

The Commission is requesting Office of Management and Budget (OMB) approval for a renewal of this information collection. **There are changes in the Commission's burden estimates.**

## 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. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

- (a) The Communications Assistance for Law Enforcement or CALEA was enacted in October 1994 to respond to rapid advances in telecommunications technology and to eliminate obstacles faced by law enforcement personnel in conducting electronic surveillance.
- (b) In brief, CALEA was intended to preserve the ability of law enforcement agencies to conduct electronic surveillance by requiring that telecommunications carriers and manufacturers of telecommunications equipment modify and design their equipment, facilities, and services to ensure that they have the necessary surveillance capabilities.
- (c) The information collection requirements were established to implement sections 105, 107(c), 109(b) and 301 of the Communications Assistance for Law Enforcement Act (CALEA), 47 U.S.C. §§ 1004, 1006(c), 1008(b), and 229; Pub. L. No. 103-414, 108 Stat. 4279 (1994).
- (d) The information collection requirements for the System Security and Integrity plan filings are codified in 47 C.F.R. §§ 1.20003, 1.20004, and 1.20005. The CALEA sections 107(c) and 109(b) information collection requirements are described in the CALEA and Broadband Access and Services, ET Docket No. 04-295, *Second Report and Order and Memorandum Opinion and Order*, 21 FCC Rcd. 5360, 5425, and 5431 (2006), appendices (E) for section 109 petitions and (F) for section 107 petitions.
- (e) Currently, the Commission is developing the CALEA Electronic Filing System (CEFS) that is expected to be fully operational by the end of 2022.<sup>1</sup> The Commission's rules require telecommunications carriers, facilities-based broadband Internet access providers, and providers of interconnected Voice over Internet Protocol (VoIP) service to file System Security and Integrity plan filings (SSI Plans) whenever there is a change in relevant information.<sup>2</sup> CALEA also requires the Commission to review filed SSI Plans to confirm that they comply with Commission requirements.<sup>3</sup> This information includes a description of how the service provider complies with CALEA, and carrier contact information. CALEA requires a telecommunications carrier to file a corrected SSI Plan if the Commission deems a filing deficient.<sup>4</sup> Currently, these submissions are filed in paper form delivered by mail or courier. Such information is not disclosed to the public. On May 6, 2022, the non-substantive information collection changes for

---

<sup>1</sup> Public Safety Homeland Security Bureau Provides Information on Implementation of Voluntary Electronic Filing of CALEA System Security and Integrity Plans and Seeks Comment on Mandatory Electronic Filing, Public Notice, DA 22-592 (PSHSB rel. June 1, 2022); *see also* Public Safety And Homeland Security Bureau Announces Comment And Reply Comment Dates For The Implementation Of Electronic Filing Of CALEA System Security And Integrity Plans, Public Notice, DA 22-681 (PSHSB rel. June 28, 2022).

<sup>2</sup> 47 U.S.C. § 229(b)(3); 47 CFR § 1.20005(a).

<sup>3</sup> 47 U.S.C. § 229(c); 47 CFR § 1.20005(b).

<sup>4</sup> 47 CFR § 1.20005(b)(1).

the voluntary CALEA Electronic Filing System were approved by the Office of Management and Budget, control number 3060-0809.<sup>5</sup> The CEFS will offer electronic filing to the public and be consistent with OMB directives to reduce the burden on the public.

***Current Information Collection Requirements:***

- (a) Telecommunications carriers, including facilities-based broadband Internet access providers and providers of interconnected VoIP, must establish and submit to the Commission their policies and procedures for ensuring that any interception of communications or access to call-identifying information effected within its switching premises can be activated only in accordance with lawful authorization and with the affirmative intervention of an individual officer or employee of the carrier, acting in accordance with regulations prescribed by the Commission.
- (b) Each telecommunications carrier must include in this submission:
  - (1) information about the senior officer or employee responsible for the carrier's interception operations,
  - (2) information necessary for law enforcement agencies to contact the carrier regarding interceptions, and
  - (3) other information about the carrier's security and integrity program.
- (c) The Commission must review each carrier's policies and procedures to determine whether these are in compliance with the rules established under CALEA.
- (d) If the Commission determines that any carrier's policies and procedures are non-compliant, the carrier must modify its policies and procedures accordingly.
- (e) 47 CFR § 1.20004 of the Commission's rules require telecommunications carriers to maintain records of interceptions. Pursuant to 5 C.F.R. § 1320.3(b)(2), this recordkeeping burden was adjusted to zero hours because the nature and extent of the requirement is usual and customary. Telecommunications carriers must keep such records to demonstrate that they are in compliance with Federal and State wiretapping laws and regulations that have existed for the past 40 years. The certification requirement can be met by having the designated company liaison:
  - (1) sign the certification statement,
  - (2) verify that the records are complete and accurate, and
  - (3) attach the appropriate legal authorization and any extensions.
- (f) The two-tiered recordkeeping requirement mandates that each telecommunications carrier:
  - (1) maintain its certification, as is the case with authorized interceptions, for a "reasonable period of time;" and

---

<sup>5</sup> See OMB Approvals for Non-Substantive Changes to Currently Approved Information Collections (OMB Control Nos. 3060-0809, 3060-0917, 3060-0918, 3060-0862), May 6, 2022.

(2) include in its policies and procedures, submitted to the Commission for review, a detailed description of how long it will maintain its record of interceptions.

(g) CALEA section 107(c) permits a carrier to apply to the Commission for an extension of the Commission’s deadline to come into compliance with CALEA section 103 capability requirements, limited to no more than two years from the date that the extension is granted. For instructions regarding the proper filing of CALEA section 107 petitions, see CALEA and Broadband Access and Services, , ET Docket No. 04-295, *Second Report and Order and Memorandum Opinion and Order*, 21 FCC Rcd. 5360, 5431 (2006), appendix (F). This section applies to all carriers subject to CALEA and any petitions filed under it are voluntary.

(h) CALEA section 109(b) permits a carrier to file a petition with the Commission and an application with the Department of Justice (DOJ) to request that DOJ pay the costs of the carrier’s CALEA compliance (cost-shifting relief) with respect to any equipment, facility, or service installed or deployed after January 1, 1995. For instructions regarding the proper filing of CALEA section 109(b) petitions, see CALEA and Broadband Access and Services, *Second Report and Order and Memorandum Opinion and Order*, ET Docket No. 04-295, 21 FCC Rcd. 5360, 5425 (2006), appendix (E). This section applies to all carriers subject to CALEA and any petitions filed under it are voluntary.

The Commission has authority for this information collection pursuant to sections 105, 107(c), 109(b) and 301 of the Communications Assistance for Law Enforcement Act (CALEA), 47 U.S.C. §§ 1004, 1006(c), 1008(b), and 229; Public Law No. 103-414, 108 Stat. 4279 (1994).

This information collection does not affect individuals or household; 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.**

(a) The Commission uses all of the information submitted, *e.g.*, information about the senior officer or employee responsible for the carrier’s interception operations, information necessary for law enforcement agencies to contact the carrier regarding interceptions, and other information about the carrier’s security and integrity program, to determine whether or not the carrier is in conformance with CALEA’s requirements and the Commission’s rules.

(b) In addition, the Commission reviews sections 107(c) and section 109(b) filings to determine, respectively:

(1) whether a carrier should be granted additional time to comply with CALEA, consistent with the statutory requirements, or

(2) whether a carrier’s network should be deemed to be in compliance if the Attorney General does not pay the carrier to upgrade its network to meet CALEA’s obligations.

(c) The Commission shares with law enforcement officials the system security information that carriers file, *e.g.*, the contact information that law enforcement officials need to serve an intercept order or warrant on a carrier.

(d) Finally, law enforcement officials rely on the system security records maintained by telecommunications carriers to determine the accountability and accuracy of telecommunications carriers' compliance with lawful electronic surveillance orders.

**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.**

At present, applicants may only file their submissions on paper. However, updates to FCC recordkeeping technology have made it possible to file non-public documents electronically. As a result, staff re-examined the public's need for electronic filing of CALEA non-public documents and determined that automating the CALEA filing process with electronic filing capability would make it more efficient for both filers and Commission staff. **Currently, the Commission is developing a new electronic filing system that is expected to be fully operational by the end of 2022.**<sup>6</sup>

The CEFS will streamline the CALEA SSI Plan review process using a web-based checklist system, and enhance recordkeeping and retrieval capabilities. The Commission anticipates the estimated time burden will be reduced with electronic filing of SSI Plans because the new system will reduce the preparation time and paperwork burden on regulated entities. The CEFS will present a public-facing web form containing data entry fields for collection of key portions of the required data. This web form will help ensure filers supply necessary information in their SSI Plans. The CEFS will also reduce the time burden imposed on the Commission and the responders when deficient paper SSI plans must be returned to responders for correction. The new CEFS database will ask users to upload their entire integrated SSI Plan document in Word or PDF format to ensure the Commission's records remain the same as as they were prior to CEFS. As noted previously, the CEFS will offer electronic filing to the public, and be consistent with OMB directives to reduce the burden on the public. Based on the data collected about SSI Plan submissions from our records including the new filing system that is expected to be fully operational at the end of the 2022, we expect to adjust the estimated time burden downward with our next renewal of this information collection.

**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.**

None of the information collected will be duplicative of other information collected.

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

(a) In conformance with the Paperwork Reduction Act of 1995, the Commission is making an effort to minimize burdens on all respondents, regardless of size.

---

<sup>6</sup> Public Safety Homeland Security Bureau Provides Information on Implementation of Voluntary Electronic Filing of CALEA System Security and Integrity Plans and Seeks Comment on Mandatory Electronic Filing, Public Notice, DA 22-592 (PSHSB rel. June 1, 2022); *see also* Public Safety And Homeland Security Bureau Announces Comment And Reply Comment Dates For The Implementation Of Electronic Filing Of CALEA System Security And Integrity Plans, Public Notice, DA 22-681 (PSHSB rel. June 28, 2022).

(b) Regarding the system security requirements of CALEA, the *Notice of Proposed Rulemaking (NPRM)* in CC Docket No. 97-213 sought comment on whether to adopt different, less burdensome requirements for small businesses filing compliance statements:

(1) the Commission received little comment regarding this proposal, and

(2) in adopting final rules, the Commission found that CALEA mandates—and the critical nature of our goals in this proceeding necessitate—that all carriers comply with our rules and regulations regarding implementation of CALEA.

(c) The January 1999 *R&O, In the Matter of the Communications Assistance Act for Law Enforcement, Report and Order*, CC Docket No. 97-213, FCC 99-11, 14 FCC Rcd. 4151 (1999) and subsequent Orders in CC Docket No. 97-213, however, substantially reduced the burden proposed in the *NPRM* for all telecommunications carriers, regardless of size.

(1) For example, while the *NPRM* proposed the inclusion of information on designated and non-designated employees who participate in surveillance work, the *R&O* substantially reduced this burden by requiring that only the one senior employee responsible for CALEA be identified in the required filing.

(2) The *NPRM* proposed a dual certification/affidavit regarding authorized and unauthorized interceptions; the January 1999 *R&O* narrowed this requirement to a single document, ideally consisting of a copy of the legal authorization, accompanied by a signed certification that the record is complete and accurate.

(d) Most importantly, the *Recon Order, In the Matter of the Communications Assistance for Law Enforcement Act, Order on Reconsideration*, CC Docket No. 97-213, FCC 99-184, 15 FCC Rcd. 20735 (1999), reduced the recordkeeping burden by not designating a specific period of time for records of authorized and non-authorized interceptions to be maintained. Instead, the *Recon Order* asked that the certification be maintained for a “reasonable period of time” to be determined by the carrier.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

(a) The system security filings and record maintenance is required by CALEA.

(b) The Commission anticipates collecting this information once from telecommunications carriers detailing their policies and procedures regarding compliance with CALEA and regarding authorized and unauthorized interceptions and call-identification information.

(c) When these policies and procedures are changed, however, the affected carrier will have to resubmit this information for Commission review.

(d) The requirement that carriers maintain a record of each electronic surveillance for a “reasonable period of time” will be a one-time activity for each surveillance.

(e) Without this information and record maintenance, the Commission and law enforcement agencies will not be able to monitor compliance with the statutory requirements of CALEA.

- (f) Sections 107(c) and 109(b) petitions are voluntary and are the bases, respectively, of granting carriers additional time to comply with CALEA or recovery of network upgrade costs. If these filings are not made, relief cannot be granted.
- (g) The letters demonstrating that currently filed section 107(c) petitions qualify for relief and the monitoring reports are one-time filings that will ensure carriers compliance with CALEA.

**7. Explain any special circumstances that cause an information collection to be conducted in a manner: requiring respondents to report information to the agency more often than quarterly; requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; requiring respondents to submit more than an original and two copies of any document; requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

Current data collection is consistent with 5 CFR §§ 1320.6.

**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.**

The 60-day notice was published in the *Federal Register* on August 18, 2022 (87 FR 50857). No comments were received as a result of this notice.

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

The respondents will not receive any payments.

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

Pursuant to section 0.457(g) of the Commission's rules, the information in the CALEA system security filings and petitions will not be made routinely available for public inspection.

Section 107(c) and section 109(b) filings are entitled to confidential treatment under the Freedom of Information Act. The Commission has directed respondents to file their petitions under a general claim of confidential or proprietary protection, subject only to scrutiny by the Commission and the Attorney General who is consulted in section 107(c) adjudications and is a party to all section 109(b) adjudications.

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

No questions of a sensitive nature are asked.

**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.**

**HOURLY BURDEN ON RESPONDENTS:**

**A. Submitting System Security Filings to the Commission**

**Telecommunications Carriers CALEA Compliance:**

As result of Commission action in CC Docket No. 97-213, we estimate that a total of 3,000 telecommunications carriers were obliged to establish and submit to the Commission their policies and procedures for complying with CALEA requirements.

This submission must include information regarding the appointment of a senior authorized officer or employee responsible for CALEA activities, and a 24-hour point of contact for law enforcement officials.

Initial filings were made in 2000, and are not a recurring burden. However, any time the policies and procedures change or a liaison either steps down or is appointed, a revised submission must be sent to the Commission.

Revisions to SSI plans:

This resubmission should take about 7.5 hours and the Commission expects to get as many as 150 revisions a year to be completed by staff attorneys, for a total of 1,125 annual burden hours.

The Commission expects that respondents will submit approximately 150 revisions of the initial (CC Docket No. 97-213) system security submissions per year. The Commission also expects each resubmission should take about 7.5 hours to be prepared by “in-house” staff attorneys at **\$ 80.63** per hour, for a total of about 1,125 burden hours.

**Annual burden hours per entity: 7.5 hours x 150 telecommunications carriers.**

**Total annual burden hours: 1,125 hours.**

**Total in-house cost: 1,125 hours x \$ 80.63 = \$ 90,708.75.**

New Submission of SSI plans:

The Commission expects that respondents will submit approximately 100 new system security submissions per year with each taking 7.5 hours to prepare by “in-house” staff attorneys at \$ 80.63 per hour, for a total of 750 hours.

**Annual burden hours per entity: 7.5 hours x 100 providers.**

**Total annual burden hours: 750 hours.**

**Total in-house cost: 750 hours x \$ 80.63 = \$ 60,472.50.**

The *Second R&O* required that facilities-based broadband Internet access and interconnected VoIP providers undertake system security filings within 90 days of the effective date of 47 C.F.R. §§ 1.20004 and 1.20005, which was March 12, 2007. In addition, new entities entering the marketplace must file before starting operations.

**B. Recordkeeping for Interceptions of Communications or Access to Call Identifying Information (as required by 47 CFR 1.20004)**

Pursuant to 5 C.F.R. § 1320.3(b)(2), this recordkeeping burden was adjusted to zero hours because the nature and extent of the requirement is usual and customary. Telecommunications carriers must keep such records to demonstrate that they are in compliance with Federal and State wiretapping laws and regulations that have existed for the past 40 years.

**C. Section 107(c) Petitions.**New Petitions

The Commission expects that 5 carriers will submit new section 107(c) petitions, and that these carriers will utilize “in-house” staff attorneys at \$ 80.63 per hour and it will take about 32 hours to prepare the petition. The Commission estimates the total annual hourly burden for this at **160 hours. The number of petitions was adjusted downward from 25 to 5 during coordination with the Office of Managing Director (OMD) regarding OMD’s recent update to application fees.**

Annual burden hours per entity: **32 hours x 5 carriers.**

Total annual burden hours: **160 hours.**

Total in-house cost: **160 Hours x \$ 80.63 = \$ 12,900.80.**

**D. Section 109(b) Petitions.**

If a carrier believes that compliance with CALEA is not reasonably achievable with respect to any equipment, facility or service installed or deployed after January 1, 1995, the Commission requires that carrier to file a petition and an application with the Department of Justice (DOJ) to request that DOJ pay the costs of the carrier’s CALEA compliance.

The Commission estimates that a total of 5 facilities-based broadband Internet access providers, interconnected VOIP providers, and wireline and wireless carriers that will file section 109 petitions. We estimate that the time to prepare each filing will be 80 hours at \$ 80.63 per hour. **The number of petitions was adjusted downward from 10 to 5 during coordination with the Office of Managing Director (OMD) regarding OMD’s recent update to application fees.**



**Annual burden hours per entity: 80 hours x 5 carriers.**  
**Total annual burden hours: 400 hours.**  
**Total in-house cost 400 Hours x \$ 80.63 = \$ 32,252.00.**

**E. Monitoring Reports**

The monitoring reports were a one-time collection that has been completed. The current burden is therefore zero.

**Total Annual Burden Hours Summary: 0**

This section shows the burden hours in A-E above for each type of telecommunications carrier. The Table following Question 14 summarizes these burden hours and their associated costs.

**Telecommunications Carriers Subject to CALEA:**

A. Submitting policies and procedures (new and revised) =	1,875 hours
B. Recordkeeping for Interceptions =	0 hours
C. Section 107(c) Petitions =	160 hours
D. Section 109(b) Petitions =	400 hours
E. Monitoring Reports =	0 hours
<b>Total =</b>	<b>2,435 hours</b>

**Total Number of Respondents: 250 (150 updated submissions, 100 new)**

**Total Number of Responses: 260 (250 SSI Plan submissions, plus 10 petitions)**

- (a) The number of responses per respondent will average 1.4 annually.
- (b) However, the number of annual responses per respondent can be up to 3 responses for revision to system security filings.

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

- (a) Total annualized capital costs/startup costs: **\$0.00**
- (b) Total annual costs (O&M): **\$0.00**
- (c) Total annualized cost-requested: **\$0.00**

**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), any other expenses that would not have been incurred without this collection of information.**

**A. Costs for system security policies and procedures:**

GS-15 step 5 attorney to review 150 revised system security submissions annually and 100 new system security submissions from telecommunications carriers annually (total of 250 submissions) at \$ 80.63 an hour; one hour per submission.

**Total Annual In-House Costs to the Federal Government for SSI Plans**

**250 hours x \$ 80.63 = \$ 20,157.50.**

**B. Recordkeeping for Interceptions of Communications or Access to Call Identifying Information (as required by 47 CFR 1.20004):**

The recordkeeping burden is zero hours.

**C. Costs for CALEA Section 107(c) Petitions:**

GS-15 attorney to review 5 new section 107(c) petitions at \$ 80.63 an hour; one hour per submission.

**5 Hours x \$ 80.63 = \$ 403.15**

**D. Costs for CALEA Section 109(b) Petitions:**

GS-15 attorney to review 5 section 109(b) petitions from carriers subject to CALEA at \$ 80.63 an hour; 20 hours per submission.

**100 Hours x \$ 80.63 = \$ 8,063.00.**

**Total Annual In-House Costs to the Federal Government for petitions: \$ 403.15 + \$ 8,063.00 = \$ 8,466.15**

Communications Assistance for Law Enforcement Act (CALEA)

3060-0809  
October 2022

Below is a summary of the annual hour and cost burdens:

Information Collection Requirements	Respondents	Average Hours Per Respondent	Previous Total Hourly Burden on Respondents	Current Total Hourly Burden on Respondents	Difference from Previous Burden	In-House Costs to Respondents	Cost to Federal Government
<b>A. System Security Filings:</b>							
New Submissions	100	7.5	750	750	0	\$ 60,472.50 (750 x \$ 80.63)	\$ 8,063.00 (100 x \$ 80.63)
Revisions	150	7.5	1,125	1,125	0	\$ 90,708.75 (1,125 x \$ 80.63)	\$ 12,094.50 (150 x \$ 80.63)
<b>Total Hourly Burden and Costs</b>			<b>1,875</b>	<b>1,875</b>	<b>0</b>	<b>\$ 151,181.25</b>	<b>\$ 20,157.50</b>
<b>B. Recordkeeping of Interceptions of Communications or Access to Call-Identifying Information</b>							
Certification			0	0	0		
Recordkeeping			0	0	0		
<b>Total Hourly Burden and Costs</b>			<b>0</b>	<b>0</b>	<b>0</b>		
<b>C. Section 107(c) Petitions, Carriers Subject to CALEA as a Result of CC Docket No. 97-213 and ET Docket No. 04-295:</b>							
Existing Petitions	0	0	0	0	0	0	0
New Petitions	5*	32	800 (32 x 25)	160 (32 x 5)	- 640	\$ 12,900.80 (160 x \$ 80.63)	\$ 403.15 (5 x \$ 80.63)
<b>Total Hourly Burden and Costs</b>			<b>800</b>	<b>160*</b>	<b>- 640*</b>	<b>\$ 12,900.80</b>	<b>\$ 403.15</b>
<b>D. Section 109(b) Petitions:</b>							
Carriers Subject to CALEA as a Result of CC Docket No. 97-213 and ET Docket No. 04-295	5*	80	800 (80 x 10)	400 (80 x 5)	- 400	\$ 32,252.00 * (400 x \$ 80.63)	\$ 8,063.00 * (100 x x \$ 80.63)
<b>Total Hourly Burden and Costs</b>			<b>1,600</b>	<b>560*</b>	<b>-1,040 *</b>	<b>\$ 32,252.00 *</b>	<b>\$ 8,466.15 *</b>
<b>E Monitoring Reports, All Facilities-Based Broadband Internet Access and VoIP Providers</b>							
<b>Total Hourly Burden and Costs</b>			<b>0</b>	<b>0</b>	<b>0</b>		
<b>F. CUMULATIVE TOTALS</b>							
Carriers Subject to CALEA as a Result of CC Docket No. 97-213	250*		3,475	\$ 2,435.00 *	-1,040	\$ 196,334.05 *	\$ 28,623.65

**15. Explain the reasons for any program changes or adjustments reported.**

- (a) In the “Difference from Previous Burden” column in the Table above “\*\*” indicates an adjustment to last year’s burden estimates. There was no program change.
- (b) In 2019, the total burden hours were estimated at 3,475 hours. The current estimation is reduced to 2,435 which represents a total decrease of 1,040 hours because we adjusted our 107(c) petition estimate downward from a total of 25 to 5, and the 109(b) petition estimate downward from a total of 10 to 5. This decrease in the burden hours is due to adjustments in the estimated petitions which is based on information from the Office of the Managing Director (OMD) when OMD updated application fees recently.

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

The data will not be published for statistical use.

**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.**

Not applicable. The requirements are in Commission rules and the OMB expiration date will not be displayed. However, the Commission publishes a list of OMB-approved information collections in 47 CFR 0.408 of the Commission’s rules. This section of the Commission’s rules “displays” the OMB control number, title of the information collection, and the OMB expiration date.

**18. Explain any exceptions to the Certification Statement identified in Item 19, “Certification of Paper Work Reduction Act Submissions,”**

There are no exceptions to the Certification Statement.

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

This information collection does not employ any statistical methods.