

## **SUPPORTING STATEMENT**

### **A. Justification:**

The Federal Communications Commission (Commission) is requesting that the Office of Management and Budget (OMB) to approve a revision to OMB Control No. 3060-1028 – International Signaling Point Code. The Commission is developing revised and new electronic forms for this collection as part of the Commission’s modernization of its online, web-based electronic filing system – the International Communications filing system (ICFS). This Supporting Statement seeks approval for the new and revised applications forms to request an International Signaling Point Code (ISPC) and reflects changes in the costs and burdens associated with these collections. As a result, this information collection reflects an increase in the annual responses from 5 to 20, an increase in the annual burden hours from 2 to 15 and an increase in annual costs from \$0 to \$13,300.

### **1. Explain the circumstances that make the collection of information necessary.**

An ISPC is a unique, seven-digit code used to identify the signaling network of each international carrier. The ISPC has a unique format that is used at the international level for signaling message routing and identification of signaling points in Signaling System 7 networks. ISPC applications are filed through ICFS. After receipt and review of an ISPC application, the Commission assigns an ISPC code(s) to each international carrier applicant free of charge on a first-come, first-served basis. The collection of this information is required to assign a unique identification code to each international carrier and to facilitate communication among international carriers through their use of the ISPC code on the shared signaling network. The Commission informs the International Telecommunication Union (ITU) of its assignment of ISPCs to international carriers on an ongoing basis.

In 1987, the Commission assumed the responsibility as the Administrator for the United States for issuing ISPCs to international carriers based on an exchange of letters between AT&T, the Commission, and the ITU Telecommunications Standardization Bureau (ITU-T). The ITU allocates a specific amount of ISPCs to member countries for assignment to carriers. ITU-T Recommendation Q.708 includes a list of criteria for assignment of signaling point codes.

The ITU, headquartered in Geneva, Switzerland, is United Nations specialized agency for information and communication technologies. The ITU-T, which is one of three sectors of the ITU, has a continuing role in preparing the technical specifications for telecommunications systems, networks and services, including their operation, performance, and maintenance. In addition, the ITU-T oversees the tariff principles and accounting methods used to provide international services.

Pursuant to the ITU guidance contained in ITU-T Recommendation Q.708, the Commission must obtain certain information from an applicant requesting a new ISPC assignment.<sup>1</sup> This information is used by the Commission to assess whether the applicant’s use of the ISPC will be in comply with ITU guidelines. The minimum information required is the name of the applicant and the name of the signaling point (typically the city where the ISPC will be located). ITU-T Recommendation Q.708 states that administrators can request additional information from applicants, which may include applicant contact information; location(s) where the ISPC(s) will be implemented; description of the nature of the use of the ISPC(s) in the network; a statement regarding the signaling point manufacturer/type; and identification of at least one planned Message Transfer Part (MTP) signaling relation. Applicants must

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<sup>1</sup> International Telecommunication Union, ITU-T Recommendation Q.708, SERIES Q: SWITCHING AND SIGNALLING, Specifications of Signalling System No. 7 – Message transfer part (MTP), 03/99, [https://www.itu.int/rec/dologin\\_pub.asp?lang=e&id=T-REC-Q.708-199903-I!!PDF-E&type=items](https://www.itu.int/rec/dologin_pub.asp?lang=e&id=T-REC-Q.708-199903-I!!PDF-E&type=items).

also make several certifications/acknowledgments regarding their obligations and rights associated with an ISPC assignment. Operators that have been assigned an ISPC must also notify the Commission when any parameters of their code assignment(s) have changed (i.e., modifications), such as a change in the location where the ISPC has been implemented. If an assigned ISPC has undergone a transfer of control as a result of a merger, acquisition, divestiture, or formation of a joint venture, the ISPC operator must notify the Commission of the transfer and the identity of the new holder of the ISPC (along with relevant contact information).

**ICFS Modernization of ISPC Electronic Forms.** The Commission seeks OMB approval of revisions to its ISPC application form and the addition of new forms that will be electronically filed through ICFS. The new online forms will ensure the Commission collects the information required by the Commission’s rules and relevant ITU guidelines. The use of such online forms will reduce costs and administrative burdens on applicants, resulting in greater efficiencies, and improve transparency to the public. Once the Commission receives approval for the new forms from OMB, as required by section 1.10006 of the Commission’s rules, we will announce the availability of mandated e-forms and their effective dates.

**2. Indicate how, by whom, and for what purpose the information is to be used.**

The Commission obtains relevant information from signaling point operators through the filing of applications for ISPCs in ICFS. The information collection requirements contained in this collection facilitate the Commission's assignment of unique ISPCs to international carriers for identification purposes. In addition, they enhance the ability of the international carriers to communicate with each other internationally through the shared signaling network. Since ISPCs are a limited resource, the information collection assists the Commission in reclaiming ISPCs that are not being used.

**ICFS Modernization of ISPC Electronic Forms.** As part of the Commission’s modernization of ICFS, we are making substantive changes to the electronic ISPC application forms and once OMB approves the new forms, applicants will be required to file their application in ICFS. The information will be used to ensure compliance with the Commission’s rules. In the Appendix we provide mock-up of the forms and the instructions. Below is a summary of the substantive revisions to the current form and a description of the new forms.

<b>Name of Form</b>	<b>Brief Description</b>	<b>Rule Section</b>
1. SPC-NEW: International Signaling Point Code – New Assignment	Revised form for request for assignment of ISPCs for Signaling System No. 7.	ITU-T Recommendation Q.708
2. SPC-T/C: International Signaling Point Codes – Transfer of Control/Assignment	New form for notification that an ISPC has been transferred to another entity because of a merger, acquisition, divestiture, or formation of a joint venture.	ITU-T Recommendation Q.708
3. SPC-MOD: International Signaling Point Codes – Modification	New form for notification of a modification of an existing ISPC assignment(s), e.g., notification that the location of ISPC implementation has changed.	ITU-T Recommendation Q.708
4. SPC-WAV: International Signaling Point Codes – Waiver	New form to request a stand-alone waiver of ISPC requirements.	ITU-T Recommendation Q.708

5. SPC-AMD: International Signaling Point Codes – Amendment	New form to request to amend a pending ISPC application.	ITU-T Recommendation Q.708
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This information collection does not affect individuals or households; thus, there are no impacts under the Privacy Act.

The statutory authority for this collection is contained in Sections 1, 4(i)-(j), 201-205, 211, 214, 219-220, 303(r), 309 and 403 of the Communications Act of 1934, as amended, 47 U.S.C §§ 151, 154(i)-(j), 201-205, 211, 214, 219-220, 303(r), and 403.

**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.**

Currently 100% of ISPC applications (SPC-NEW) are filed electronically through ICFS. Once OMB approves the revised SPC-NEW form and the new electronic ISPC application forms (SPC-T/C, SPC-AMD, SPC-MOD and SPC-WAV), applicants will be required to e-file all applications associated with an ISPC. Until that time, filers will continue to file their new applications (SPC-NEW) using the current electronic form through ICFS and must submit an amendment or waiver request in ICFS through an attachment. The new ICFS will allow filers to work more efficiently, which will reduce the time and effort spent on the filing of submarine cable applications.

**4. Describe efforts to identify duplication.**

The information collected in these applications is not duplicated elsewhere. Similar information is not available.

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

This collection of information does not significantly impact small businesses or other small entities.

**6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

The Commission would not have unique identification codes, such as ISPCs, to identify each international carrier if these collections of information were not conducted. Furthermore, the lack of ISPCs would hinder the ability of international carriers to identify other carriers and would likely result in delays in communication or miscommunication among international carriers on the shared signaling network.

**7. Describe if there are special circumstances associated with this request.**

There are no special circumstances associated with this collection of information.

**8. Provide a copy of the PRA Federal Register notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the Agency in response to those comments.**

On April 6, 2023, the Commission published a 60-day notice in the Federal Register (88 FR 20519) to request comments from the public. The comment period ended on June 5, 2023. No comments were received from the public in response to the notice.

**9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.**

Respondents will not receive any payments or gifts.

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

Any applicants may request that any information supplied be withheld from public inspection, pursuant to 47 CFR § 0.459 of the FCC’s rules. This request must be justified pursuant to 47 CFR § 0.457.

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

This collection of information does not contain questions 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.**

The chart shows the total number of responses and the combined burden hours for in-house staff and outside counsel to provide responses. We estimate that 50% of the burden hours are incurred in-house and 50% by outside counsel.

Information Collection	Number of Responses	Average Hours Per Response	Total Annual Hour Burden
Applications for assignment of ISPC <sup>2</sup>	6	3	18
Modifications of ISPC <sup>3</sup>	3	0.5	1.5
Notification applications for transfers of ISPCs <sup>4</sup>	2	1.5	3
Amendment of Pending ISPC Application	3	1	3
Waiver of ISPC Assignment Requirements <sup>5</sup>	0 <sup>6</sup>	1.5	0
Notification of Signaling Point Code Implementation (Notification by letter filed in the ISPC file)	6	0.5	3
<b>Totals:</b>	<b>20</b>	<b>0.5-3</b>	<b>28.5</b>

<sup>2</sup> ITU-T Q.708

<sup>3</sup> ITU-T Q.708.

<sup>4</sup> ITU-T Q.708.

<sup>5</sup> 47 CFR § 1.3.

<sup>6</sup> To date the Commission has not received a request to waive the ISPC requirements.

**Cumulative Total Number of Respondents** = 11 respondents  
**Cumulative Total Annual Responses** = 20 responses  
**Cumulative Total Annual Burden Hours:** = 28.5 hours

**Therefore, the respondent’s burden hours are: 15 (rounded)**

**In-House Costs**

We estimate that 50% of the burden hours are incurred by in-house staff. We estimate that in-house staff is paid at an estimated rate of \$40 per hour.

**Total In-House Cost to Respondent – 28.5 hours X 50% X \$40 per hour = \$570**

**13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in Question 12 above).**

Annual Burden Cost:

(a) Capital and Start-up Costs: None.

(b) Operation and Maintenance Costs:

**Outside Legal/Engineering Assistance.** We estimate that the respondents will require outside legal and engineering assistance for 50% of the burden hours. The cost of outside legal and engineering assistance is estimated at \$300 per hour.<sup>7</sup> The figure is based on a small survey of local firms in the Washington D.C. area and is considered a conservative estimate.

28.5 hrs. x 50% x \$300 per hr. = \$4,275 Total Outside Legal/Engineering Costs

**Application Fees.** The Commission adopted a new schedule of application fees in 2020 and updated it in 2022.<sup>8</sup> The current fees are shown in the table below.<sup>9</sup>

ISPC Application Filing Fees	Number of Applicants Per Year	Application Fees	Cost
New ISPC Filing	6	\$875	\$5,250
ISPC Transfer of Control/Assignment	2	\$755	\$1,510
Modification of ISPC	3	\$755	\$2,265
Waiver of ISPC Application Requirements	0	\$375	0
<b>Totals</b>			<b>\$ 9,025</b>

<sup>7</sup> The rules and requirements in this collection will not require respondents to maintain any special equipment.

<sup>8</sup> *Amendment of the Schedule of Application Fees Set Forth in Sections 1.1102 through 1.1109 of the Commission's Rules*, MD Docket No, 20-270, Report and Order, 35 FCC Rcd 15089 (2020), 86 FR 15026; Erratum, October 25, 2021, FCC 21-110. The Commission updates the application fees every even-numbered year, and most recently in 2022. See *Amendment of the Schedule of Application Fees Set Forth in Sections 1.1102 through 1.1109 of the Commission's Rules*, MD Docket No. 20-270, Order, FCC 22-94 (rel. Dec. 16, 2022).

<sup>9</sup> There is no fee for an amendment of an ISPC application.

(c) Total Annual Cost Burden = \$4,275 + \$9,025 = **\$13,300.**

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

We make the following estimates for the total annual cost to the Federal Government to review and process the ISPC applications that applicants file annually, in accordance with OMB guidance.<sup>10</sup> While we are utilizing the best available cost information, there are certain limitations to our data. For example, we only have aggregated total costs for ICFS that are not broken down by incremental costs due to the difficulty in identifying with any more precision what those incremental costs are. We utilized the lowest cost collection and analysis methodology consistent with the ultimate purpose and goals of mandatory electronic filing, which are to simplify and reduce filing burdens for applicants and review burdens for the Federal Government.

As the Commission stated in the *2020 Application Fees Notice* and adopted in the *2020 Application Fees Report and Order*, the review of all ISPC applications includes industry analyst processing and review, staff attorney review, and supervisory attorney review.<sup>11</sup> The Commission’s application fees are based on government costs for processing applications up through first line supervisor review.<sup>12</sup> The Commission’s costs for review of applications up through the point of grant could, and in most instances will, exceed the costs through first line review. For example, these costs might include staff time for follow-up inquiries with applicants for additional information, higher-level supervisory review, and ICFS administrative work related to granting and tracking applications. The estimated Commission costs described below reflect these additional costs for complete processing and grant of ISPC applications. The review and processing of the applications will be performed by one employee at the GS-14/Step 5 grade level (attorney), up to two employees at the GS-15/Step 5 grade level (supervisor attorneys), and one employee at the GS-11/Step 5 grade level (Industry Analyst).

Federal Government Staff	Number of Staff	Salary Per Hour	Hourly Cost	Annual Burden Hours	Annual Costs
GS-15/Step 5 Attorney	2	\$84.55	\$169.10	15	\$2,536.50
GS-14/Step 5 Attorney	1	\$71.88	\$71.88	45	\$3,234.60
GS-11/Step 5 Industry Analyst	1	\$42.68	\$42.68	25	\$1,067.00
	<b>4</b>				<b>\$6,838.10</b>

The combined cost to the Federal Government is \$6,838.10.

<sup>10</sup> 5 CFR 1320.5(d)(iii) (“The agency shall also seek to minimize the cost to itself of collecting, processing, and using the information, but shall not do so by means of shifting disproportionate costs or burdens onto the public.”).

<sup>11</sup> *2020 Application Fees Report and Order; Amendment of the Schedule of Application Fees Set Forth in Sections 1.1102 Through 1.1109 of the Commission’s Rules*, MD Docket No. 20-270, Notice of Proposed Rulemaking, 36 FCC Rcd 1618, paras. 168-171 (2020).

<sup>12</sup> *2020 Application Fees Report and Order*, 35 FCC Rcd. at 15093, para. 12 (“We estimated the direct labor costs to process a particular application by multiplying an estimate of the number of hours needed for each task, up through first-level supervisory tasks required to process the application. . .”).

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

The changes in this revision are associated with revisions to the current form and new forms required for ISPC applicants that increase the burden hour estimates for this collection. There are four newly created ISPC applications (SPC-MOD, SPC-T/C, SPC-WAV, and SPC-AMD), a revised SPC-NEW application, and new application fees for all SPC forms (except that there is no application fee for SPC-AMD). Prior to 2020 there were no application fees for ISPC applications. We also revised our previous assessment that filers of ISPC applications do not rely on outside counsel for assistance. This information collection reflects an increase in annual costs from \$0 to \$13,300 due to the introduction of application fees and increase in burden hours for SPC-NEW, the costs and application fees associated with the SPC-MOD, SPC-T/C, and SPC-WAV applications, and the costs associated with the SPC-AMD application (no application fee). Therefore, the Commission's program changes for the collection are as follows: +6 to the number of respondents, +15 to the annual number of responses, +13 to the annual burden hours and +13,300 to the annual cost.

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

The Commission does not plan to publish the information for statistical use.

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

No waiver is necessary.

**18. Exceptions to "Certification for Paperwork Reduction Submissions."**

There are no exceptions to the Certification Statement.

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

This collection of information does not anticipate the use of statistical methods.

