

**NON-SUBSTANTIVE CHANGE REQUEST JUSTIFICATION**  
**OMB Control No. 3060-0798, OMB Control No. 3060-0800, and OMB Control No. 3060-1058**  
FCC Forms 601, 603, and 608

The Wireless Telecommunication Bureau (WTB) is submitting this non-substantive change request to the Office of Management and Budget (OMB) for approval of minor non-substantive changes made to the submission process for a limited number of FCC Form 601, 603 and 608 applications. The FCC Form 601 is a consolidated, multi-part application form that is used for market-based and site-based licensing for wireless telecommunications services, including public safety, which are filed through the Commission's Universal Licensing System (ULS). FCC Form 603 is used to apply for an assignment of authorization or transfer of control, as well as to notify the Commission of consummation of an assignment or transfer of wireless licenses to which the Commission has previously consented or for which notification but not prior consent is required. Finally, FCC Form 608 is used to provide notification or request approval for any spectrum leasing arrangement entered into between an existing licensee in certain Wireless and/or Public Safety Radio Services and a spectrum lessee. Form 608 is also used to notify or request approval for any spectrum subleasing arrangement.

WTB's ULS currently provides licensees and applicants electronic filing capability for the vast majority of applications requiring these forms; however, there are a few limited categories of submissions that ULS cannot accept electronically. These include: 1. Special Temporary Authority (STA) applications in certain market-based services; 2. Sublease applications; and 3. Multi-step transactions (such as simultaneous assignment applications or lease back applications). These categories of applications currently require licensees and applicants to file their FCC Form 601, 603, or 608 forms manually on paper with a request for waiver of rule sections 1.913 and/or 1.931 that require electronic filing.

In an effort to provide a complete electronic filing solution to licensees and applicants, particularly considering the current pandemic due to COVID-19 and the FCC mail slot closure in Gettysburg, WTB is requesting approval to require applications to file these applications electronically via the FCC's Electronic Comment Filing System (ECFS). ECFS contains non docketed in-boxes which are utilized for applicants, licensees and interested parties to file documents, as an electronic alternative to manual filings. Wireless applicants will use ECFS for the limited categories of applications referenced above, and ULS will continue to be used for electronic filing of all other wireless radio services applications.

The respondents, burden hours and costs of this Information Collection are not impacted by the minor non-substantive changes to FCC Forms 601, 603, and 608. The minor non-substantive change is highlighted below:

Change #1 to Form 601, 603, and 608 – Filing is accomplished through the Commission's Universal Licensing System (ULS) or any other electronic filing interface the Commission develops. The substance, respondents, burden hours, and costs of Information Collection OMB Control No. 3060-0798, OMB Control No. 3060-0800, and OMB Control No. 3060-1058 are not impacted.

Also, the Supporting Statements for OMB Control No. 3060-0798, OMB Control No. 3060-0800, and OMB Control No. 3060-1058 have been updated accordingly.