**NON-SUBSTANTIVE CHANGE REQUEST JUSTIFICATION**

**OMB Control No.** **3060-0798**

FCC Forms 601

The Commission submits to the Office of Management and Budget (OMB) for approval the following non-substantive change to the FCC Form 601 that will implement a solution aimed at easing the administrative burdens for both license applicants and FCC staff in offshore spectrum licensing.    Specifically, the change will add an additional option to more accurately identify offshore fixed station locations on the FCC Form 601 and its associated schedules.

Offshore spectrum is utilized in a site-based paradigm in many spectrum bands to provide for narrowband spectrum access in the Gulf of Mexico and in other U.S. territorial waters in the Atlantic and Pacific Oceans, including areas adjacent to the Continental U.S., Alaska, Hawaii, Puerto Rico, the U.S. Virgin Islands, American Samoa, Guam, and the Northern Mariana Islands.  The majority of site-based offshore authorizations are for Private Land Mobile Radio services, radiolocation services, aviation-ground services, and maritime coast stations.

Currently, the FCC Form 601 does not have an option that license applicants can select for offshore locations that accurately identifies the physical location of its fixed station location as being offshore.  License applicants utilize a work around approach that entails listing the county and state that most closely matches the offshore location, but this approach is typically inaccurate and subsequently triggers application offlines and FCC staff intervention before a license can be granted.  This work around also makes it impossible to identify offshore licenses on the face of the license because there is no reference to the location being offshore in its fixed location description.

Accordingly, the change requested will add the abbreviation of “OF” for offshore as an option for license applicants to select in describing the fixed station location in Schedule D, M and I of the FCC Form 601.  No new information is being collected, as we currently collect and request that license applicants describe the location of their fixed stations using the abbreviations for states, jurisdictions, and areas; the requested change simply adds offshore (OF) to the list of abbreviations already contained in the FCC Form 601.  This change will simplify the licensing process for offshore stations and eliminate the need for time-consuming work-around approaches, resulting in more efficient license processing for both license applicants and FCC staff.

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The drop down selection for each of the questions referenced below will be updated to include ‘OF’ (Offshore) as a selection. The FCC Form 601 Instructions are being revised as follows:

**Main Form Appendix II Current text:**



**Main Form Appendix II Revised text:**

Appendix II is being revised to add OF Offshore as an option, we are also proposing to move the GM, Gulf of Mexico selection from the section of the appendix listing states to the end of the listing where we list other non-state options.



**Schedule D Item 12 Current Text:**

Item 12 This item must be completed with the County/Borough/Parish or equivalent entity in which the station is located unless any of the following pertain to the Fixed Location:

1. The City entered in Item 10 is an Independent City that is not affiliated with a County/Borough/Parish (i.e., Baltimore, MD)
2. The State code entered in Item 11 does not have Counties/Boroughs/Parishes, enter the equivalent entity (i.e., Puerto Rico, Virgin Islands)
3. The State code entered in Item 11 is GM, Gulf of Mexico

NOTE: If the nearest City, County/Borough/Parish or equivalent entity and State are located in a bordering County/Borough/Parish or equivalent entity and/or State, enter a complete description of the location in Item 9 as shown in the example. Complete Item 10 if a City, Town or Village within the station's County/Borough/Parish or equivalent entity is nearby, and complete Items 11 and 12 with the County/Borough/Parish or equivalent entity and State in which the coordinates are actually located.

Example: 9) (Street) Summit Mtn near Palo Verde, Imperial County, CA

1. (City) Palo Verde
2. (State) AZ
3. (County/Borough/Parish) La Paz

**Area Locations**

For area locations, respond to items 9-12 as specified in the table in the instructions for Item 4: Item 9 This item is not applicable for area locations and should be left blank.

Item 10 If ‘P’ was entered in Item 4, enter the city or town name of the location in this item. This item is required only if Item 12 is blank.

Item 11 If ‘P’, ‘C’, ‘S’, or ‘X’ was entered in Item 4, enter the State of the location in this item (if ‘X’ was entered in Item 4, enter the State of the primary control station). Refer to FCC 601 Main Form Instructions, Appendix II, for a list of valid state, jurisdiction, and area codes.

Item 12 If ‘C’, ‘P’ or ‘X’ was entered in Item 4, enter the County/Borough/Parish or equivalent entity of the location in this item.

This item is always required for area of operation code ‘C’.

This item is required for area of operation code ‘P’ except when: (a) the City entered in Item 10 is an Independent City that is not affiliated with a County/Borough/Parish (*i.e*., Baltimore, MD), or (b) the State entered in Item 11 is ‘GM’ (Gulf of Mexico).

**Schedule D Item 12 Revised Text:**

Item 12 This item must be completed with the County/Borough/Parish or equivalent entity in which the station is located unless any of the following pertain to the Fixed Location:

1. The City entered in Item 10 is an Independent City that is not affiliated with a County/Borough/Parish (i.e., Baltimore, MD)
2. The State code entered in Item 11 does not have Counties/Boroughs/Parishes, enter the equivalent entity (i.e., Puerto Rico, Virgin Islands)
3. The State code entered in Item 11 is GM, Gulf of Mexico, or OF, Offshore

NOTE: If the nearest City, County/Borough/Parish or equivalent entity and State are located in a bordering County/Borough/Parish or equivalent entity and/or State, enter a complete description of the location in Item 9 as shown in the example. Complete Item 10 if a City, Town or Village within the station's County/Borough/Parish or equivalent entity is nearby, and complete Items 11 and 12 with the County/Borough/Parish or equivalent entity and State in which the coordinates are actually located.

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This item is always required for area of operation code ‘C’.

This item is required for area of operation code ‘P’ except when: (a) the City entered in Item 10 is an Independent City that is not affiliated with a County/Borough/Parish (*i.e*., Baltimore, MD), or (b) the State entered in Item 11 is ‘GM’ (Gulf of Mexico), or ‘OF’ (Offshore).

**Schedule I Location Data Item 12 Current Text**:

Item 12 This item must be completed with the County/Borough/Parish or equivalent entity in which the Station is located unless any of the following pertain:

1. the city entered in Item 10 is an Independent City that is not affiliated with a County/Borough/Parish (i.e., Baltimore, MD)
2. the State code entered in Item 11 is GM, Gulf of Mexico.

**NOTE:** If the nearest City, County/Borough/Parish or equivalent entity and State are located in a bordering county/borough/parish or equivalent entity and/or state, enter a complete description of the location in Item 9 as shown in this example. Complete Item 10 if a City, Town or Village within the Station's County/Borough/Parish or equivalent entity is nearby and complete Items 11 and 12 with the County/Borough/Parish or equivalent entity and State in which the coordinates are actually located.

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Item 11 If ‘P’, ‘C’, or ‘S’ was entered in Item 4, enter the State of the location in this item. Refer to FCC 601 Main Form Instructions, Appendix II, for a list of valid state, jurisdiction, and area codes.

Item 12 If ‘P’ or ‘C’ was entered in Item 4, enter the County/Borough/Parish or equivalent entity of the location in this item. This item is always required for area of operation code ‘C’. This item is also required for area of operation code ‘P’ except when: (a) the city entered in Item 10 is an Independent City that is not affiliated with a County/Borough/Parish (*i.e*., Baltimore, MD), or (b) the State entered in Item 11 is ‘GM’ (Gulf of Mexico).

**Schedule I Location Data Item 12 Revised Text**:

Item 12 This item must be completed with the County/Borough/Parish or equivalent entity in which the Station is located unless any of the following pertain:

1. the city entered in Item 10 is an Independent City that is not affiliated with a County/Borough/Parish (i.e., Baltimore, MD)
2. the State code entered in Item 11 is GM, Gulf of Mexico, or OF, Offshore

**NOTE:** If the nearest City, County/Borough/Parish or equivalent entity and State are located in a bordering county/borough/parish or equivalent entity and/or state, enter a complete description of the location in Item 9 as shown in this example. Complete Item 10 if a City, Town or Village within the Station's County/Borough/Parish or equivalent entity is nearby and complete Items 11 and 12 with the County/Borough/Parish or equivalent entity and State in which the coordinates are actually located.

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Item 12 If ‘P’ or ‘C’ was entered in Item 4, enter the County/Borough/Parish or equivalent entity of the location in this item. This item is always required for area of operation code ‘C’. This item is also required for area of operation code ‘P’ except when: (a) the city entered in Item 10 is an Independent City that is not affiliated with a County/Borough/Parish (*i.e*., Baltimore, MD), or (b) the State entered in Item 11 is ‘GM’ (Gulf of Mexico), or ‘OF’ (Offshore).

**Schedule M Item 8 Current Text:**

Item 8 (Not required for ITS) This item must be completed with the County/Borough/Parish or equivalent entity in which the Transmitter is located unless any of the following pertain to the Transmit Station location:

* 1. the city entered in Item 7 is an Independent City that is not affiliated with a County/Borough/Parish (i.e., Baltimore, MD)
	2. the State code entered in Item 9 is GM, Gulf of Mexico

**Schedule M Item 8 Revised Text:**

Item 8 (Not required for ITS) This item must be completed with the County/Borough/Parish or equivalent entity in which the Transmitter is located unless any of the following pertain to the Transmit Station location:

* 1. the city entered in Item 7 is an Independent City that is not affiliated with a County/Borough/Parish (i.e., Baltimore, MD)
	2. the State code entered in Item 9 is GM, Gulf of Mexico or OF, Offshore.