

**SUPPORTING STATEMENT**

**A. Justification:**

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

Pursuant to the Warning Alert and Response Network (WARN) Act, Congress required the Commission to create the wireless emergency alert (WEA) system (previously known as the Commercial Mobile Service Alert System) to promote the safety of life and property through the use of wire and radio communications.

All the information collections in this Supporting Statement refer to the WEA system, a mechanism under which Commercial Mobile Service (CMS) providers may elect to transmit emergency alerts to the public. Those CMS Providers electing to transmit WEA messages are referred to as Participating CMS Providers. OMB approved without change the previous revision of a currently approved collection on August 1, 2018 (ICR Ref. No. 201804-3060-013). OMB also approved an extension of the collection, as revised, on August 3, 2021 (ICR Ref. No. 202106-3060-002).

**Notice of Election.**

On August 7, 2008, the Commission released the Third Report and Order in PS Docket No. 07- 287 (CMS Third Report and Order), FCC 08-184. The CMS Third Report and Order implemented provisions of the WARN Act, including a requirement that within 30 days of release of the CMS Third Report and Order, each CMS provider must file an election with the Commission indicating whether or not it intends to transmit emergency alerts as part of WEA. The Commission began accepting WEA election filings on or before September 8, 2008.

The Bureau has sought several extensions of this information collection. On January 30, 2018, the Commission adopted a WEA Second Report and Order and Second Order on Reconsideration in PS Docket Nos. 15-91 and 15-94, FCC 18-4 (WEA Second R&O). In that order, the Commission defined “in whole” or “in part” WEA participation, specified the difference between these elections, and required CMS providers to update their election status accordingly.

On October 20, 2023, the Commission released a WEA Third Report and Order in PS Docket Nos. 15-91 and 15-94, FCC 23-88 (WEA Third R&O). This order requires all CMS providers to refresh their WEA election status by uploading election information into an electronic WEA Database to be established and hosted by the Commission. CMS providers will state whether they participate in WEA in whole, in part, or not at all, and will disclose the geographic areas where they offer WEA. Each CMS provider is

required to disclose the entities on behalf of which it files its election, irrespective of whether it elects to participate in WEA. WEA election attestation disclosures must include (a) the name and WEA participation of the CMS provider; (b) the name and WEA participation status of any subsidiary companies on behalf of which the CMS provider's election is filed; (c) any "doing business as" names under which the CMS provider or its subsidiaries offer wireless service to the public. These requirements allow consumers to understand potential nuances in WEA participation among subsidiary entities owned or controlled by the same parent company.

CMS providers that offer WEA in an area that is geographically coextensive with their wireless voice coverage area may satisfy this requirement by attesting to that fact, and, the Commission will use the Graphical Information System (GIS) voice coverage area map that the provider has already submitted to satisfy the Commission's Broadband Data Collection requirement. CMS providers that offer WEA in an area that is not co-extensive with their wireless voice coverage area must submit a geospatial data file compatible with the WEA Database describing their WEA coverage area to satisfy this requirement.

The Commission will aggregate this information into the WEA Database which will be available to alerting authorities and the public.

Enhanced Notice At Time of Sale.

Section 10.240 of the Commission's rules already requires that CMS providers participating in WEA (Participating CMS Providers) "in part" provide notice to consumers that WEA may not be available on all devices or within the entire service area, as well as details about the availability of WEA service. As part of the WEA Second R&O, the Commission adopted enhanced disclosure requirements, requiring Participating CMS Providers "in part" to disclose the extent to which enhanced geo-targeting is available on their network and devices at the point of sale and the benefits of enhanced geo-targeting at the point of sale. We believe these disclosures will allow consumers to make more informed choices about the best providers and devices to insure their ability to receive WEA Alert Messages that are relevant to them.

Notice to Current Subscribers.

A CMS provider that elects not to transmit WEA Alert Messages, in part or in whole, shall provide clear and conspicuous notice, which takes into account the needs of persons with disabilities, to existing subscribers of its non-election or partial election to provide Alert messages by means of an announcement amending the existing subscriber's service agreement.

A CMS provider that elects not to transmit WEA Alert Messages, in part or in whole, shall use the notification language set forth in §10.240 (c) or (d) respectively, except that

the last line of the notice shall reference FCC Rule 47 CFR 10.250, rather than FCC Rule 47 CFR 10.240.

In the case of prepaid customers, if a mailing address is available, the CMS provider shall provide the required notification via U.S. mail. If no mailing address is available, the CMS provider shall use any reasonable method at its disposal to alert the customer to a change in the terms and conditions of service and directing the subscriber to voice-based notification or to a Web site providing the required notification.

#### Database Collection.

The Commission also seeks to collect information in connection with its creation of a WEA database to improve information transparency for emergency managers and the public regarding the extent to which WEA is available in their area. The Commission previously requested this information from CMS providers on a voluntary basis, including whether or not a CMS provider participated in WEA, and if so, geographic area served and devices that are programmed, at point of sale, to transmit WEAs. As a result of rules adopted in the WEA Third R&O, CMS providers must provide this information to the Commission to be stored in a WEA database that the Commission will establish and maintain. Participating CMS Providers are required to update their WEA election information biannually in the Commission's WEA database. The information in the WEA database will be available publicly.

We note that many Participating CMS Providers already provide information of this nature in their docketed filings. As discussed below, this database will remove a major roadblock to emergency managers' ability to conduct tests of the alerting system and enable individuals and emergency managers to identify the alert coverage area.

Since collecting information on the extent of CMS providers' participation is statutorily mandated, the Commission requests approval of this existing collection by OMB so that the Commission may continue to meet its statutory obligation under the WARN Act. The database information collection is mandatory.

#### Integrating Location-Aware Maps into Alert Messages.

The WEA Third Report and Order requires WEA messages to link the recipient to a native mapping application to better understand the specific, localized geographic area under threat and where the recipient is located relative to the threat. This knowledge will enable recipients to more quickly take any necessary protective action, which will be especially useful during time-sensitive emergencies such as earthquakes, and wildfires.

#### Expanding WEAs to Include Multilingual Alerts.

The WEA Third R&O requires Participating CMS Providers to pre-install templates of

common alert messages in the 13 most commonly spoken languages on WEA-capable phones they provide to consumers. This will make WEA messages accessible for the first time to millions of Americans who primarily speak a language other than English. The 13 languages included are: Spanish, Chinese, Tagalog, Vietnamese, Arabic, French, Korean, Russian, Haitian Creole, German, Hindi, Portuguese, and Italian. The WEA-capable mobile devices of Participating CMS Providers must also support American Sign Language (ASL) templates.

The statutory authority for this information collection is authorized under 47 U.S.C. 151, 152, 154(i) and (n), 201, 301, 303(b), (e), (g), (j), and (r), 307, 309, 403, and 606, of the Communications Act of 1934, as amended, and 1201, (a), (b), (c), (f), 1203, 1204, and 1206 of the Warning Alert and Response Network Acts.

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

**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.**

Notice of Election: The mandatory information collection has been and will be used by the Commission to satisfy the statutory requirement of the WARN Act that the Commission receive notice of election by all CMS providers concerning whether and if so, to what extent, they will participate in WEA. The Commission will make available on its website a WEA database with this information for the benefit of the public and emergency managers.

Notice to Current Subscribers and at Time of Sale: CMS providers have provided notice to consumers that WEA may not be available on all devices or within the entire service area, as well as details about the availability of WEA service and the CMS providers' degree of participation.

Database Collection: The new mandatory information collection is for a database being created that will help emergency managers, individuals, and Commission staff determine which phones and CMS providers provide WEAs, and the areas served by those CMS providers. Specifically, CMS providers will record in the database: (a) their refreshed WEA participation election; (b) the geographic area in which they offer WEA; and (c) a list of all the mobile devices they offer at the point of sale, indicating for each device whether, and to what extent, it is WEA-capable. The WEA database will improve accessibility, enable analytics, and aggregate coverage data and information about Participating CMS Providers and their devices, and enhance confidence in the WEA system for the public and emergency personnel. The information collected to the WEA database will be updated every six months (biannually) by CMS providers to maintain reliability. The mandatory, standardized database replaces the voluntary submissions formerly required of CMS providers.

Integrating Location-Aware Maps into Alert Messages: This information, provided by Participating CMS Providers, will be used by WEA recipients to acquire better situational awareness during emergencies. WEA-capable devices will support alert messages that include a link to a native mapping application that will enable a recipient to determine his or her real time location in relation to the area affected by the WEA message. The map must include the overall geographic area, the contour of the area subject to the emergency alert within that geographic area, and the alert recipient's location relative to these geographic areas. This functionality is required only when a the device has access to a mapping application, location services are enabled, and necessary permissions are granted.

Multilingual WEA Alerts: Recognizing that there are millions of Americans whose primary language is not English, Participating CMS Providers will now translate WEA messages into the 13 most commonly spoken languages (other than English) in the United States by creating templates enabling these messages to be stored on WEA-enabled mobile devices. People whose primary language is not English will, for the first time, be able to understand emergency alerts transmitted to their phones and react accordingly. In addition, Participating CMS Providers must also support ASL templates, enabling hearing impaired consumers better accessibility to emergency alerts.

**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.**

Notice of Election: Notices of election, including disclosure of the geographic area the provider serves, will be submitted on a standardized form electronically to a database managed by the Commission. CMS providers will update their information in the WEA database biannually.

If there are technical impediments to using the Web-based filing system, then a written notification to the Commission by email, FAX, courier, or U.S. Mail may be used. All non-electronic notifications shall contain the information required above, and shall be addressed to the Chief, Public Safety and Homeland Security Bureau, Federal Communications Commission, Washington, D.C. 20554. (However, all hand-delivered Notifications shall be addressed to the Federal Communications Commission, Office of the Secretary).

Notice at Time of Sale and Current Subscribers: The availability and benefits of enhanced geo-targeting may be disclosed to new subscribers by URL or by a sales representative at the point of sale. Sales representatives are not required to memorize information about the availability and benefits of enhanced geo-targeting, but they may rely on information available at the CMS Provider's URL to provide details to consumers at the point of sale.

Disclosure to current subscribers may take the form of an announcement amending the existing subscriber's service agreement. In the case of prepaid customers, if a mailing address is available, the CMS provider shall provide the required notification via U.S. mail. If no mailing address is available, the CMS provider shall use any reasonable method at its disposal to alert the customer to a change in the terms and conditions of service and directing the subscriber to voice-based notification or to a Web site providing the required notification.

Database Collection: The Commission will collect the notice of election and other required information from CMS providers electronically on a mandatory basis using a Commission designed and maintained database. The Commission has experience successfully developing databases for similar kinds of reporting by CMS providers (e.g., NORS, and DIRS) which are efficient, user-friendly, and minimally burdensome.

Integrating Location-Aware Maps into Alert Messages: The presentation of the maps and location information will all be created and displayed electronically. Participating CMS Providers will work with handset manufacturers and solution vendors to implement these changes. Participating CMS Providers will not be required to broadcast additional information over their networks to facilitate the mapping requirements.

Multilingual WEA Messages: Participating CMS Providers will translate alert messages into the 13 most commonly spoken non-English languages. These message templates will be pre-installed on devices sold by Participating CMS Providers. Subscribers will be able to use their devices to select which language to receive WEA messages, and the provider is required to display the alert in the chosen language, or to display the alert message in English if the preferred language is not supported by the alert message templates.

**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.**

The mandatory reporting requirements are unique to WEA and are not duplicated elsewhere.

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

As an overarching principle, the Commission weighed the costs small entities might incur against the public interest benefits of the new obligation imposed and concluded that the public safety benefits outweighed the costs. Further, we have carefully designed and evaluated the reporting requirements to minimize the time and amount of data needed from small entities for the Commission to achieve its objectives as stated in item 1 above. In support of smaller, rural providers, we adopted a longer compliance time frame, providing sufficient flexibility for cost-related concerns smaller providers might encounter.

**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.**

Election and Notice Collections: Failure to conduct the enhanced consumer disclosures, including availability of WEA-capable devices and geographic areas served, and/or ongoing collection of notices of election as required by the WARN Act could constitute a violation of the Commission's rules as directed by Congress. Further, the ability of the Commission to develop and deploy an effective WEA system could be jeopardized if the Commission were unable to receive a timely notice of election and other required information from CMS providers. Further, failure to perform this collection could adversely affect our situational awareness and the public's ability to access emergency support services during emergencies.

Database Collection: This information collection is now mandatory and CMS providers must update their information biannually. The change recognizes that maintaining a voluntary collection of this information inhibits the public, Commission staff, and emergency managers from being able to efficiently ascertain the geographic coverage of WEA for a particular area, as well as the devices that provide such coverage.

Integrating Location-Aware Maps into Alert Messages: The purpose of the WEA system is to provide recipients with timely, actionable information to allow them to assess and react to whatever situation is presented in the alert. Providing a map that would quickly allow a recipient to determine proximity to the area for which the alert has been issued. This mapping feature advances public safety with minimal impact on Participating CMS Providers as no additional information would need to be broadcast over its infrastructure to enable this functionality.

Multilingual WEA Messages: Since its launch in 2012, over 84,000 alert messages have been issued including severe weather warnings, evacuate and shelter-in-place alerts, as well as AMBER, GOLD, and SILVER alerts. The Commission has consistently worked to improve the reach and accuracy of these messages. Requiring Participating CMS Providers to transmit alert messages in ASL and 13 of the most common languages, besides English, spoken in the U.S. will increase the accessibility of WEA messages to a presently underserved population. Requiring Participating CMS Providers to include within the alert message a map showing the area of the emergency in relation to where the person receiving the message is located will improve the accuracy and usefulness of the alerts. Without these steps, non-English speakers and those with hearing impairments would continue to be underserved, and people receiving the alert message would be uncertain as to the exact location of the emergency.

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

Election and Notice Collections: We do not foresee special circumstances that would result in these information collections being inconsistent with the listed criteria. Participation elections are not general collections of information, but rather updates to previous elections and slight elaborations on the “yes” or “no” election previously approved by OMB. Similarly, the enhanced disclosure requirement is a slight elaboration on a pre-existing collection.

Database Collection: We do not foresee that the mandatory information collection will be collected in a manner inconsistent with the specified criteria because the Commission will structure the database to limit the scope of the required data.

Integrating Location-Aware Maps into Alert Messages: We do not foresee special circumstances that would result in these information collections being inconsistent with the listed criteria.

Multilingual WEA Messages: We do not foresee special circumstances that would result in these information collections being inconsistent with the listed criteria.

**8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency’s notice, 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.**

The Commission published a 60-day notice in the Federal Register seeking comments from the public on April 4, 2024 (89 FR 24835). No PRA Comments were received as a result of this Notice.

Other than the Federal Emergency Management Agency (FEMA), the Commission has not consulted with others outside the agency on these collections.

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

No payment or gift to respondents has been or will be made.

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

There is no need for confidentiality with this collection of information.

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

There are no questions of a sensitive nature involved with this collection of information.



**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.**

**Collection Burdens Attributable to All 1,253 CMS Providers:**

**Notice of Election**

**Total Number of Respondents: 1,253.**

**Frequency of response:** On occasion.

**Total Number of Responses Annually: 1,253.**

1,253 carriers x 1 reports/annually = **1,253 responses.**

**Total Annual Burden Hours:**

1,253 carriers x 1 reports/carrier/annually x 0.5 hours/report = **626.5 hours (rounded to 627 hours).**

**Method of estimation of burden:** This time estimate is based solely on our estimate of the actual time needed for data entry and submission. In making our time estimate, we have taken into account that all filings are to be made electronically through the submission of a letter describing the CMS provider's election. In sum, we estimate the total time needed to file this initial notice of election to be no more than 30 minutes (0.5 hours).

**Total Annual "In-House" Costs:** The Commission estimates the hourly wage of full-time employee who will be submitting this information as \$40.91/hour (2024 General Schedule (GS) Locality Pay Table Hourly Rate (Washington-DC-Baltimore-Arlington, DC-MD-VA-WV-PA, GS Grade 10, Step 5). Therefore, the in-house costs to the respondents are as follows:

$\$40.91 \times 1,253 \text{ carriers} \times 1 \text{ report/annually} \times 0.5 \text{ hours per report} = \mathbf{\$ 25,630.12.}$

**Enhanced Notice at Time of Sale**

**Total Number of Respondents: 1,253.**

**Frequency of response:** On occasion.

**Total Number of Responses Annually:**

1,253 carriers x 1 reports/annually = **1,253 responses.**

**Total Annual Burden Hours:**

1,253 carriers x 1 reports/carrier/annually x 10 hours hours/report<sup>1</sup> = **12,530 hours.**

**Total Annual “In-House” Costs:** The Commission estimates the hourly wage of full-time employee who will be submitting this information as \$40.91/hour. Therefore, the in-house costs to the respondents are as follows:

$\$40.91 \times \text{carriers} \times 1,253 \text{ report/annually} \times 10 \text{ hours per report} = \mathbf{\$512,602.30.}$

**Notice to Current Subscribers**

**Total Number of Respondents: 1,253.**

**Frequency of response: 1.**

**Total Number of Responses Annually:**

1,253 carriers x 1 report/annually = **1,253 responses.**

**Total Annual Burden Hours:**

1,253 carriers x 1 report/carrier/annually x 12 hours/report = 15,036 hours.

**Total Annual “In-House” Costs:**

The Commission estimates the hourly wage of full-time employee who will be submitting this information as \$40.91/hour. Therefore, the in-house costs to the respondents are as follows:

$\$40.91 \times 1,253 \text{ carriers} \times 1 \text{ report/annually} \times 12 \text{ hours per report} = \mathbf{\$615,122.76.}$

**Database Collection**

**Total Number of Respondents: 1,253.**

**Frequency of response: On occasion.**

**Total Number of Responses Annually: 1,253.**

1,253 carriers x 1 reports/annually = **1,253 responses.**

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<sup>1</sup> The estimated time per response can take from .5 hours to 10 hours for this requirement but the Commission is basing its calculation on 10 hours per response for this requirement.

**Total Annual Burden Hours:**

1,253 carriers x 1 reports/carrier/annually x 0.5 hours/report = **626.5 hours**  
(rounded to 627 hours).

**Method of estimation of burden:** This time estimate is based solely on our estimate of the actual time needed for data entry and submission. In making our time estimate, we have taken into account that all filings are to be made electronically through the database interface. In sum, we estimate the total time needed to file this initial notice of election to be no more than 30 minutes (0.5 hours).

**Total Annual “In-House” Costs:** The Commission estimates the hourly wage of full-time employee who will be submitting this information as \$40.91/hour. Therefore, the in-house costs to the respondents are as follows:

$\$40.91 \times 1,253 \text{ carriers} \times 1 \text{ report/annually} \times 0.5 \text{ hours per report} = \mathbf{\$25,630.12}$ .

**Total Respondents Annually: 1,253**

**Total Annual Responses:  $1,253 + 1,253 + 1,253 + 1,253 = 5,012$**

**Total Annual Burden:  $627 + 12,530 + 627 + 15,036 = 28,820$**

**Total Combined Annual “In-House” Costs:  $\$25,630.12 + \$512,602.30 + \$615,122.76 + \$25,630.12 = \$1,178,985.30$**

**Burdens Attributable to Participating CMS Providers:**

**One-time “in-house” costs:** The Commission estimates that Participating CMS Providers will incur one-time in-house costs to update WEA standards and update and test software improvements necessary to comply with the new requirements adopted here.<sup>2</sup> The cost is broken down as follows:

Update standards: We estimate that updating 12 standards will require Participating CMS Providers to use 15 in-house network engineers in order to fulfill this requirement, working one hour every other week for one year, a total of 26 hours at an hourly salary of \$62.25 per hour plus an additional \$28.01 representing a 45% mark-up for benefits for a total hourly compensation of \$90.26.

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<sup>2</sup> There is a difference in the one-time costs itemized in this Supporting Statement as compared to what was contained in the WEA Third R&O. This is due to the more accurate calculations contained here which resulted in slight differences to our rounding calculations.

26 hours x 15 engineers x 12 standards = 4,680 hours divided by 3 = 1,560 hours

1,560 burden hours x \$90.26 = **\$140,805.60 rounded to \$140,800.**<sup>3</sup>

Software modification: We estimate that 38 Participating CMS Providers will use an in-house software developer to perform this requirement at an annual salary of \$132,930 plus an additional \$59,819 representing a 45% mark-up for benefits for total annual compensation of \$192,749. The developer would work for ten months of a year (0.83 of a year) on this project.<sup>4</sup>

**Total Number of Respondents: 38.**

**Frequency of response: 1 software modification.**

**Total Annual Burden Hours:**

38 respondents x 1 software modification x 1 software developer x 1,726.4 hours<sup>5</sup> = 65,603.2 hours, rounded to 65,600 hours total annual burden hours divided by 3 = 21,867 hours.

**Total Annual “In-House” Costs:**

The Commission estimates the hourly wage of full-time employee who will be submitting this information as \$92.67/hour<sup>6</sup>. Therefore, the in-house costs to the respondents are as follows:

$\$92.67 \times 21,867 \text{ hours} = \mathbf{\$2,026,414.89, \text{ rounded to } \$2,026,000.}$

Software testing: We estimate this will require 12 in-house software developers at an annual salary of \$132,930 plus an additional \$59,819 representing a 45% mark-up for benefits for total annual compensation of \$192,749. These developers would work for two months of a year (0.17 of the year) and there would be one set of 12 developers for each of the 38 Participating CMS Providers.

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<sup>3</sup> All one-time estimated Participating CMS Providers burden hours were annualized and then multiplied by the hourly costs. .

<sup>4</sup> We anticipate the costs included in this category include the costs associated with providing Multilingual Alerts Messages and Integrating Location-Aware Maps into Alert Messages.

<sup>5</sup> This figure is calculated based on a 2,080 hour work year x 0.83 (the fraction of the year attributed to this project) = 1,726.4 hours.

<sup>6</sup> This figure is calculated based on an annual salary of \$192,749 divided by 2,080 hours per year = an hourly salary of \$92.67.

**Total Number of Respondents: 38.**

**Frequency of response: 1 testing sequence.**

**Total Annual Burden Hours:**

38 respondents x 1 testing sequence x 12 software developers x 346.7 hours<sup>7</sup> = 158,095.2 hours, rounded to 158,100 hours, divided by 3, 52,700 hours.

**Total Annual “In-House” Costs:**

The Commission estimates the hourly wage of full-time employee who will be submitting this information as \$92.67/hour<sup>8</sup>. Therefore, the in-house costs to the respondents are as follows:

$\$92.67 \times 52,700 \text{ hours} = \mathbf{\$4,883,709, \text{ rounded to } \$4,884,000.}$

**In-House Recurring Costs:** We estimate that each of the 76 Participating CMS Providers will experience annual in-house recurring costs of \$160,000 to report their WEA availability. We estimate the work necessary to calculate and report WEA availability could be accomplished by a data scientist compensated at an hourly rate of \$80.33 (\$55.40 base salary plus a 45% mark-up for benefits of \$24.93). We estimate that this task will be an in-house employee, with 26 hours annually as the upper bound of the time required for Participating CMS Providers to report their WEA availability, including any changes in service, and a list of mobile devices offered at the point of sale.

**Total Number of Respondents: 76.**

**Frequency of response: 1.**

**Total Number of Responses Annually:**

76 Participating CMS Providers x 1 report/annually = **76 responses.**

**Total Annual Burden Hours:**

76 responses x 26 hours/report = 1,976 hours.

**Total Annual “In-House” Recurring Costs:**

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<sup>7</sup> This figure is calculated based on a 2,080 hour work year x 0.1667 (the fraction of the year attributed to this project) = 346.7 hours

<sup>8</sup> This figure is calculated based on an annual salary of \$192,749 divided by 2,080 hours per year = an hourly salary of \$92.67.

The Commission estimates the hourly wage of full-time employee who will be submitting this information as \$80.33/hour. Therefore, the in-house costs to the respondents are as follows:

$\$80.33 \times 1,976 \text{ hours} = \$158,732$ , rounded to **\$160,000**.

**CUMULATIVE TOTALS for ALL Collections of Information:**

**Total Respondents Annually: 1,253**

**Total Annual Responses:  $5,012 + 88 + 76 = 5,176$**

**Total Annual Burden:  $28,820 + 1,560 + 21,867 + 52,700 + 1,976 = 106,943$**

**Total Combined Annual “In-House” Costs:  $\$1,178,985.30 + 7,050,800 + \$160,000 = \$8,389,785.30$**

**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).**

We anticipate that Participating CMS Providers will incur one-time costs hiring third party contractors to update standards, modify software, and conduct software testing to comply with these new obligations. Our specific breakdown is as follows:

Update standards: We estimate that updating 12 standards will require 15 contract network engineers, working one hour every week for one year, a total of 26 hours at an hourly salary of \$62.25 per hour plus an additional \$28.01 representing a 45% mark-up for benefits for a total hourly compensation of \$90.26.

$\$90.26 \text{ per hour} \times 26 \text{ hours} \times 15 \text{ third party contract engineers hired by the Participating CMS Providers} \times 12 \text{ standards} = \$422,416.80$ , rounded to \$422,400, for an annual cost of **\$140,805.60, rounded to \$140,800.**<sup>9</sup>

Software modification: We estimate this will require 38 Participating CMS Providers to hire a software developer at an annual salary of \$132,930 plus an additional \$59,819 representing a 45% mark-up for benefits for total annual compensation of \$192,749. The developer would work for ten months of a year (0.83 of a year) on this project.<sup>10</sup>

The Commission estimates the hourly wage of full-time employee who will be submitting this information as \$92.67/hour<sup>11</sup>. Therefore, the annual costs to the respondents are as follows:

<sup>9</sup> All one-time costs Participating CMS Providers are estimated to incur are annualized for the initial three-year term of the collection.

<sup>10</sup> We anticipate the costs included in this category include the costs associated with providing Multilingual Alerts Messages and Integrating Location-Aware Maps into Alert Messages.

$\$92.67 \times 21,867 \text{ hours} = \$2,026,414.80$ , rounded to **\$2,026,000**.

Software testing: We estimate this will require 12 contract software developers at an annual salary of \$132,930 plus an additional \$59,819 representing a 45% mark-up for benefits for total annual compensation of \$192,749. These developers would work for two months of a year (0.1667 of the year) We estimate that 38 Participating CMS Providers will accomplish their software testing by using third party software developers in order to fulfill this requirement. The cost for this task will be:

$38 \text{ respondents} \times 1 \text{ testing sequence} \times 12 \text{ software developers} \times 346.7 \text{ hours}^{12} = 158,095.2$  hours, rounded to 158,100 hours, divided by 3, 52,700 hours.

The Commission estimates the hourly wage of full-time employee who will be submitting this information as \$92.67/hour<sup>13</sup>. Therefore, the in-house costs to the respondents are as follows:

$\$92.67 \times 52,700 \text{ hours} = \$4,883,709$ , rounded to **\$4,884,000**.

**Total Annual Costs (One-time) to the Respondent: \$7,050,800** = 140,800 + \$2,026,000 + \$4,884,000.

**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.**

**One-time costs establish the WEA database:**

CMS providers previously made non-uniform election filings in the FCC's existing electronic filing system. Updates to these elections were not required and the filings were cumbersome for emergency alerting authorities and the public to access. This new collection will standardize and expand on the information from CMS providers, but will simplify the filing process by presenting a web form with standardized data entry fields. It will simplify the filing process for CMS providers, streamline the Commission's review process, and enhance recordkeeping and retrieval capabilities.

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<sup>11</sup> This figure is calculated based on an annual salary of \$192,749 divided by 2,080 hours per year = an hourly salary of \$92.67.

<sup>12</sup> This figure is calculated based on a 2,080 hour work year x 0.1667 (the fraction of the year attributed to this project) = 346.7 hours.

<sup>13</sup> This figure is calculated based on an annual salary of \$192,749 divided by 2,080 hours per year = an hourly salary of \$92.67.

**Annualized costs to the Commission:**

Biannual WEA Election Notices

There are 1,253 CMS providers who we must enter WEA participation election information into the new FCC database biannually. We estimate that it will take a GS 13 grade 5 attorney approximately 0.5 hours to review each of the CMS providers election biannual notifications:

2,506 CMS provider WEA elections annually x .25 hours = 626.5 hours rounded up to 627

627 hours x \$64.06 per hour = \$40,166.

Participating CMS Provider Biannual Notices

There are 76 Participating CMS Providers. Their WEA election filings will contain more information and will thus require additional time for Commission staff to review. We estimate that a GS 13 grade 5 attorney will require approximately 1.5 hours to review each of the Participating CMS Providers biannual election notifications:

152 Participating CMS Providers' WEA elections annually x 1.5 hours = 228 hours

228 hours x \$64.06 per hour = \$14,606.

Total Annual Cost to the Commission: \$40,166 + \$14,606 = \$54,772.

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

The rules adopted by the Commission, modifying this collection resulted in a program change. There are no changes in the total number of respondents. However, there are increases in the total annual responses by +164, increases in the total annual burden hours by +78,123 and Participating CMS Providers will incur a one-time total annual cost of \$7,050,800 to implement the WEA systems contained in the Third R&O.

No adjustments are being reported.

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



The Commission will create, maintain, and make available on its website, a database of the names and election decision of all CMS providers that submit an election decision. The public information will be updated as needed to reflect new or changed election filings by CMS providers.

**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 does not intend to seek approval not to display the expiration date of the information collection from OMB.

**18. Explain any exceptions to the Certification Statement.**

There are no exceptions to the Certification Statement.

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

This information collection does not employ any statistical methods.