

This submission is being made pursuant to 5 C.F.R. § 1320.12 and 44 U.S.C. § 3507(j) of the Paperwork Reduction Act of 1995 to obtain the Office of Management and Budget (OMB) approval to extend this information collection (FCC Forms 471, 472, 474, 486, 488, 500).

### **SUPPORTING STATEMENT**

This information collection establishes the collection requirements for the Emergency Connectivity Fund Program, as established by Congress in the American Rescue Plan and implemented in the Commission's Report and Order, in order to obtain information from applicants that is used by the Wireline Competition Bureau (Bureau) and the Universal Service Administrative Company (USAC or the Administrator) to reimburse schools and libraries for the purchase of eligible equipment and/or advanced telecommunications and information services for use by students, school, staff, and library patrons who would otherwise lack the connected devices and broadband connections necessary to fully engage in remote learning during the COVID-19 emergency period. *See Establishing the Emergency Connectivity Fund to Close the Homework Gap*, WC Docket No. 21-93, Report and Order, FCC 21-58, adopted May 10, 2021 (*Emergency Connectivity Fund Program Report and Order*).

#### **A. Justification:**

1. *Circumstances that make the collection necessary.* The Federal Communications Commission seeks processing of this information collection under the Paperwork Reduction Act (PRA), 5 CFR § 1320.12 and 44 U.S.C. § 3507(j).

The E-Rate Program was authorized by Congress as part of the Telecommunications Act of 1996 (1996 Act), and created by the Commission in 1997 to, among other things, enhance, to the extent technically feasible and economically reasonable, access to advanced telecommunications and information services for all public and nonprofit elementary and secondary school classrooms and libraries. (See 47 U.S.C. § 254(h)(20)(A).) The E-Rate Program allows eligible schools, libraries, and consortia (comprised of eligible schools and libraries) to request universal service support for what are called "category one" services (which provide connectivity *to* schools and libraries) and "category two" services (which provide connectivity *within* schools and libraries). (See 47 CFR §§ 54.501, 54.502.) Category one services generally include data transmission and Internet access services, while category two services include internal connections (e.g., Wi-Fi), managed internal broadband services (e.g., managed Wi-Fi), and basic maintenance of internal connections. (See 47 CFR § 54.502(a)(1)-(2).)

Under the E-Rate Program, eligible schools, school districts, libraries, and consortia that include eligible schools and libraries may apply for discounts ranging from 20 percent to 90 percent of the pre-discount price of eligible services. The level of discounts may change depending on the category of eligible services selected and are based on indicators of need.

Eligible school and library applicants can seek funding on an annual basis. E-rate applicants begin the application process by first seeking bids for eligible services and filing the FCC Form 470 with USAC, the current administrator of the E-Rate program. After entering into agreements for services, applicants may seek funding for such services by filing an FCC Form 471 application with the Administrator once the application window opens.

On July 23, 2014, the Commission released an Order and Further Notice of Proposed Rulemaking (FNPRM) (WC Docket No. 13-184, FCC 14-99; 79 FR 49160, August 19, 2014) (*2014 First E-Rate Order*) modernizing the E-Rate program. Specifically, the *2014 First E-Rate Order* adopted new

rules and procedures to reorient the E-Rate Program to focus support on high-speed broadband for schools and libraries while also taking steps to streamline the program.

On December 19, 2014, the Commission released an Order and Order on Reconsideration (WC Docket No. 13-184, FCC 14-189; 80 FR 5961, February 4, 2015) (*2014 Second E-Rate Order*), which implemented the next critical steps to modernize the E-Rate Program by maximizing options for schools and libraries seeking to purchase high-speed broadband and adjusting the E-Rate program spending cap to \$3.9 billion. With these improvements, the Commission sought to close the high-speed connectivity gap between rural schools and libraries and their urban and suburban counterparts and provide sufficient and certain funding for high-speed connectivity to and within all eligible schools and libraries.

On March 11, 2021, the American Rescue Plan was signed into law to provide relief during the COVID-19 emergency period. Section 7402 of the Act established a \$7.171 billion Emergency Connectivity Fund in the Treasury of the United States. Congress directed the Commission to promulgate rules providing for the distribution of funding from the Emergency Connectivity Fund to eligible schools and libraries for the purchase of eligible equipment and/or advanced telecommunications and information services for use by students, school staff, and library patrons at locations other than a school or library no later than 60 days after the enactment of the American Rescue Plan, or by May 10, 2021.

Pursuant to section 7402 of the American Rescue Plan, the Commission established the Emergency Connectivity Fund Program (Program). The support provided through this Program allows eligible schools and libraries to seek funding for the reasonable costs incurred in purchasing eligible equipment, including Wi-Fi hotspots, modems, routers, and connected devices, as well as advanced telecommunications and information services, to meet the remote learning needs of students, school staff, and library patrons who lack access to connected devices and broadband connections sufficient to engage in remote learning during the unprecedented time. When the first application window opened, schools and libraries were able to request Emergency Connectivity Fund support for the upcoming school year, July 1, 2021 through June 30, 2022, to meet the remaining unmet needs of their students, school staff, and library patrons and provide the necessary connected devices and broadband connections needed to engage in remote learning during the COVID-19 emergency period. Since additional funds remained available after the first application filing window, the Bureau directed USAC to open additional application filing window(s). The COVID-19 public health emergency expired on May 11, 2023, setting June 30, 2024 as the sunset date for the Emergency Connectivity Fund. The Emergency Connectivity Fund Program support will only be available for purchases of eligible equipment and services made by the June 30, 2024 date.

The Emergency Connectivity Fund Program is a separate program from the E-Rate Program, which has long provided funding for broadband services delivered to and within schools and libraries. In the interest of efficiency and simplicity, however, the goals and measures, rules, and processes adopted for the Emergency Connectivity Fund Program leverage the Commission's experience with the E-Rate Program, including adapting the E-Rate Program forms and processes for use in the Emergency Connectivity Fund Program to streamline the application and reimbursement processes for applicants, expedite the processing of applications and requests for reimbursement, and lessen administrative burdens on applicants and service providers.

The Emergency Connectivity Fund Program is open to eligible schools and libraries. Consistent with the 1996 Act and the American Rescue Plan, the Commission adopted rules providing that all of the schools, libraries and consortia of schools and libraries that are eligible to receive support through the

E-Rate Program are also eligible to receive support through the Emergency Connectivity Fund Program. The Emergency Connectivity Fund Program reimburses 100% of the costs for eligible equipment and services, provided that the requested amounts are reasonable as determined by the Commission. The Emergency Connectivity Fund Program has a Congressionally appropriated \$7.171 billion budget and these funds will be available until they are expended or until September 30, 2020.

In order to receive funding through the Emergency Connectivity Fund Program, applicants must submit a request for funding to USAC for review. USAC reviews the request for funding and recommends commitments that are reviewed and approved by the Commission. In order to receive funding, applicants are required to submit an Emergency Connectivity Fund FCC Form 471, including supporting documentation that is requested during the application review process. The authorized person is also required to provide certifications regarding their compliance with the Emergency Connectivity Fund Program rules. The form as amended for use by the Emergency Connectivity Fund Program is included with this submission. The approval for the information collection associated with the FCC Form 471 can be found in the OMB Control No. 3060-0806.

Upon receipt of services or the connected devices, eligible schools and libraries, consortia of schools and libraries, and service providers submit requests for reimbursement. Specifically, schools, libraries, consortia, and service providers submit the Emergency Connectivity Fund request for Reimbursement, along with supporting invoice documentation, to request disbursements through the Emergency Connectivity Fund Program to USAC that is reviewed and recommended for approval (FCC Forms 472 and 474 as adapted for use in the Emergency Connectivity Program). The Commission reviews and approves the disbursement of funds to applicants and service providers. The authorized person who submitted the request for reimbursement is required to provide certifications regarding their compliance with the Emergency Connectivity Fund Program with the request for reimbursement. The Request for Reimbursement for use by the Emergency Connectivity Fund Program is included with this submission. The approval for the information collection associated with the FCC Form 472 and the FCC Form 474 can be found in the OMB Control No. 3060-0856.

Applicants can also request post-commitment changes to their Emergency Connectivity Fund FCC Form 471 by submitting a post-commitment change request to USAC for review and approval (FCC Forms 471, 486, and 500 as adapted for use in the Emergency Connectivity Program). Applicants are able to amend service start and end dates, reduce or cancel funding requests, substitute equipment or services, or change service providers through this process. The post-commitment change request for use in the Emergency Connectivity Fund Program is included in this submission. This change request is based on the approved information collections associated with the FCC Form 471, OMB Control No. 3060-0806 and the FCC Forms 486 and 500, OMB Control No. 3060-0853.

Note: The title of this collection has changed from “Establishing the Emergency Connectivity Fund” to “Emergency Connectivity Fund” since the program has been established.

This information collection does not affect individuals or households. Therefore there is no impact under the Privacy Act.

Statutory authority for this collection of information is contained in sections 1, 4(i), 4(j), 201-205, 214, 254, and 403 of the Communications Act of 1934, as amended, 47 U.S.C. § 151-154, 201-205, 218-220, 254, 303(r), 403 and 405 and section 7402 of the American Rescue Plan Act, Pub. L. No. 117-2, 135 Stat. 4.

a. Emergency Connectivity Fund FCC Form 471 “Services Ordered and Certification.”

For the Emergency Connectivity Fund, an eligible school or library files an Emergency Connectivity Fund FCC Form 471 (ECF FCC Form 471) application to notify USAC of the services that have been or will be purchased, the service provider(s) with whom the applicant has entered into an agreement, and an estimate of the funds needed to reimburse the costs of the eligible equipment and services through the Emergency Connectivity Fund. See 47 CFR § 54.1710. Applicants also must provide their FCC Registration Number. See 47 CFR §§ 1.8002 and 1.8003. The first application filing window for the Emergency Connectivity Fund Program opened on June 29, 2021 after the release of the May 10, 2021 *Emergency Connectivity Fund Program Report and Order*.

- Online Access for Streamlined Filing – Filers access the ECF FCC Form 471 through an online portal. Once information is prepopulated into the ECF FCC Form 471, applicants are able to check and provide corrections and updates to the information displayed. The online portal asks basic information about the applicant such as name, address, email address, and website information, and prepopulates these and other components of information already known about the applicant from prior submitted basic entity related data that was migrated to the online ECF FCC Form 471. This information comes from the applicant’s information that was pre-filed and stored in the system, minimizing the burden of collecting this basic information. The portal may also ask other questions related to the ECF FCC Form 471 as the applicant completes and submits the online ECF FCC Form 471. Access to the portal and pre-population of data is expected to expedite the ECF FCC Form 471 filing process for applicants to request Emergency Connectivity Fund Program support for eligible equipment and services to meet the current unmet needs of their students, school staff, and library patrons.
- Customized Applications – In general, the ECF FCC Form 471 is customized to the type of applicant and/or the type of selections made during the filing process.
- Integrated Instructions – Guidance for filling out the form is integrated into the system to provide filers a roadmap to complete the ECF FCC Form 471. Wherever applicable and possible, filers are provided explanatory text regarding the selections they choose during filing, and additional text to remind them where they may have to provide additional information or meet special requirements.
- Requesting Services – In addition to information previously asked of applicants to request funding for services in this collection, applicants may need to supply additional information and documentation to enable USAC and the Commission to determine if the applicant is compliant with the Emergency Connectivity Fund Program rules and to obligate funds. For example, applicants and service providers who agree to invoice on behalf of applicants, may be asked to provide their FCC Registration Number, DUNS number, and Employer Identifier Number (EIN) in order to have funds committed and obligated if this information is not currently available in the system.
- Other Documentation Requirements – Schools and libraries are required to maintain inventories of equipment and services purchased or reimbursed through the Emergency Connectivity Fund Program. Schools and school districts are asked questions regarding the level of unmet needs their students face and how Emergency Connectivity Fund Program support is addressing these unmet needs. Schools and school districts also provide

documentation about how they determined the unmet needs of their students during the pandemic as part of their funding application. Libraries are required to maintain eligible use policies for patrons and require library patrons to sign a statement that affirms the library patron would otherwise lack access to equipment or services sufficient to meet the library patron's educational needs if not for the use of the equipment and/or service being provided by the library. Libraries must be able to provide the eligible use policy and signed statements upon request by USAC or the Commission. Furthermore, applicants that select the service provider invoicing method for their funding request, also have to upload written verification from the service provider agreeing to invoice the Emergency Connectivity Fund Program as part of the applicant's funding application.

- Streamlined Communications – Once an ECF FCC Form 471 has been filed, filers receive a notice through the user online portal to confirm receipt.
- The Commission's rules require applicants to certify on the ECF FCC Form 471 their compliance with the requirements for the Emergency Connectivity Fund Program (sections 54.1710(a)(1)(i)-(xv) and 54.1710(a)(2)). These certifications are required to protect the Emergency Connectivity Fund Program from waste, fraud, and abuse and to ensure compliance with the Commission's rules.
- ECF FCC Form 471 "Description of Services Requested and Certification" Instructions. Directions and guidance for filers are integrated into the online Emergency Connectivity Fund Program FCC Form 471 experience.

b. Emergency Connectivity Fund Request for Reimbursement (FCC Form 472 or FCC Form 474)

- For the Emergency Connectivity Fund Program, applicants and service providers submit an Emergency Connectivity Fund Request for Reimbursement (ECF FCC Form 472 or ECF FCC Form 474) to receive disbursements through the Program. The invoicing process is through an online portal, with much of the requested information being pre-populated for the applicant or service provider to review and certify. For the Emergency Connectivity Fund Program, USAC reviews and provides recommendations for approving requests for reimbursement to the Commission. The Commission reviews the ECF Requests for Reimbursement and disburses funds directly to the applicants, or to the service provider, if agreed to by the service provider and applicant with written verification of the agreement between the two parties. The ECF Request for Reimbursement (FCC Form 472 or FCC Form 474) relies on the data that is collected on the E-rate FCC Form 472 and FCC Form 474 (approved under OMB Control Number 3060-0856), including the amount paid for approved services delivered on or after the actual service start date and approved equipment and services, as reported on the FCC Form 471 (approved under OMB Control No. 3060-0806).
- Applicants and service providers are also required to provide invoices and other supporting documentation for the services and equipment that are included in the ECF Request for Reimbursement. This requirement helps to ensure that the Emergency Connectivity Fund is being used as intended to provide relief during the COVID-19 emergency period and protects the Program from waste, fraud, and abuse. In addition, applicants that request reimbursement prior to paying their service provider(s) for the requested equipment and services are also required to submit documentation demonstrating that they paid their service provider(s) in full within 30 days of receipt of funds. The provided documentation must show that the service provider(s) were fully paid for the requested equipment and services reimbursed

through the Emergency Connectivity Fund Program. (47 CFR § 54.1711(b)). Applicants must answer yes or no on the FCC Form 472 to indicate if they are requesting reimbursement for contracted equipment and services prior to paying their service provider(s).

- Applicants and service providers must provide certifications along with their ECF Requests for Reimbursement (FCC Form 472 or FCC Form 474). (47 CFR § 54.1711(a)(1)(i)-(xii); § 54.1711(a)(2)(i)-(x)). These certifications are required to protect the Emergency Connectivity Fund Program from waste, fraud, and abuse and to ensure compliance with the Commission's rules.
- Applicants and service providers will receive electronic notifications as to the status of their ECF Requests for Reimbursement (FCC Form 472 or FCC Form 474).

c. Emergency Connectivity Fund Program Post-Commitment Change Request

- After USAC reviews the funding request and commitments are issued to fund the eligible equipment and services requested in the ECF FCC Form 471, applicants and service providers may make adjustments to previously filed FCC Form 471, such as changing the service start date or service end date listed on the ECF FCC Form 471, cancelling or reducing the amount of a funding request approved in the FCC Form 471, requesting a service or equipment substitution for items included in the ECF FCC Form 471 and requesting a service provider change for the service provider that was originally included in the ECF FCC Form 471. (See also 47 CFR § 54.1710(b) (allowing applicants to submit service substitutions for approval by USAC.)) This Emergency Connectivity Fund Program Post-Commitment Change Request can be used by applicants and service providers to make these necessary changes to their previously approved and committed ECF FCC Form 471. The change request for use in the Emergency Connectivity Fund Program is included in this submission. This change request adopts portions of the approved information collections for the FCC Form 471, OMB Control No. 3060-0806 and the FCC Forms 486 and 500, OMB Control No. 3060-0853 to create a more streamlined process for making post-commitment changes in the Emergency Connectivity Fund Program. The applicant or service provider requests these changes by logging into the online portal, making changes to the selected ECF FCC Form 471 application, and then re-certify the requested changes to the selected ECF FCC Form 471 in the online portal.

- d. Recordkeeping, Reporting, and Audits. All participants in the Emergency Connectivity Fund Program are required to retain documentation for at least ten (10) years from the last date of delivery of supported equipment or services and produce these records upon request of any representative (including any auditor) appointed by a state education department, USAC, the Commission and its office of Inspector General or any local, state or federal agency with jurisdiction over the entity. Emergency Connectivity Fund program participants may also be subject to compliance audits to ensure participants are complying with Program rules and certification requirements. (47 CFR §§ 54.1714(a)-(c), 54.1715(a)-(c)).

2. *Use of information.* The requirements contained herein are necessary to implement the Congressional mandate for the Emergency Connectivity Fund. The information collected herein provides the Commission and USAC with the necessary information to administer the Emergency Connectivity Fund Program, determine the amount of support entities seeking funding are eligible to receive, determine if entities are complying with the Commission's rules, and to prevent waste, fraud, and abuse. The information also allows the Commission to evaluate the extent to which the Emergency

Connectivity Fund is meeting the statutory objectives specified in section 7402 of the American Rescue Plan Act and the Commission's performance goals set forth in the *Emergency Connectivity Fund Report and Order*, and to evaluate the need for and feasibility of any future revisions to program rules. The name, address, DUNS number and business type will be disclosed in accordance with the FFATA/DATA Act reporting requirements. Emergency Connectivity Fund Program application, commitment, and disbursement data is also publicly available.

3. *Use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.* Participants must submit information through an online portal on the USAC website. The online data collections do not, in non-material respects, exactly resemble the representation or template of the form charts included with this submission. The online interface permits applicants to input data in required fields and auto-populates data where applicable, reducing applicants' filing burden. To reduce potential applicant confusion, the electronic filing process uses progressive disclosure where possible, so that an applicant is asked to provide only information relevant to their application (*e.g.*, school applicants will not be asked to provide, or see questions intended for library applicants). The online interface stores application information and related materials for school and library entities and can potentially help applicants comply with recordkeeping requirements and possible audits. Furthermore, where possible, information already provided by applicants is stored in the online portal and carried forward to future filings (*i.e.*, pre-populated data) to further reduce the filing burdens on applicants.
4. *Efforts to identify duplication.* There is no duplication of information. The information sought is unique to each applicant and to the extent it is already available in the E-Rate Program, it is auto-populated into the Emergency Connectivity Fund Program online portal. The Commission does not otherwise collect information from schools and libraries outside of the E-rate Program or the Emergency Connectivity Fund Program. The data collected by the Commission regarding school and library use of connected devices, telecommunications, information, and broadband services is, to the best of the Commission's knowledge, not available from other sources. To the extent data can be cross-walked based on unique identifiers, this information is obtained and automatically pre-populated into the forms. The online system "pre-populates" information, so that applicants and service providers do not have to manually re-enter information that has not changed from previous filings.
5. *Impact on small entities.* Entities directly subject to the requirements in this information collection are primarily schools, libraries, school districts, and consortia comprised of schools and libraries. This information collection is designed to impose the least possible burden on the respondents while ensuring that the Commission and USAC have information necessary to evaluate requests for funding and requests for reimbursement through the Emergency Connectivity Fund Program. These requirements are necessary to ensure the public funds intended to provide relief from the COVID-19 pandemic are used in compliance with the American Rescue Plan Act and other applicable requirements. Without the requested information, the Commission and USAC would not be able to assess eligibility of the requested equipment and services and the extent to which funds were properly used.
6. *Consequences if information not collected.* Failing to collect the information, or collecting it less frequently, would prevent the Commission from implementing section 7402 of the American Rescue Plan Act, and prevent eligible schools and libraries from seeking Emergency Connectivity Fund Program support for eligible equipment and services.

7. *Special circumstances.* There are no special circumstances associated with this information collection.
8. *Federal Register notice; efforts to consult with persons outside the Commission.* The Commission published a notice pursuant to 5 CFR Section 1320.8(d), in the Federal Register to solicit public comment on the collection on April 18, 2024 (89 FR 27759). No comments were received.
9. *Payments or gifts to respondents.* There will be no payments or gifts to respondents.
10. *Assurances of confidentiality.* There is no assurance of confidentiality provided to applicants and service providers concerning this information collection. However, applicants and service providers may request materials or information submitted to the Commission or to USAC be withheld from public inspection under 47 CFR § 0.459 of the FCC’s rules.
11. *Questions of a sensitive nature.* The request does not address any private matters of a sensitive nature.
12. *Estimates of the hour burden of the collection to respondents.* The following represents the hour burden of the collection of information:
  - a. Emergency Connectivity Fund FCC Form 471 “Services Ordered and Certification.”
    - (1) **Number of Respondents:** Approximately 23,000 respondents.
    - (2) **Frequency of Response:** Annually and on occasion.
    - (3) **Total Number of Responses per Respondent:** 1.7
    - (4) **Hourly Burden per Respondent:** 4.5
      - 4 hours (to fill out the form to comply with the reporting requirement); and 0.5 hours (for the ten-year recordkeeping requirement) = 4.5 hours
    - (5) **Total Annual Burden:** 175,950.
      - 23,000 (number of respondent) x 1.7 (estimated number of submissions) = 39,100 responses x 4.5 hours = 175,950.
    - (6) **Total estimate of In-House Cost to Respondents:** \$7,038,000
    - (7) **Explanation of Calculation:** It will take approximately 4 hours to fill out the FCC Form 471 for the reporting requirements (23,000 respondents x 4 hours x 1.7 Forms = 156,400). It will take approximately 0.5 hours for the ten-year recordkeeping requirement (23,000 respondents x 0.5 hours x 1.7 Forms = 19,550).

Approximately 23,000 respondents will spend approximately 4.5 hours to comply with requirements preparing ECF FCC Forms 471 and the ten-year recordkeeping requirement at a cost of \$40 per hour.

      - 156,400 hours x \$40/hour = \$6,256,000 cost for reporting requirement

- 19,550 hours x \$40/hour = \$782,000 cost for recordkeeping and audits requirement

175,950 hours x \$40/hour = \$7,038,000

b. Emergency Connectivity Fund Request for Reimbursement (FCC Form 472 or FCC Form 474)

(1) **Number of Respondents:** Approximately 23,000 respondents.

(2) **Frequency of Response:** On occasion.

(3) **Total Number of Responses per Respondent:** 4

(4) **Hourly Burden per Respondent:** 1.5

1 hour (to fill out the form to comply with reporting requirement) and 0.5 (hours for the ten-year recordkeeping requirement) = 1.5 hours

(5) **Total Annual Burden:** 138,000

- 23,000 (number of respondents) x 4 (estimated number of submissions) x 1.5 hours = 138,000

(6) **Total Estimate of In-House Cost to Respondents:** \$5,520,000

(7) **Explanation of Calculation:** It will take approximately 1 hour to fill out ECF Request for Reimbursement for the reporting requirements (23,000 respondents x 1 hour x 4 Forms = 92,000). It will take approximately 0.5 hours for the ten-year recordkeeping requirement (23,000 respondents x 0.5 hours x 4 Forms = 46,000).

Approximately 23,000 respondents will spend approximately 1.5 hours to comply with requirements preparing ECF Request for Reimbursement and the ten-year recordkeeping requirement at a cost of \$40 per hour.

- 92,000 hours x \$40/hour = \$3,680,000 cost for reporting requirement
- 46,000 hours x \$40/hour = \$1,840,000 cost for the recordkeeping and audits requirement

138,000 hours x \$40/hour = \$5,520,000

c. Emergency Connectivity Fund Post-Commitment Change Request - FCC Form 488 (streamlined information collection based on the FCC Form 486, FCC Form 500 and FCC Form 471 for use in the Emergency Connectivity Fund Program)

(1) **Number of Respondents:** Approximately 1,000 respondents.

(2) **Frequency of Response:** On occasion.

- (3) **Total Number of Responses per Respondent:** 1
- (4) **Hourly Burden per Respondent:** 1 hour (to fill out the form to comply with reporting requirement) and 0.5 (hours for the ten-year recordkeeping requirement) = 1.5 hours
- (5) **Total Annual Burden:** = 1,500

- 1,000 (number of respondents) x 1 (estimated number of submissions) x 1.5 hours = 1,500

(6) **Total Estimate of In-House Cost to Respondents:** \$60,000

(7) **Explanation of Calculation:** It will take approximately 1 hour to provide data for the post-commitment change request for the reporting requirements (1,000 respondents x 1 hour x 1 Form = 1,000). It will take approximately 0.5 hours for the ten-year recordkeeping requirement (1,000 respondents x 0.5 hours x 1 Form = 500).

Approximately 1,000 respondents will spend approximately 1.5 hours to comply with requirements preparing Form and the ten-year recordkeeping requirement at a cost of \$40 per hour.

- 1,000 hours x \$40/hour = \$40,000 cost for reporting requirement
- 500 hours x \$40/hour = \$20,000 cost for recordkeeping and audits requirement

1,500 hours x \$40/hour = \$60,000.

The estimated respondents, responses, and burden hours are listed below:

Information Collection Requirements	Number of Respondents	Total Number of Responses	Hourly Burden per Response	Total Annual Hourly Burden	Total In-House Cost to the Respondents
Emergency Connectivity Fund FCC Form 471	23,000	39,100	4.5	175,950	\$7,038,000
Emergency Connectivity Fund Request for Reimbursement (FCC Form 472/FCC Form 474)	23,000	92,000	1.5	138,000	\$5,520,000

**Emergency Connectivity Fund Program**

**3060-1286  
June 2024**

Emergency Connectivity Fund Post-Commitment Change Request – FCC Form 488 (combined parts of FCC Form 486, FCC Form 500 and FCC Form 471 for a more streamlined information collection for the Emergency Connectivity Fund Program)	1,000	1,000	1.5	1,500	\$60,000
<b>Grand Total</b>	23,000 unique respondents	132,100	7.5	315,450	\$12,618,000

13. *Estimates for cost burden of the collection to respondents.* There are no outside contracting costs for this information collection. See the last column in the chart for Item 12 above for the Total In-House Cost to Respondents.
14. *Estimate of the cost burden to the Commission.* There will be few, if any, costs to the Commission because reviewing requests and handling financial obligations are already part of Commission duties.
15. *Program changes or adjustments.* There are no adjustments or program changes to this information collection.
16. *Collections of information whose results will be published.* The Commission publishes the Emergency Connectivity Fund program application and disbursement data as part of USAC’s Open Data platform. The release of pricing data fulfills one of the Commission’s performance goals in the Emergency Connectivity Fund Program Report and Order which was to improve purchasing and policy decisions through pricing transparency for eligible equipment and services. The Commission has no plans at this time to publish other data collected for statistical use or other reports. However, the Commission may publish such data in the future, to the extent that the data’s confidentiality is not protected under law, in the course of carrying out the Commission’s policymaking responsibilities.
17. *Display the expiration date for OMB approval of the information collection.* The Commission seeks approval to not display the expiration date for OMB approval of this information collection. OMB approval of the expiration date 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:**

The Commission does not anticipate that the collection of information will employ statistical methods.