

FCC Application for Radio Service Authorization
Wireless Telecommunications Bureau; Public
APRIL 2021
Safety and Homeland Security Bureau, FCC Form 601-2.0

3060-XXXX

SUPPORTING STATEMENT

A. Justification:

1. The Commission is submitting a request to the Office of Budget and Management (OMB) for approval of the FCC Form 601-2.0, a new data collection that will gradually replace the FCC Form 601 ((3060-0798). The Commission is implementing a new electronic licensing system called Universal Licensing System 2.0 (ULS 2.0) to replace the current Universal Licensing System (ULS). Services will gradually be moved to the new ULS 2.0, beginning with market-based Special Temporary Authority (STA) applications. The burden hours and costs associated with market-based STAs will now be a part of the ULS 2.0 system and FCC Form 601-2.0.

The FCC Form 601-2.0 will be a consolidated electronic data collection for market-based and site-based licensing for wireless telecommunications services, including public safety, which will be filed through the Commission's modernized Universal Licensing System 2.0 (ULS-2.0). This form will gradually replace the FCC Form 601 (3060-0798) as services are moved from legacy ULS to ULS 2.0. The substance of and wording the FCC Form 601 data collection will remain the same in the new system. The data collected in ULS 2.0 consists of administrative, technical, and other information needed for licensing of wireless radio services. Once fully implemented, this system will be used to submit all Wireless Services applications along with any supporting documentation. The application purposes include: applying for a new license (including STA's) modifying or renewing an existing license, cancelling a license, submitting required notifications, requesting an extension of time to satisfy construction requirements, and requesting an administrative update to an existing license (such as mailing address change) Applicants can also amend or withdraw applications while they are pending in ULS.2.0

The data collected in ULS 2.0 includes the FCC Registration Number (FRN), which serves as a "common link" for all filings an entity has with the FCC. The Debt Collection Improvement Act of 1996 requires entities filing with the Commission to use an FRN.

ULS 2.0 data records may include information about individuals or households, *e.g.*, personally identifiable information or PII, and the use(s) and disclosure of this information are governed by the requirements of a system of records notice or "SORN", FCC/WTB-1, "Wireless Services Licensing Records." There are no additional impacts under the Privacy Act.

The Commission now seeks approval for a new collection of information under OMB Control Number 3060-XXXX to permit the collection of market-based STA information. We estimate that 24 respondents, will file 176 responses per year (7 per licensee), with an estimated time burden of 88 hours (30 minutes per filing).

Statutory authority for this information collection is contained in 47 U.S.C. §§ 151, 152, 154, 154(i), 155(c), 157, 161, 201, 202, 208, 214, 301, 302a, 303, 307, 308, 309, 310, 311, 314, 316, 319, 324, 331, 332, 333, 336, 534, 535, and 554.

2. The Commission, in accordance with its statutory responsibilities under the Communications Act of 1934, as amended, uses the information provided by applicants in ULS 2.0 on FCC Form 601-2.0 to determine if the applicant is legally, technically, and financially qualified to provide licensed services and make proper use of the frequency spectrum.
3. Electronic filing is mandatory for all respondents as specified in 47 CFR §1.913. We anticipate that all filings will be submitted electronically.
4. This agency does not impose a similar information collection on the respondents. There are no similar data available.
5. In conformance with the Paperwork Reduction Act of 1995, the Commission is making an effort to minimize the burden on all respondents, regardless of size. The Commission has limited the information requirements to those absolutely necessary for evaluating and processing each application and to deter possible abuses of the processes.
6. Generally, the frequency of filing FCC Form 601-2.0 will be determined by the applicant and/or licensee and the frequency of response can be on occasion or periodic.
7. This collection of information is consistent with the guidelines in 5 CFR § 1320.
8. The Commission published a 60-day notice for the FCC Form 601-2.0 requirements that appeared in the Federal Register on February 23, 2021, 86 FR 10966, seeking comment from the public on the information collection requirements contained in this collection. No comments were received on the Paperwork Reduction Act (PRA) as a result of the notice.
9. Respondents will not receive any payments.
10. Respondents may request that materials or information submitted to the Commission be withheld from public inspection under 47 CFR §0.459 of the FCC rules.

Information on the FCC Form 601-2.0 is maintained in the Commission's system of records notice or 'SORN', FCC/WTB-1, "Wireless Services Licensing Records." These licensee records are publicly available and routinely used in accordance with subsection b. of the Privacy Act, 5 U.S.C. 552a(b), as amended.

The Commission has in place the following policy and procedures for records retention and disposal: Records will be actively maintained as long as the authorization is valid. Paper records will be archived

after being keyed or scanned into the database and destroyed when 12 years old. Electronic records will be backed up and deleted twelve years after the authorization is no longer valid.

11. This collection does not address private matters of a sensitive nature, and the PII is covered by the system of records notice or 'SORN', FCC/WTB-1, "Wireless Services Licensing Records."
12. The Commission estimates that 176 FCC Form 601-2.0 applications will be filed annually for a market-based STAs and that the *average* burden per response is 30 minutes (.5 hours).

The Commission estimates that 50% of the responses (88) will be completed by the applicant themselves with no additional assistance and the remaining 50% (88) will be contracted out to a law firm or application preparation service for completion of the form.

The Commission estimates the average burden per response to be approximately 30 minutes (0.5 hours) for those respondents completing the forms themselves. For those respondents hiring a consultant, we estimate a burden of approximately 30 minutes (0.5 hours) to coordinate with the consultant.

The estimated annual burden is:

88 responses x .50 hours = 44 hours

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Total Annual burden: 44 hours + 44 hours = 88 hours.

"In-House Cost":

Assuming that 50% of the responses are completed by personnel comparable in pay to a mid-to-senior level federal employee (GS-13, Step 5) to prepare the collection, we estimate the cost to be about \$56.31 per hour @ .5 hours per filing. The cost per filing: $\$56.31 \times .5 = \28.16 .

88 applications x \$28.16 per filing = \$2,478.08

The Commission estimates that 50% will be contracted out to a law firm or application preparation service for completion of the form and will spend approximately 30 minutes (0.5 hours) coordinating this information. Assuming they use personnel comparable in pay to a mid-to-senior level federal employee (GS-13, Step 5) to coordinate this submission we estimate the cost to be approximately \$56.31 per hour @ 0.5 hours per filing. The cost per filing = \$28.16.

88 applications x \$28.16 per filing = \$2,478.08

TOTAL IN-HOUSE COST:
\$2,478.08 + \$2,478.08 = \$4,956.16

Total Number of Respondents: 24.
Total Number of Annual Responses: 176.
Total Annual Burden Hours: 88 hours.
Total In-House Cost: \$4,956.16.

13. Cost to the Respondent:

- a. Total annualized capital/start-up costs: \$0.00
- b. Total annualized cost requested to prepare FCC 601-2.0 are:

FCC application filing fees:

We estimate that approximately 10% of 176 various applications filed require an application fee of \$140-\$395 each. (The balance of the respondents would be exempt from filing fees due to type of entity, i.e. public safety, governmental entities, non-commercial educational broadcasters, or because the radio service or purpose for which they are filing does not require a fee.)

For purposes of this submission, we estimate the total application fees using an average of \$275 per filing:

176 total responses x 10% (feeable) = 18 feeable filings

18 filings x \$275 average fee = \$4,950

Contracting costs:

We estimate that 50% of the respondents will contract out the completion of the form and would use an attorney or application preparation service at a cost of \$300/hour to prepare the FCC 601-2.0 and take the consultant .5 hours to complete each form.

88 applications x .5 hours x \$300/hour = \$13,200

TOTAL ESTIMATED RESPONDENT COST:

4,950 + 13,200 = \$18,150

14. Cost to the Federal Government:

FCC Form 601-2.0 Applications estimated to be filed: 176

88 applications x 30 mins. (0.50 hrs)
@ \$39.51 per hour (GS-11 Step 5) for an Industry Analyst (Processing) = \$1,738.44

88 applications x 10 mins. (0.166 hrs)
@ \$39.51 per hour (GS-11 Step 5) for an Industry Analyst (Processing) = \$577.16

Total = \$2,315.60

15. The Commission is requesting OMB approval for this new information collection which will add program changes/increases to OMB's inventory as follows: 24 to the number of respondents, 176 to the annual number of responses, 88 to the annual burden hours and \$18,150 to the annual cost.

16. The data will not be published for statistical use.

17. The Commission is requesting a waiver from displaying the OMB expiration date for the FCC Form 601-2.0, in ULS 2.0. Granting this waiver will prevent the Commission from having to update the system and thus reduce cost. All OMB-approved information collections are published in 47 CFR 0.408. This section includes the OMB control number, title of the collection and the OMB expiration date.

18. There are no exceptions to the "Certification Statement."

B. Collections of Information Employing Statistical Methods:

This information collection does not use any statistical methods.