

1SUPPORTING STATEMENT
U.S. Department of Commerce
National Telecommunications and Information Administration
NTIA Internet Use Survey
OMB Control No. 0660-0021

Abstract

The National Telecommunications and Information Administration (NTIA) respectfully requests OMB’s review and approval of revisions to a currently approved collection known as the NTIA Internet Use Survey. Renewal will allow the U.S. Census Bureau (Census or the Bureau) to incorporate these questions on computer and Internet use as a supplement to the November 2023 Current Population Survey (CPS). The subject information collection was fielded in its current form in November 2021, and previous iterations of the survey have been commissioned by NTIA and administered by Census periodically since 1994. Data from the NTIA Internet Use Survey are used to help understand the state of the digital divide and other important Internet policy challenges. In addition to supporting evidence-based policymaking, NTIA uses the resulting data in a number of publications. Furthermore, Census prepares a public use dataset for each survey that both NTIA and Census publish on their websites for use by external researchers and other interested members of the public.

- 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.**

President Biden has made clear the Administration’s goal is to ensure that “every community in America has access to affordable, high-speed Internet.”¹ Further, Secretary of Commerce Gina Raimondo has observed that “high-quality, affordable broadband isn’t a luxury, but it’s a necessity for education, jobs, and healthcare.”² Digitally connected Americans populate the modern workforce, drive creative innovation throughout the economy, and ensure a growing customer base to help sustain our nation’s global competitiveness.

The NTIA Internet Use Survey will aid the Administration’s efforts to achieve digital equity, helping to inform decisions about policies and funding related to broadband deployment, affordability, adoption, and digital skills. The research and policy analysis enabled by this data collection are particularly important in light of the historic investments being made through the Biden-Harris Administration’s Internet for All programs, and following a pandemic that has further highlighted the importance of the Internet in daily life. NTIA is working with Congress, the Federal Communications Commission (FCC), other federal agencies, state and local governments, industry, and nonprofits to develop and promote policies that foster ubiquitous

¹ “Remarks by President Biden in State of the Union Address, February 7, 2023,” *available at* <https://www.whitehouse.gov/briefing-room/speeches-remarks/2023/02/07/remarks-by-president-biden-in-state-of-the-union-address-2/>.

² “Press Briefing by Press Secretary Jen Psaki and Secretary of Commerce Gina Raimondo, April 7, 2021,” *available at* <https://www.whitehouse.gov/briefing-room/press-briefings/2021/04/07/press-briefing-by-press-secretary-jen-psaki-and-secretary-of-commerce-gina-raimondo-april-7-2021/>.

broadband deployment, adoption, and effective use. Collecting current, systematic, and comprehensive information on Internet use and non-use by U.S. households is critical to enabling policymakers to gauge progress made to date and identify specific areas and demographic groups in which adoption is a concern with a specificity that permits carefully targeted and cost-effective responses.

The U.S. government has a pressing need for comprehensive data in this area. The U.S. Government Accountability Office (GAO), NTIA, and the FCC have issued reports noting the importance of useful broadband data for policymakers. Moreover, Congress has passed legislation – including the Broadband Data Improvement Act, the American Recovery and Reinvestment Act, the Broadband DATA Act, the Consolidated Appropriations Act, 2021, and most recently, the Infrastructure Investment and Jobs Act – wholly or in part to facilitate data collection, research, and policy analysis in this area. Modifying the CPS to include NTIA’s requested Internet use questions will enable the Commerce Department and NTIA to respond to congressional concerns and directives. It will also enable NTIA to continue using timely data in the State Digital Equity Capacity Grant Program, which employs a funding formula that by law must be based in part on estimates from the NTIA Internet Use Survey.³

Since 1994, NTIA has sponsored 16 supplements to the CPS on the Internet and the shifting technologies Americans use for online access. NTIA proposes to add 65 questions to the November 2023 edition of the Census Bureau’s CPS to gather reliable data on broadband and computer use by U.S. households. The Bureau enjoys an outstanding reputation for data gathering and analysis based on its centuries of experience and its scientific methods. Coordinating NTIA’s requested information collection on broadband usage with the Bureau’s regularly scheduled CPS will significantly reduce the potential burdens on that agency and on surveyed households.

NTIA seeks OMB’s permission to undertake this data collection pursuant to NTIA’s authority “to conduct studies and make recommendations concerning the impact of the convergence of computer and communications technology.” 47 USC §902(b)(2)(M). Further, Congress empowered NTIA “to contract for studies and reports relating to any aspect of assigned functions,” which enables the agency to sponsor the CPS supplement. See 47 USC §902(b)(2) (P). (Attachment A-1, 47 USC §902).

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 Census Bureau will collect the desired information during its regularly scheduled CPS interviews. NTIA will use the data collected to work with the President, the Congress, and the FCC to develop evidence-based policies that foster the deployment and adoption of broadband and Internet-enabled services throughout the United States. For example, data about Internet use by U.S. households, including members’ online activities, provides useful context around broadband demand that complements FCC data on broadband subscriptions and speeds. The NTIA Internet Use Survey data will also support government efforts to advance U.S. Internet

³ 47 USC §1723(d)(3)(A)(i).

policy abroad. Further, American communities can use the data to advocate for new or expanded broadband service in their areas. The data collected will also be available to the public to further policy research on broadband and other communications issues. Finally, state and local officials can use the collected data to develop policies and programs to increase broadband access and use in their respective jurisdictions.

NTIA has made extensive use of all previous data collections. The many reports, blog posts, and other publications released by NTIA on this subject explore in depth the state of Internet use in the U.S., and rely heavily on the datasets produced through earlier collections for time-series analyses. As with our prior data sets, NTIA will make the newly collected data available on its interactive Data Explorer visualization tool, which is available at <<https://www.ntia.gov/data/explorer>>. The tool allows policymakers, researchers, and the public to chart Internet usage over time, in granular detail. Additionally, NTIA regularly uses these datasets for internal policy analysis purposes, and has referenced these data in filings with the FCC and in other agency documents. NTIA also utilizes the datasets to update global broadband metrics maintained by the Organisation for Economic Co-operation and Development. Our CPS-based research provides vital support for more informed decisions about Internet and telecommunications policy by NTIA, the Administration, Congress, and the FCC, among others. Estimates from the NTIA Internet Use Survey have also been used as inputs into the funding formula for the State Digital Equity Capacity Grant Program.⁴

This information collection is designed to obtain information that meets the Information Quality Guidelines of NTIA. These guidelines establish standards for the utility, integrity, and objectivity of information disseminated by NTIA.⁵

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.

The Bureau will conduct computer-assisted personal visits and telephone interviews. The Bureau considers these techniques the most appropriate collection methodology, given existing available information technology.

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 above.

Adding NTIA's proposed 65 questions to the Bureau's CPS will generate official geographic and demographic statistics on broadband and Internet usage in the U.S. that are unavailable with such

⁴ The funding formula is described in detail in the Notice of Funding Opportunity for this program. See Notice of Funding Opportunity: State Digital Equity Planning Grant Program, available at <https://broadbandusa.ntia.doc.gov/sites/default/files/2022-05/DE%20PLANNING%20GRANT%20NOFO.pdf>.

⁵ See Section 515 Standards: Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by the National Telecommunications and Information Administration (Sept. 25, 2002), available at www.ntia.doc.gov/ntiahome/occ/ntiaiqguidelines_09252002.htm.

attributes from any other source. To NTIA's knowledge, there are no other current data sources that provide the depth and reliability of information on broadband adoption and usage that is available from the NTIA Internet Use Survey. The three computer and Internet use questions added to the American Community Survey beginning in 2013, while vital to learning about broadband adoption among smaller geographic and demographic groups, provide only basic information about adoption at the household level. In contrast, the NTIA-sponsored series of CPS supplements provides a granular look at how Americans use the Internet, including new applications and devices.

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

Not Applicable.

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.

If NTIA is unable to conduct the information collection, comprehensive and reliable data that are essential to the development of sound and cost-effective government policies regarding broadband adoption and usage and, more generally, the Internet, would be unattainable. In addition, although NTIA has at times in the past sponsored the NTIA Internet Use Survey annually, NTIA, in consultation with the Bureau, has decided to implement an every-two-year timetable (funding permitting) not only to allow sufficient time intervals but to ensure that the data stay reasonably current with the rapidly changing technological landscape of computer and Internet use. Starting with the 2017 edition of the survey, NTIA has planned to sponsor a data collection in every November of odd numbered years, which will avoid the seasonal differences that may have been reflected in NTIA's past July and October CPS supplements. The two most recent surveys were fielded in November 2019 and November 2021, and NTIA will sponsor the next survey in November 2023. In addition to the aforementioned benefits of continuing on this schedule, a 2023 edition of the survey will enable NTIA to use updated estimates of Internet and device use in future Notices of Funding Opportunity for the ongoing State Digital Equity Capacity Grant Program.

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;**

The information collection does not impose such requirement.

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

The information collection does not impose such requirement.

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

The information collection does not impose such requirement.

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

The information collection does not impose such requirement.

- **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;**

The information collection is not connected with such a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study.

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

The information collection does not impose such requirement.

- **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**

The information collection does not include a pledge of confidentiality that is unsupported by authority established in statute or regulation, unsupported by disclosure and data security policies that are consistent with the pledge, or will unnecessarily impede sharing of data with other agencies for compatible confidential use.

- **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**

The information collection does not impose such requirement.

- 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.**

The Federal Register Notice soliciting public comment was published on June 2, 2023 (Vol. 88, p. 36,282). NTIA received 17 comments in response to the notice. The comments largely focused

on the content of the proposed supplemental questions, with only a few alluding to the cost and burden of the NTIA Internet Use Survey. (See Attachment A-2, Summary of Comments, for NTIA's comment summary and response; see also Attachments C1-C17 to view the comments received by NTIA.)

NTIA consulted with the following person(s) concerning the development of the proposed questions:

Kyra Linse, Census Bureau
Tim Marshall, Census Bureau

The result of these consultations and cognitive testing undertaken by Census Bureau experts is NTIA's 65 proposed supplemental questions. The Bureau Director's advance letter (see Attachment A-3) referred to in response to Question 10 below provides respondents with an address at the Bureau to which they can submit general comments on the survey, as well as those regarding respondent burden.

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

Not Applicable.

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.

The Bureau will collect CPS data (including NTIA's proposed supplemental questions) in compliance with the Privacy Act of 1974. Each sample household will receive an advance letter approximately one week before the start of the initial CPS interview. The letter includes the information required by the Privacy Act of 1974, informs each respondent of the voluntary nature of the survey, and states the estimated time required for participating in the survey.

Additionally, interviewers must ask each respondent if he/she received the advance letter and, if not, will provide a copy of the letter to each respondent and allow sufficient time for him/her to read its contents. Upon request, interviewers also provide households with the pamphlet "The Census Bureau Respects Your Privacy and Protects Your Personal Information" (see Attachment A-4), which reaffirms the confidentiality assurances and mentions the Bureau's past performance in assuring confidentiality. All information given by respondents to Bureau employees is held in strict confidence under Title 13, United States Code, Section 9. Each Bureau employee has taken an oath to that effect and is subject to a jail penalty and/or a substantial fine if he/she discloses any information given to him/her. Finally, all data are protected from cybersecurity risks through screening of the systems that transmit data as required by the Federal Cybersecurity Enhancement Act of 2015 (Division N, Title II, Subtitle B, Sec. 223 of the Consolidated Appropriations Act of 2016, Pub. Law No. 114-113, 129 STAT. 2242 (Dec. 18, 2015)).

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and 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.

NTIA’s proposed supplemental questions are not 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’.**

The Bureau estimates that the total annual respondent burden for NTIA’s proposed 65 questions is 8,333 hours (10 minutes per household for each of the 50,000 households in the CPS sample).

Estimated Annualized Respondent Burden Hours

| Information Collection Instrument | 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) |
|--|--|-----------------------------|--|--|-----------------------------------|--|
| A | Individuals & Households | 50,000 | 1 | 50,000 | 10/60 | 8,333 |

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in 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.**

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

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

The Bureau charged NTIA \$920,000 to include the 65 supplemental questions in the November 2023 CPS, to produce summary tables, and to create a public use microdata file for use by NTIA and the public. Separately, the Bureau charged \$150,000 to perform cognitive testing on the revised survey instrument and make recommendations based on their findings.

Annualized Costs to the Federal Government

| Staff | Grade/Step | Salary | Fringe (if applicable) | % of Effort | Total Annualized Cost to Gov't |
|--|------------|--------|------------------------|-------------|--------------------------------|
| Census Bureau Charges | | | | | |
| Survey Administration, Summary Table Production, & Public Use Microdata File | | | | | \$920,000 |

| | | | | | |
|-------------------------------------|--|--|--|--|-------------|
| Cognitive Testing | | | | | \$150,000 |
| Total Cost to the Government | | | | | \$1,070,000 |

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

NTIA is proposing to include revisions to the information collection relative to the currently-approved version. Throughout the process that resulted in the proposed information collection, NTIA and the Census Bureau have primarily focused on reducing interview times and improving understanding without sacrificing the range and depth of collected information, such as the use of simplified language and question structures. Through a combination of expert review and cognitive testing by the Census Bureau, NTIA implemented a number of recommendations for further improvements to the survey questions. The result of this process is NTIA’s proposed revision to the information collection. A redlined document showing changes from the currently-approved survey instrument can be found in Attachment A-5.

16. For collections of information whose results will be published, outline the 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.

During the months that follow data collection, the Bureau will produce summary tables and a public use microdata file for NTIA, the latter of which will ultimately be posted online for public use. To provide analysis on U.S. households’ broadband and computer use more quickly than NTIA’s past in-depth reports have allowed, we will use the collected data to produce and publish several shorter reports or blogs for posting to the agency’s website, along with charts and summary data tables. NTIA intends to issue these analyses over a period of several months, and will likely use complex statistical techniques such as regression modeling to produce them. Blogs reporting results of previous surveys are available on the agency’s website at <https://www.ntia.gov/data/blogs>. NTIA also makes available thousands of summary statistics through its Digital Nation Data Explorer visualization tool, at <https://www.ntia.gov/data/explorer>, and will update that tool with results from this data collection when it begins posting analyses.

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.

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

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

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

