#### SUPPORTING STATEMENT

U.S. Department of Commerce
National Telecommunications and Information Administration
Middle Mile Grant Program
Post-Award Bi-Annual Performance (Technical) Report and Final Report
OMB Control No. 0660-0052

### SUPPORTING STATEMENT PART A

#### **Abstract**

This request is required for NTIA to collect performance information from eligible grant recipients through reporting and monitoring, to comply with the Infrastructure Investment and Jobs Act of 2021.

### **Justification**

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The Middle Mile (MM) Grant Program is authorized by the Infrastructure Investment and Jobs Act of 2021, Division F, Title IV, Section 60401; Pub. L. 117-58, 135 Stat. 429 (November 15, 2021) (Infrastructure Act or Act). This program provides funding for the construction, improvement, or acquisition of middle mile infrastructure. The purpose of the grant program is to expand and extend middle mile infrastructure to reduce the cost of connecting areas that are unserved or underserved to the internet backbone. NTIA will make up to \$980,000,000 available on a competitive basis for federal assistance under the MM Program (\$1,000,000,000 minus two percent set aside to cover NTIA's administrative costs).

Recognizing middle mile's central importance, Congress identified two key objectives: to "encourage the expansion and extension of middle mile infrastructure to reduce the cost of connecting unserved and underserved areas to the backbone of the internet" and to "promote broadband connection resiliency through the creation of alternative network connection paths that can be designed to prevent single points of failure on a broadband network."

The Office of Management and Budget (OMB) requires agencies administrating grant programs to implement post-award financial and performance reporting for those programs<sup>2</sup>. The Uniform Administrative Requirements, Cost Principles, and Audit Requirement and the Department of

<sup>&</sup>lt;sup>1</sup>Infrastructure Act § 60401(b)(1).

<sup>&</sup>lt;sup>2</sup> See Office of Management and Budget, OMB Circular A-102, *Grants and Cooperative Agreements with State and Local Governments*, at §2(a) (Revised 10/7/94, as further amended 8/29/97); Office of Management and Budget, OMB Circular A-110, *Uniform Administrative Requirements for Grants and Agreements With Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations*, at Subpart C, §21(Revised 11/19/93, as further amended 9/30/99); Office of Management and Budget, OMB Circular A-136, *Financial Reporting Requirements*, at §II.3 (Revised 6/10/09).

Commerce Financial Assistance Standard Terms and Conditions authorizes NTIA to require performance reports from MM Program grant recipients<sup>3</sup>.

As part of the reporting requirement detailed in the Notice of Funding Opportunity (NOFO) for the MM Program, award recipients are required to submit an SF-425 Financial Report biannually, a Performance (Technical) Report biannually, and a Final Report. Award recipients are to follow the reporting requirements described in Sections A.01, Reporting Requirement, of the Department of Commerce Financial Assistance Standard Terms and Conditions (dated November 12, 2020). Additionally, in accordance with 2 C.F.R. Part 170, all recipients of a federal award made on or after October 1, 2010, are required to comply with reporting requirements under the Federal Funding countability and Transparency Act or 2006, Pub. L. No. 109-282 (Sept. 26, 2006).

During the period of performance for the MM Program grant recipients will be required to submit Performance (Technical) Reports to the NTIA Federal Program Officer listed on the recipient's award documents, on a bi-annual basis for the periods ending March 31 and September 30 of each year, until the funds have been expended. Grant recipients will also be required to submit a Final Report as part of the grant close-out process that describes the programmatic objectives achieved through the funding and completion of the grant-funded project, including those elements collected in the bi-annual report. The Performance (Technical) Report will contain information as prescribed in 2 C.F.R. 200.329 and the Department of Commerce Financial Assistance Standard Terms and Conditions (dated November 12, 2020), Section A.01.

As indicated in the NOFO, the grant recipient shall submit a report with respect to the six-month period immediately preceding the report date, that:

- 1. Describes how the eligible entity expended the funds and includes an SF-425 form and all required financial reporting information.
- 2. Certifies that the eligible entity complied with the requirements of the Infrastructure Act and the MM Program, including:
  - a. A description of each service provided with the grant funds; and
  - b. Information regarding the middle mile infrastructure constructed, improved, or acquired, including material describing specific routes deployed, splice points and interconnection points along such routes, interconnection points, any interconnection or wholesale agreements in place with third parties, and connections to last-mile infrastructure.
- 3. Describes whether the project prioritizes local hires.
- 4. Describes whether the project has a Community Benefit Agreement, with a description of any such agreement.
- 5. Identifies each subrecipient that received a subaward or subcontract from the eligible entity and a description of the specific project for which grant funds were provided.
- 6. Technical progress reporting information as prescribed in 2 C.F.R. § 200.329 (http://go.usa.gov/xkVgP) and Department of Commerce Financial Assistance Standard Terms and Conditions (dated November 12, 2020), Section A.01.
- 7. For projects over \$5,000,000 (based on expected total cost):

<sup>&</sup>lt;sup>3</sup> Department of Commerce Uniform Administrative Requirements for Grants, §14.51.

- a. A recipient may provide a certification that, for the relevant project, all laborers and mechanics employed by contractors and subcontractors in the performance of such project are paid wages at rates not less than those prevailing, as determined by the U.S. Secretary of Labor in accordance with subchapter IV of chapter 31 of title 40, United States Code (commonly known as the "Davis-Bacon Act"), for the corresponding classes of laborers and mechanics employed on projects of a character similar to the contract work in the civil subdivision of the State (or the District of Columbia) in which the work is to be performed, or by the appropriate State entity pursuant to a corollary State prevailing-wage-in-construction law (commonly known as "baby Davis-Bacon Acts"). If such certification is not provided, a grant recipient must provide a project employment and local impact report detailing:
  - i. The number of contractors and sub-contractors working on the Project;
  - ii. The number of workers on the Project hired directly and hired through a third party;
  - iii. The wages and benefits of workers on the Project by classification; and
  - iv. Whether those wages are at rates less than those prevailing.<sup>4</sup>
- b. If a recipient has not provided a certification that a project either will use a unionized project workforce or includes a project labor agreement, meaning a pre-hire collective bargaining agreement consistent with section 8(f) of the National Labor Relations Act (29 U.S.C. § 158(f)), then the recipient must provide a project workforce continuity plan, detailing:
  - i. Steps taken and to be taken to ensure the project has ready access to a sufficient supply of appropriately skilled and unskilled labor to ensure construction is completed in a competent manner throughout the life of the project (as required in Section III.B), including a description of any required professional certifications and/or in-house training, registered apprenticeships or labor-management partnership training programs, and partnerships with entities like unions, community colleges, or community-based groups;
  - ii. Steps taken and to be taken to minimize risks of labor disputes and disruptions that would jeopardize timeliness and cost-effectiveness of the project;
  - iii. Steps taken and to be taken to ensure a safe and healthy workplace that avoids delays and costs associated with workplace illnesses, injuries, and fatalities, including descriptions of safety training, certification, and/or licensure requirements for all relevant workers (*e.g.*, OSHA 10, OSHA 30, confined space, traffic control, or other training required of workers employed by contractors), including issues raised by workplace safety committees and their resolution;
  - iv. The name of any subcontracted entity performing work on the project, and the total number of workers employed by each such entity, disaggregated by job title; and

3

<sup>&</sup>lt;sup>4</sup> As determined by the U.S. Secretary of Labor in accordance with subchapter IV of chapter 31 of title 40, United States Code (commonly known as the "Davis-Bacon Act"), for the corresponding classes of laborers and mechanics employed on projects of a character similar to the contract work in the civil subdivision of the State (or the District of Columbia) in which the work is to be performed.

v. Steps taken and to be taken to ensure that workers on the project receive wages and benefits sufficient to secure an appropriately skilled workforce in the context of the local or regional labor market.

Recipients must maintain sufficient records to substantiate all information above upon request.

OMB provided NTIA the approval to collect the aforementioned information through the Bi-Annual Performance (Technical) Report and Final Report on April 24, 2023. NTIA is now seeking OMB approval to modify the Bi-Annual Performance (Technical) Report and Final Report to include questions regarding equipment purchases, which will enable the Commerce Department and NTIA to ensure recipient compliance with the Build America, Buy America Act ("BABA") and facilitate NTIA's ability to collect data to comply with BABA reporting requirements. NTIA will also use the information collected to effectively administer and monitor the grant program to ensure the achievement of the Middle Mile Grant Program purposes and account for the expenditure of federal funds to deter waste, fraud, and abuse.

In order to comply with the Made in America Office and OMB-approved limited BABA waiver for Middle Mile, a Specific Award Condition (SAC) was added to relevant awards. The SAC requires that non-federal entities report in accord with 2 C.F.R. § 200.334, *Retention requirements for records*. In this connection, the recipient is required to maintain detailed records concerning the acquisition of all iron, steel, manufactured products, and construction materials used in MM projects. This includes but is not limited to the: acquisition date; acquisition price; verification of domestic sourcing; how it was used in the project; and current location.

Moreover, the Middle Mile NOFO Section IV.I.1 states that grant recipients may only use federal award funds and any non-federal cost share committed to an award to pay for allowable costs under the MM Program. Allowable costs are determined in accordance with the cost principles identified in 2 C.F.R. Part 200, including Subpart E of such regulations for States and non-profit organizations, and in 48 C.F.R. Part 31 for commercial organizations,17 as well as in the grant program's authorizing legislation. In addition, costs must be reasonable, necessary, allocable, and allowable for the proposed project, and conform to generally accepted accounting principles. Based on the scope of the MM Program, eligible uses of Middle Mile Program funds include construction, improvement, and/or acquisition of facilities and telecommunications equipment required to deploy middle mile broadband facilities. Ineligible costs described in Section IV.I.2 of the NOFO prohibits the use of grant funds for non-Middle Mile infrastructure.

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.

NTIA has collected information on the performance of individual MM Program awards through the Bi-Annual Performance (Technical) Reports and Final Report. The Bi-Annual Performance reports, submitted for the periods ending March 31 and September 30 of each year, ask a series of questions that broadly address project progress and monitoring needs of program personnel by getting baseline

(planned) and actual information on the bi-annual and cumulative project and milestone progress, and potential project barriers, if any.

The sole modification to the Bi-Annual Performance (Technical) Reports and Final Report is the addition of the Inventory Report which includes questions regarding equipment purchases. The collected data will comply with BABA reporting requirements. NTIA will also use the information collected to effectively administer and monitor the grant program to ensure the achievement of the Middle Mile Grant Program purposes and account for the expenditure of federal funds to deter waste, fraud, and abuse.

The Infrastructure Act contains robust reporting requirements for Eligible Entities, and requires NTIA, the Federal Communications Commission, and other agencies to coordinate to make information regarding federal broadband funding, low-cost plans, and other aspects of the MM Program readily available to and understandable by the public. NTIA will fulfill its obligations to the fullest extent possible. Recipients of U.S. Department of Commerce and NTIA grants also should be cognizant of the access to records requirements set forth at 2 C.F.R. § 200.337.

NTIA will protect confidential and proprietary information from public disclosure consistent with applicable law, including the Trade Secrets Act, as amended (18 U.S.C. § 1905) and the Economic Espionage Act of 1996 (18 U.S.C. § 1831 *et seq.*). In the event that a submission contains information or data deemed to be confidential commercial information or that otherwise should not be publicly disclosed, that information should be identified, bracketed, and marked as Privileged, Confidential, Commercial or Financial Information. Based on these markings, the confidentiality of the contents of those pages will be reviewed for protection consistent with applicable law.

Additionally, some of the information submitted in the course of applying for funding under this program or provided in the course of its grant management activities, may be considered law enforcement sensitive or otherwise important to national security interests. This may include threat, risk, and needs assessment information, and discussions of demographics, transportation, public works, and industrial and public health infrastructures. In the event that a submission contains such information or data, that information should be identified, bracketed, and marked appropriately. Based on these markings, the confidentiality of the contents of those pages will be reviewed for protection consistent with applicable law. The applicant should be familiar with the regulations governing Protected Critical Infrastructure Information (6 C.F.R. Part 29) and Sensitive Security Information (49 C.F.R. Part 1520), as these designations may provide additional protection to certain classes of homeland security information.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

Collection of all information will be accomplished through electronic submissions. Analysis and aggregation of information will not be done using technical analysis techniques. All submissions will be analyzed individually.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2

The Bi-Annual Performance (Technical) Reports and Final Reports are unique to the MM Program. The reports ask specific questions relating to the program's performance. NTIA may only collect this information from MM Program recipients and it is not available elsewhere.

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

This item does not apply.

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.

Without the information requested on the Bi-Annual Performance (Technical) Reports and Final Report, NTIA cannot effectively ensure that grant recipients are spending their grant dollars in a way that is consistent with the purposes of the MM Program. Non-Federal entities will also be unable to satisfy requirements for the BABA SAC.

In the absence of collecting this information, NTIA would lack the means to evaluate grant recipients' progress toward achieving MM Program purposes and priorities. Moreover, without these reports, the grants could be the subject of waste, fraud, and abuse of federal funds. Therefore, it is necessary for the NTIA to collect information using these reports.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner:
- requiring respondents to report information to the agency more often than quarterly;

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

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

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

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

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

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

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

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

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

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

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

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

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

 requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

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

8. If applicable, provide a copy and identify the date and page number of publications in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received

in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

NTIA provided the 60-day notice in the Federal Register, published on October 23, 2023 (Vol. 88, No. 162, p. 57,441), and did not receive any comments from the public as of the end of the comment period on October 23, 2023. The 60-day notice can be found at<u>at: https://www.govinfo.gov/content/pkg/FR-2023-08-23/pdf/2023-18178.pdf.</u>

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

NTIA will not provide gifts or payments to MM grant recipients.

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 Systems of Records Notice (SORN) or Privacy Impact Assessment (PIA), those should be cited and described here.

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

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

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

- 12. Provide estimates of the hour burden of the collection of information.
  - Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
  - If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
  - Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under 'Annual Cost to Federal Government'.

NTIA developed burden estimates for the Performance (Technical) Report and Final Report based on an activity breakdown analysis of the reporting forms. A team of consultants reviewed the forms in detail. Individuals on the team estimated how much time it would take for them to perform the following activities:

- Review instructions;
- Collect and process information;
- Adjust existing practices to comply with the rules of the information collection;
- Search data sources;
- Complete and review the response (on a field-by-field basis); and
- Transmit or disclose the information.

The analysis team then averaged out their burden hour estimates for each activity to produce a final activity breakdown, which added up to the burden hours for individual forms. There are 39 MM grants in total.

Middle Mile Grant Program  (Estimated Annualized Respondent Burden Hours							
Type of Form	Type of Respondent (e.g., Occupational Title)	# of Responde nts (a)	Annual Responses per Responde nt Required	Total Annual Response s Expected per Year (c) = (a) x (b)	Hour Burden Per Respons e (d)	Aggregate Hour Burden (e) = (c) x (d)	
Bi-Annual Performance Report	Administrati ve Services Manager	39	2	78	38.22	2,981.16	
Final Performance Report	Administrati ve Services Manager	39	1	39	38.22	1,490.58	
Total			3	117	38.22	4,471.74	

NTIA estimates that responses to the questions included in the proposed regulations require an average of 38.22 hours to complete. Estimating the maximum number of respondents at 39, this would result in a total burden of 4,471.74 hours. It should be noted that 4,471.74 hours is the maximum number of hours in a year which would burden respondents; typically, a respondent would be expected to complete two Bi-Annual Performance Reports each year and a Final Performance Report only once the period of performance expires.

The total estimated costs to respondents or record-keepers are based on the following:

- The total hour burden of the collection of information equaling 4,471.74 hours.
- Respondents will be State, territory, or Tribal land personnel. To estimate reasonable staff expenses
  to respond to this information collection, NTIA reviewed the Bureau of Labor Statistics (BLS)
  Occupational Outlook Handbook and determined that the Administrative Services Manager
  description closely aligns with the positions of recipient staff responsible for completing this request.
  BLS lists a median salary of \$99,290 annually, amounting to \$47.73 per hour.
  <a href="https://www.bls.gov/ooh/management/administrative-services-managers.htm">https://www.bls.gov/ooh/management/administrative-services-managers.htm</a>
- Total cost based on an hour's burden equals \$213,436.15 for the Bi-Annual Performance (Technical) Report and Final Performance Report.

## **Estimated Annualized Respondent Cost**

Type of	Form	Number of	Number of	Annual	Hourly	Total Burden
Respondent/Occupational		Respondents	Responses	Burden	Wage	Costs
Title			per	per	Rate	
			Respondent	Response		
				(Hrs)		
Administrative Services	Performanc	39	2	38.22	\$47.73	\$ 142,290.77
Manager	e (Technical	39		30.22	\$47.73	\$ 142,290.77
Widilagei	Report)					
	тероге)					
Administrative Services	Final Report	39	1	38.22	\$47.73	\$ 71,145.38
Manager						
Total						\$213,436.15

The estimate in hours of the burden of the collection of information does not include the hours for the Standard Forms associated with this grant program. The burden hour estimates for the Standard Forms will be included on NTIA's Request for Common Form to use the previously approved OMB information collection instruments.

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

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

14. Provide estimates of annualized cost 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 Question 12, 13, and 14 in a single table.

NTIA intends to begin making grant awards for the initial rounds of MM grant program funding by February 6<sup>th</sup>, 2023. The costs to the federal government for this information collection also will include:

- a. NTIA staffing
- b. Contract Services to support grants processing and monitoring
- c. Grants Office Services to make financial awards; and

d. other related expenses.

The administrative budget ceiling in the Act for MM Program is \$980,000,000 (\$1,000,000,000 minus two percent set aside to cover NTIA's administrative costs). This is a non-recurring collection of limited cost to NTIA. NTIA will collect and store the information in electronic format for a maximum of 117 responses annually and will not need to acquire additional information systems for the collection and storage of the data. Therefore, costs associated with printing, equipment, and support services are incidental to general NTIA administrative and infrastructure costs. The cost to review responses is a small portion of the salaries of staff time assigned to the program. Total annual staff time is not expected to exceed 120 hours, which is less than 1% of total program staff time.

Estimated Cost: 117 hours at \$45.14 per hour (based on GS-12 staff salary<sup>5</sup>) = \$ 13,203.45.

**Annualized Costs to the Federal Government** 

Staff	Grade/ Step	Salary	Fringe (if applicable	% of Effort (Annually)	Total Annualized Cost to Gov't
NTIA Program Staff	12	\$45.14 per hour	Included in hourly estimate	2.5 hours per respondent, 39 respondents, maximum 3 reports in a year	\$45.14 * 2.5 hours * 39 responses * maximum 3 reports = \$ 13,203.45
Total Cost to the Government					\$ 13,203.45

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

This is a new information collection.

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

The information collected will not require complex analytical techniques. The information collected may be tabulated or published in aggregate on the NTIA website in the future.

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.

Approval is not being sought to not display the expiration date for OMB approval of the information collection. The standard OMB control number is expected to be displayed on the paper and electronic versions of the Performance (Technical) Report and Final Report.

<sup>&</sup>lt;sup>5</sup>Office of Personnel Management, 2023 General Schedule (GS) Pay & Leave – Salaries & Wages for Washington-Baltimore-Arlington, https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/23Tables/html/DCB\_h.aspx.

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

The agency certifies compliance with 5 C.F.R. § 1320.9 and the related provisions of 5 C.F.R. § 1320.8(b)(3).