

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.

The Federal Communications Commission (FCC or Commission) requests the Office of Management and Budget (OMB) approval to revise this approved information collection for the Disaster Information Reporting System (DIRS).

Using DIRS, participating communications companies provide the Commission with their emergency contact information and can subsequently inform the Commission of damage to their infrastructure and facilities, as well as request resources for restoration from the Commission. DIRS respondents provide this information using web-based electronic forms tailored to their types of networks and facilities. The Commission coordinates with the Department of Homeland Security (DHS)'s Federal Emergency Management Agency (FEMA) to identify in which areas and situations to activate DIRS. FEMA and the Commission can activate DIRS with or without the DHS's National Coordinating Center for Communications (NCC) activating Emergency Support Function-2 of the National Response Plan (ESF-2). When the NCC activates ESF-2, DIRS additionally complements NCC in support of NCC's role as the primary agency for ESF-2. During smaller-scale disasters, the Commission activates DIRS-Lite, a limited version of the DIRS collection mentioned above that collects a subset of the information collected in DIRS, to reduce the burden on respondents but also maintain visibility in critical communications assets.¹ The Commission designates the DIRS-Lite disaster areas at the request for information from a federal agency, including the Chairperson of the Commission.² For DIRS-Lite, only wireline and wireless carrier respondents are asked to provide a set of information to the Commission, and this submission may be done by email or through phone calls.³ Unlike the full DIRS activation, the DIRS-Lite activation does not supersede the Part 4 mandatory network outage reporting obligations of the Commission's rules.

Certain federal, state, territorial, and Tribal Nation agencies (Participating Agencies) can apply to access geographically relevant reports filed in DIRS. To ensure confidential DIRS information is protected from disclosure, Participating Agencies granted access to DIRS reports are required to notify the Commission of requests to disclose DIRS filings and changes in statutes or rules (e.g., its open records laws) that would affect the agency's ability keep the information confidential. Participating Agencies are also responsible for developing and implementing initial and annual security training to each person granted a user account for

¹ FCC, *Standard Operating Procedures DIRS-Lite*, https://transition.fcc.gov/pshs/docs/Standard_Operating%20Procedures_DIRS-Lite.pdf (last visited Apr. 16, 2024) (*DIRS-Lite Manual*).

² *Id.* at 1.

³ *Id.*

accessing DIRS filings, maintaining copies of all training material for Commission inspection upon request,⁴ implementing practical data protection safeguards,⁵ maintaining and making available for FCC inspection “a list of all localities for which the agency has disclosed DIRS data,”⁶ and immediately reporting any known or reasonably suspected breach of protocol involving DIRS filings to the Commission and to affected providers.⁷ Non-Participating Agencies that request DIRS information from a Participating Agency are responsible for executing a certification form stating that it complies with the information sharing framework that the Commission has developed, including maintaining the confidentiality of the information and “securely destroying the information when the public safety event that warrants its access to the information has concluded.”⁸

Revisions to Information Collection Requirements Which Require OMB Approval.

On January 25, 2024, the FCC released a *Second Report and Order and Second Further Notice of Proposed Rulemaking*, FCC 24-5 (2024 *Second Report and Order and FNPRM*), which adopted new rules that for the first time will require cable communications, wireless, wireline and interconnected VoIP providers (Subject Providers) to report their infrastructure status information in DIRS on a daily basis while DIRS is activated. During that time, Subject Providers will not be required to file reports of system outages in the FCC’s Network Outage Reporting System (NORS) that arise during the DIRS activation and that are timely reported in DIRS. The new rules also require Subject Providers to provide a final report to the Commission within 24 hours of the Commission’s deactivation of DIRS and the termination of required daily reporting that details the state of their infrastructure at the time of DIRS deactivation and provides an estimated date of resolution of any remaining outages. This mandatory reporting requirement replaces the former voluntary DIRS reporting framework because, after almost two decades of observation, the Commission notes that the United States has been experiencing an increasing number of perilous floods, hurricanes, winter storms, tornados, and wildfires necessitating a more regular activation of DIRS. The potential for malicious threats to our critical communications system has also increased over time as a result of global instability. During disasters in specific geographic areas, the now-voluntary DIRS reports provide the Commission with critical situation awareness from those providers who participate. The cadence

⁴ See *Amendments to Part 4 of the Commission’s Rules Concerning Disruptions to Communications*, PS Docket No. 15-80, Second Report and Order, 36 FCC Rcd 6136, 6207, Appendix B, para. 50 (2021) (2021 *Second Report and Order*).

⁵ *Id.* at 6181-82, para. 147.

⁶ *Id.* at 6152, para. 53.

⁷ *Id.* at 6180, para. 144.

⁸ *Id.* at 6176, para. 124. For purposes of this document, a “Non-Participating Agency” is a local agency that a Participating Agency engages with to provide the local agency with access to NORS or DIRS information on a “need to know” basis and subject to the local agency abiding by the procedures established by the Participating Agency.

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of mandatory daily reports from Subject Providers during DIRS activations will improve the Commission's visibility into infrastructure status during emergencies.

Statutory authority for this collection of information is contained in sections 1, 4(i), 4(j), 4(n), 201, 214, 218, 251(e)(3), 301, 303(b), 303(g), 303(j), 303(r), 307, 309 316, 332, and 403 of the Communications Act of 1934, as amended, and 47 U.S.C. 151, 154(i)-(j) & (n), 201, 214, 218, 251(e)(3), 301, 303(b), 303(g), 303(r), 307, 309(a), 309(j), 316, 332, 403; sections 2, 3(b), and 6-7 of the Wireless Communications and Public Safety Act of 1999, 47 U.S.C. §§ 615 note, 615, 615a-1, 615b, section 106 of the Twenty First Century Communications and Video Accessibility Act of 2010, 47 U.S.C. § 615c, section 506(a) of the Repack Airways Yielding Better Access for Users of Modern Services Act of 2018 (RAY BAUM'S Act), and section 6206 of the Middle Class Tax Relief and Job Creation Act of 2012, 47 U.S.C. § 1426.

This information collection does not affect individuals or households; thus, there are no impacts under the Privacy Act.⁹

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.

The Communications Act of 1934, as amended, tasks the Commission with promoting the safety of life and property through the use of wire and radio communication. To do so, the Commission has authority to adopt necessary rules and regulations and issue inquiries to communications carriers for relevant information.¹⁰ The Commission, through its designated Defense Commissioner, has the duty and responsibility to develop preparedness programs for the provision of services by common carriers, broadcasting and cable facilities, satellite, and wireless radio services.¹¹

Pursuant to this authority, the Commission created the Emergency Contact Information System (ECIS) in response to the events of September 11, 2001. The Commission submitted, and OMB approved, an information collection for ECIS permitting communications providers to voluntarily provide their contact information to the Commission, and collected this information to ensure: (1) a rapid restoration of communications in the event of a disaster, such as a terrorist threat or attack, and (2) that public safety, health, and other emergency and defense personnel would have access to effective communications services during times of crisis.

In 2007, the Commission's Public Safety and Homeland Security Bureau (PSHSB) updated ECIS, renaming it DIRS). Using DIRS, participating communications companies

⁹ 5 U.S.C. § 552(a).

¹⁰ See 47 U.S.C. §§ 154(i), 218 and 303(r).

¹¹ See 47 U.S.C. § 0.181.

provide the Commission with their emergency contact information and can subsequently inform the Commission of damage to their infrastructure and facilities, as well as request resources for restoration from the Commission when DIRS is activated. DIRS respondents provide this information using web-based electronic forms tailored to their types of networks and facilities. The Commission coordinates with the Department of Homeland Security (DHS)'s Federal Emergency Management Agency (FEMA) to identify in which areas and situations to activate DIRS. FEMA and the Commission can activate DIRS with or without the DHS's National Coordinating Center for Communications (NCC) activating Emergency Support Function-2 of the National Response Plan (ESF-2). When the NCC activates ESF-2, DIRS additionally complements NCC in support of NCC's role as the primary agency for ESF-2.

Participating Agencies that voluntarily seek access are required to send an e-mail request to a dedicated Commission e-mail address that includes contact information, a description of why the agency has a need to access DIRS filings, how it intends to use the information in practice, any requests to exceed the proposed presumptive limits on individuals with DIRS access, and a completed copy of a Certification Form which the Commission evaluates to determine whether access should be granted. The Commission must be notified of data breaches or the unauthorized or improper disclosure of DIRS data, requests from third parties to disclose DIRS filings, and of any change in relevant statutes or rules (e.g., its open records laws) affecting the agency's ability to adhere to the confidentiality protections in this information sharing framework. This allows the Commission to ensure that confidential information remains protected, identify misuse of DIRS information, further investigate violations of information sharing rules, and, if necessary, restrict or terminate continued access by offending Participating Agencies. Participating Agencies must develop and implement initial and annual security training to each person granted a user account for accessing DIRS filing, and maintain copies of all training material for Commission inspection upon request. Downstream sharing records must also be available to the Commission upon request, allowing the Commission to maintain control over who has access to the DIRS filings and whether proper protocol is followed.

The rules adopted in the *2024 Second Report and Order and FNPRM* require Subject Providers to report their infrastructure status information daily to the FCC in DIRS during DIRS activations. Mandating DIRS reporting for Subject Providers will improve situational awareness in emergency and disaster situations for the Commission and Participating Agencies. This collection will advance the ability of the Commission and its Federal, state, local, Tribal, and territorial partners, as well as the public more generally, to effectively manage and mitigate the short-term and long-term impacts of disasters on communications networks, ultimately increasing network resiliency and availability during and after disasters to enable viable access to emergency communications.

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.

DIRS utilizes a secure, web-based form similar to other forms that the Commission has found to be efficient, user-friendly, and minimally burdensome to respondents in prior collections. If the Commission activates DIRS, it accepts electronic submissions through the Commission's dedicated web portal.¹² Respondents may also make DIRS submissions by email, telephone, or hardcopy if PSHSB specifies by Public Notice that it prefers to receive DIRS filings via one or more of these alternative formats. The collected information is available to authorized personnel within the Commission and the electronic submissions are available via password-protected electronic means to select federal and potential state agency partners. DIRS respondents may access their submissions but cannot view other parts of the DIRS database nor edit other respondent's submissions. If the Commission activates DIRS-Lite, it accepts email and phone submissions; there are no web portal submissions or hardcopy collections. The *2024 Second Report and Order and FNPRM* does not change these collection methods.

Participating Agencies' requests to access DIRS information (including required accompanying materials) and any required notifications are submitted to the Commission electronically via a dedicated e-mail address. Required follow-up will also be conducted electronically. This method reduces the burden on agency and Commission staff as forms and correspondence are stored and accessed electronically. Once the request for access is approved, the Participating Agencies will be able to access a web page maintained by PSHSB that will permit access to the DIRS report database using date and location filters. The location filters will limit Participating Agencies "read only" access to reports in states where a Participating Agency has jurisdiction.

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 infrastructure status information collected in DIRS is not duplicated in any other collection. To avoid potential overlap and reduce filing burdens, Subject Providers will not be required to file reports of system outages in the FCC's Network Outage Reporting System (NORS) that arise during the DIRS activation and that are timely reported in DIRS.

With respect to the Commission's information sharing requirements, this information collection collects the same information as requested in the Commission's NORS collection (3060-0484). Specifically, to avoid a duplicative collection, Participating Agencies provide information once to simultaneously satisfy both collections.

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

In compliance with the Paperwork Reduction Act of 1995, the Commission has made an effort to minimize the burden on all respondents, regardless of size. Inputting the requested

¹² FCC, *Disaster Information Reporting System-Login*, <https://dirs.fcc.gov/> (last visited May 6, 2024).

infrastructure status information into DIRS will have minimal impact on small businesses because Subject Providers will file their information using an efficient web-based interface, unless otherwise directed by PSHSB. The DIRS web-based interface also accepts batch submissions rather than only single-entry submissions. Additionally, when DIRS is activated, Subject Providers, including small entities, will not be required to file reports of system outages in the FCC's Network Outage Reporting System (NORS) that arise during the DIRS activation and that are timely reported in DIRS. . Additionally, DIRS-Lite submissions require only a subset of the information collected in DIRS and are accepted via a phone call or email. In these ways, the Commission has taken efforts to minimize the burden on all respondents while still fulfilling its public safety mandate.

To provide Participating Agencies maximum flexibility and reduce potential costs of compliance with the training requirements, the Commission adopted requirements that allow agencies to develop their own training program or rely on an outside training program that covers, at a minimum, each of the required "program elements." In addition, rather than requiring third-party audits of training programs to ensure that state and federal agencies' training programs comply with the Commission's proposed required program elements, Participating Agencies are required to make copies of their training curriculum available for the Commission's review upon demand which will significantly minimize costs associated with the required training programs. The Commission also declined to grant local agencies direct access to DIRS considering among other things the burdens that would result for local entities, many of which may be small entities. Finally, the Commission adopted a single form to address the certifications and acknowledgments required for direct access to DIRS similar to the certification form required for sharing sensitive numbering data with states using FCC Form 477 data.

6. Describe the consequences to a Federal program or policy activity, if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reduce burden.

Failure to mandate collection of this information would adversely impact the Commission's ability to carry out its congressionally mandated objective of promoting the safety of life and property. Without the requested information, the Commission will not obtain and share critical infrastructure status information with authorities, including FEMA. This will significantly frustrate the ability of these authorities to effectively deploy their resources to maintain and restore critical communications in the aftermath of a disaster. The Commission will also be unable to provide situational awareness through comprehensive public reports related to disasters and to obtain information that would aid the Commission and its partners in restoration and mitigation efforts.

The above-described requirements for Participating Agencies that seek access DIRS data, including application requirements, required notifications, and recordkeeping requirements, allows the Commission to protect the presumptively confidential DIRS information and to monitor how Participating Agencies are complying with the information sharing framework. If the Commission did not collect this information, there would be a greater likelihood that the

sensitive information contained in DIRS filings would be shared, disclosed, or used beyond what is permitted by the information sharing framework.

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

This collection of information is consistent with the guidelines in 5 CFR 1320.5(d)(2). Information may be provided by respondents to the Commission more often than quarterly in the event that DIRS is activated for more than one emergency or disaster in the same quarter. Information will almost always be provided by respondents to the Commission in fewer than 30 days following a DIRS activation, as it is critical that the Commission collect timely information for the duration, or in the immediate aftermath, of emergencies to facilitate its public safety mission. The Commission has instituted procedures to protect the confidentiality of requested collection of information, regardless of which entities are providing information to the Commission. All collected information is presumed confidential and handled with appropriate safeguards. As noted in the *DIRS User Manual*, “[b]ecause the information that communications companies input to DIRS is sensitive for national security and/or commercial reasons, [the collected information] shall be treated as presumptively confidential upon filing.”¹³ The filings and the information contained therein would be withheld from public disclosure, shared only with Participating Agencies, and provided to others in narrow circumstances. The Commission will also continue to work with respondents to ensure that any concerns regarding the confidentiality of their filings are resolved in a manner consistent with Commission rules.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency’s Report and Order, 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 May 24, 2024 (89 FR 45890). No PRA comments were received from the public.

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

The Commission will not provide any payment or gift to respondents.

¹³ FCC, *Disaster Information Reporting System (DIRS) User Manual – Version 5*, Feb. 24, 2014 at 3, https://transition.fcc.gov/pshs/disaster/disaster_manual.pdf (*DIRS User Manual*).

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

The Commission provides respondents with assurances that their collected filings and reports are treated with a presumption of confidentiality. As noted in the *DIRS User Manual*, “[b]ecause the information that communications companies input to [their collected filings] is sensitive for national security and/or commercial reasons, [the collected filings] shall be treated as presumptively confidential upon filing.”¹⁴ To protect the confidentiality of the DIRS information disclosed to Participating Agencies, the Commission limits the access to only those agencies who complete the registration process and then limits by geographic area the reports available to each Participating Agency. The Commission also adopted safeguards to protect the data accessed by Participating Agencies from manipulation and from distribution to unauthorized recipients. The *2024 Second Report and Order and FNPRM* does not alter these confidentiality protections.

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

This collection of information does not address any matters of a sensitive nature.

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.

Respondents will enter emergency contact information and, when necessary, critical information (*i.e.* related to infrastructure damage and restoration) in DIRS. Respondents will submit unique daily DIRS reports during disaster events because their networks cover a large geographic area (e.g. a network covers several effected counties and reports one DIRS report for each county) or provide a variety of services (e.g. wireline, cable system, broadcast, IXC blocking, etc.). We anticipate that data entry will take 10 minutes for initial entry of contact information, 10 minutes for each daily update of infrastructure status information, and 10 minutes to enter the final report upon DIRS deactivation.¹⁵

Total burden hours for the proposed revised collection for all respondents is provided below:

Initial Entry of Contact Information for All Subject Provider Respondents

Number of Respondents Annually: 54 respondents/county x 339 counties = 18,306 respondents.

Frequency of response: Annually.

¹⁴ *Id.*

¹⁵ See *Resilient Networks; Amendments to Part 4 of the Commission’s Rules Concerning Disruptions to Communications*, PS Docket Nos. 21-346 and 15-80, Second Report and Order and Second Further Notice of Proposed Rulemaking, FCC 24-5, para. 34, n.84.

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Total Number of Responses Annually: 54 respondents/county × 339 counties × 1 response/respondent = 18,306 total responses.

Average response time per response: 10 minutes = 1/6 hours

Total Annual Burden Hours: 54 respondents/county × 339 counties × 1 response/respondent × 1/6 hours/response = 3,051 hours.

Method of estimation of burden: We estimate there are an average of 54 cable communications, wireline, interconnected VoIP, and wireless service providers per county, consisting of approximately 50 non-duplicated fixed voice providers, including switched access wireline, cable VoIP, and non-cable interconnected VoIP providers, plus 4 facility-based wireless voice providers per county (three nationwide providers and an average of one local provider).¹⁶ In examining DIRS activation and deactivation notices between 2017 and 2023, we calculate that on average 339 counties are affected by a DIRS activation each year.

Total Annual “In-House” Costs: The Commission estimates the hourly wage of a full-time employee who will be submitting this information is \$33.51/hour, inclusive of overhead and fringe benefit costs.¹⁷ Therefore, the estimated in-house costs to the respondents are as follows:

3,051 total annual burden hours × \$33.51/hour = **\$102,239 total annual “in-house” costs.**

Daily Updates and Final Report for All Subject Provider Respondents

Number of Respondents: 18,306 (same group of respondents as above).

Frequency of response: 15, with 14 representing the average number of days a county is affected by a DIRS activation plus 1 final report.

Total Number of Responses Annually: 18,306 respondents × 15 responses/respondent (14 daily updates plus 1 final report) = 274,590 responses.

¹⁶ See *Resilient Networks; Amendments to Part 4 of the Commission’s Rules Concerning Disruptions to Communications*, PS Docket Nos. 21-346 and 15-80, Second Report and Order and Second Further Notice of Proposed Rulemaking, FCC 24-5, para. 34, n.84 (relying on Mobile Deployment Form 477 Data). For purposes of our analysis, we treat each filing as if submitted by a unique respondent. However, we note that the actual number of respondents is likely far less than our estimate because, in many instances, several of the filings will be made by a single company (e.g., a regional or nationwide service provider).

¹⁷ The mean hourly wage for an office and administrative support worker to enter the required data is \$21.90 + \$9.86 for benefits × 105.5% inflation adjustment = \$33.51/hr. See *Resilient Networks; Amendments to Part 4 of the Commission’s Rules Concerning Disruptions to Communications*, PS Docket Nos. 21-346 and 15-80, Second Report and Order and Second Further Notice of Proposed Rulemaking, FCC 24-5, para. 34, n.84

Average response time per response: 10 minutes = 1/6 hours

Total Annual Burden Hours: 274,590 total responses × 1/6 hours/response = 45,765 hours.

Method of estimation of burden: Exact numbers of respondents and responses are inherently unpredictable as they reflect disaster and emergency scenarios that are not known in advance. In preparing these estimates, the Commission has analyzed data from recent DIRS activations and erred on the side of overestimating potential burden. We calculated the total number of days where all counties were affected between 2017 and 2023 and divided that number by the total number of affected counties (339) and determined that the average duration of days one county was affected to be 14 days.¹⁸

Total Annual “In-House” Costs: The Commission estimates the hourly wage of a full-time employee who will be submitting this information is \$33.51/hour, inclusive of overhead and fringe benefit costs. Therefore, the estimated in-house costs to the respondents are as follows:

45,765 total annual burden hours × \$33.51/hour = **\$1,533,585 total annual “in-house” costs.**

Cumulative Totals for All Respondents

- Total Respondents Annually: 18,306
- Total Annual Responses: 18,306 (initial entry of contact information) + 274,590 (daily and final reports) = 292,896 responses;
- Total Annual Hours Burden: 3,051 (initial entry of contact information) + 45,765 (daily and final reports) = 48,816 hours;
- **Total Annual “In-House” Costs:** \$102,239 (initial entry of contact information) + \$1,533,585 (daily and final reports) and) = **\$1,635,824.**

Burden Estimate for Participating Agencies

The Commission notes that the information sharing framework established in the *Second Report and Order* allows for access to be granted not only for DIRS, but also to NORS. We note that the process and requirements for Participating Agencies under this framework is identical, regardless of whether they seek access to NORS, DIRS, or both. Because the Commission anticipates that NORS and DIRS access will be requested together in most cases, it believes that the estimated costs for Participating Agencies associated with DIRS access are fully included in the estimates submitted as part of its collection on Part 4 of the Commission’s Rules Concerning

¹⁸ *Id.*

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Disruptions to Communications, OMB Control No. 3060-0484. To avoid double-counting the estimated burden hours and costs associated with both collections, the Commission estimates the marginal cost of the Participating Agencies aspect of this collection to be zero.

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).

While the Commission cannot quantify overall costs to Participating Agencies for implementing the information sharing framework due to variable based on each participating agency's particular circumstances, the Commission anticipates that the simple nature of the framework's recordkeeping requirements will result in negligible initial costs and low costs annually. Because, as noted above, NORS and DIRS access will be requested together in most cases, the Commission believes that the total annual cost burden to respondents or record keepers associated with DIRS access are fully included in the cost estimates submitted as part of its collection on Part 4 of the Commission's Rules Concerning Disruptions to Communications, OMB Control No. 3060-0484. To avoid double-counting the cost associated with both collections, the Commission estimates the marginal cost of the Participating Agencies for this aspect to be zero.

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.

The Commission does not expect to incur costs beyond the normal labor costs for staff.

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

The Commission is reporting a program change in the number of respondents from 400 to 18,306 (+17,906) due to the reporting requirements in DIRS becoming mandatory. The total number of responses will also increase from 104,000 to 292,896 (+188,896), and annual burden hours will increase from 16,320 to 48,816 (+32,496), because of the change from voluntary to mandatory DIRS reporting. Respondents voluntarily submitting responses under the current framework will

experience no change, but those respondents who did not previously register and file reports in DIRS will now be required to do so.

No adjustments are being reported to this information collection.

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

The Commission treats DIRS and DIRS-Lite submissions as presumptively confidential and will not publish the individual submissions but may publish this information on an aggregated basis. For example, the Commission may publish this information on an aggregated basis pursuant to the Wireless Resiliency Cooperative Framework (Framework) or in daily communications status reports during DIRS activations.¹⁹ The reports detail the operational status of communications services in the areas experiencing a disaster, providing the public with situational awareness.²⁰

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 requests a waiver of the requirement to display the OMB expiration date on the electronic survey form because each time this collection is submitted to OMB for extension, the Commission must update the forms in DIRS. This is not cost effective for the Commission. Additionally, OMB approval of the expiration date of the information collection will be displayed on OMB's website.

18. Explain any exceptions to the Certification Statement identified in Item 19, "Certification of Paperwork Reduction Act Submissions."

There are no exceptions to the Certification Statement.

B. Collections of Information Employing Statistical Methods:

The revisions to this information collection do not employ any statistical methods.

¹⁹ *Improving the Resiliency of Mobile Wireless Communications Networks; Reliability and Continuity of Communications Networks, Including Broadband Technologies*, PS Docket Nos. 13-239 and 11-60, Order, 31 FCC Rcd 13745 (2016); *See, e.g.*, FCC, Hurricane Maria Communications Status Report for March 21, 2018 at 2 (2018), <https://www.fcc.gov/document/hurricane-maria-communications-status-report-march-21-2018> (including information from Framework Signatories in its status report for wireless services).

²⁰ *See id.*