

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 Commission is submitting this request to the Office of Management and Budget (OMB) for approval of a new information collection with regard to the reporting requirement rules set forth in the *Location-Based Routing for Wireless 911 Calls Report and Order* adopted on January 25, 2024, in PS Docket No. 18-64¹. The goal of this proceeding is to reduce emergency response times and ultimately save lives by requiring the Commercial Mobile Radio Service (CMRS) providers² to implement location-based routing for wireless 911 voice calls and real-time text (RTT) communications³ to 911 call centers nationwide. With location-based routing (LBR) as implemented under these new rules, CMRS providers will use precise location information to route wireless 911 voice calls and RTT communications to 911 to the appropriate public safety answering point (PSAP). The CMRS providers must certify compliance and submit evidence including the technology, processes, and validation practices used to meet the LBR requirements within 60 days of the applicable compliance deadlines.⁴ In addition, CMRS providers must certify that neither they nor any third party they relied upon to obtain location information will use the information for any non-911 purposes, unless agreed to or required by law, and that safeguards have been implemented to protect the privacy and security of the information.⁵ Also, the CMRS providers must collect and report aggregate data on the routing methodologies used for live wireless 911 voice calls in the specified locations under the rules for a 30-day period beginning from the applicable compliance dates.⁶ Further, should the PSAPs and CMRS providers agree to different compliance deadlines than those established by the rules, the CMRS providers must notify the Commission of the dates and terms of the alternate time frame within 30 days of the agreement or by June 12, 2024, whichever is later.⁷ Lastly, the

¹ *Location-Based Routing for Wireless 911 Calls*, PS Docket No. 18-64, Report and Order, FCC 24-4 (rel. January 26, 2024), Erratum (rel. March 13, 2024) (*LBR Report and Order*).

² In the *LBR Report and Order*, the Commission used the term Commercial Mobile Radio Service (CMRS) provider to refer to providers of CMRS, as defined in 47 CFR § 9.3 (“Commercial mobile radio service (CMRS)”). When addressing the record in this proceeding, it assumed that commenters using terms such as “wireless carriers” or “wireless providers” were referring to CMRS providers subject to part 9 of the Commission’s rules.

³ The Commission defines real-time text as “[t]ext communications that are transmitted over Internet Protocol (IP) networks immediately as they are created, e.g., on a character-by-character basis.” 47 CFR § 9.3; *accord id.* § 67(g). In the *LBR Report and Order*, it used the term “RTT communications” to refer to instances in which an RTT user initiates contact with 911, for consistency with our part 9 and part 67 rules. See 47 CFR §§ 9.10(c), 67.1(g), 67.2(c)(2). When addressing the record in this proceeding, it assumed that commenters using the terms “RTT call” or “RTT message” were referring to the same RTT communications described in the Commission’s part 9 and part 67 rules.

⁴ See 47 CFR § 9.10(s)(4)(i)(A)-(B).

⁵ See 47 CFR § 9.10(s)(4)(i)(C).

⁶ See 47 CFR § 9.10(s)(4)(ii)(A).

⁷ See 47 CFR § 9.10(s)(5).

CMRS providers must subsequently notify the Commission of the actual date of compliance within 30 days of that date or June 12, 2024, whichever is later.⁸ In this supporting statement, the Commission provides current information on the number of CMRS providers (respondents) affected by this information collection and the burden hour estimate for the respondents to meet the reporting requirement.

In December 2022, the Commission adopted a *Notice of Proposed Rulemaking* proposing to require CMRS providers and covered text providers to implement LBR for wireless 911 voice calls and texts nationwide.⁹ Public safety commenters overwhelmingly supported the Commission’s proposals. Legacy tower-based routing results in millions of 911 voice calls nationwide arriving at the incorrect PSAP for the caller’s location, which can result in a delay of a minute or more in dispatch and response.¹⁰ The record confirms that implementing LBR is technologically feasible and will significantly reduce wireless 911 voice call transfers, saving valuable time for both PSAPs and callers.

In January 2024, the Commission adopted the *LBR Report and Order* to facilitate the implementation of LBR for wireless 911 voice calls and RTT communications to 911 call centers nationwide. The *LBR Report and Order* takes the following actions:

- The Commission requires CMRS providers to deploy a technology that supports location-based routing for wireless 911 voice calls and RTT communications to 911 originating on their Internet Protocol (IP)-based networks (i.e., 4G LTE, 5G, and subsequent generations of IP-based networks). It also requires CMRS providers to use location-based routing to route wireless 911 voice calls and RTT communications to 911 originating on their IP-based networks when location information meets certain thresholds for accuracy and timeliness.
- The Commission requires CMRS providers to use location-based routing for wireless 911 voice calls and RTT communications to 911 when caller location information available to the CMRS provider’s network at time of routing is ascertainable within a radius of 165 meters at a confidence level of at least 90%. In the absence of these conditions, CMRS providers must use alternative routing methods based on “best available” location information, which may include but is not limited to device-based or tower-based location information.
- The Commission adopts the proposed six-month timeline for nationwide CMRS providers to implement location-based routing for wireless 911 voice calls and provides twenty-four months for non-nationwide CMRS providers to implement location-based routing of wireless

⁸ *Id.*

⁹ *Location-Based Routing for Wireless 911 Calls*, PS Docket No. 18-64, Notice of Proposed Rulemaking, 37 FCC Rcd 15183, 15184, para. 1 (2022) (*Notice of Proposed Rulemaking*).

¹⁰ The Commission has previously found that a one minute increase in response times increases mortality, and that a one minute decrease in response times decreases mortality. See, e.g., *Wireless E911 Location Accuracy Requirements*, Third Further Notice of Proposed Rulemaking, 29 FCC Rcd 2374, 2388-89, para. 33 & n.70 (2014). As stated in the *Notice of Proposed Rulemaking* and affirmed in this *Report and Order*, the Commission estimates that the implementation of wireless location-based routing under the rules it adopts today will save 13,837 lives annually, assuming a one-minute decrease in response time. See *Notice of Proposed Rulemaking*, 37 FCC Rcd at 15206-07, para. 61 & n.161; see also Section III.F.1.

911 voice calls.¹¹ In addition, it provides 24 months for all CMRS providers to implement location-based routing for RTT communications to 911.

- The Commission requires CMRS providers within 60 days of the applicable compliance deadlines to certify and submit evidence of compliance with location-based routing requirements. At that time, CMRS providers must also submit one-time live call data reporting on the routing methodologies used for calls in live call areas, and they must certify the privacy of location information used for location-based routing. Additionally, the CMRS providers are required to retain live wireless 911 voice call data gathered pursuant to the rules for a period of two years.
- The Commission allows CMRS providers and PSAPs to establish mutually agreed upon LBR compliance deadlines different from the deadlines imposed by the new rules. The CMRS providers must notify the Commission separately of both the alternate time frame agreement and subsequently the actual compliance date within 30 days of those dates or by June 12, 2024, whichever is later.

The information collections contained in the adopted rules are necessary and vital to the effective implementation of LBR for wireless 911 voice calls and RTT communications to 911 call centers nationwide. The *LBR Report and Order* noted that the rule sections containing information collection requirements were subject to Office of Management and Budget (OMB) approval under the Paperwork Reduction Act. Based on the public safety need for the information in these collections, the Commission now seeks OMB approval of these information collections as required under the rules adopted in the *LBR Report and Order* for a three-year period.

The information collection requirements associated with the new rules set for in the *LBR Report and Order* are described below.

Information Collection Requirements

In an effort to facilitate accountability for the CMRS providers and transparency for the 911 community into the process of implementing LBR for wireless 911 voice calls and RTT communications to 911 call centers, the *LBR Report and Order* imposed the following certification and reporting requirements for CMRS providers that constitute an information collection:

Section 9.10(s)(4) – Certification and Reporting. Within 60 days after each benchmark specified in paragraphs (s)(1)(i), (ii), and (2) of Section 9.10 of the rules, CMRS providers must comply with the following certification and reporting requirements:

- Section 9.10(s)(4)(i)(A) – CMRS providers must certify that they are in compliance with the requirements specified in paragraphs (s)(1)(i), (ii), and (2) of this section applicable to them;

¹¹ The Commission defines a “[n]on-nationwide CMRS provider” for purposes of its part 9 rules as “[a]ny CMRS provider other than a nationwide CMRS provider.” 47 CFR § 9.10 (i)(1)(v). A “[n]ationwide CMRS provider” for purposes of the Commission’s part 9 rules is “[a] CMRS provider whose service extends to a majority of the population and land area of the United States.” 47 CFR § 9.10 (i)(1)(iv).

- Section 9.10(s)(4)(i)(B) – CMRS providers must identify specific network architecture, systems, and procedures used to comply with paragraphs (s)(1)(i), (ii), and (2) of this section, including the extent to which the CMRS provider validates location information for routing purposes and the validation practices used in connection with this information; and
- Section 9.10(s)(4)(i)(C) – CMRS providers must certify that neither they nor any third party they rely on to obtain location information or associated data used for compliance with paragraphs (s)(1)(i), (ii), or (2) of this section will use such location information or associated data for any non-911 purpose, except with prior express consent or as otherwise required by law. The certification must state that the CMRS provider and any third parties it relies on to obtain location information or associated data used for compliance with paragraphs (s)(1)(i), (ii), or (2) of this section have implemented measures sufficient to safeguard the privacy and security of such location information or associated data.
- Section 9.10(s)(4)(ii)(A) – CMRS providers also must collect and report aggregate data on the routing technologies used for all live wireless 911 voice calls in the locations specified for live 911 call location data in paragraph (i)(3)(ii) of this section for a thirty-day period which begins on the compliance date(s) specified in paragraphs (s)(1)(i) and (ii) of this section. CMRS providers must retain live wireless 911 voice call data gathered pursuant to this section for a period of 2 years. CMRS providers must collect and report the following data, expressed as both a number and percentage of the total number of live wireless 911 voice calls for which data is collected pursuant to this section:
 - Section 9.10(s)(4)(ii)(A)(1) – Live wireless 911 voice calls routed with location-based routing using location information that meets the timeliness and accuracy thresholds defined in paragraph (s)(3)(i)(A) and (B) of this section;
 - Section 9.10(s)(4)(ii)(A)(2) – Live wireless 911 voice calls routed with location-based routing using location information that does not meet the timeliness or accuracy thresholds defined in paragraph (s)(3)(i)(A) and (B) of this section; and
 - Section 9.10(s)(4)(ii)(A)(3) – Live wireless 911 voice calls routed using tower-based routing.

Section 9.10(s)(5) – Modification of Deadlines by Agreement. Nothing in this section of the rules shall prevent PSAPs and CMRS providers from establishing, by mutual consent, deadlines different from those established for CMRS provider compliance in paragraphs (s)(1)(i), (ii), and (2) of this section.

- The CMRS provider must notify the Commission of the dates and terms of the alternate time frame within 30 days of the parties’ agreement or by June 12, 2024, whichever is later.
- The CMRS provider must subsequently notify the Commission of the actual date by which it comes into compliance with the location-based routing requirements in paragraphs (s)(1)(i), (ii), or (2) of this section within 30 days of that date or by June 12, 2024, whichever is later.

- CMRS providers must file such notifications pursuant to this paragraph (s)(5) in PS Docket No. 18-64.

Statutory authority for this collection is contained in Sections 1, 2, 4(i), 4(j), 4(o), 251(e), 303(b), 303(g), 303(r), 316, and 403 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 152, 154(i), 154(j), 154(o), 251(e), 303(b), 303(g), 303(r), 316, 403, and Section 4 of the Wireless Communications and Public Safety Act of 1999, Pub. L. No. 106-81, Sections 101 and 201 of the New and Emerging Technologies 911 Improvement Act of 2008, Pub. L. No. 110-283, and Section 106 of the Twenty-First Century Communications and Video Accessibility Act of 2010, Pub. L. No. 111-260, as amended 47 U.S.C. §§ 615a, 615a-1, 615b, 615c.

This 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.

The Commission's Public Safety and Homeland Security Bureau (the Bureau) will use the information collected pursuant to Section 9.10(s)(4) that is submitted by the CMRS providers in their compliance certifications, including technologies and methodologies used, and live call data reports to assess and monitor the implementation of LBR for wireless 911 voice calls and RTT communications to 911 call centers nationwide. Also, the Bureau would use the data generated by the information collections to analyze the effectiveness of the LBR implementation at the benchmark dates set forth in the rules to determine if further measures might be needed to strengthen LBR for 911 calls and texts even after the CMRS providers have complied with the certification and reporting requirements. In addition, with the information collected pursuant to Section 9.10(s)(5) the Bureau would be able to monitor compliance dates agreed to between CMRS providers and PSAPs that are different from the compliance dates established by the new rules.

The information collection and reporting requirements contained in these rules will facilitate the effective implementation of LBR for wireless 911 calls and texts by the Commission, public safety entities, and CMRS providers alike. These requirements will provide an objective snapshot of each CMRS provider's implementation progress and routing technology performance as they meet the timeliness and accuracy requirement set for in Section 9.10(s)(3).¹² In addition, the requirements should simplify the enforcement and complaint process for both PSAPs and CMRS providers regarding misrouted 911 calls and texts.

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.

¹² See 47 CFR § 9.10(s)(3)(i)(A) and (B); see also 47 CFR § 9.10(s)(3)(ii).

Most records, if not all, will be generated and stored electronically. Although this is a new collection, CMRS providers routinely submit certifications electronically to the Commission in other matters. Also, CMRS providers continue to electronically submit live call data reports to the Commission as required by the wireless E911 indoor location accuracy regulations set forth in a *Sixth Report and Order* released on July 17, 2020, in PS Docket 07-114.¹³ OMB previously approved the information collections associated with that matter under OMB Control No 3060-1210. CMRS providers most likely use automated measures to collect this information and presumably would continue to do so in this matter. Further, the Commission believes that information technology, including electronic mail, will facilitate much of the information collection and significantly reduce the number of estimated burden hours than if such technology were not available.

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 Commission has not previously required any information collections related to implementing LBR for wireless 911 voice calls and RTT to 911 call centers nationwide. Accordingly, the approval sought herein for this information collection pertains to the burden hours required for CMRS providers to meet the certification and reporting requirements of the new rules.

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

In order to minimize the impact on small businesses, which most of the non-nationwide CMRS providers affected by these new rules would be considered, several steps were taken by the Commission to ease the burden to these entities. For example, non-nationwide CMRS providers have been given an additional 18 months longer to meet the LBR compliance requirements than the nationwide carriers have to comply.¹⁴ Nationwide providers have until November 13, 2024 to comply, whereas non-nationwide CMRS providers have until May 13, 2026 to comply with the new rules.¹⁵ Each type of CMRS provider has 60 days from the benchmark dates above to certify compliance and submit the required reporting.¹⁶ In addition, small entities will further benefit from the Commission's adoption of provisions that allow PSAPs and CMRS providers to enter into agreements that establish an alternate timeframe for meeting the location-based routing requirements.¹⁷ The flexibility to negotiate an alternative timeframe that meets a CMRS provider's business and financial needs is a significant step by the Commission that could minimize the economic impact for small entities.

¹³ *Wireless E911 Location Accuracy Requirements*, Sixth Report and Order, 35 FCC Rcd 7752 (2020) (*Sixth Report and Order*), corrected by Erratum (rel. Aug. 28, 2020); *see also* 47 CFR § 9.10(i) et seq.

¹⁴ *See* 47 CFR § 9.10(s)(4).

¹⁵ *Id.*

¹⁶ *Id.*

¹⁷ *See LBR Report and Order* at 90, para. 61; *See also* 47 CFR § 9.10(s)(5).

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.

The information collected will assist the Commission in ensuring public safety and will help to ensure that CMRS providers will use precise location information to route wireless 911 voice calls and RTT communications to 911 to the appropriate PSAP. For the millions of individuals seeking emergency assistance each year by wireless 911 voice call or RTT communication to 911, improving routing for these services will reduce emergency response times and save lives. If the information such as LBR routing technologies used or the aggregated live call data is not collected, the Commission's ability to monitor compliance and enforce its rules would be diminished or even eliminated. These submissions are essential to ensure transparency in the enforcement process and to enable all stakeholders in the matter the ability to monitor the progress of the LBR implementation.

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.

No special circumstances exist that would cause this data collection to be conducted in any manner that is inconsistent with the guidelines in 5 CFR § 1320.

8. Identify the date and page number of publication in the Federal Register of the agency's Paperwork Reduction Act (PRA) 60-day notice, required by 5 C.F.R. § 1320.8(d), soliciting comments on the information collection requirement(s) prior to submission to OMB.

The Commission published a notice in the *Federal Register* on May 2, 2024 (89 FR 35822) to solicit the views of industry and the general public. The Commission has received no comments in response to the Notice in the *Federal Register*.

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.

Based on the state of the record in the proceeding, the Commission declined to establish a presumption of confidentiality for the one-time certification and reporting requirements adopted in the *LBR Report and Order*.¹⁸ However, CMRS providers may request confidential treatment under the Commission's existing confidentiality rules¹⁹ for materials submitted pursuant to these new requirements, specifying the information they wish to keep confidential and providing the required justification. It is

¹⁸ See *LBR Report and Order* at 45-6, para. 95.

¹⁹ See 47 CFR § 0.459.

noted that the Commission retains the right to release aggregated or anonymized data that would not reveal specific information for which confidential treatment has been sought, including doing so on its website, in order to facilitate transparency and compliance with the rules.²⁰ In addition, nothing in the *LBR Report and Order* is intended to limit the authority of state and local 911 agencies to publish 911 call data to the extent authorized under state or local law.²¹ The Commission will work with respondents to ensure that their concerns regarding the confidentiality of any proprietary, business-sensitive, or security-sensitive information are resolved in a manner consistent with the Commission's rules.²² Further, any personally identifiable information that may be included in the live call data collected and furnished by CMRS providers to the Commission should be protected to the extent that it is considered Customer Proprietary Network Information (CPNI), pursuant to 47 U.S.C. § 222(h)(1)(A) and 47 CFR. § 64.2001 *et seq.*

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

This information collection does not ask questions 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.

In this new information collection, the Commission estimates that there are 59 CMRS providers affected by the new rules based on the 2023 Universal Service Monitoring Report published on March 14, 2024.²³ Thus, for the certification and reporting requirements, the Commission estimates that this information collection will have 59 unique respondents. Estimates of the burden hours for the collection of information are as follows:

a. Certification and Reporting Requirements related to Section 9.10(s)(4) – Within 60 days after each benchmark specified in paragraphs (s)(1)(i), (ii), and (2) of this section, CMRS providers must comply with the certification and reporting requirements as set forth in Section 9.10(s)(4)(i)(A)-(C) and 9.10(s)(4)(ii)(A)(1)-(3).

- For 9.10(s)(4)(i)(A), CMRS providers must certify that they are in compliance with the requirements specified in paragraphs (s)(1)(i), (ii), and (2) of this section applicable to them;
- For 9.10(s)(4)(i)(B), CMRS providers must identify specific network architecture, systems, and procedures used to comply with paragraphs (s)(1)(i), (ii), and (2) of this section, including the

²⁰ See *LBR Report and Order* at 46, para. 95; see also 47 CFR § 0.459.

²¹ *Id.*

²² The Commission's privacy rules, including those governing the use, disclosure, and access to CPNI, are at 47 CFR §§ 64.2001-64.2011.

²³ Federal-State Joint Board on Universal Service, Universal Service Monitoring Report at 26, Table 1.12 (2023), <https://docs.fcc.gov/public/attachments/DOC-401168A1.pdf>.

extent to which the CMRS provider validates location information for routing purposes and the validation practices used in connection with this information; and

- For 9.10(s)(4)(i)(C), CMRS providers must certify that neither they nor any third party they rely on to obtain location information or associated data used for compliance with paragraphs (s)(1)(i), (ii), or (2) of this section will use such location information or associated data for any non-911 purpose, except with prior express consent or as otherwise required by law. The certification must state that the CMRS provider and any third parties it relies on to obtain location information or associated data used for compliance with paragraphs (s)(1)(i), (ii), or (2) of this section have implemented measures sufficient to safeguard the privacy and security of such location information or associated data.
- For 9.10(s)(4)(ii)(A)(1)-(3), CMRS providers must also collect and report aggregate data on the routing technologies used for all live wireless 911 voice calls in the locations specified for live 911 call location data in paragraph (i)(3)(ii) of this section for a thirty-day period which begins on the compliance date(s) specified in paragraphs (s)(1)(i) and (ii) of this section. CMRS providers must retain live wireless 911 voice call data gathered pursuant to this section for a period of 2 years. CMRS providers must collect and report the following data, expressed as both a number and percentage of the total number of live wireless 911 voice calls for which data is collected pursuant to this section:
 - (1) Live wireless 911 voice calls routed with location-based routing using location information that meets the timeliness and accuracy thresholds defined in paragraph (s)(3)(i)(A) and (B) of this section;
 - (2) Live wireless 911 voice calls routed with location-based routing using location information that does not meet the timeliness or accuracy thresholds defined in paragraph (s)(3)(i)(A) and (B) of this section; and
 - (3) Live wireless 911 voice calls routed using tower-based routing.

b. Notification Requirements related to Section 9.10(s)(5) – Nothing in this section of the rules shall prevent PSAPs and CMRS providers from establishing, by mutual consent, deadlines different from those established for CMRS provider compliance in paragraphs (s)(1)(i), (ii), and (2) of this section.

- The CMRS provider must notify the Commission of the dates and terms of the alternate time frame within 30 days of the parties' agreement or by June 12, 2024, whichever is later.
- The CMRS provider must subsequently notify the Commission of the actual date by which it comes into compliance with the location-based routing requirements in paragraphs (s)(1)(i), (ii), or (2) of this section within 30 days of that date or by June 12, 2024, whichever is later.
- CMRS providers must file such notifications pursuant to this paragraph (s)(5) in PS Docket No. 18-64.

The new requirements from the rules will impose a one-time cost on CMRS providers.²⁴ Activities including the one-time certification of LBR compliance, submission of methods used to achieve compliance, and certification of privacy protections for the location information along with gathering and reporting the aggregated routing technology data used during the 30-day required time period will generate cost for the CMRS providers. Also, additional notification requirements as established in Section 9.10(s)(5) may be applicable to the cost estimate for CMRS providers entering into agreements with PSAPs for compliance dates different from the requirements under the rules. However, as all of this required information should be available to each provider internally, the Commission anticipates the work to compile and report this information to take no longer than a week of five business days.²⁵ The Commission believes that one network engineer would be sufficient to complete this task in this time frame, resulting in a total provider cost of 40 work-hours.²⁶

Total Number of Respondents: 59.

Frequency of Response: 1.

Total Number of Responses:

59 CMRS providers x 1 certification and reporting submission = **59 responses.**

Total Annual Burden Hours:

59 CMRS providers x 1 certification and reporting submission (using 1 engineer) x 40 hours of work = **2,360 hours.**

TOTAL ANNUAL IN-HOUSE (One-Time) COSTS TO RESPONDENTS:

The Commission estimates the same hourly labor cost of internal or “in-house” network engineers as in the previous cost estimate for network implementation to be \$117.87 per hour.²⁷ Therefore, the in-house costs to the respondents are as follows:

- *CMRS providers compliance certifications and reporting requirements:*

\$117.87 per hour × 40 hours × 59 providers = \$278,173.20

- **Total Annual “In-House” (One-Time) Costs: \$278,173.20**

13. Provide estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.

There is no annual and/or recurring cost to the respondents as the rules set forth a one-time certification and reporting requirement for CMRS providers.²⁸

²⁴ See *LBR Report & Order* at 58, para. 132.

²⁵ *Id.*.

²⁶ *Id.*

²⁷ *Id.*

²⁸ See *LBR Report and Order* at 3, para. 3.

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.

There are no costs to the Commission beyond what it considers to be part of the FCC's normal operating costs.

15. Explain the reasons for any program changes or adjustments reported.

This is a new information collection. The Commission is reporting program changes to the total number of respondents/total annual responses of +59 and the total annual burden hours of +2,360 due to the adoption of FCC 24-4. These estimates will be added to OMB's Active Inventory.

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 has reserved the right to publish any or all of the aggregate live 911 call data and otherwise permits state and local 911 authorities to publish data made available to them within the extent of relevant state and local laws.

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 seek approval not to display the expiration date for OMB approval of the information collection.

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

There was an update to the title of this information when the 60/30-day notices were published in the Federal Register on May 2, 2024 (89 FR 35822) and on July 8, 2024 (89 FR 55943) from Section 9.10(s), Location-Based Routing for Wireless 911 Calls to Location-Based Routing for Wireless 911 Calls. The updated title is reflected in this submission to OMB.

There are no other exceptions to the Certification Statement.

B. Collections of Information Employing Statistical Methods:

No statistical methods are employed.