assurances of confidentiality.* For this information request, parties may submit confidential information. Requests for confidentiality may be submitted to the Commission to be withheld from public inspection under 47 C.F.R. § 0.459 of the FCC’s rules.
10. *Questions of a sensitive nature.* There are no questions of a sensitive nature with respect to the information collections described herein.
11. *Estimates of the hour burden of the collection to respondents.* The following represents the hour burden on the collections of information:
12. **Update to end-of-term commitments:**

(1) Number of respondents: 21 (13 rate-of-return carriers and 8 competitive ETCs participating in the Alaska Plan)

(2) Frequency of response: One-time reporting requirement.

(3) Total number of responses per respondent: 1.

(4) Estimated time per response: 10 hours.

(5) Total annual hour burden: 210 hours.

 10 hours per respondent for 21 carriers filing on an annual basis. Total annual hour burden is calculated as follows:

21 respondents x 1 report per respondent = 21 responses x 10 hours = **210 total annual hours.**

(6) Total estimate of in-house cost to respondents: $26,250 (210 hours x $125/hour[[1]](#footnote-1)).

(7) Explanation of calculation: We estimate that each Alaska Plan participant will take 10 hours preparing and submitting the relevant information.

 21 (responses) x 10 (hours to prepare and submit information) x $125/hour = $26,250.

**The estimated respondents and responses and burden hours are listed below:**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Information Collection Requirements** | **Number of Respondents** | **Number of Responses****Per Year** | **Estimated Time per Response (hours)** | **Total Burden Hours** | **In-house Cost to Respondents** |
| **a. Update to end-of-term commitments** | **21** | **1** | **10** | **210** | **$26,250** |

**Total Number of Respondents: 21 respondents filing once.**

**Total Number of Responses Annually: 21**

**Total Annual In-house Costs to respondents: $26,250**

1. *Estimates for the cost burden of the collection to respondents.* There are no outside contracting costs for this information collection. *See* the last column in the chart in item 12 above for the estimated in-house costs to respondents.
2. *Estimates of the cost burden to the Commission.* There will be few, if any, costs to the Commission because notice and enforcement requirements are already part of Commission duties.
3. *Program changes or adjustments.* This is a new information collection, resulting in program changes/increase to the total number of respondents to 21, total annual responses of 21 and total annual burden hours of 210.
4. *Collections of information whose results will be published.* The Commission will make the Alaska Plan participants’ updated deployment obligations available publicly.
5. *Display of expiration date for OMB approval of information collection.* There is no paper form associated with this information collection; it is collected electronically through ECFS described above.  The Commission seeks approval to not display the expiration date for OMB approval of this information collection.  The Commission publishes a list of all OMB-approved information collections in 47 C.F.R. § 0.408 of the Commission’s rules.
6. *Exceptions to certification statement for Paperwork Reduction Act submissions*. There are no exceptions to the certification statement.

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

The Commission does not anticipate that the collection of information will employ statistical methods.

1. In-house costs to respondents can be higher for Alaskan companies. *See* Comments of Alaska Telephone Association, OMB Control No. 3060-1228; FCC WC Docket No. 16-271, at 20 (Jan. 11, 2018) (“Provider employee labor rates are estimated at $125/hour. The FCC’s $40/hour estimate does not reflect the Alaska market, . . .”). [↑](#footnote-ref-1)