

SUPPORTING STATEMENT

A. Justification:

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The Federal Communications Commission (FCC or Commission) is requesting Office of Management and Budget (OMB) approval of a new information collection. This information collection pertains to a *Report and Order* (Report and Order) adopted by the Commission in 2016,<sup>1</sup> and modified in part by an *Order on Reconsideration* (Order on Reconsideration) adopted by the Commission in 2019.<sup>2</sup> The *Report and Order* adopted final rules requiring submarine cable<sup>3</sup> licensees to report service outages through the network outage reporting system (NORS). The *Order on Reconsideration* modified the *Report and Order* by reexamining and amending certain aspects of the required reporting to better conform the requirements to how the Commission expects to use the outage information. In doing so, the Commission preserved the benefits of the new rules while minimizing the costs and administrative burdens of reporting by refocusing the submarine cable outage rules on significant disruptions to submarine cable communications and those outages that have national security implications.

Submarine cables provide the conduit for the vast majority of voice, data and Internet connectivity between the mainland United States and Alaska, Hawaii, Guam, American Samoa, the Northern Mariana Islands, Puerto Rico, and the U.S. Virgin Islands, as well as the connectivity between the United States and the rest of the world.<sup>4</sup> The Commission has estimated that submarine cables “carry over 95 percent of all U.S.-international voice and data traffic.”<sup>5</sup> Other sources estimate that submarine cables carry 99 percent of such traffic.<sup>6</sup> Accordingly, the operation and maintenance of the approximately 74 undersea cables licensed in the United States<sup>7</sup> are essential to the nation’s economic stability, national security and other vital public interests.<sup>8</sup>

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<sup>1</sup> *Improving Outage Reporting for Submarine Cables and Enhanced Submarine Cable Outage Data*, GN Docket No. 15-206, Report and Order, 31 FCC Rcd 7947 (2016) (Submarine Cable Report and Order).

<sup>2</sup> *Improving Outage Reporting for Submarine Cables and Enhanced Submarine Cable Outage Data*, GN Docket No. 15-206, Order on Reconsideration, 34 FCC Rcd 13054 (2019) (Submarine Cable Order on Reconsideration).

<sup>3</sup> This document uses submarine cable and undersea cable interchangeably.

<sup>4</sup> *Improving Outage Reporting for Submarine Cables and Enhancing Submarine Cable Outage Data*, GN Docket 15-206, Notice of Proposed Rulemaking, 30 FCC Rcd 10492, 10492-92, para. 1 (2015) (Submarine Cable Outage Notice or Notice).

<sup>5</sup> *Submarine Cable Outage Notice*, 30 FCC Rcd at 10494, para. 8.

<sup>6</sup> See, e.g., Greg Miller, *Undersea Internet Cables are Surprisingly Vulnerable*, Wired (Oct. 29, 2015) <http://www.wired.com/2015/10/undersea-cable-maps/>.

<sup>7</sup> *Submarine Cable Outage Order on Reconsideration*, 34 FCC Rcd at 13064-65, n.87. As of February 2020, there are 74 FCC licensed submarine cables operating or planned to enter service. See FCC, Submarine Cable Landing Licenses, <https://transition.fcc.gov/ib/pd/pf/scll.html> (last visited November 24, 2020).

<sup>8</sup> *Submarine Cable Outage Notice*, 30 FCC Rcd at 10493, para. 1 & n.2. APEC Policy Support Unit, Economic Impact of Submarine Cable Disruptions at 9 (Dec. 2012), [http://publications.apec.org/publication-detail.php?pub\\_id=1382](http://publications.apec.org/publication-detail.php?pub_id=1382) (citing a U.S. Federal Reserve representative’s seminar presentation) (“APEC Report”). The United States is a member of the Asia Pacific Economic Cooperation (APEC). See APEC, Member Economies, <http://www.apec.org/About-Us/About-APEC/Member-Economies.aspx> (last visited November 24, 2020). APEC estimated that submarine cables carry traffic associated with over \$10 trillion in transactional value globally per day.

The Communications Act of 1934, as amended, charges the Commission with promoting “the safety of life and property through the use of wire and radio communication.”<sup>9</sup> This foundational mission underlies our efforts to promote resilient, reliable, and secure communications across the mainland United States and its territories, and informs how we interpret our duties under the Cable Landing License Act<sup>10</sup> and Executive Order 10530,<sup>11</sup> which provide the Commission with authority to grant, withhold, condition and revoke submarine cable landing licenses and, in particular, for such grants to occur “upon such terms as shall be necessary to assure just and reasonable . . . service in the operation and use of cables so licensed.”<sup>12</sup>

Presently, submarine cable licensees are not required to report on their cables’ operational status. Rather, licensees provide such operational information to the Commission on a voluntary, ad hoc basis through the Commission’s Undersea Cable Information System (UCIS).<sup>13</sup> This ad hoc approach contrasts significantly with the Commission’s part 4 outage reporting requirements for other communication services.<sup>14</sup> Furthermore, the Network Outage Reporting System (NORS) established for part 4 data reporting has not previously provided the Commission with the necessary information to analyze undersea cable disruptions, as the system was not designed for submarine cable reporting.<sup>15</sup>

There are a number of problems with the current approach of relying on UCIS to collect submarine cable outage information. First, UCIS, as a voluntary program, only reflects information on approximately 25 percent of undersea cables in use today, and accordingly, the Commission lacks visibility into the vast majority of undersea cable infrastructure and related outages or disruptions.<sup>16</sup> Second, the information submitted through UCIS is not uniform and there are no standardized triggers to require reporting, so the information that is provided to the Commission is inconsistent and not necessarily reliable or probative about the root cause of the outage.<sup>17</sup> Third, UCIS was designed as a “file depository,” meaning that there is no systematic data collection effort or a database to house the information.<sup>18</sup> This makes the limited reports the Commission does receive difficult to analyze and not

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*See also Submarine Cable Report and Order*, 31 FCC Rcd at 7988, para. 3.

<sup>9</sup> 47 U.S.C. § 151.

<sup>10</sup> Cable Landing License Act of 1921, 47 U.S.C. §§ 34-39 (Cable Landing License Act).

<sup>11</sup> Exec. Order No. 10,530, 19 Fed. Reg. 2709 (May 10, 1954).

<sup>12</sup> Cable Landing License Act 47 U.S.C. §§ 34-35; *Submarine Cable Outage Notice*, 30 FCC Rcd at 10509-10510, para. 48. In acting upon applications for such licenses, the Commission seeks the approval of the U.S. Department of State. Executive Order 10530, § 5(a). Pursuant to its authority, the Commission has adopted rules governing submarine cable service at Sections 1.767 and 1.768 of the Commission’s rules. 47 CFR §§ 1.767, 1.768.

<sup>13</sup> *Submarine Cable Outage Report and Order*, 31 FCC Rcd at 7950-51, para. 8 and n.23.

<sup>14</sup> *Submarine Cable Outage Notice*, 30 FCC Rcd at 10494, para. 5; *See* 47 CFR pt. 4. Part 4 outage reporting requires more targeted information on the causes and effects of communications outages, establishes specific reporting triggers and thresholds, and provides specific deadlines for those reports to be made.

<sup>15</sup> *Submarine Cable Outage Notice*, 30 FCC Rcd at 10499, para. 19. Because NORS was not designed for submarine cable reporting, it lacks many of the data fields that are needed to report on submarine cable infrastructure.

<sup>16</sup> *Submarine Cable Outage Notice*, 30 FCC Rcd at 10494, 10497, paras. 6, 13; *Submarine Cable Outage Report and Order*, 31 FCC Rcd at 7951, para. 9.

<sup>17</sup> *Submarine Cable Outage Notice*, 30 FCC Rcd at 10494, 10497, 10498-99, paras. 6, 13, 17; *Submarine Cable Outage Report and Order*, 31 FCC Rcd at 7951, para. 9.

useful for identifying network reliability trends.<sup>19</sup> Fourth, although some licensees report certain cable faults through NORs, or to the National Coordinating Center for Communications (NCCC) within the Department of Homeland Security, most licensees have opted not to report in UCIS in a consistently reliable fashion. These deficiencies make it difficult for the Commission to learn about outages and related trends, thereby interfering with the Commission's obligation to confirm that the critical communication facilities that it licenses, and over which it has jurisdiction, are reasonably available and operational.<sup>20</sup>

A mandatory outage reporting regime for submarine cable systems is necessary to provide the Commission with greater visibility into the availability and health of these networks to allow it to better track and analyze submarine cable resiliency, and to suggest or take appropriate actions when the data so indicate. One industry estimate suggests there are approximately 200 submarine cable faults each year globally.<sup>21</sup> The purpose of NORs is to collect information on "service disruptions that could affect homeland security, public health or safety, and the economic well-being of our Nation."<sup>22</sup> The need for such reporting is only heightened for submarine cable infrastructure, where only few facilities exist, and these are vital to U.S. economic activity and national security, have unique vulnerabilities in their environment,<sup>23</sup> and are exceptionally challenging to repair.<sup>24</sup>

After the adoption of its *Report and Order*, the Commission modified aspects of the mandatory reporting requirements for submarine cable outages in the *Order on Reconsideration* in 2019. The *Order on Reconsideration* addressed two Petitions, filed with the Commission by separate entities, by granting in part and denying in part requests submitted.<sup>25</sup> Specifically, the *Order on Reconsideration* reduced the scope of reportable outages by revising the set of planned maintenance related outages that require reporting and addressed a discrepancy between the *Report and Order* and the accompanying rule

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<sup>18</sup> *Submarine Cable Outage Notice*, 30 FCC Rcd at 10498, para. 16; *Submarine Cable Outage Report and Order*, 31 FCC Rcd at 7951, para. 9.

<sup>19</sup> *Submarine Cable Outage Notice*, 30 FCC Rcd at 10498, para. 16; *Submarine Cable Outage Report and Order*, 31 FCC Rcd at 7951, para. 9.

<sup>20</sup> *Submarine Cable Outage Report and Order*, 31 FCC Rcd at 7951, para. 9.

<sup>21</sup> See International Cable Protection Committee (ICPC) Press Release, "ICPC comments on submarine cable security around the world," Feb. 16, 2016, available at <https://www.iscpc.org/documents/?id=2039> (ICPC Press Release). ICPC is an international association of undersea cable operators, and 23 of its members are U.S. entities. See ICPC Member List, available at <https://www.iscpc.org/about-the-icpc/member-list/>.

<sup>22</sup> *New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, ET Docket No. 04-35, Report and Order, 19 FCC Rcd 16830, 16833, para. 1 (2004).

<sup>23</sup> Communications, Security, Reliability, and Interoperability Council (CSRIC) IV, Final Report – Protection of Submarine Cables Through Spatial Separation at 2 (2014), [https://transition.fcc.gov/pshs/advisory/csric4/CSRIC\\_IV\\_WG8\\_Report1\\_3Dec2014.pdf](https://transition.fcc.gov/pshs/advisory/csric4/CSRIC_IV_WG8_Report1_3Dec2014.pdf) (CSRIC IV Report) (noting the multitude of threats to submarine cables, including commercial fishing, dredging, energy projects, and other cable activity, as well as natural threats such as earthquakes or landslides).

<sup>24</sup> See CSRIC IV Report at 26-30 (describing the unique difficulties in repairing submarine cable infrastructure).

<sup>25</sup> See Petition of the North American Submarine Cable Association for Reconsideration of *Improving Outage Reporting for Submarine Cables and Enhanced Submarine Cable Outage Data*, GN Docket No. 15-206, Report and Order (rec. Sep. 8, 2016); Petition of Submarine Cable Coalition for Reconsideration of *Improving Outage Reporting for Submarine Cables and Enhanced Submarine Cable Outage Data*, GN Docket No. 15-206, Report and Order (rec. Aug. 11, 2016) (Petitions).

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appendix.<sup>26</sup> These actions reduced the cost burdens associated with the reporting, but retained the benefits of the reporting. In addition, the Order on Reconsideration denied the supplemental request to rescind the submarine cable outage reporting rules altogether.

The Commission also directed the Public Safety and Homeland Security Bureau to retire the current voluntary submarine cable outage information collection, OMB Control No. 3060-1116.<sup>27</sup>

Statutory authority for this new collection is contained in 47 U.S.C. §§ 34–39, 151, 154, 155, 157, 201, 251, 254, 301, 303(b), 303(g), 303(r), 307, 309(a), 309(j), 316, 332, 403, 615a–1, 615c, 1302(a), and 1302(b); 5 U.S.C. 301, and Executive Order no. 10530.

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

**2. Indicate how, by whom and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

Currently, licensees provide information to the Commission on a voluntary, ad hoc basis through the UCIS. The Commission will use the information submitted by submarine cable licensees in this new information collection to improve the Commission’s ability to monitor the systemic reliability of submarine cable networks and to detect and remediate adverse trends and to identify threats to national security.

This is a new collection that will be collected via the Commission’s NORS outage reporting system. As with the other information collection using NORS (under OMB Control No. 3060-0484), this new collection will facilitate FCC monitoring, analysis, and investigation of the reliability and security of submarine cable networks, and to identify and take action on potential threats to our Nation’s telecommunications infrastructure. Drawing from a decade of experience in outage reporting, the Commission will seek an ongoing dialogue with submarine cable licensees, as well as with the industry at large, regarding lessons learned from the new information collection. These efforts will help the Commission develop a better understanding of the root causes of significant outages, and to explore preventive measures in the future to mitigate the potential impact of such outages on the Nation and the American public.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

The FCC’s Public Safety and Homeland Security Bureau (PSHSB) maintains an Internet portal for the electronic submission of NORS reports.<sup>28</sup> Submarine cable licensees will submit their filings through the existing NORS portal using templates created for reporting submarine cable outages. The Commission may then electronically retrieve the submarine cable outage filings in real time in the NORS

<sup>26</sup> *Submarine Cable Order on Reconsideration*, 34 FCC Rcd at 13057-58, 13063-64, paras. 12-14, 32-33.

<sup>27</sup> *Submarine Cable Report and Order*, 31 FCC Rcd at 7953, para 14; *Submarine Cable Order on Reconsideration*, 34 FCC Rcd at 13067. The UCIS information collection (OMB 3060-1116) will be retired accordingly six months after OMB reviews this new collection.

portal. In the event that licensees are unable to submit their filings electronically through NORS, because the necessary modifications to incorporate submarine cable reporting are not yet completed or the system otherwise is not accessible, PSHSB will have available an Excel spreadsheet asking for the same information as would be required if a respondent was filing electronically in NORS. Our rules provide for submission of that alternative form by email, Fax, courier, or U.S. mail.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in item 2 above.**

The *Report and Order* establishes a new, mandatory information collection for submarine cable outages and directs PSHSB to retire the current voluntary information collection, UCIS. As a result, this new collection would not duplicate any information that the Commission already receives. As previously discussed, the current voluntary information collection is deficient, does not result in reports on every relevant outage, and does not provide the Commission with sufficient information regarding submarine cable network outages. The voluntary information collection cannot be modified or used for the purposes described in item 2 above.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

In accordance with the Paperwork Reduction Act of 1995, the Commission seeks to minimize the burden on all respondents, regardless of size. The reporting requirements limit the information collection requirements to those absolutely necessary to promote the safety of life and property. We believe that all submarine cable licensees, including any small businesses or entities, already collect the requested information, and therefore, the only burden on licensees is to submit the data via the existing NORS portal. For ease of reporting, the NORS portal contains templates for each type of filing required.

**6. Describe the consequences to a Federal program or policy activity, if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reduce burden.**

The FCC has a statutory mandate to “promot[e] the safety of life and property through the use of wire and radio communications.”<sup>29</sup> Additionally, the Cable Landing License Act<sup>30</sup> and Executive Order 10530<sup>31</sup> provide the Commission with authority to grant, withhold, condition and revoke submarine cable landing licenses.<sup>32</sup> The Cable Landing License Act and Executive Order provide that the Commission may place conditions on the grant of a submarine cable landing license in order to “assure just and

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<sup>28</sup> See 47 C.F.R. § 4.11. In the event of technical impediments to using the Web-based system during the Notification stage, then reporting entities may alternatively provide a written Notification to the Commission by email, Fax, courier, or U.S. mail may alternatively be used.

<sup>29</sup> 47 U.S.C. § 151.

<sup>30</sup> Cable Landing License Act, 47 U.S.C. §§ 34-39.

<sup>31</sup> Executive Order 10530.

<sup>32</sup> See *Submarine Cable Outage Notice*, 30 FCC Rcd at 10509-10510, para. 48. In acting upon applications for such licenses, the Commission seeks the approval of the U.S. Department of State. Executive Order 10530, § 5(a). Pursuant to its authority, the Commission has adopted rules governing submarine cable service at Sections 1.767 and 1.768 of the Commission’s rules. 47 CFR §§ 1.767, 1.768. The Cable Landing License Act does not apply to cables that lie wholly within the continental United States. See 47 U.S.C. § 34.

reasonable rates and service in the operation and use of cables so licensed.”<sup>33</sup> “Just and reasonable service” entails assurance that the cable infrastructure will be reasonably available. Availability of submarine cables is also critically important for national security and the economy because submarine cables carry 95 percent of international communications traffic and serve as the primary means of connectivity for numerous U.S. states and territories.<sup>34</sup>

In the absence of outage reporting, the Commission’s ability to carry out its dual obligations of ensuring just and reasonable submarine cable service, and promoting the safety of life and property, would be hampered by the lack of situational awareness regarding the functionality of submarine cables. To fulfill the aforementioned statutory obligations, the FCC needs all submarine cable licensees to file outage reports in a common place and in a uniform fashion.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with the criteria listed in the supporting statement.**

This information collection is consistent with the requirements of 5 C.F.R. § 1320.5(d)(2) and the criteria listed in this Supporting Statement. We do not anticipate circumstances that would result in a collection of information in an inconsistent manner.

**8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency’s notice, required by 5 CFR 1320.8(d), soliciting comments on the information prior to submission to OMB.**

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

Following the adoption of the *Order on Reconsideration*, the Commission published a 60-Day Notice in the Federal Register seeking comments from the public on May 8, 2020 (85 FR 27416). No PRA comments were received as a result of the 60-day notice.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

No payment or gift to respondents has been, or will be, made in connection to this information collection.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

Outage reports filed with the Commission pursuant to part 4 are presumed confidential.<sup>35</sup> The information in those filings may be shared with the Department of Homeland Security only under

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<sup>33</sup> See *Submarine Cable Outage Notice*, 30 FCC Rcd at 10509-10510, para. 48. See also 47 U.S.C. § 35. For example, the Commission has used its authority under the Cable Landing License Act to adopt international circuit data reporting requirements for submarine cable landing licensees. *Part 43 Second Report and Order*, 28 FCC Rcd at 606, para. 104.

<sup>34</sup> *Submarine Cable Outage Notice*, 30 FCC Rcd at 10492-10493, paras. 1-2.

<sup>35</sup> See 47 C.F.R. § 4.2.

appropriate confidential disclosure protections. Other persons seeking disclosure must follow the procedures delineated in 47 C.F.R. §§ 0.457 and 0.459 of the Commission's rules for requests for and disclosure of information. The information collection discussed here does not affect the Commission's presumption of confidentiality for the other filings submitted in NORS.

**11. Provide additional justification for any questions of a sensitive nature.**

This collection of information does not address any matters of a sensitive nature.

**12. Provide estimates of the hour burden of the collection of information. The statement should: indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance.**

**Number of Respondents:**

The Commission estimates that there will be 74 respondents. There are currently 74 licensed submarine cable systems.<sup>36</sup> The Commission determines that since multiple licensees often operate on a single submarine cable system, and licensees sharing cables are encouraged to designate a Responsible Licensee for the purpose of filing outage reports with the Commission,<sup>37</sup> the number of respondents will also be 74.

**Frequency of Response:**

The Commission estimates that there will be 336 responses. For purposes of calculating this estimate, the Commission treats the set of reports for each submarine cable outage as a single response. Each response contains three elements, a Notification, an Interim Report, and a Final Report.

**Annual Hour Burden:**

NORS submarine cable reports include three components: 1) a Notification that an outage has occurred; 2) an Interim Report containing more detailed information on the outage; and 3) a Final Report containing detailed information on the outage including how it was resolved. The Commission estimates that respondents will take up to 2 hours to complete and file each component, for a total of 6 hours to complete and file all three components for each reportable outage.<sup>38</sup>

To estimate that total annual burden, we calculate the number of responses and multiply this by the 6 hours to complete each response.

**336 total responses x 6 hours per response = 2,016 total annual hours per year.**

**Method of Calculating Burden:**

We explain the methods used to calculate the burden above.

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<sup>36</sup> See FCC, Submarine Cable Landing Licenses, <https://transition.fcc.gov/ib/pd/pf/sccl.html> (last visited November 24, 2020).

<sup>37</sup> Improving Reporting for Submarine Cables and Enhanced Submarine Cable Outage Data, GN Docket No. 15-206, Report and Order, FCC 16-81, para. 38 (rel. July 12, 2016) (*Report and Order*).

<sup>38</sup> There may be a short period of time immediately following the effective date of this new collection where responses may have to be submitted on a specially designed Excel spreadsheet that mirrors the NORS form and submitted to the FCC by alternative methods (i.e, email, Fax, courier or U.S. Mail) which might, on occasion, result in a small increase to the filing burden.

**Variance in Burden:**

We do not expect variance in burden amongst entities affected by this information collection.

**Summary of Respondents and Burden:**

**Total Number of Respondents: 74**

**Total Number of Annual Responses: 336**

**Total Annual Burden Hours: 2,016 hours.**

**Total Annual In-House Costs: \$223,776.00.**

**2,016 hours x \$111 per hour for  
a computer and information systems manager = \$223,776.00.**

The Commission estimates that the hourly wage of a full-time employee who will be submitting this information as \$74 per hour in direct salary and \$37 per hour for benefits and overhead.<sup>39</sup>

**13. Provide estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in items 12 and 14).**

The costs for collecting and filing the information collection are reflected in the responses to questions 12 and 14. The Commission believes that submarine cable licensees have existing network monitoring capabilities that ensure its situational awareness of outages. Submarine cable licenses may use this information provided by these monitoring capabilities to complete the responses required in this new collection. Therefore, in addition to the costs already accounted for in the responses to questions 12 and 14, the Commission does not anticipate that submarine cable licensees will have start-up costs nor record keeper burdens, as a result of this information collection.

**14. Provide estimates of annualized costs to the Federal government. Also provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expenses that would not have been incurred without this collection of information.**

We estimate that the total cost to the Federal government will be \$22,939.20, based on the salaries of two engineers (GS-14 step 5), an attorney (GS-15 step 5), and an IT Developer (GS-15 step 5):

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<sup>39</sup> See Bureau of Labor Statistics, "Occupational Employment and Wages, May 2018, 11-3021 Computer and Information Systems Managers," (May 29, 2019) <https://www.bls.gov/oes/current/oes113021.htm>.

<sup>40</sup> Hourly rates are based on the OPM 2020 Washington-Baltimore-Arlington, DC-MD-VA-WV-PA Locality Pay Area. Office of Personnel and Management, 2020 General Schedule (GS) Locality Pay Table, Salary Table 2020-DCB, [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DCB\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DCB_h.pdf) (last accessed Jul. 14, 2020).



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Each will spend approximately 80 hours of their work time each year on the information collected as follows:

(Two) Engineers	GS-14 step 5 at \$65.88/hr wage	\$65.88 x 80 x 2	\$10,541
(One) Attorney	GS-15 step 5 at \$77.49 /hr wage	\$77.49 x 80 x 1	\$6,199
(One) IT Developer	GS-15 step 5 at \$77.49 /hr wage	\$77.49 x 80 x 1	\$6,199
<b>Total \$22,939</b>			

**15. Explain the reasons for any program changes or adjustments for this information collection.**

This is a new information collection resulting in program change/increases to the total respondents of +74, total annual responses of +336 and total burden hours of + 2,016 due to the adoption of FCC 16-81 and FCC 19-138.

No adjustments are being reported for this information collection.

**16. For collections of information whose results will be published, outline plans for tabulation and publication.**

The Commission does not plan to publish this information.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

The Commission does not intend to seek approval to not display the expiration date of this information collection.

**18. Explain any exceptions to the Certification Statement.**

When the 60/30-day notices were published in the Federal Register on May 8, 2020 (85 FR 27416) and December 29, 2020 (85 FR 85633) respectively, the Commission inadvertently stated that the total respondents as 75; however, it should have been stated as 74. The correct total respondents is 74 and is included in this submission to OMB.

There are no other exceptions to the Certification Statement.

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

This information collection does not employ any statistical methods.