

SUPPORTING STATEMENT

A. Justification:

1. The Federal Communications Commission ("Commission") is requesting that the Office of Management and Budget (OMB) approve an extension of OMB Control No. 3060-1057 (delegated authority collection) titled, "Application for Authority to Construct or Make Changes in an International Broadcast Station (FCC Form 420-IB)."

The FCC Form 420-IB will be used to request authority from the Commission to construct or make changes in an international broadcast station. This application has not been implemented yet due to a lack of budget resources and technical staff. After the FCC Form 420-IB has been implemented, it will be completed by international broadcasters in lieu of the "Application for Authority to Construct or Make Changes in an International, Experimental Television, Experimental Facsimile, or a Developmental Broadcast Station," (FCC Form 309).

Currently, the FCC Form 309 is shared between the International Bureau and the Media Bureau. The FCC Form 309 is used by the Media Bureau for experimental broadcast licenses and it is used by the International Bureau in connection with international broadcast stations. (Note: The OMB approved the FCC Form 309 under OMB Control Number 3060-1035).

The International Bureau and Media Bureau have different information collection requirements. The proposed FCC Form 420-IB was put under the separate OMB control number of 3060-1057 in order to facilitate the automation of the form and any changes to the form in the future. The FCC Form 309 will continue to be used by the Media Bureau in connection with the authority to construct or make changes to an experimental broadcast license.

We stated previously that the Commission plans to develop a Consolidated Licensing System (CLS). However, the Commission discontinued its plan to develop CLS. Instead, the Commission plans to make the FCC Form 420-IB available to the public in the International Bureau Filing System ("IBFS"). It is anticipated that this form will be available in IBFS on or before December 2021.

The FCC Form 420-IB does not affect individuals and, therefore, is not subject to the Privacy Act of 1974, as amended.

The Commission has authority for this collection pursuant to the rules set forth in Section 325(c) of the Communications Act of 1934, as amended, and in 47 C.F.R. Part 73, Subpart F.

2. The information collected pursuant to the rules set forth in Section 325(c) of the Communications Act of 1934, as amended, and in 47 CFR Part 73, Subpart F, is used by the Commission to assign frequencies for use by international broadcast stations, to grant authority to operate such stations and to determine if interference or adverse propagation conditions exist

that may impact the operation of such stations. If the Commission did not collect this information, it would not be in a position to effectively coordinate spectrum for international broadcasters or to act for entities in times of frequency interference or adverse propagation conditions. The orderly nature of the provision of international broadcast service would be in jeopardy without the Commission's involvement.

3. The FCC Form 420-IB is in the process of development by the Commission and it is anticipated that the form will be completed by December 2021. After it has been developed, the Commission will seek approval from OMB to implement the new form. After it has been developed, it will be available to applicants in IBFS. At present, zero (0) percent of this collection is automated because the form is not yet in existence.

4. These information collection requirements are not duplicated elsewhere in the Commission's rules.

5. The information collection requirements do not have a significant impact on a substantial number of small entities. The total number of entities subject to the Commission's international broadcast rules is approximately 10 and only a small percentage, if any, of the 10 could be categorized as a small entity. Also, the paperwork burdens accounted for in this collection are minimal.

6. If the Commission did not collect this information, it would not be in a position to effectively coordinate spectrum for international broadcasters or to act for entities in times of frequency interference or adverse propagation conditions. The orderly nature of the provision of international broadcast service would be in jeopardy without the Commission's involvement.

7. This information collection is not conducted in a manner inconsistent with the guidelines in 5 CFR 1320.5.

8. On July 14, 2020, a 60-day notice was published in the Federal Register (85 FR 42398) to solicit comments from the public on the extension of this collection. No comments were received from the public.

9. The Commission does not provide any payment or gift to respondents.

10. There is no need for confidentiality pertaining to the information collection requirements in this collection.

11. This collection does not contain questions of a sensitive nature.

**Application to Construct or Make Changes
in an International Broadcast Station,
FCC Form 420-IB**

**OMB Control No: 3060-1057
September 2020**

12. An estimate of the annual burden hours for the 10 respondents to this information collection is as follows:

FCC Form 420-IB	Responses	Frequency of Response & Hours	Responses X Hours = Burden Hours
Complete Application	10	6 hours/response On-occasion Filing	60
Total:	10 Average	6 Hours	60 Annual Hours Average

13. The estimated costs of \$46,050 are summarized in the chart below.

FCC Form 420-IB	Responses	Hours	Costs	Total
Application Fees	10	N/A	\$2,405 per application	\$24,050
Outside Legal Assistance	10	4 Hours	\$300 per hour	\$12,000
Outside Engineering Assistance	10	4 Hours	\$250 per hour	\$10,000
Total:				\$46,050 Total estimated costs

14. The estimated annualized costs to the Federal government is **\$24,797** and is calculated as follows:

10 international broadcast license applications X 32 annual hours = 320 annual hours
(legal review 160 hours; engineering review 160 hours)

GS-855-15/Step 5 Electronics Engineer @ \$77.49 per hour X 160 annual
hours = \$12,398.40

GS-905-15/Step 5 Attorney @ \$77.49 per hour X 160 annual
hours = \$12,398.40

$\$12,398.40 + \$12,398.40$ (Engineer and Attorney) = **\$24,796.80**
(rounded up to \$24,797)

15. This information collection does not include any program changes or adjustments.

16. The results of this information collection requirement will not be published for statistical use.

17. We are seeking 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. Additionally, the OMB expiration date and OMB control number are “displayed” in 47 CFR 0.408.

18. There are no exceptions to the Certification Statement.

Part B. Collections of Information Employing Statistical Methods:

Not applicable. This information collection does not employ statistical methods.