

SUPPORTING STATEMENT

A. Justification:

The Commission adopted on September 18, 2023, the *Report and Order (R&O)*, Amendment of Part 73 of the Commission's Rules to Update Television and Class A Television Broadcast Station Rules, and Rules Applicable to All Broadcast Stations, MB Docket No. 22-227, FCC 23-72. The *R&O* adopted a number of revisions to the Commission's rules to reorganize and clarify the Commission's technical licensing, operating, and interference rules for full power and Class A television, including a revision to 47 CFR Section 73.3544(b) and (c).

1. 47 CFR Section 73.3544(b) permits that an informal electronic filing of an Administrative Update via the Commission's Licensing and Management System (LMS) may be filed to cover the following changes:

- (1) A correction of the routing instructions and description of an AM station directional antenna system field monitoring point, when the point itself is not changed.
- (2) A change in the type of AM station directional antenna monitor. See §73.69.
- (3) The location of a remote control point of an AM or FM station when prior authority to operate by remote control is not required.

47 CFR Section 73.3544 (c) requires a change in the name of the licensee where no change in ownership or control is involved may be accomplished by electronically filing an Administrative Update via LMS by the licensee to the Commission.

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

Statutory authority for this collection of information is contained in Section 154(i) of the Communications Act of 1934, as amended.

2. FCC staff use the data to ensure changes are in accordance with FCC rules and regulations and to issue a modified station license.
3. This collection of information is an informal electronic filing. We do not believe the use of information technology is burdensome in this situation.
4. This agency does not impose a similar information collection on the respondents. There is no similar data available.
5. In conformance with the Paperwork Reduction Act of 1995, the Commission is making an effort

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to minimize the burden on all respondents. Therefore, this information collection will not have a significant economic impact on a substantial number of small entities/businesses.

6. The frequency for this collection of information is determined by respondents, as necessary.
7. This collection of information is consistent with the guidelines in 5 CFR Section 1320.5(d)(2).
8. The Commission published a Notice in the *Federal Register* on October 13, 2023 (88 FR 70980) seeking comments from the public on the information collection requirements contained in this collection. No comments were received from the public.
9. No payment or gift was provided to the respondents.
10. There is no need for confidentiality with this collection of information.
11. This collection of information does not address any private matters of a sensitive nature.
12. We estimate 325 respondents (300 respondents filing information applications + 25 filing notifications). For Section 73.3544(b), we assume that each respondent spends an hour to prepare the application and file it with the Commission, including time in consultation with a engineering consultant, who will review and prepare the engineering work necessary to obtain the station license). For Section 73.3544(c), we estimate that is require about 15 minutes (0.25 hours) for a respondent to complete the written notification for a change to the license (without a change in ownership or control) and submit it to the FCC.

Total Number of Annual Respondents: 325 Licensees

Total Number of Annual Responses:

300 application filings
+25 notification filings
325 filings/responses

Annual Hourly Burden:

300 informal applications x 1 hour = 300 hours
25 notifications x 0.25 hours = 6.25 hours
Total Annual Burden Hours = 306.25 hours (306 rounded)

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Annual “In-House Cost” Burden: We estimate that the respondent will have an average salary of \$100,000/year (\$48.08/hour).

$$\begin{aligned}
&300 \text{ informal applications} \times 1 \text{ hour} \times \$48.08/\text{hour} = \$14,424.00 \\
&25 \text{ notifications} \times 0.25 \text{ hours} \times \$48.08/\text{hour} = \$ \underline{300.50} \\
&\text{Total “In House” Burden Cost} = \mathbf{\$14,724.50}
\end{aligned}$$

This estimate is based on FCC staff’s knowledge and familiarity with the availability of the data required.

13. Annual Cost Burden: We assume that each respondent will use a consulting engineer to complete the informal applications to modify station licenses. The average cost of a consulting engineer is \$250/hour.

$$\text{Total Annual Cost Burden} = 300 \text{ informal applications} \times 1 \text{ hour} \times \$250/\text{hour} = \mathbf{\$75,000}$$

14. Cost to the Federal Government: The Commission will use professional staff at the GS-12, step 5 level (\$51.15/hour) and clerical staff at the GS-5, step 5 level (\$23.28/hour) to process these informal applications/notifications.

$$\begin{aligned}
&300 \text{ informal applications} \times 0.5 \text{ hours} \times \$51.15/\text{hour} = \$7,672.50 \\
&300 \text{ informal applications} \times 0.5 \text{ hours} \times \$23.28/\text{hour} = \$3,492.00 \\
&25 \text{ notifications} \times 0.25 \text{ hours} \times \$23.28/\text{hour} = \$ \underline{145.50} \\
&\text{Total Annual Cost to the Federal Government} = \mathbf{\$11,310.00}
\end{aligned}$$

15. There are no program changes or adjustments to this collection as a result of the rules adopted in FCC 23-72.

16. The data will not be published.

17. OMB approval of the expiration of the information collection will be displayed on OMB’s website.

18. There are no exceptions to the Certification Statement.

B. Collections of Information Employing Statistical Methods:

This information collection does not employ any statistical methods.