

SUPPORTING STATEMENT

This revised information collection is being submitted to obtain emergency approval from the Office of Management and Budget (OMB) for modified information collection requirements due to recent Federal Communications Commission (Commission or FCC) orders, as explained below. The Commission seeks emergency processing under the Paperwork Reduction Act (PRA), 5 CFR. § 1320.13. The Commission is requesting approval from OMB for this information collection no later than 32 days after it is received at OMB.

The revised collection will ensure that federal, state, Tribal, and territorial agencies seeking Disaster Information Reporting System (DIRS) information have implemented the necessary security measures to protect the confidentiality of that information. By implementing these measures, agencies will be qualified to receive communications infrastructure status information during disasters like hurricanes and wildfires, which can improve their emergency management and response efforts and ultimately save lives. *See Amendments to Part 4 of the Commission's Rules Concerning Disruptions to Communications*, PS Docket No. 15-80, Second Report and Order, 36 FCC Rcd 6136 (2021) (*Second Report and Order*).

A. Justification:

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

In 2007, the Federal Communications Commission's (FCC's or Commission's) Public Safety and Homeland Security Bureau (PSHSB) updated ECIS, renaming it the Disaster Information Reporting System (DIRS). Using DIRS, participating communications companies provide the Commission with their emergency contact information and can subsequently inform the Commission of damage to their infrastructure and facilities, as well as request resources for restoration from the Commission. DIRS respondents provide this information using web-based electronic forms tailored to their types of networks and facilities. The Commission coordinates with the Department of Homeland Security (DHS)'s Federal Emergency Management Agency (FEMA) to identify in which areas and situations to activate DIRS. FEMA and the Commission can activate DIRS with or without the DHS's National Coordinating Center for Communications (NCC) activating Emergency Support Function-2 of the National Response Plan (ESF-2). When the NCC activates ESF-2, DIRS additionally complements NCC in support of NCC's role as the primary agency for ESF-2.

During smaller-scale disasters, the Commission activates DIRS-Lite, a limited version of the DIRS collection mentioned above that collects a subset of the information collected in DIRS, to reduce the burden on respondents but also maintain visibility in critical communications assets.¹ The Commission designates the DIRS-Lite disaster areas at the request for information from a federal agency, including the Chairman of the Commission.² For DIRS-Lite, only DIRS

¹ FCC, Standard Operating Procedures DIRS-Lite, https://transition.fcc.gov/pshs/docs/Standard_Operating_%20Procedures_DIRS-Lite.pdf (last visited Feb. 25, 2022) (*DIRS-Lite Manual*).

² *Id.* at 1.

wireline and wireless carrier respondents are asked to provide a set of information to the Commission, and this submission may be done by email or through phone calls.³ Unlike the full DIRS activation, the DIRS-Lite activation does not supersede the Part 4 mandatory network outage reporting obligations of the Commission’s rules.

The Commission is requesting Office of Management and Budget (OMB) approval of a revision of this information collection to reflect changes to these rules adopted by the Commission in a *Second Report and Order* on March 18, 2021, as FCC 21-34,⁴ allowing certain federal, state, and Tribal Nation agencies (Participating Agencies) to access to certain geographically relevant reports filed in DIRS.

In 2016, the Commission found that Participating Agencies with a demonstrated “need to know” would benefit from having access to DIRS reports.⁵ The Commission observed in the *2016 Report and Order* that this information sharing would benefit the public interest if implemented with “appropriate and sufficient safeguards” but that the record advancing this proposal was not fully developed because the “information sharing proposal raised a number of complex issues that warranted further consideration.”⁶ In response, a more complete record was developed with input from affected stakeholders leading to the adoption of the *Second Report and Order*, which created a framework to provide state, federal, local, and Tribal partners with access to the critical DIRS information they need to ensure the public’s safety while preserving the presumptive confidentiality of the information.

Revisions to Information Collection Requirements Which Require OMB Approval.

The *Second Report and Order* places information collection and recordkeeping requirements on Participating Agencies that voluntarily seek access to the FCC’s DIRS reports. Amendments to Section 4.2 of the Commission’s Rules spell out the requirements for Participating Agencies.⁷ Specifically, a Participating Agency seeking “read-only” access to DIRS information will be required to e-mail a request to a dedicated Commission e-mail address that includes: (i) a signed statement from an agency official, on the agency’s official letterhead, including the official’s full contact information and formally requesting access to DIRS filings; (ii) a description of why the agency has a need to access DIRS filings (citing to statutes or other regulatory authority that establishes it has official duties making it directly responsible for

³ *Id.*

⁴ *See Amendments to Part 4 of the Commission’s Rules Concerning Disruptions to Communications*, PS Docket No. 15-80, *Second Report and Order*, 36 FCC Rcd 6136 (2021) (*Second Report and Order*).

⁵ *See Amendments to Part 4 of the Commission’s Rules Concerning Disruptions to Communications, et al.*, PS Docket No 15-80, et al., *Report and Order, Further Notice of Proposed Rulemaking and Order on Reconsideration*, 31 FCC Rcd 5817 (2016) (*2016 Report and Order*).

⁶ *2016 Report and Order*, 31 FCC Rcd at 5850-53, paras 84-89.

⁷ *Id.* at 6186, Appendix A.

emergency management and first responder support functions) and how it intends to use the information in practice; (iii) if applicable, a request to exceed the proposed presumptive limits on the number of individuals (i.e., user accounts) permitted to access DIRS filings with an explanation of why this is necessary, and (iv) a completed copy of a Certification Form, a template of which is provided in Appendix C to the *Second Report and Order*.⁸

To ensure confidential DIRS information is protected from disclosure, Participating Agencies that are granted access to DIRS are required to notify the Commission: (i) within 14 calendar days from the date the agency receives a request from third parties to disclose DIRS filings and DIRS filings, or related records, pursuant to its jurisdiction’s open record laws or other legal authority that could compel it to do so, and (ii) at least 30 calendar days prior to the effective date of any change in relevant statutes or rules (e.g., its open records laws) that would affect the agency’s ability to adhere to the confidentiality protections in this information sharing framework. Participating Agencies will also be responsible for developing and implementing initial and annual security training to each person granted a user account for accessing DIRS filing, maintaining copies of all training material for Commission inspection upon request.⁹ They also must implement practical data protection safeguards, including assigning user accounts to single employees, promptly reassigning user accounts to reflect changes as their rosters of designated employees change, and periodically changing user account passwords to ensure that user account credentials are not used by individuals who are not the agency’s designated employees.¹⁰ To ensure accountability in the use of DIRS information, Participating Agencies must also maintain and make available for FCC inspection “a list of all localities for which the agency has disclosed DIRS data”¹¹ and immediately report any known or reasonably suspected breach of protocol involving DIRS filings to the Commission and to affected providers.¹²

Non-Participating Agencies that request DIRS information from a Participating Agency will be responsible for executing a certification form designed by the Commission and supplied by the Participating Agency where the Non-Participating Agency certifies under penalty of perjury, that it will comply with the information sharing framework that the Commission has developed, including maintaining the confidentiality of the information and “securely destroying the information when the public safety event that warrants its access to the information has concluded.”¹³

⁸ *Id.* at 6178-6179, n.280. See also *id.* at 6210, Appendix C.

⁹ *Second Report and Order*, 36 FCC Rcd, at 6207, Appendix B, para. 50.

¹⁰ *Id.* at 6181-82, para. 147.

¹¹ *Id.* at 6152, para. 53.

¹² *Id.* at 6180, para. 144.

¹³ *Id.* at 6176, para. 124. For purposes of this document, a “Non-Participating Agency” is a local agency that a Participating Agency engages with to provide the local agency with access to NORS or DIRS information on a “need to know” basis and subject to the local agency abiding by the procedures established by the Participating Agency.

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Statutory authority for this collection of information is contained in sections 1, 4(i), 4(j), 4(o), 251(e)(3), 254, 301, 303(b), 303(g), 303(r), 307, 309(a), 309(j), 316, 332, and 403 of the Communications Act of 1934, as amended, and section 706 of the Telecommunications Act of 1996, 47 U.S.C. 151, 154(i)-(j) & (o), 251(e)(3), 254, 301, 303(b), 303(g), 303(r), 332, 403, and 1302. Regulatory authority for this collection of information is contained in 47 CFR 0.181(h), 54.1515(d).

This information collection does not affect individuals or households; thus, there are no impacts under the Privacy Act.¹⁴

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 Communications Act of 1934, as amended, tasks the Commission with promoting the safety of life and property through the use of wire and radio communication. To do so, the Commission has authority to adopt necessary rules and regulations and issue inquiries to communications carriers for relevant information.¹⁵ The Commission, through its designated Defense Commissioner, has the duty and responsibility to develop preparedness programs for the provision of services by common carriers, broadcasting and cable facilities, satellite, and wireless radio services.¹⁶ See 47 U.S.C. § 0.181.

Pursuant to this authority, the Commission created the Emergency Contact Information System (ECIS) in response to the events of September 11, 2001. The Commission submitted, and OMB approved, an information collection for ECIS permitting communications providers to voluntarily provide their contact information to the Commission.¹⁷ The Commission collected this information to ensure: (1) a rapid restoration of communications in the event of a disaster, such as a terrorist threat or attack, and (2) that public safety, health, and other emergency and defense personnel would have access to effective communications services during times of crisis.

In 2007, the Commission's Public Safety and Homeland Security Bureau (PSHSB) updated ECIS, renaming it the Disaster Information Reporting System (DIRS). Using DIRS, participating communications companies provide the Commission with their emergency contact information and can subsequently inform the Commission of damage to their infrastructure and facilities, as well as request resources for restoration from the Commission. DIRS respondents

provide this information using web-based electronic forms tailored to their types of networks and facilities. The Commission coordinates with the Department of Homeland Security (DHS)'s Federal Emergency Management Agency (FEMA) to identify in which areas and situations to

¹⁴ 5 U.S.C. § 552(a).

¹⁵ See 47 U.S.C. §§ 154(i), 218 and 303(r).

¹⁶ See 47 U.S.C. § 0.181.

¹⁷ See OMB Control No. 3060-1003; 02/14/2002.

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activate DIRS. FEMA and the Commission can activate DIRS with or without the DHS's National Coordinating Center for Communications (NCC) activating Emergency Support Function-2 of the National Response Plan (ESF-2). When the NCC activates ESF-2, DIRS additionally complements NCC in support of NCC's role as the primary agency for ESF-2.

To enable the Commission to ensure that only qualifying agencies that agree to follow the information sharing requirements are permitted to access DIRS, Participating Agencies that voluntarily seek access will be required, as described above, to e-mail a request to a dedicated Commission e-mail address that includes contact information, a description of why the agency has a need to access DIRS filings, how it intends to use the information in practice, any requests to exceed the proposed presumptive limits on individuals with DIRS access, and a completed copy of a Certification Form.

Participating Agencies will be responsible for immediately notifying the Commission and affected service providers data breaches or the unauthorized or improper disclosure of DIRS data. This notification allows service providers to use this information to minimize the negative effects of improper disclosure and allows the Commission to quickly identify misuse of DIRS information, further investigate violations of information sharing rules, and, if necessary, restrict continued access by offending participating agencies. Participating Agencies are also required to notify the Commission of request from third parties to disclose DIRS filings or related records pursuant to its jurisdiction's open record laws or other legal authority that could compel it to do so. These notifications will allow the Commission to take appropriate action, including (at the Commission's option) notifying an affected service provider so that the provider can supply its comments on the matter if permitted under the jurisdiction's open records law. In addition, Participating Agencies are required to notify the Commission at least 30 calendar days prior to the effective date of any change in relevant statutes or rules (e.g., its open records laws) that would affect the agency's ability to adhere to the confidentiality protections in this information sharing framework. This notification will provide the Commission with an opportunity to determine whether to terminate an agency's access to DIRS filings or take other appropriate steps as necessary to protect this information. Participating Agencies will also be responsible for developing and implementing initial and annual security training to each person granted a user account for accessing DIRS filing, maintaining copies of all training material for Commission inspection upon request

Participating Agencies must implement practical data protection safeguards, which will likely include recordkeeping related to assigning user accounts to single employees, promptly reassigning user accounts to reflect changes as their rosters of designated employees change, and periodically changing user account passwords to ensure that user account credentials are not used by individuals who are not the agency's designated employees. Participating Agencies must also maintain copies of all training material for Commission inspection upon request, which the

Commission will use to ensure that the training requirements of the information sharing program have been satisfied. In addition, Participating Agencies will be responsible for maintaining

records of downstream sharing that must be made available to the Commission upon request, which provides the Commission with the ability to maintain control over who has access to the DIRS filings and whether proper protocol is followed.

Collection of such information through DIRS has already been approved by OMB, and the *Second Report and Order* does not adopt rules that would alter the fundamental aims and purposes of the approved collection.

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.

DIRS utilizes a secure, web-based form similar to other forms that the Commission has found to be efficient, user-friendly, and minimally burdensome to respondents in prior collections. If the Commission activates DIRS, it accepts electronic submissions through the Commission's dedicated web portal.¹⁸ Respondents may also make DIRS submissions by email, telephone, or hardcopy if the Commission's Public Safety and Homeland Security Bureau specifies by Public Notice that it prefers to receive DIRS filings via one or more of these alternative formats. The collected information is available to authorized personnel within the Commission and, via password-protected electronic means, to select federal and potential state agency partners. DIRS respondents may access their submissions but cannot view other parts of the DIRS database nor edit other respondent's submissions. If the Commission activates DIRS-Lite, it accepts email and phone submissions; there are no web portal submissions or hardcopy collections.

Participating Agencies' requests to access DIRS information (including required accompanying materials) and any required notifications will be submitted to the Commission electronically via a dedicated e-mail address. Required follow-up will also be conducted electronically. This method reduces the burden on agency and Commission staff as forms and correspondence will be stored and accessed electronically.

Once the request for access is approved, the Participating Agencies will be able to access a web page maintained by PSHSB that will permit access to the DIRS report database using date and location filters. The location filters will limit Participating Agencies "read only" access to reports in states where a Participating Agency has jurisdiction. To protect the integrity and confidentiality of DIRS reports downloaded or printed by a Participating Agency, PSHSB

¹⁸ *Disaster Information Reporting System-Login*, <https://www.fcc.gov/nors/disaster/Login.cfm> (last visited February 24, 2022).

implemented certain technological safeguards, such as imbedding a special “CONFIDENTIAL” notice as a header or footer on each page and is investigating the feasibility of adding a watermark to each page downloaded or printed by a Participating Agency.¹⁹

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

DIRS was created to meet the requirements at 47 CFR. § 0.181(h) of the Commission’s rules. This information collection requests the same information as requested in the NORS collection (3060-0484). Specifically, to avoid a duplicative collection, Participating Agencies will provide information in response to the NORS collection request which will also be used for this information collection.

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

In compliance with the Paperwork Reduction Act of 1995, the Commission has made an effort to minimize the burden on all respondents, regardless of size. Inputting the requested information into DIRS will have minimal impact on small businesses because the information will be provided over an efficient web-based interface. The DIRS web-based interface also accepts batch submissions rather than only single-entry submissions. Additionally, the Commission provides a limited waiver to the Commission’s Part 4 network outage reporting rules for service providers that participate in DIRS when DIRS is active.²⁰ DIRS respondents are also only required to update information as conditions change, not on a prescribed timeframe. Moreover, with the exception of DIRS respondents that receive fixed and mobile support pursuant to the Commission’s 2019 *The Uniendo a Puerto Rico Fund and the Connect USVI Fund Order* (Support Recipients), reporting in DIRS is voluntary.²¹ Additionally, DIRS-Lite submissions require only a subset of the information collected in DIRS and are accepted via a phone call or email. In these ways, the Commission has taken efforts to minimize the burden on all respondents while still fulfilling its public safety mandate.

To provide Participating Agencies maximum flexibility and reduce potential costs of compliance with the training requirements, rather than mandate an agency’s use of a specific

¹⁹ See *Public Safety and Homeland Security Bureau Seeks Comment on Potential Safeguards in Connection with Sharing of Network Outage Reporting System and Disaster Information Reporting System Reporting System Data*, PS Docket No. 15-80, Public Notice, DA 22-61, released January 19, 2022.

²⁰ *Public Safety and Homeland Security Bureau Announces Limited Waiver of Sections 4.9 and 4.11 of the Commission’s Rules During Activations of the Disaster Information Reporting System*, Public Notice, DA 09-1319 (PSHSB 2009).

²¹ See *The Uniendo a Puerto Rico Fund and the Connect USVI Fund, Connect America Fund, ETC Annual Reports and Certifications*, WC Docket No. 18-143, WC Docket No. 10-90, WC Docket No. 14-58, Report and Order, and Order on Reconsideration, FCC 19-95, para. 138 (2019) (*PR and USVI Funds Order*).

training program, adopted requirements that allow agencies to develop their own training program or rely on an outside training program that covers, at a minimum, each of the required “program elements.”

In addition, rather than requiring third-party audits of training programs to ensure that state and federal agencies’ training programs comply with the Commission’s proposed required program elements, Participating Agencies are required to make copies of their training curriculum available for the Commission’s review upon demand which will significantly minimize costs associated with the required training programs. The Commission also declined to adopt a “downstream training” requirement which would have required any entity receiving DIRS information from a Participating Agency to complete formal training. Similarly, the Commission declined to adopt a requirement for Participating Agencies to obtain an affidavit on confidentiality from local entities prior to receipt of DIRS information. To further assist and reduce the burden on small entities and other participating agencies with meeting the training requirements the Commission adopted in the *Second Report and Order*, the Commission will consult with diverse stakeholders with a range of perspectives, including state governments, the public safety community, service providers, and other industry representatives to develop exemplar training materials, that can be used by participating agencies to training their staffs on the proper uses of DIRS filings.

The Commission also declined to grant local agencies direct access to DIRS considering among other things the burdens that would result for local entities, many of which may be small entities. Providing direct access to local entities would have potentially exponentially increased the number of participating entities, in contrast to the relatively limited number of state, federal, and other entities that the Commission identified for eligibility in the *Second Report and Order*. These local entities would have to comply with requirements of the information sharing framework and would incur the associated costs. Further, because local entity governments typically do not have the level of experience navigating the kinds of infrastructure status information contained in DIRS filings as compared to state agencies, developing this experience would likely increase their cost of compliance as well as increase the risk of improper disclosure of DIRS information.

Additionally, the Commission has adopted a single form to address the certifications and acknowledgments required for direct access to DIRS. The use of a single form, coupled with the fact that the proposed certification form is similar to one that the Commission currently requires for sharing sensitive numbering data with states using FCC Form 477 data, should help minimize preparation time and costs, specifically for those smaller agencies since these agencies should be familiar with the existing requirements and have comparable operational processes and procedures already in place.

6. Describe the consequences to a Federal program or policy activity, if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reduce burden.

Failure to collect this information, at all or less frequently than requested, will adversely impact the Commission’s ability to carry out its congressionally mandated objective of

promoting the safety of life and property. Without the requested information, the Commission will not obtain and share critical infrastructure status information with authorities, including FEMA. This will significantly frustrate the ability of these authorities to effectively deploy their resources to maintain and restore critical communications in the aftermath of a disaster. The Commission will also be unable to provide situational awareness through comprehensive public reports related to disasters and unable to easily identify and contact satellite provider respondents during (or in close proximity to) disaster events to obtain information that would aid the Commission and its partners in restoration and mitigation efforts.

The *Second Report and Order* “creates a framework to provide state, federal, local, and Tribal partners with access to the critical NORS and DIRS information they need to ensure the public’s safety while preserving the presumptive confidentiality of the information.”²² This information sharing will “improve situation awareness during and after disasters, enable agencies to better assess the public’s ability to access emergency communications, and assist with the coordination of emergency response efforts.”²³ This critical information would be unavailable to state, federal, local, and Tribal partners if this information is not collected.

The above-described requirements for requests to access DIRS data, required notifications, and recordkeeping requirements for training programs and downstream sharing allows the Commission to protect the presumptively confidential DIRS information and to monitor how Participating Agencies are complying with the information sharing framework. If the Commission did not collect this information, there is a greater likelihood that the sensitive information contained in DIRS filings would be shared, disclosed, or used beyond what is permitted by the information sharing framework.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with the criteria listed in supporting statement.

This collection of information is consistent with the guidelines in 5 CFR 1320.5(d)(2). Information may be provided by respondents to the Commission more often than quarterly in the event that DIRS is activated for more than one emergency or disaster in the same quarter. Information will almost always be provided by respondents to the Commission in fewer than 30 days following a DIRS activation, as it is critical that the Commission collect timely information for the duration, or in the immediate aftermath, of emergencies to facilitate its public safety mission. The Commission has instituted procedures to protect the confidentiality of requested collection of information, regardless of whether the information is collected from Support Recipients or voluntary DIRS participants. All collected information is presumed confidential and handled with appropriate safeguards. As noted in the *DIRS User Manual*, “[b]ecause the information that communications companies input to DIRS is sensitive for national security and/or commercial reasons, [the collected information] shall be treated as presumptively

²² *Second Report and Order*, 36 FCC Rcd at 6137, para. 3.

²³ *Id.* at 6142, para. 18

confidential upon filing.”²⁴ The Commission will apply this same standard to this proposed revision to the collection. Namely, the filings and the information contained therein would be withheld from public disclosure, shared only with Participating Agencies, and provided to others in narrow circumstances. The Commission will also continue to work with respondents to ensure that any concerns regarding the confidentiality of their filings are resolved in a manner consistent with Commission rules.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency’s Report and Order, required by 5 CFR 1320.8(d), soliciting comments on the information prior to submission to OMB. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Emergency approval is being sought for the above-described information collection requirements. The Commission seeks waiver of the 60-day notice requirement due to the emergency nature of this request under 5 CFR § 1320.8(d). However, the Commission has published a 30-day emergency PRA notice in the Federal Register announcing submission of this emergency request and seeking public comment on the information collection (*see* 88 FR 51317) published on August 3, 2023. The Commission will conduct all the regular OMB clearance processes and procedures upon approval of the emergency request. The Commission will publish the necessary notice(s) in the Federal Register when seeking regular OMB approval.

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

The Commission will not provide any payment or gift to respondents.

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

The Commission provides respondents with assurances that their collected filings reports will be treated with a presumption of confidentiality. As noted in the *DIRS User Manual*, “[b]ecause the information that communications companies input to [their collected filings] is sensitive for national security and/or commercial reasons, [the collected filings] shall be treated as presumptively confidential upon filing.”²⁵

²⁴ FCC, Disaster Information Reporting System (DIRS) User Manual – Version 5, February 24, 2014 at 3, (available at https://transition.fcc.gov/pshs/disaster/disaster_manual.pdf) (*DIRS User Manual*); *The FCC’s Public Safety and Homeland Security Bureau Launches Disaster Information Reporting System (DIRS)*, Public Notice, DA 07-3871, 22 FCC Rcd 16757 (PSHSB 2007).

²⁵ *Id.*

The *Second Report and Order* adopts procedures allowing state, federal, local, and Tribal agencies with a demonstrated “need to know” to apply for “read-only” access to DIRS reports impacting locations where the agency has jurisdiction. To protect the confidentiality of the DIRS information disclosed to these Participating Agencies, the Commission limited the access to only those agencies who complete the registration process and then limits by geographic area the reports available to each Participating Agency. The Commission also adopted safeguards to protect the data accessed by Participating Agencies from manipulation and from distribution to unauthorized recipients.

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

This collection of information does not address any matters 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.

Respondents will enter emergency contact information and, when necessary, critical information (*i.e.* related to infrastructure damage and restoration) in DIRS. Respondents often submit many unique DIRS reports per disaster event because their networks cover a large geographic area (e.g. a network covers several effected counties and reports one DIRS report for each county) or provide a variety of services (e.g. wireline, cable system, broadcast, IXC blocking, etc.). We estimate that each respondent will enter 37 unique reports of critical information over an average of five DIRS activations per year. The critical information will be entered as an initial entry with subsequent update(s) as required. We estimate that each respondent will update each unique entry of critical information six times, on average. We anticipate that data entry will take 0.1 hours for initial entry of contact information; 0.5 hours for initial input of critical information, and 0.1 hour for updates of critical information. This estimate is based on the Commission staff’s knowledge and familiarity with the availability of the data required.

Total burden hours for the proposed revised collection for all respondents is provided below:

Initial Entry of Contact Information for All Respondents

Number of Respondents Annually: 400

Frequency of response: Annually.

Total Number of Responses Annually: 400 respondents × 1 response/respondent = 400 total responses.

Average response time per response: 0.1 hours

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Total Annual Burden Hours: $400 \text{ respondents} \times 1 \text{ response/respondent} \times 0.1 \text{ hours/response} = 40 \text{ hours.}$

Method of estimation of burden: We estimate that each respondent entity to DIRS will enter (or update) their contact information once annually.

Total Annual “In-House” Costs: The Commission estimates the hourly wage of a full-time employee who will be submitting this information is \$80/hour, inclusive of overhead and fringe benefit costs. Therefore, the estimated in-house costs to the respondents are as follows:

$40 \text{ total annual burden hours} \times \$80/\text{hour} = \mathbf{\$3,200 \text{ total annual “in-house” costs.}}$

Initial Entry of Critical Information for All Respondents

Number of Respondents: 400 (same group of respondents as above)

Frequency of response: Annually.

Total Number of Responses Annually: $400 \text{ respondents} \times 37 \text{ responses/respondent} = 14,800 \text{ responses.}$

Average response time per response: 0.5 hours

Total Annual Burden Hours: $14,800 \text{ total responses} \times 0.5 \text{ hours/response} = 7,400 \text{ hours.}$

Method of estimation of burden: Exact numbers of respondents and responses are inherently unpredictable as they reflect disaster and emergency scenarios that are not known in advance. In preparing these estimates, the Commission has analyzed data from recent hurricane seasons and erred on the side of overestimating potential burden.

Total Annual “In-House” Costs: The Commission estimates the hourly wage of a full-time employee who will be submitting this information is \$80/hour, inclusive of overhead and fringe benefit costs. Therefore, the estimated in-house costs to the respondents are as follows:

$7,400 \text{ total annual burden hours} \times \$80/\text{hour} = \mathbf{\$592,000 \text{ total annual “in-house” costs.}}$

Updates of Critical Information for All Respondents

Number of Respondents: 400 (same group of respondents as above)

Frequency of response: Annually.

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Total Number of Responses Annually: 400 respondents × 37 responses/
respondent × 6 updates = 88,800 total responses.

Average response time per response: 0.1 hours

Total Annual Burden Hours: 88,800 total responses × 0.1 hours/response =
8,880 hours.

Method of estimation of burden: Exact numbers of respondents and responses are inherently unpredictable as they reflect disaster and emergency scenarios that are not known in advance. In preparing these estimates, the Commission has analyzed data from recent hurricane seasons and erred on the side of over estimating potential burden.

Total Annual “In-House” Costs: The Commission estimates the hourly wage of a full-time employee who will be submitting this information as \$80/hour, inclusive of overhead and fringe benefit costs. Therefore, the estimated in-house costs to the respondents are as follows:

8,880 total annual burden hours × \$80/hour = **\$710,400 total annual “in-house” costs.**

Cumulative Totals for All Respondents

- Total Respondents Annually: 400
- Total Annual Responses: 400 (initial entry of contact information) + 14,800 (initial entry of critical information) + 88,800 (updates of critical information) = 104,000 responses;
- Total Annual Hours Burden: 40 (initial entry of contact information) + 7,400 (initial entry of critical information) + 8,880 (updates of critical information) = 16,320 hours;
- **Total Annual “In-House” Costs:** \$3,200 (initial entry of contact information) + \$592,000 (initial entry of critical information) + \$710,400 (updates of critical information) = **\$1,305,600.**

Burden Estimate for Participating Agencies

The Commission notes that the information sharing framework established in the *Second Report and Order* allows for access to be granted not only for DIRS, but also to the Commission’s Network Outage Reporting System (NORS). We note that the process and requirements for Participating Agencies under this framework is identical, regardless of whether they seek access to NORS, DIRS, or both. Because the Commission anticipates that NORS and DIRS access will be requested together in most cases, it believes that the estimated costs for Participating Agencies associated with DIRS access are fully included in the estimates submitted as part of its collection on Part 4 of the Commission’s Rules Concerning Disruptions to

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Communications, OMB Control No. 3060-0484. To avoid double-counting the estimated burden hours and costs associated with both collections, the Commission estimates the marginal cost of the Participating Agencies aspect of this collection to be zero.

13. Provide 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 shown in items 12 and 14).

While the Commission cannot quantify overall costs to Participating Agencies for implementing the information sharing framework due to variable based on each participating agency's particular circumstances, the Commission anticipates that the simple nature of the framework's recordkeeping requirements will result in negligible initial costs and low costs annually. Because, as noted above, NORS and DIRS access will be requested together in most cases, the Commission believes that the total annual cost burden to respondents or record keepers associated with DIRS access are fully included in the cost estimates submitted as part of its collection on Part 4 of the Commission's Rules Concerning Disruptions to Communications, OMB Control No. 3060-0484. To avoid double-counting the cost associated with both collections, the Commission estimates the marginal cost of the Participating Agencies for this aspect to be zero.

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

The Commission does not expect to incur costs beyond the normal labor costs for staff.

15. Explain the reasons for any program changes or adjustments for this information collection.

The Commission estimates that neither the total number of service provider respondents nor the number of responses will increase due to the proposed modifications to this information collection. The information collected from Participating Agencies is accounted for in our PRA submission for the NORS (3060-0484) because when they file there, we anticipate that Participating Agencies will request access to NORS and DIRS in the same filing.

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

The Commission treats DIRS and DIRS-Lite submissions as presumptively confidential and will not publish the individual submissions but may publish this information on an aggregated basis. For example, the Commission may publish this information on an aggregated basis pursuant to the Wireless Resiliency Cooperative Framework (Framework) or in daily communications status reports during DIRS activations.²⁶ The reports detail the operational status of communications services in the areas experiencing a disaster, providing the public with situational awareness.²⁷

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 Commission requests a waiver of the requirement to display the OMB expiration date on the electronic survey form because each time this collection is submitted to OMB for extension, the Commission must update the forms in DIRS. This is not cost effective for the Commission. Additionally, OMB control numbers and expiration dates for the Commission's information collection requirements assigned by OMB pursuant to the Paperwork Reduction Act of 1995, Public Law 104-13 can be found at <https://www.reginfo.gov/public/do/PRAMain> See 47 CFR § 0.408.

²⁶ *Improving the Resiliency of Mobile Wireless Communications Networks; Reliability and Continuity of Communications Networks, Including Broadband Technologies*, PS Docket Nos. 13-239 and 11-60, Order, 31 FCC Rcd 13745 (2016); See, e.g., FCC, Hurricane Maria Communications Status Report for March 21, 2018 at 2 (2018), <https://www.fcc.gov/document/hurricane-maria-communications-status-report-march-21-2018> (including information from Framework Signatories in its status report for wireless services).

²⁷ See *id.*

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

There are no exceptions to the Certification Statement.

B. Collections of Information Employing Statistical Methods:

The revisions to this information collection do not employ any statistical methods.