

## SUPPORTING STATEMENT

### **A. Justification:**

1. FCC 605 is a multi-part, consolidated, general application form that is part of the Universal Licensing System (ULS). Form 605 includes a main form containing administrative information and a series of Schedules used to file technical information applicable to a specific radio service. The form is used to file for authorization to operate radio stations, amend pending applications, modify existing licenses, renew or renew/modify existing licenses, request cancellation of a license, withdraw a pending application, or request an administrative update of an existing license (*i.e.*, name change without change to corporate structure or control, change mailing address, change name of vessel, etc.) in the Ship (Part 80), Aircraft (Part 87), Amateur (including Amateur Vanity (Part 97)), Restricted and Commercial (Part 13), and General Mobile Radio Services (GMRS) (Part 95). This form is also used to apply for a Special Temporary Authority (STA) in these services and to self-certify for temporary authorization to operate where applicable. Respondents are required to submit FCC 605 electronically.

This consolidated form was created to have a consistent "look and feel" that maximizes the collection of data and minimizes narrative responses, free-form attachment, and free-form letter requests. The consolidated application form permits common fields, questions and statements to reside in one place. Technical data, specific to each service, can be captured in their own schedule. FCC 605 accommodates applicants requesting a change which involves multiple existing licenses (*i.e.*, change of mailing address, etc.).

Among the data collected on this form is the FCC Registration Number (FRN). Use of the FRN in the ULS creates a common link among a single entity's filings with the FCC Effective December 3, 2001, collection of FRN is required to comply with the Debt Collection Improvement Act of 1996 (DCIA).

Records may include information about individuals or households, *e.g.*, personally identifiable information or PII, and the use(s) and disclosure of this information is governed by the requirements of a system of records notice or 'SORN', FCC/WTB-1, "Wireless Services Licensing Records." There are no additional impacts under the Privacy Act.

**Revised Information Collection Requirements Which Require Approval from the Office of Management and Budget (OMB):**

The Commission is requesting OMB approval for a minor revision to the reporting, recordkeeping and/or third-party disclosure requirements. The Commission is removing Certification #3 for the General Mobile Radio Service, as well as minor clarifications to the General Filing Instructions.

Additionally, *FCC Report and Order Amendment of the Schedule of Application Fees Set Forth in Sections 1.1102 through 1.1109 of the Commission's Rules*, Report and Order, FCC 20-184 (rel. Dec. 29, 2020), streamlined the Commission's application fees associated to the FCC Form 605 and all applicants are now charged a \$35 fee. Previously Amateur Radio applicants were non-feeable and the previous 29% that were paying a \$71 fee are now reduced to a \$35 fee.

Statutory authority for this collection of information is contained in 47 U.S.C. 154, 301 sections 4 and 301.

2. The FCC uses the information in FCC Form 605 to determine whether the applicant is legally, technically, and financially qualified to obtain a license. Without such information, the Commission cannot determine whether to issue the licenses to the applicants that provide telecommunication services to the public, and therefore, to fulfill its statutory responsibilities in accordance with the Communications Act of 1934, as amended. Information provided on this form will also be used to update the database and to provide for proper use of the frequency spectrum as well as enforcement purposes.

For Third Party Disclosure requirements, Amateur and Commercial Radio Service applicants for initial authorization ("new application") or an upgrade of authorization ("modify application") are required to provide a completed FCC Form 605 to a Volunteer Examination Coordinator (VEC) or Commercial Radio Operator License Examination Manager (COLEM) prior to taking an exam. The VEC or COLEM certifies additional information as to the results of the exam and electronically forward the FCC Form 605 to the FCC. Approximately 64,000, or 49% of the applications are filed electronically through these third parties. There is no additional cost or time burden to the applicant for this third-party filing. (Any additional respondent costs and burden are associated with the examination procedures.). Again, information about individuals or households, and the use(s) and disclosure of this information is governed by the requirements of system of records, FCC/WTB-1. All information is publicly available except the Date of Birth for Commercial Radio Operator applicants and applicant

Telephone Numbers and email addresses are redacted.

3. The Commission anticipates that 97% of the respondents will file FCC Form 605 electronically.
4. This agency does not impose a similar information collection on the respondents. There are no similar data available.
5. In conformance with the Paperwork Reduction Act of 1995, the Commission is making an effort to minimize the burden on all respondents, regardless of size. The Commission has limited the information collection requirements to those absolutely necessary for evaluating and processing each application and to deter against possible abuses of the processes.
6. Generally, the frequency of filing of FCC Form 605 is determined by the applicant and licensee, *i.e.* licensees are required to renew their authorizations at which time the information is verified: GMRS, Ship, Aircraft, and Amateur licensees file every 10 years, and Restricted Radiotelephone Operators and Commercial Radio Operators which have a “lifetime issue”, file just once, except when there is a name change, an address change, a vessel name change, etc. Thus, we must verify the information in our database at these time intervals or when these various changes are made in order to maintain the integrity of the database and to provide proper management of the frequency spectrum.
7. This collection of information is consistent with the guidelines in 5 CFR § 1320.
8. The Commission published a 60-day notice soliciting public comment on the information collection requirements that are contained in this collection. The notice appeared in the Federal Register on June 23, 2023 (88 FR 41103). No comments were received as a result of the notice.
9. Respondents will not receive any payments.
10. To protect the privacy of its applicants, the FCC will redact the telephone number(s) of applicants and the birth date of the Commercial Radio Operator applicants.

Information on the FCC Form 605 is maintained in the Commission’s system of records notice or ‘SORN’, FCC/WTB-1, “Wireless Services Licensing Records.” These licensee records are publicly available and routinely used in accordance with subsection b of the Privacy Act, 5 U.S.C. 552a(b), as amended. Taxpayer Identification Numbers (TIN) and material that is afforded confidential

treatment pursuant to a request made under 47 CFR §0.459 will not be available for public inspection.

The Commission has in place the following policy and procedures for records retention and disposal: Records will be actively maintained as long as the individual remains a licensee. Paper records will be archived after being keyed or scanned into the system. Electronic records will be backed up on tape. Electronic and paper records will be maintained for at least twelve years and three months.

11. This collection does not address private matters of a sensitive nature, and the PII is covered by the system of records notice or ‘SORN’, FCC/WTB-1, “Wireless Services Licensing Records”.
12. The Commission estimates 130,000 respondents (applicants/licensees) annually and that applicants will complete the form on their own. This collection is relatively simple, only requiring administrative data on the Main Form, and in most situations, requires minimal technical data specific to the radio service supplied by an attached schedule. The *average* burden per respondent is estimated to be 26.4 minutes<sup>1</sup> (0.44 hours). The estimate is based on FCC staff’s knowledge and familiarity with the availability of the data required.

FCC Form 605 Burden:

$$130,000 \text{ applications} \times 0.44 \text{ hours (26.4 minutes)} = \mathbf{57,200 \text{ hours}}$$

We estimate 110 applicants will submit the explanation of a felony conviction. We estimate this will take about 10 minutes per respondent.

$$110 \text{ applications} \times 0.17 \text{ hours (10 minutes)} = \mathbf{18 \text{ hours}}$$

$$\mathbf{\text{Total Burden Hours:} = 57,200 \text{ hours} + 18 \text{ hours} = 57,218 \text{ hours}}$$

THIRD PARTY DISCLOSURES: Amateur and Commercial Radio Service applicants for initial authorization (“new application”) or an upgrade of authorization (“modify application”) are required to provide a completed FCC Form 605 to a Volunteer Examination Coordinator (VEC) or Commercial Radio Operator License Examination Manager (COLEM) prior to taking an exam. The VEC or COLEM certifies additional information as to the results of the exam and may electronically forward the FCC Form 605 to the FCC. Approximately 63,700, or 49% of the applications are filed electronically through these third parties. Additionally, these applicants pay a \$35

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<sup>1</sup> This estimated burden also includes the time it would take respondents to keep copies of their records.

application fee as a result of FCC Report and Order Amendment of the Schedule of Application Fees Set Forth in Sections 1.1102 through 1.1109 of the Commission's Rules FCC 20-184

**Total Number of Respondents: 130,000 applicants/licenses**

**Total Number of Annual Responses: 130,000 FCC Form 605 applications**

There is no in-house cost associated with this information collection since applicants will complete the form on their own.

13. Cost to the Respondent:

Total capital and start-up costs to prepare FCC Form 605:

The estimated application fees associated with filing the Form 605 with the FCC are as follows:

We estimate that approximately 130,000 respondents will file Form 605 applications and will require a \$35 filing fee.

$$130,000 \text{ respondents} \times \$35 = \$4,550,000$$

**Total Estimated Annual Costs: \$4,550,000**

14. Cost to the Federal Government:

FCC 605 Applications estimated to be filed: 130,000.

$$\begin{array}{l} 130,000 \text{ Applications} \times .50 \text{ (30 min.)} \\ \times \$51.15 \text{ per hour (GS-12, Step 5) for} \\ \text{an Application Examiner} \end{array} = \$3,324,750$$

**Total Cost to the Federal Government: \$3,324,750**

15. There are program changes in the reporting burden which is due to a result of changes to the FCC application fees adopted in FCC 20-184. There is a \$1,873,300 increase in cost to the respondents for this collection.

16. The data will not be published for statistical use.

17. The Commission is requesting a waiver from displaying the OMB expiration date on

the FCC Form 605. Granting this waiver will prevent the Commission from destroying stock upon re-approval of the form or having to update the electronic versions each time this information collection is submitted to OMB.

18. There is no exception to the certification statement.

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

No statistical methods are employed.