

SUPPORTING STATEMENT

This new information collection is being submitted to obtain the Office of Management and Budget (OMB) approval for new information collection requirements resulting from a Federal Communications Commission (Commission or FCC) order. As explained below, the Commission adopted a process for facilitating the modification of CAF Phase II Auction support recipients' defined deployment obligations and directed the Wireline Competition Bureau (Bureau) to implement those requirements.

This new collection addresses the requirements that Connect America Fund (CAF) Phase II auction support recipients may follow for the post-auction review of defined deployment obligations (and associated support) on a state-by-state basis when the total number of actual locations in eligible areas is less than the number of funded locations.

A. Justification

1. *Circumstances that make the collection necessary.* The Communications Act of 1934, as amended (Act), requires the "preservation and advancement of universal service." 47 U.S.C. § 254(b). The information collection requirements reported under this information collection are the result of FCC actions to promote the Act's universal service goals.

This information collection addresses the requirements of a process (the eligible locations adjustment process (ELAP)) that facilitates the post-auction review of certain CAF Phase II Auction support recipients' defined deployment obligations (and associated support), on a state-by-state basis, in situations where the number of eligible locations within a state is less than the number of funded locations. *Connect America Fund*, WC Docket Nos. 10-90 et al., Order on Reconsideration, 33 FCC Rcd 1380, 1390-92, paras. 23-28 (2018) (*Phase II Auction Reconsideration Order*); *Connect America Fund*, WC Docket No. 10-90, Order, 34 FCC Rcd 10395 (WCB 2019) (adopting rules and requirements necessary to implement this process, consistent with the parameters set forth in the *Phase II Auction Reconsideration Order* and prior Commission guidance for adjusting defined deployment obligations) (*ELAP Order*). CAF Phase II Auction support recipients' participation in this process is voluntary.

ELAP requires the one-time collection of location information for all eligible locations within the state where the participant is seeking an adjustment to its defined deployment obligation. Eligible locations include every location qualifying for support (qualifying locations) and may include additional locations within eligible areas of the state that the participant will reserve as part of its defined deployment obligations, even if such locations cannot be identified as qualifying at the time of the ELAP process (prospective locations). The total number of eligible locations reported by the participant cannot exceed the participant's defined deployment obligation for the state.

Participants must also submit a description of its methods for identifying all locations qualifying for support, as well as some supporting evidence, such as copies of public records, aerial photography, location information for non-eligible locations, or similar evidence. Participants must certify the truth and accuracy of this information.

The Bureau will announce which participants have met their prima facie evidentiary standard, and the Universal Service Administrative Company (USAC) will then use certain location information (address, geocoordinates, number of units) filed by these participants to populate a publicly available map (public ELAP Map).

Other interested parties deemed eligible to participate in ELAP (stakeholders) may then challenge the accuracy and completeness of any relevant participant's eligible location information. To file such a challenge, stakeholders must submit alternative location information (of the same kind and in the same format as required of the participant), a brief description of the methods used to identify the location as an eligible location, and supporting evidence.

Stakeholders include government entities (state, local, and Tribal) as well as individuals or non-governmental entities with a legitimate and verifiable interest in ensuring broadband service in the relevant areas. Such stakeholders cannot hold a controlling interest in a competitor of the relevant participant(s).

The Bureau will use a third-party commercial verifier to confirm the eligibility of stakeholders who challenge a participant's location information. The Bureau will require certification that the stakeholder (exclusive of governmental entities) does not hold a controlling interest in a direct competitor of the relevant participant. The Bureau will also separately gather certain limited information about these stakeholders (e.g., name and contact information).

All ELAP information will be filed and maintained in a new module within the High-Cost Universal Service Broadband Portal (HUBB) (OMB Control No. 3060-1228). The module will permit centralization and controlled access to ELAP information as well as maintenance of such information.

The module will incorporate several features like those required for reporting deployed location information in the HUBB. Specifically, the module will have an automated validation system that will generate error messages when the location information submitted by ELAP parties fails to meet reporting parameters (such as redundancies, required file type) as specified in the *ELAP Order*. Participants and stakeholders will be able to pre-file information and correct, update, add, or delete information prior to their respective filing deadline. The module will have integrated instructions and guidance for submitting information. To the extent practicable, the module will generate notices where correction, supplementation, or redaction of information is necessary.

Unlike deployed location information collected pursuant to OMB Control No. 3060-1228, all ELAP information, including the description of methods and supporting documentation as well as location data, except the location data published in the public ELAP Map, will be treated as presumptively confidential.

Requirements for which the Commission seeks OMB approval:

(1) Collection of Location Information from Participants (See 12.a):

For each state in which a participant is seeking an adjustment to its defined deployment obligation, the participant must submit location information for all qualifying locations and may submit information for prospective locations. The total number of eligible locations (qualifying and prospective locations) in a state cannot exceed the participant's defined deployment obligation for that state.

To initiate the ELAP process, a participant must identify itself and the state in which it is seeking adjustment to its defined deployment obligation. There are 198 participant/state combinations. We estimate that 75 percent of the participant/state combinations, or 148 respondents, will submit location information pursuant to the ELAP. In some instances, a participant will seek to adjust its defined deployment obligation in more than one state. In these instances, each participant/state combination is treated as a separate respondent and information submitted for each state are treated as separate filings.

Participants must submit eligible location information in a tabular format (e.g., a .csv file) into a module within the HUBB. Separate .csv files must be prepared for each qualifying location and prospective locations. For each location entry, participants must submit the following information:

- (a) Study Area Code(s)
- (b) Address of location
- (c) Latitude of the location (to 6 decimal places)
- (d) Longitude of Location (to 6 decimal places)
- (e) Number of units at the location
- (f) Method information, e.g., GPS methods and/or source used and the "as-of" date of such method or source
- (g) Location Type, i.e., qualifying location, prospective location, ineligible location
- (h) Ineligible Reason Code from Drop-Down List
- (i) Ineligible Reason Comment if Ineligible Reason Code is "Other"

In addition, the participant may submit the above location information in the same .csv file for any location that it has affirmatively determined to be ineligible, together with a description of the reason why such location should not be counted, e.g., derelict, industrial facility, temporary or mobile unit.

The participant also must provide the following information: contact information for the person who prepared and submitted the data; an officer certification that the information is true and correct; and the certifying officer's official contact information. A participant may revise and recertify its filing until the filing deadline.

(2) Collection of Methods Description from Participants (See 12.b):

For each state in which it is seeking adjustment, each participant must submit its methods description (e.g., as a .pdf file) into the ELAP module. The description must describe the participant's method(s) for identifying every qualifying location within

eligible areas within a state. Participants must also justify their methodological choices and make clear that they systematically and reasonably gathered location data for all eligible areas.

In their methods description, participants relying on databases or software to identify locations must demonstrate that the database or geolocation software has an evidentiary basis, such as customer records. Participants must also establish the source's accuracy and reliability in the relevant geographic areas, which may be accomplished through, for example, proof of statistical sampling and verification of sampled locations in eligible areas. Participants relying on publicly available databases/information must describe how they accounted for any differences between such databases/information and the Commission's requirements (such as how buildings and other structures are defined as locations) when compiling their location data.

The participant also must provide the following information: contact information for the person who prepared and submitted the data; an officer certification that the information is true and correct; and the certifying officer's official contact information. A participant may revise and recertify its filing until the filing deadline.

(3) Collection of Supporting Evidence from Participants (See 12.c):

For each state in which a participant is seeking adjustment to its defined deployment obligation, it must file in the ELAP module evidence supporting their descriptions of methods and location information in a commonly supported format, e.g., pdf., jpeg., etc. This evidence will assist the Bureau's evaluation of the completeness of participants' location lists.

Participants have flexibility in determining what and how much evidence to submit. For example, participants may submit publicly available information supporting their determination that certain locations are ineligible, such as copies from county assessor websites. Similar public records information may be submitted to demonstrate the reliability and validity of database or geolocation software.

The participant also must provide the following information: contact information for the person who prepared and submitted the data; an officer certification that the information is true and correct; and the certifying officer's official contact information. A participant may revise and recertify its filing until the filing deadline.

(4) Collection of Information Verifying Stakeholder Eligibility (See 12.d)

In order to participate as stakeholders in the ELAP process, non-governmental entities and individuals must submit certain information to USAC for the purposes of verifying their identity and eligibility to participate as a stakeholder and must certify that this information is true and correct. USAC will submit some of this information to a commercial verifier selected by USAC. In addition, stakeholders must certify that they do not hold a controlling interest in a direct competitor of the participant. Individuals must acknowledge receipt of a Privacy Act Notice.

The Bureau anticipates that a variety of stakeholders will file challenges and estimates that there will be at least one unique stakeholder for every participant/state combination, or 148 stakeholders. The Bureau anticipates that 50 percent (74) of all stakeholders will be non-governmental entities and individuals. As noted below, pursuant to the Privacy Act of 1974, as amended, 5 U.S.C. § 552a, the Commission will create a system of records notice (SORN) to cover any personal identifiable information.

Once the stakeholder's eligibility is verified, the third-party verifier will submit information to USAC (e.g., name, e-mail address, and confirmation) on the stakeholder's eligibility to participate in ELAP. In situations where the prospective stakeholder's identity and/or eligibility cannot be verified through the commercial verifier, the stakeholder may submit to USAC alternative evidence, such as copies of public records or government-issued documentation.

(5) Collection of Location Information from Stakeholders (See 12.e):

For each state where the stakeholder is challenging a participant's filings, stakeholders may submit location information for eligible locations that they have identified as omitted from the relevant participant's location information. The Bureau anticipates that a variety of stakeholders will file challenges and estimates that there will be 148 stakeholders.

Stakeholders must submit eligible location information in a tabular format (e.g., a .csv file) into the HUBB ELAP module. Separate .csv files must be prepared for each qualifying location and prospective location. For each location entry, the stakeholder must submit the following information:

- (a) Study Area Code(s)
- (b) State(s) for which the carrier is making the filing
- (c) Latitude of the location (to 6 decimal places)
- (d) Longitude of Location (to 6 decimal places)
- (e) Address of location
- (f) Number of units at the location
- (g) Method information, e.g., GPS methods and/or source used and the "as-of" date of such method or source
- (h) Location Type, i.e., qualifying location, prospective location, ineligible location
- (i) Ineligible Reason Code from Drop-Down List
- (j) Ineligible Reason Comment if Ineligible Reason Code is "Other"

In addition, stakeholders also must provide the following information: contact information for the person who prepared and submitted the data and a certification that the information is true and correct. If the stakeholder is an individual, the individual must submit the certification. If the stakeholder is a non-commercial entity or a governmental entity, the certification may be submitted by any representative authorized to act on behalf of the entity. A stakeholder may revise and recertify its filing until the filing deadline.

(6) Collection of Methods Description and Supporting Evidence from Stakeholders (See 12.f):

For each state where the stakeholder is challenging a participant's filings, stakeholders must submit a description of how they identified eligible locations, including any limitations to their methods used, and must submit proof that the location data describes an eligible location.

We expect that there will be a variety of stakeholders responding to participants' submissions. Accordingly, the description of methodology may range from a simple explanation, such as might occur if a homeowner reports that his/her home has been omitted from the participant's list of eligible locations, or a more in-depth explanation, such as might occur if a local government entity claims that several locations have been omitted from the participant's list.

Generally, the Bureau has determined that sets of geocoordinates 36 feet or more from another describe separate structures. Accordingly, when a stakeholder-reported location falls within 36 feet of the geocoordinates reported by the participant (generally, an overlap in the first three decimal places of geocoordinates), the stakeholder must also explain why the location should be considered a separate and unique location from the location reported by the participant (e.g., the stakeholder's location data describes a separate business or residential location or unit within the same property/parcel).

If a stakeholder reports one or more prospective locations as location(s) omitted from the relevant participant's location information, it must explain why such location(s) should be considered when determining participant's defined deployment obligations and submit some supporting evidence that the location(s) will become a qualifying location(s) within the participant's build-out period. Stakeholders may include factual arguments demonstrating why their methodology produces location information more complete or accurate than that of the participant but are not required to do so.

The stakeholder must submit contact information for the person who prepared and submitted the information (if different from the contact information for the party submitting the location information). In addition, the stakeholder must submit a certification that the information is true and correct, a certification that the stakeholder is eligible to participate in the process, and the certifying individual's official title and/or contact information (if different from the stakeholder's contact information). A stakeholder may revise and recertify its filing until the filing deadline.

On behalf of the Commission, USAC will gather certain limited information verifying the identity of stakeholders (e.g., name and contact information) and their interests in ensuring service to the relevant area as well as certain information about locations that the stakeholder asserts are eligible locations which may include information linking an individual to certain property and commercial interests. The collection of such information is regulated by the Privacy Act of 1974, as amended (5 U.S.C. § 552a) and will be covered by a SORN.

(7) Collection of Reply Information from Participants (See 12.g):

Participants may submit a reply responding to relevant stakeholder challenge(s). This reply may include additional location information, methods description, and/or supporting evidence and may also include arguments challenging the methods or evidence of the stakeholder. The reply must be limited to information in stakeholder challenge(s).

A participant must submit contact information for the person who prepared and submitted the reply, certify that its submission is true and accurate, and may revise and recertify its filing until the filing deadline.

Statutory authority for this information collection is contained in 47 U.S.C. § 151-154, 254.

2. *Use of Information:* The Commission will use the information to adjust the defined deployment obligations of CAF Phase II auction support recipients and their support awards (on a per location basis). These adjustments will help ensure that the universal service support received by each CAF Phase II auction support recipient does not exceed the amount of support allocated, on a per qualifying location basis, to all actual locations in eligible areas within the state. Accordingly, this process will also help ensure that CAF Phase II auction support recipients will use support for its intended purpose of deploying service to eligible locations and expedite the return of sums that cannot be used for this purpose.
3. *Technology collection techniques:* Respondents will enter information in USAC's HUBB portal. The interface is designed to provide online storage of information for carriers, with the potential to ease compliance with recordkeeping requirements and possible audits. Furthermore, where possible, information already provided by carriers can be transferred to the HUBB deployed location reporting module (i.e., the transfer of pre-populated data), to reduce the filing burden.
4. *Efforts to Identify Duplication:* This will be the first-time participants and stakeholders will enter information about eligible locations into the HUBB. The location data collected and the associated formats are like those proscribed for the reporting of deployed locations, e.g., study area code, address, latitude/longitude, etc., so as to permit transfer of the eligible location data, as warranted, to the reporting of deployed locations in the HUBB.
5. *Impact on Small Entities:* The collection of information may affect small entities as well as large entities. The process has been designed to limit the burden as much as possible on small entities. Participants with smaller defined deployment obligations will have fewer eligible locations to identify and report. Small entities and individuals that are stakeholders need only report qualifying and, as warranted, prospective locations that are omitted from participants' location information. They also have less rigorous requirements for describing their methods of identifying and distinguishing such locations. Filing guidance and training will be made available to assist small entities in understanding what type of information should be submitted and in what format.
6. *Consequences if information is not collected.* If an entity eligible to receive CAF Phase II auction support fails to submit the requisite information, the Bureau will not be able to

determine whether an adjustment to its defined deployment obligation is warranted. Accordingly, the defined deployment obligations assumed by these carriers when they accepted the CAF II auction award will not be changed. If a participant is not able to meet its defined deployment obligation at the end of its build out term because it has been unable to identify the requisite number of qualifying locations, it will be held in default of its obligations and subject to the recovery of support and potential forfeiture penalties specified in *Phase II Auction Order. Connect America Fund et al.*, WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 5949, 6016-6018, paras. 188-194 (2016) (*Phase II Auction Order*).

7. *Special Circumstance.* We do not foresee any special circumstances with this information collection.
8. *Federal Register notice; efforts to consult with persons outside the Commission.* A 60-day notice was published in the *Federal Register* pursuant to 5 C.F.R. § 1320.8(d) on July 1, 2020. See 85 FR 39565. No comments were received from the public.
9. *Payments or gifts to respondents.* The Commission does not anticipate providing any payment or gifts to respondents.
10. *Assurances of confidentiality.* The information submitted in the ELAP Map will be made public. We intend to keep other information confidential to the extent permitted by law. Also, this collection contains information that affects individuals or households, and thus, there are impacts under the Privacy Act. As required by the Privacy Act of 1974, as amended, 5 U.S.C. § 552a, the Commission will create a system of records notice (SORN) to cover the collection, storage, maintenance, and disposal (when appropriate) of any personally identifiable information that the Commission may collect as part of the information collection. USAC must preserve the confidentiality of all personally identifiable information, must not use the information except for purposes of administering the Universal Service Fund, and must not disclose such information unless directed to do so by the Commission. See *ELAP Order*, 34 FCC Rcd 10395, 10412-14, paras. 50-56. If the Commission requests information that the respondents believe is confidential, respondents may request confidential treatment of such information under section 0.459 of the Commission's rules.
11. *Questions of a sensitive nature.* Some of the requirements contained in this information collection affect individuals or households, and thus, there are impacts under the Privacy Act. As noted above, the Commission will create a SORN to cover the collection, storage, maintenance, and disposal (when appropriate) of any personally identifiable information that the Commission may collect as part of the information collection.
12. *Estimates of the hour burden of the collection to respondents.* The following represents the hour burden on the collections of information:

a. Collection of Location Information from Participants:

- (1) Number of Respondents: We estimate that 148 respondents will submit location information pursuant to the ELAP. In some instances, one carrier will seek to adjust their defined deployment obligation in different states. For instance, carrier

A has an obligation in Maryland and an obligation in Virginia. Although this is one company, it is factored in twice in the number of respondents.

- (2) Frequency of Response: Once.
- (3) Total number of responses per respondent: One.
- (4) Estimated time per response: 40 hours.
- (5) Total annual hour burden: 5,920.

40 hours per response per respondent filing. Total annual hour burden is calculated as follows:

148 respondents x 1 response x 40 hours = **5,920 total annual hours.**

- (6) Total estimate of in-house cost to respondents: \$236,800 (5,920 hours x \$40/hour).
- (7) Explanation of calculation: We estimate that each carrier will take, on average, 40 hours to gather and submit the data. Some carriers may need to physically survey and confirm locations on the ground, but most carriers may rely on databases, aerial photography, and public records.

148 (responses) x 40 (hours to prepare location information) x \$40/hour = \$236,800

b. Collection of Methods Description from Participants:

- (1) Number of Respondents: We estimate that 148 respondents will submit location information pursuant to the ELAP. In some instances, one carrier will seek to adjust its defined deployment obligation in different states. For instance, carrier A has an obligation in Maryland and an obligation in Virginia. Although this is one company, it is factored in twice in the number of respondents.
- (2) Frequency of Response: Once.
- (3) Total number of responses per respondent: One.
- (4) Estimated time per response: 16 hours.
- (5) Total annual hour burden: 2,368.

16 hours per response per respondent filing. Total annual hour burden is calculated as follows:

148 respondents x 1 response per respondent x 16 hours = **2,368 total annual hours.**

- (6) Total estimate of in-house cost to respondents: \$94,720 (2,368 hours x \$40/hour).
- (7) Explanation of calculation: We estimate that each carrier will take, on average, 16 hours per response. Carriers may need to review and redact information from their sources and test their sources' accuracy within geographic areas by testing locations before drafting and submitting their description into the HUBB module.

$$148 \text{ (responses)} \times 16 \text{ (hours to prepare response per year)} \times \$40/\text{hour} = \$94,720$$

c. Collection of Supporting Evidence from Participants:

- (1) Number of Respondents: We estimate that 148 respondents will submit location information pursuant to the ELAP. In some instances, one carrier will seek to adjust their defined deployment obligation in different states. For instance, carrier A has an obligation in Maryland and an obligation in Virginia. Although this is one company, it is factored in twice in the number of respondents.
- (2) Frequency of Response: Once.
- (3) Total number of responses per respondent: One.
- (4) Estimated time per response: 5 hours.
- (5) Total annual hour burden: 740.

5 hours per response per respondent filing. Total annual hour burden is calculated as follows:

$$148 \times 1 \text{ response per respondent} = 148 \text{ responses} \times 5 \text{ hours} = \mathbf{740 \text{ total annual hours.}}$$

- (6) Total estimate of in-house cost to respondents: \$29,600 (740 hours x \$40/hour).
- (7) Explanation of calculation: We estimate that each carrier will take 5 hours per response. This estimate includes the time to gather and organize documentation and upload it into the HUBB module.

$$148 \text{ (responses)} \times 5 \text{ (hours to prepare the response)} \times \$40/\text{hour} = \$29,600$$

d. Collection of Information Verifying Stakeholder Eligibility:

- (1) Number of Respondents: Approximately 74 stakeholder respondents.
- (2) Frequency of Response: Once.
- (3) Total number of responses per respondent: One.
- (4) Estimated time per response: 2 hours.

- (5) Total annual hour burden: 74.

2 hours per response per respondent filing. Total annual hour burden is calculated as follows:

74 respondents x 1 response x 2 hours = **148 total annual hours**.

- (6) Total estimate of in-house cost to respondents: \$5,920 (148 hours x \$40/hour).

- (7) Explanation of calculation: We estimate that each stakeholder, for each state where they are challenging participant information, will take, on average, 2 hours to gather and submit the information to USAC.

74 (responses) x 2 (hours to prepare information) x \$40/hour = \$5,920

e. Collection of Location Information from Stakeholders:

- (1) Number of Respondents: Approximately 148 stakeholder respondents.

- (2) Frequency of Response: Once.

- (3) Total number of responses per respondent: One.

- (4) Estimated time per response: 5 hours.

- (5) Total annual hour burden: 740.

20 hours per response per respondent filing. Total annual hour burden is calculated as follows:

148 respondents x 1 response x 5 hours = **740 total annual hours**.

- (6) Total estimate of in-house cost to respondents: \$29,600 (740 hours x \$40/hour).

- (7) Explanation of calculation: We estimate that each stakeholder will take, on average, 5 hours to gather and submit the data. Stakeholders must identify only those locations omitted from participants' eligible location information and may consult the public ELAP Map. In addition, while some stakeholders will need to prepare information for several locations, some stakeholders will need only prepare a limited amount of information for one or a few locations.

148 (responses) x 5 (hours to prepare location information) x \$40/hour = \$29,600

f. Collection of Methods Description and Supporting Evidence from Stakeholders:

- (1) Number of Respondents: Approximately 148 stakeholder respondents.

- (2) Frequency of Response: Once.

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

(4) Estimated time per response: 4 hours.

(5) Total annual hour burden: 592.

4 hours per response per respondent filing. Total annual hour burden is calculated as follows:

148 respondents x 1 response per respondent x 4 hours = **592 total annual hours**.

(6) Total estimate of in-house cost to respondents: \$23,680 (592 hours x \$40/hour).

(7) Explanation of calculation: We estimate that each stakeholder will take, on average, 4 hours per response. While individual homeowners or community associations will require less time to prepare a short description documenting how they identified the location as eligible, governmental entities will need more time to evaluate locations in larger areas.

148 (responses) x 4 (hours to prepare response per year) x \$40/hour = \$23,680

g. Collection of Reply Information from Participants:

(1) Number of Respondents: Approximately 148 participant respondents.

(2) Frequency of Response: Once.

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

(4) Estimated time per response: 2 hours.

(5) Total annual hour burden: 296.

2 hours per response per respondent filing. Total annual hour burden is calculated as follows:

148 x 1 response per respondent = 148 responses x 2 hours = **296 total annual hours**.

(6) Total estimate of in-house cost to respondents: \$11,840 (296 hours x \$40/hour).

(7) Explanation of calculation: We estimate that each carrier will take 2 hours per response. This includes the time to gather and organize documentation and upload it into the HUBB module.

148 (responses) x 2 (hours to prepare the response) x \$40/hour = \$11,840

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. Collection of Location Information from Participants	148	1	40	5,920	\$236,800
b. Collection of Methods Description from Participants	148	1	16	2,368	\$94,720
c. Collection of Supporting Evidence from Participants	148	1	5	740	\$29,600
d. Collection of Information Verifying Stakeholder Eligibility	74	1	2	148	\$5,920
e. Collection of Location Information from Stakeholders	148	1	5	740	\$29,600
f. Collection of Methods Description and Supporting Evidence from Stakeholders	148	1	4	592	\$23,680
g. Collection of Reply from Participants	148	1	2	296	\$11,840

TOTALS:

Total Number of Respondents: 296 unique respondents filing multiple times.

Total Number of Responses Annually: 962.

Total Annual Hourly Burden for Requirements (a) – (g): 10,804.

Total Annual In-House Costs to Respondents: \$432,160.

13. *Estimates for the cost burden of the collection to respondents.* Respondents may use commercial database providers to assist with the identification of eligible locations, although it is not required. The expected costs for contracting with such outside parties are built into the in-house costs for respondents noted above.
14. *Estimates of the cost burden to the Commission.* There will be few, if any, costs to the Commission because ensuring proper use of universal service support is already part of Commission duties.
15. *Program changes or adjustments.* This is a new information collection, resulting in program changes/increases to the total number of respondents of 296, total annual responses of 962 and total annual burden hours of 10,804.
16. *Collections of information whose results will be published.* The Commission plans to make a subset of the information filed by participants publicly available.
17. *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 the module in the HUBB portal described above. The Commission seeks approval to not display the expiration date for OMB approval of this information collection. The Commission will use an edition date in lieu of the OMB expiration date. This will prevent the Commission from having to repeatedly update the expiration date on the portal each time this collection is submitted to OMB for review and approval. The Commission publishes a list of all OMB-approved information collections in 47 C.F.R. § 0.408 of the Commission's rules.
18. *Exceptions to certification 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 the collection of information will employ statistical methods.