

**SUPPORTING STATEMENT
U.S. DEPARTMENT OF COMMERCE
NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION
NTIA/FCC WEB-BASED FREQUENCY COORDINATION SYSTEM
OMB CONTROL NO. 0660-0018**

SUPPORTING STATEMENT PART A

Abstract

This request is to extend approval of a currently approved information collection for support of a web-based system that collects specific information from applicants seeking to operate in spectrum that is shared by federal and non-federal users.

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.**

This is a request to extend approval of a currently approved information collection. The National Telecommunications and Information Administration (NTIA) developed an Internet web-based system that collects specific identification information from applicants seeking to operate in the 71–76 GHz, 81–86 GHz, and 92–95 GHz (70-80-90 GHz) radio frequency (RF) bands that are shared on a co-primary basis by federal and non-federal users. Before this system was put in place, non-federal entities were required to submit an application for RF spectrum support to the Federal Communications Commission (FCC), which would then coordinate with NTIA regarding whether the proposed use would cause harmful interference to existing or planned U.S. Government operations in the identified band. Under that system, non-federal users only had access to FCC licensing databases that contained the physical parameters of radio stations held by private sector licensees. Consequently, in shared bands, non-federal applicants would have to propose frequencies without any knowledge of existing federal assignments in those bands. Under that system, the manual RF assignment process used by the FCC and NTIA was very time-consuming and, in extreme cases, took up to a year to complete.

The web-based system provides a means for non-federal applicants to rapidly determine the availability of RF spectrum in a specific location, or the need for detailed frequency coordination with the U.S. Government of a specific newly proposed assignment within the shared portions of the RF spectrum. The website allows the non-federal applicant's proposed radio site information to be analyzed, and a real-time determination to be made as to whether there is a potential for interference to, or from, existing federal government radio operations in the vicinity of the proposed site. The system also helps expedite the coordination process for non-federal applicants while assuring protection of government data relating to national security. The information provided by non-federal

applicants also ensures the protection of the applicant's station from RF interference from future government operations.

Non-federal entities are required to submit information regarding the physical characteristics of the proposed radio station and the proposed location of the operation. This information is necessary to make a determination regarding electromagnetic compatibility among radio stations in the frequency band. The name and address of the proposed licensee of the station is also required. Once the proposed station has been registered in the Government Master File (GMF), it will then be protected from interference as a result of future federal installations.

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.

The information submitted to the website (<http://freqcoord.ntia.doc.gov/terms.aspx>) is used by NTIA to ensure the mutual compatibility of proposed non-federal radio stations with existing federal radio stations and planned future use. The data is used for analysis on a continuous basis by the federal agencies to assure mutual compatibility of future government operations. If information were disseminated by NTIA in connection with operation of this website, such dissemination will comply with NTIA's Information Quality Guidelines.

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.

Collection of all information will be accomplished through electronic submissions.

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 Question 2.

The web-based system is a novel approach to spectrum management, providing a means for non-federal applicants to determine rapidly the availability of RF spectrum in a specific location, or the need for detailed frequency coordination of a specific newly proposed assignment within the shared portions of the RF spectrum. The type of information requested from non-federal applicants is not only unique to this system, but also specific to the applicant, and therefore, unlikely to be available from any other source. Moreover, no other federal agency collects identical information because no other agency provides the same service. Thus, the information collection does not raise duplication concerns.

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

The data requested through the website is the minimum data set required to perform an analysis of the potential interference to and from a proposed radio station.

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.

As stated above, this website was developed to streamline the spectrum management process. The website allows a non-federal applicant's proposed radio site information to be analyzed, and a real-time determination to be made as to whether there is a potential for interference to, or from, existing federal government radio operations in the vicinity of the potential site. The web-based system helps expedite the coordination process for non-federal applicants while assuring protection of sensitive data about government operations. The information provided by non-federal applicants also ensures the protection of the applicant's station from RF interference from future government operations. Without it, NTIA would have to analyze the non-federal applicant's proposed radio site information manually to determine whether a potential existed for interference to, or from, federal government radio operations in the vicinity of the proposed site. Such a manual check is extraordinarily labor-intensive requiring an extremely long response time.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**

No special circumstances require the collection of information to be conducted in a manner inconsistent with OMB guidelines. This information collection is consistent with OMB guidelines.

- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

No special circumstances require the collection of information to be conducted in a manner inconsistent with OMB guidelines. This information collection is consistent with OMB guidelines.

- **requiring respondents to submit more than an original and two copies of any document;**

No special circumstances require the collection of information to be conducted in a manner inconsistent with OMB guidelines. This information collection is consistent with OMB guidelines.

- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**

No special circumstances require the collection of information to be conducted in a manner

inconsistent with OMB guidelines. This information collection is consistent with OMB guidelines.

- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**

No special circumstances require the collection of information to be conducted in a manner inconsistent with OMB guidelines. This information collection is consistent with OMB guidelines.

- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

No special circumstances require the collection of information to be conducted in a manner inconsistent with OMB guidelines. This information collection is consistent with OMB guidelines.

- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**

No special circumstances require the collection of information to be conducted in a manner inconsistent with OMB guidelines. This information collection is consistent with OMB guidelines.

- **requiring respondents to submit proprietary trade secret, 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.**

No special circumstances require the collection of information to be conducted in a manner inconsistent with OMB guidelines. This information collection is consistent with OMB guidelines.

- 8. If applicable, provide a copy and identify the date and page number of publications in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

A Federal Register Notice soliciting public comment was published on June 2, 2023 (Vol. 88, No. 63, page 19618). No comments were received.

The FCC and NTIA had discussions over several years to identify a mechanism that would provide non-federal users with an additional level of information that would expedite the frequency assignment process without compromising information contained within the GMF that is either classified or currently not releasable under the Freedom of Information Act (FOIA). In response, NTIA developed this website to assist non-federal users in their efforts to identify available spectrum for use, and also to help expedite the coordination process for federal agencies. The website became operational in 2005.

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

NTIA will not provide gifts or payments to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a system of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

NTIA will protect confidential and proprietary information in performance and financial reports from public disclosure to the fullest extent authorized by applicable law, including the “Freedom of Information Act,” as amended (5 U.S.C. § 552 et seq.), the “Trade Secrets Act,” as amended (18 U.S.C. § 1905 et seq.), and the “Economic Espionage Act of 1996,” as amended (18 U.S.C. §1831 et seq.).

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

This collection of information does not contain any questions considered of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information.

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. 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. Generally, estimates should not include burden hours for customary and usual business practices.**

- **If this request for approval covers more than one form, provide separate hour burden estimates for each form, and aggregate the hour burdens.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under ‘Annual Cost to Federal Government’.**

NTIA developed burden estimates for the web-based frequency coordination system based upon data collected since operation began in late 2005. Based on the last four years, a conservative estimate for future years is approximately 6,551 coordination approvals. The estimated time per coordination is 0.25 hours, resulting in a total burden of 1,638 hours.

Web-Based Frequency Coordination System (70-80-90 GHz)						
Estimated Annualized Respondent Burden Hours						
Information Collection Instrument and OMB Number	Type of Respondent (e.g., Occupational Title)	# of Respondents (a)	Annual # of Responses/ Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Burden Hours/ Response (d)	Total Annual Burden Hours (e) = (c) x (d)
Frequency Coordination Requests	Electrical and Electronic Engineering Technologists and Technicians	6,551	1	6,551	0.25	1,638
Total				6,551	0.25	1,638

The total estimated costs to respondents are based on the following:

- The total hour burden of the collection of information equaling 1,638 hours.
- To estimate reasonable staff expenses to respond to this information collection, NTIA reviewed the Bureau of Labor Statistics (BLS) Occupational Outlook Handbook and determined that the Electric and Electronic Engineering Technologists and Technicians description closely aligns with the positions of recipient staff responsible for completing this request. BLS lists a median salary of \$63,640 annually, amounting to \$30.60 per

hour. <https://www.bls.gov/ooh/architecture-and-engineering/electrical-and-electronics-engineering-technicians.htm>.

- Rounding up, the total cost based on 0.25 hour burden equals \$50,115.15 for the web-based frequency coordination system.

Estimated Annualized Respondent Cost

Type of Respondent/Occupational Title	Form	Number of Respondents	Number of Responses per Respondent	Annual Burden per Response (Hrs)	Hourly Wage Rate	Total Burden Costs
Electrical and Electronic Engineering Technologists and Technicians	Frequency Coordination Requests	6,551	1	0.25	\$30.60	\$50,115.15
Total						\$50,115.15

13. Provide an 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 already reflected on the burden worksheet).

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should consider costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling, and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process, and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

- **Provide estimates of annualized cost to the Federal government.**

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

14. 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 expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Question 12, 13, and 14 in a single table.

The costs to the federal government for this information collection will include NTIA staffing and other related expenses. The major expenses for the frequency coordination system occurred in 2004 and 2005 when NTIA developed the software and website. There is a recurring cost of approximately \$5,000 per year that NTIA’s Information Technology Division charges to manage the website. The only additional costs are for the staff review of each frequency that achieved successful coordination. Each review is estimated to take no more than five minutes (1/12th of an hour) by an NTIA staff person at the GS-12/1 level, who has an hourly salary of \$45.14 (based on GS-12 staff salary).¹ Overhead is estimated at 20%. The expected number of annual reviews averaged over the last five years is approximately 6,551.

Estimated Cost: 545.92 hours at \$45.14 per hour (based on GS-12 staff salary) plus 20% overhead = **\$28,195.50**.

Annualized Costs to the Federal Government

Staff	Grade/Step	Salary	Fringe (if applicable)	% of Effort	Total Annualized Cost to Gov’t
NTIA Office of Spectrum Management Staff	12	\$45.14 per hour	Overhead estimated at 20%	1/12 hours per response, 6,551 responses	$\$45.14 * 1/12 \text{ hours} * 6,551 \text{ responses} * 1.20 \text{ fringe} = \$29,571.21$
Total Cost to the Government					= \$29,571.21

The estimated annualized cost to the Federal government is based on the amount of time spent on review by staff within NTIA. NTIA estimates that at an average cost of \$45.14 per hour and an estimated level of 5 minutes per respondent, with 6,551 annual responses, plus 20% overhead, the total annual cost would be **\$29,571.21**.

¹ Office of Personnel Management, Office of Personnel Management, 2023 General Schedule (GS) Pay & Leave – Salaries & Wages for Washington-Baltimore-Arlington, https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/23Tables/html/DCB_h.aspx.

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

The annual number of respondents/responses between 2018 and 2022 increased by 3,326 and 832 burden hours due to an adjustment in Agency estimates.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

NTIA will not publish the data collected.

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 agency plans to display the expiration date for OMB approval of the information collection on all instruments.

18. Explain each exception to the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

The agency certifies compliance with 5 CFR 1320.9 and the related provisions of 5 CFR 1320.8(b) (3).

SUPPORTING STATEMENT PART B

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection of information does not employ statistical methods.