

SUPPORTING STATEMENT

A. Justification

1. *Circumstances that make collection necessary.* The Federal Communications Commission requests that the Office of Management and Budget (OMB) approve a revision of the information collection titled "Part 25 of the Federal Communications Commission's Rules Governing the Licensing of, and Spectrum Usage By, Commercial Earth Stations and Space Stations" under OMB Control No. 3060-0678, as a result of a recent rulemaking that adopted a regulatory framework for the provision of supplemental coverage from space (SCS).

Specifically, on March 15, 2024, the Commission released a Report and Order and Further Notice of Proposed Rulemaking in GN Docket No. 23-65 and IB Docket No. 22-271, FCC 24-28 (*SCS Report and Order*). The SCS regulatory framework adopted therein will enable collaborations between satellite service providers and terrestrial service providers to offer ubiquitous connectivity directly to consumer handsets using spectrum that was previously allocated only to terrestrial service. The Commission anticipates that SCS will enable consumers in areas not covered by terrestrial networks to be connected using their existing devices via satellite-based communications. SCS is a crucial component of the Commission's vision for a "single network future," in which satellite and terrestrial networks work seamlessly together to provide coverage that neither network can achieve on its own.

The *SCS Report and Order* largely preserves the existing part 25 service rules governing satellite communications and applies them to operators who now seek to provide SCS services.¹ For instance, the rules for part 25 license terms and renewals, spectrum milestones, surety bond requirements, automatic termination, and orbital debris mitigation requirements are unchanged. The *SCS Report and Order* further requires that parties who wish to provide SCS submit, via FCC Form 312, either submit a new application or a modification application to offer expanded services. Said applications must include certifications that: (1) a lease notification or application pursuant to section 1.9047 of the Commission's rules has been filed; (2) the space station licensee or grantee of market access that seeks modification of its part 25 authority in order to provide SCS will do so in the same geographic areas covered by the relevant geographically independent area (GIA); and (3) SCS earth stations will qualify as licensed by rule earth stations under section 25.115(q) of the Commission's rules. Applicants must also describe in detail their proposals to provide SCS service on existing FCC Form 312, Schedule S.

The Commission will use this information to assess applicants' legal, technical, and other qualifications to provide SCS, and to conclude whether, and under what conditions, grant of an authorization will serve the public interest. Further, this information collection will enable the Commission to monitor and enforce the entry criteria for SCS providers that the *SCS Report and Order* imposed; these criteria are designed to minimize the possibility of interference between co-channel operators and geographically adjacent markets.

In order to ensure that prospective SCS providers will be able to comply with the applicable rules, that the public interest will be served by granting their applications, and that harmful interference will be avoided to the greatest extent possible thereafter, the regulations below constitute the information collection described in this statement:

¹ The *SCS Report and Order* also adopts a new part 1 rule that require spectrum lessees to provide certain information in existing FCC Form 608. Approval for that information collection is proceeding in conjunction with this request for approval of this revised information collection.

Section 25.125(b) – *SCS space station application requirements.* An applicant seeking a space station authorization to provide SCS must either submit an application requesting modification of a current NGSO or GSO license or grant of U.S. market access under this part, or an application seeking a new NGSO or GSO license or grant of U.S. market access under this part.

(1) The application must include a certification that:

- (i) A lease notification(s) or application(s), pursuant to § 1.9047 of this chapter, where a single terrestrial wireless licensee holds or multiple co-channel licensees collectively hold all co-channel licenses within the relevant GIA in the bands identified in § 2.106(d)(33)(i) of this chapter, or as it pertains to FirstNet, an agreement, is on file with the Commission;
 - (ii) The current space station licensee under this part or grantee of market access for NGSO or GSO satellite operation under this part seeks modification of authority to provide SCS in the same geographic areas covered in the relevant GIA, or the applicant for a space station license under this part or grant of market access for NGSO or GSO satellite operation under this part seeks to provide SCS in the same geographic areas covered in the relevant GIA; and
 - (iii) SCS earth stations will qualify as “licensed by rule” earth stations under § 25.115(q).
- (2) The application must include a comprehensive proposal for the prospective SCS system on FCC Form 312, Main Form and Schedule S, as described in § 25.114, together with the certification described in paragraph (b)(1) of this section and include a list of the file and identification numbers associated with the relevant leasing notification(s) under part 1 of this chapter, application(s), and FCC Form 601(s), with a brief description of the coverage areas that will be served, domestically and internationally.

Section 25.125(c) – *Equipment authorization for SCS earth stations.* Each SCS earth station used to provide SCS under this section must meet the equipment authorization requirements under paragraph (e) of this section and all equipment authorization requirements for all intended uses of the device pursuant to the procedures specified in part 2 of this chapter and the requirements of at least one of part 22, 24, or 27 of this chapter.

Statutory authority for this information collection is contained in 47 U.S.C. §§ 151, 154(i), 157, 301, 303, 307, 308, 309, and 310.

This information collection will be done using FCC Form 312, Main Form and Schedule S. This information collection requirement does not affect individuals or households; thus, there is no impact under the Privacy Act.

The Commission is submitting this revised information collection to the Office of Management and Budget (OMB) to obtain the full three-year clearance.

2. *Use of information.* This information collection is designed to allow Commission staff to carry out its statutory duties to regulate satellite communications in the public interest; namely, to ensure that prospective providers of SCS will operate in compliance with the regulatory framework adopted in the *SCS Report and Order*. The Commission will use this information to assess applicants' legal, technical, and other qualifications, and to conclude whether, and under what conditions, grant of an authorization to provide SCS will serve the public interest. Specifically, this information collection will be critical for the Commission to review and track leasing arrangements that will result in entities providing SCS, as the information in FCC Form 312 will be used to ensure that any part 25 licensing applications connected

with the provision of SCS comply with the requirements adopted in the *SCS Report and Order*. Further, this collection will enable the Commission to monitor and enforce the entry criteria for SCS providers that the *SCS Report and Order* imposed, which are designed to minimize the possibility of harmful interference.

3. *Technological collection techniques.* For this information collection, applicants are required to provide the necessary information by submitting it electronically via FCC Form 312, including Schedule S, in the International Communications Filing System (ICFS).

4. *Efforts to identify duplication.* No other federal agency requires or collects the information described here.

5. *Impact on small entities.* In conformance with the Paperwork Reduction Act of 1995, the Commission makes an effort to minimize the burden of information collection on all its applicants regardless of size. In addition, pursuant to the Small Business Paperwork Relief Act of 2002, Public Law 107-198, see 44 U.S.C. § 3506(c)(4), the Commission previously sought specific comment in the record proceeding on how it might further reduce the information collection burden for small business concerns with fewer than 25 employees. In the *SCS Report and Order*, the Commission assessed the effects of adopting part 25 license entry criteria and requirements for SCS operations. To that end, the Commission found that these rules will have a small impact on small business concerns because, due to the significant costs involved in SCS development and deployment, few entities impacted by this rulemaking will likely qualify as small businesses.

6. *Consequences if information is not collected.* The *SCS Report and Order* established a new regulatory framework to provide SCS. That framework will enable consumers in areas not covered by terrestrial networks to be connected using their existing devices via satellite-based communications. These operations are complex, and interference among co-channel licensees and those in geographically adjacent markets is among the Commission's primary concerns. To that end, this information collection will ensure that satellite operators—whether as newly-authorized operators providing SCS or applicants seeking modification of existing authority to do so—are entering lease agreements with their terrestrial partners that are in compliance with the rules that the Commission adopted in the *SCS Report and Order*, and that granting them authority to provide SCS is in the public interest. Not collecting this information, or collecting it less frequently, would jeopardize the safe and seamless operation of a novel regulatory framework that has been crafted to provide reliable service to many areas that do not currently enjoy it.

7. *Special circumstances.* This information collection will be conducted in a manner that is consistent with the guidelines in 5 CFR § 1320.5.

8. *Federal Register notice; efforts to consult with persons outside the Commission.* The Commission initiated a 60-day public comment period which was published in the Federal Register on July 1, 2024 (89 FR 54458). No comments were received as a result of the notice. A copy of the Federal Register Notice is referenced in this submission to the OMB.

9. *Payments or gifts to respondents.* No payment or gift will be given to respondents in connection with these information collection requirements.

10. *Assurances of confidentiality.* There is no need for confidentiality pertaining to the information collection requirements in this collection. Personally identifiable information (PII) such as names, addresses, phone numbers, email addresses, or citizenship, ownership, or financial information that is

relevant to a filing will be collected and maintained in accordance with the FCC/IB-1, International Bureau Filing System,² system of records notice (SORN). A Privacy Impact Assessment (PIA) has also been performed for both of these systems. The SORN and the PIA are both posted at <https://www.fcc.gov/managing-director/privacy-transparency/privacy-act-information>.

11. *Questions of a sensitive nature.* This information collection does not address any matters of a private or sensitive nature. Nonetheless, in instances where applicants or licensees provide personally identifiable information (PII), the Commission has the FCC/IB-1, International Bureau Filing System, SORN.

12. *Estimates of the hour burden of the collection to respondents.* The following represents the frequency of response,³ time per response, total annual burden hours, and an explanation for the estimated 3,535 respondents and 3,587 responses to this information collection. To provide these estimates, we reviewed filings with the Commission over the past several years and also estimated how many applications we are likely to receive under different categories, and made some updates to the prior estimates.

I. Applications for Initial Licenses or Registrations and Requests for U.S. Market Access

A. Space Stations (Form 312, Schedule S)

1. **General requirements** (47 CFR §§ 25.110(b), 25.111(b) or (c), (d), 25.114(a)-(c), (d)(1)-(6), (d)(14); *see also* 47 CFR § 0.457(d)(1)(vii)(C))

Number of respondents: 28. 16 applications per year for U.S. space station licenses, 10 requests per year to serve the U.S. market with a non-U.S.-licensed space station, and two applications per year for a U.S. earth station to communicate with a non-U.S.-licensed space station that has not been previously granted U.S. market access.

Number of responses: 28.

Frequency of response: One time.

Annual hour burden: The total annual burden is 1,736 hours (28 responses x 62 hours/response = 1,736 hours).

2. Additional Service-Specific Requirements

- a. **Geostationary-Satellite Orbit (GSO) Fixed-Satellite Service (FSS) Applications** (47 CFR § 25.140(a))

Number of respondents: 9.

Number of responses: 9.

Frequency of response: One time.

² The system of records ("IB-1, International Bureau Filing System") refers to ICFS by its former name.

³ Throughout this document, we report the frequency of response for each information requirement. This reflects the number of times a particular respondent is required to submit that particular information. Thus, the term "one time" refers to a collection where a respondent need only submit that particular information once. Over the course of any year, however, one or more other respondents will be required to submit the same type of information. We use the term "on occasion" to refer to a collection where each respondent may be required to submit particular information more than once, but there is no requirement that they submit that information on a regular basis. We use the term "annually" to describe information that respondents must submit to us once each year.

Annual hour burden: The total annual hour burden is 18 hours (9 responses x 2 hours/response = 18 hours).

b. NGSO FSS Applications (47 CFR §§ 25.114(d)(12), 25.146)

Number of respondents: 8.

Number of responses: 8.

Frequency of response: One time and on occasion.

Annual hour burden: The total annual hour burden is 32 hours (8 responses x 4 hours/persons = 32 hours).

c. Direct Broadcast Satellite (DBS) Applications (47 CFR §§ 25.114(d)(11), (13), (18), 25.148)

Number of respondents: 1.

Number of responses: 1.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 9 hours (1 responses x 9 hours/response = 9 hours).

d. 17/24 GHz Broadcasting-Satellite Service (BSS) Applications (47 CFR §§ 25.114(d)(7), (15)-(18), 25.140(a), (b), (c), 25.203(3), 25.264)

Number of respondents: 2.

Number of responses: 2.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 156 hours (2 responses x 78 hours/response = 156 hours).

e. 17 GHz GSO FSS Applications (47 CFR §§ 25.114(d)(7), (15), (18), 25.140(a)(2), (3) (iii), (4), (5), (7), (d), 25.203(3), 25.264)

Number of respondents: 2.

Number of responses: 2.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 156 hours (2 responses x 78 hours/response = 156 hours).

f. SDARS Applications (47 CFR § 25.144(a))

Number of respondents: 2.

Number of responses: 2.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 2 hour (2 response x 1 hour/response = 2 hour).

g. GSO MSS Applications (47 CFR § 25.143(b))

Number of respondents: 1.

Number of responses: 1.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 4 hours (1 response x 4 hours/response = 4 hours).

h. NGSO MSS Applications (47 CFR §§ 25.142(a), (b)(2)(ii), 25.143(b), 25.250(b), 25.279)

Number of respondents: 4.

Number of responses: 4.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 24 hours (4 responses x 6 hours/response = 24 hours).

i. Ancillary Terrestrial Component (ATC) Applications (47 CFR §§ 25.149, 25.253, 25.254)

Number of respondents: 1.

Number of responses: 1.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 50 hours (1 response x 50 hours/response = 50 hours).

3. Request for Filing of Advance Publication Information (Letter, 47 CFR § 25.111(e); *see also* 47 CFR § 0.457(d)(1)(vii)(C))

Number of respondents: 1.

Number of responses: 1.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 2 hour (1 response x 2 hours/response = 2 hours).

B. Small Satellites or Small Spacecraft (Form 312, Schedule S, 47 CFR § 25.122 or 47 CFR § 25.123)

Number of respondents: 5.

Number of responses: 5.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 190 hours (5 responses x 38 hours/response = 190 hours).

C. Earth Stations (Form 312, Schedule B)

1. General Requirements (47 CFR §§ 25.110, 25.115(a)(1)(ii), (a)(5)-(10), (b)(1)-(9), 25.209, 25.211, 25.212, 25.218, 25.220, 25.203, 25.204(e)(1))

Number of respondents: 226.

Number of responses: 226.

Frequency of response: One time and Third Party Disclosure in accordance with 47 CFR § 25.203.⁴

Annual hour burden: The total annual hour burden is 1,808 (226 responses x 8 hours/response = 1,808 hours).

2. Applications Eligible for Autogrant Licensing (47 CFR § 25.115(a)(2))

Number of respondents: 50.

Number of responses: 50.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 300 hours (50 responses x 6 hours = 300 hours).

3. Applications Not Eligible for Autogrant Licensing (47 CFR § 25.115(a)(1), (f); see also General Requirements above)

Number of respondents: 176

Number of responses: 176.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 1,056 hours (176 responses x 6 hours/response = 1,056 hours).

4. Applications Requesting Market Access for Non-U.S. Licensed Space Stations (Form 312, Schedule S, 47 CFR §§ 25.114, 25.137)

Number of respondents: 10.

Number of responses: 10.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 80 hours (10 responses x 8 hours/response = 80 hours).

5. Applications to Register Receive-Only Earth Stations (47 CFR § 25.115(b))

Number of respondents: 2.

Number of responses: 2.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 8 hours (2 responses x 4 hours/response = 8 hours).

6. Additional Application Requirements for Other Types of Earth Stations

a. Blanket Licensed Earth Station Networks in the 3700-4200 MHz and 5925-6425 MHz Bands (47 CFR § 25.115(c)(2)(i))

Number of respondents: 10.

Number of responses: 10.

Frequency of response: One time.

⁴ Of the estimated 8 hours per response, the one-time filing accounts for approximately 7 hours per response and the third-party disclosure accounts for approximately 1 hour per response.

Annual hour burden: The total annual hour burden is 400 hours (10 responses x 40 hours/response = 400 hours).

b. Blanket Licensed Earth Station Networks within the 10.7-20.2 GHz Bands (47 CFR § 25.115(c)(1), (e), (f))

Number of respondents: 50.

Number of responses: 50.

Frequency of response: One time.

Annual hour burden: The total annual burden hours is 1,000 hours (50 responses x 20 hours/response = 1,000 hours).

c. Blanket Licensed Earth Station Networks within the 27.5-30 GHz Bands (47 CFR § 25.115(c)(1), (e), (f))

Number of respondents: 12.

Number of responses: 12.

Frequency of response: One time.

Annual hour burden: The total annual burden hours is 240 hours (12 responses x 20 hours/response = 240 hours).

d. Earth Stations In Motion (ESIM) (47 CFR § 25.228)⁵

1) Earth Stations on Vessels (ESV) (47 CFR § 25.228)

Number of respondents: 5.

Number of responses: 5.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 300 hours (5 responses x 60 hours/response = 300 hours).

2) Vehicle-Mounted Earth Stations (VMES) (47 CFR § 25.228)

Number of respondents: 4.

Number of responses: 4.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 240 hours (4 responses x 60 hours/response = 240 hours).

3) Earth Stations aboard Aircraft (ESAA) (47 CFR § 25.228)

Number of respondents: 10.

Number of responses: 10.

⁵ The total number of ESIM applications is estimated to be 12, but the information requirements in section 25.228 of the Commission's rules are platform-based and multiple platforms can be requested by a single application. For information collection purposes, these figures demonstrate the amount of applicants requesting each specific platform and the burden hours of supplying information for each platform. However, the total number of applications, 12, is used for purposes of calculating final application totals.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 800 hours (10 responses x 80 hours/response = 800 hours).

e. Temporary-Fixed (47 CFR §§ 25.110, 25.277)

Number of respondents: 115.

Number of responses: 115.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 920 hours (115 responses x 8 hours/response = 920 hours).

f. MSS (47 CFR §§ 25.115(d), 25.129(c), 25.135, 25.257, 25.258(c))

Number of respondents: 4.

Number of responses: 4.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 32 hours (4 responses x 8 hours/response = 32 hours).

g. 17/24 GHz BSS (47 CFR § 25.115(g))

Number of respondents: 3.

Number of responses: 3.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 24 hours (3 responses x 8 hours/response = 24 hours).

h. 12/17 GHz DBS (47 CFR §25.203(m))

Number of respondents: 3.

Number of responses: 3.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 27 hours (3 responses x 9 hours/response = 27 hours).

i. 17 GHz FSS (47 CFR §25.115)

Number of respondents: 3.

Number of responses: 3.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 24 hours (3 responses x 8 hours/response = 24 hours).

j. SDARS Terrestrial Repeaters (47 CFR §§ 25.144(e), 25.263(b), (c), 25.403, 25.404; *see also* FCC 10-82, para. 278)

Number of respondents: 1.

Number of responses: 1.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 4 hours (1 response x 4 hours/response = 4 hours).

D. Space Stations and Earth Stations (Form 312, Schedules B and S, Schedule B, 47 CFR § 25.124(b))

Number of respondents: 1.

Number of responses: 1.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 59 hours (1 responses x 59 hours/response = 59 hours).

II. Modifications of Existing Licenses and Market Access Grants (Form 312)

A. Space Station (47 CFR § 25.117)

Number of respondents: 44.

Number of responses: 44.

Frequency of response: On occasion.

Annual hour burden: The total annual hour burden is 704 hours (44 responses x 16 hours/response = 704 hours).

B. Earth Station (47 CFR § 25.117)

Number of respondents: 165.

Number of responses: 165.

Frequency of response: On occasion.

Annual hour burden: The total annual hour burden is 3,300 hours (165 responses x 20 hours/response = 3,300 hours).

III. Amendments of Pending Applications and Petitions (Form 312)

A. Space Station (47 CFR §§ 25.116, 25.137(e))

Number of respondents: 10.

Number of responses: 10.

Frequency of response: On occasion.

Annual hour burden: The total annual hour burden is 55 hours (10 responses x 5.5 hours/response = 55 hours).

B. Earth Station (47 CFR §§ 25.116, 25.137(e))

Number of respondents: 34.

Number of responses: 34.

Frequency of response: On occasion.

Annual hour burden: The total annual hour burden is 136 hours (34 responses x 4 hours/response = 136 hours).

IV. Transfers of Control or Assignments (Form 312 and Schedule A)

A. Transfers of Control (47 CFR §§ 25.119, 25.137(g))

1. Space Station

Number of respondents: 4.

Number of responses: 4.

Frequency of response: On occasion.

Annual hour burden: The total annual hour burden is 36 hours (4 responses x 9 hours/response = 36 hours).

2. Earth Station

Number of respondents: 155.

Number of responses: 155.

Frequency of response: On occasion.

Annual hour burden: The total annual hour burden is 1,395 hours (155 responses x 9 hours/response = 1,395 hours).

B. Assignments (47 CFR §§ 25.119, 25.137(g))

1. Space Station

Number of respondents: 3.

Number of responses: 3.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 27 hours (3 operators x 9 hours/response = 27 hours).

2. Earth Station

Number of respondents: 81.

Number of responses: 81.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 729 hours (81 responses x 9 hours/response = 729 hours).

V. Applications for Special Temporary Authority (Form 312) (47 CFR § 25.120)

A. Space Station

Number of respondents: 77.

Number of responses: 77.

Frequency of response: On occasion.

Annual hour burden: The total annual hour burden is 616 hours (77 responses x 8 hours/response = 616 hours).

B. Earth Station

Number of respondents: 753.

Number of responses: 753.

Frequency of response: On occasion.

Annual hour burden: The total annual hour burden is 6,024 hours (753 responses x 8 hours/response = 6,024 hours).

VI. Earth Station License Renewals (FCC Form 312-R) (47 CFR §§ 25.115(b)(7), 25.121(e))

Number of respondents: 268.

Number of responses: 268.

Frequency of response: On occasion.

Annual hour burden: The total annual hour burden is 536 hours (268 operators x 2 hours/response = 536 hours).

VII. Surrenders of Authorizations

A. Space Station

Number of respondents: 1.

Number of responses: 1.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 1 hour (1 response x 1 hour/response = 1 hour).

B. Earth Station

Number of respondents: 208.

Number of responses: 208.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 208 hours (208 responses x 1 hour/response = 208 hours).

VIII. Annual Reporting Requirements for Space Station Operators (47 CFR § 25.171)

Number of respondents: 38.

Number of responses: 38.

Frequency of response: Annual.

Annual hour burden: The total annual hour burden is 38 hours (38 responses x 1 hour = 38 hours).

IX. General Notification Requirements

A. Commence Construction at Own Risk (47 CFR §§ 25.113(b) and (f))

Number of respondents: 1.

Number of responses: 1.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 1 hour (1 response x 1 hour/response = 1 hours).

B. Bringing In-Orbit Spare into Use (47 CFR § 25.113(h))

Number of respondents: 1.

Number of responses: 1.

Frequency of response: On occasion.

Annual hour burden: The total annual hour burden is .5 hours (1 response x .5 hours/response = .5 hours).

C. NGSO Replacement Satellites (47 CFR § 25.113(i))

Number of respondents: 5.

Number of responses: 5.

Frequency of response: On occasion.

Annual hour burden: The total annual hour burden is 10 hours (5 responses x 2 hours/response = 10 hours).

D. Modification of Space Station Operation Not Requiring Prior Authorization (47 CFR § 25.118(e), (f))

Number of respondents: 4.

Number of responses: 4.

Frequency of response: On occasion.

Annual hour burden: The total annual hour burden is 8 hours (4 responses x 2 hours/response = 8 hours).

E. Modifications of Earth Station Operation Not Requiring Prior Authorization (47 CFR § 25.118(a))

Number of respondents: 5.

Number of responses: 5.

Frequency of response: On occasion.

Annual hour burden: The total annual hour burden is 40 hours (5 responses x 8 hours/response = 40 hours).

F. Temporary-Fixed Operation Local Coordination Reports (47 CFR § 25.277(c))

Number of respondents: 100.

Number of responses: 100.

Frequency of response: On occasion.

Annual hour burden: The total annual hour burden is 800 hours (100 responses x 8 hours/response = 800 hours).

G. Completion of Earth Station Construction (47 CFR §§ 25.133(b) and (d))

Number of respondents: 250.

Number of responses: 250.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 250 hours (250 responses x 1 hour/response = 250 hours).

H. ATC Service Initiation Notice (47 CFR § 25.149(f))

Number of respondents: 1.

Number of responses: 1.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 1 hour (1 response x 1 hour/response = 1 hour).

I. Ka-Band Space Station Operators' Notification (47 CFR § 25.258; *see also* FCC 96-311)

Number of respondents: 6.

Number of responses: 6.

Frequency of response: Third party disclosure.

Annual hour burden: The total annual hour burden is 6 hours (6 responses x 1 hour/response = 6 hours).

J. Consummation of Transfer and Control or Assignment (47 CFR § 25.119(f))

Number of respondents: 365.

Number of responses: 365.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 365 hours (365 responses x 1 hour/response = 365 hours).

K. Results of In-Orbit Testing (47 CFR § 25.173)

Number of respondents: 5.

Number of responses: 5.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 5 hours (5 responses x 1 hour/response = 5 hours).

L. Contact Information Update (47 CFR §§ 25.171, 25.172, 25.259(b), 25.260(b), 25.271(f))

Number of respondents: 25.

Number of responses: 25.

Frequency of response: On occasion.

Annual hour burden: The total annual hour burden is 12.5 hours (25 responses x .5 hour/response = 12.5 hours).

M. Notification of Non-Routine Space Station Operation (47 CFR § 25.140(d))

Number of respondents: 6.

Number of responses: 6.

Frequency of response: On occasion.

Annual hour burden: The total annual hour burden is 12 hours (6 responses x 2 hours/response = 12 hours).

N. Third Party Disclosures Requirements

1. SDARS (47 CFR § 25.263(b))

Number of respondents: 1.

Number of responses: 25.

Frequency of response: Third party disclosure.

Annual hour burden: The total annual hour burden is 25 hours (1 respondent x 25 responses x 1 hour/response = 25 hours).

2. ATC (47 CFR § 25.149)

Number of respondents: 1.

Number of responses: 25.

Frequency of response: Third party disclosure.

Annual hour burden: The total annual hour burden is 25 hours (1 respondent x 25 responses x 1 hour/response = 25 hours).

3. ESIM (47 CFR § 25.228)

a. ESV (47 CFR § 25.228(e))

Number of respondents: 5.

Number of responses: 5.

Frequency of response: Third party disclosure.

Annual hour burden: The total annual hour burden is 5 hours (5 responses x 1 hour/response = 5 hours).

b. VMES (47 CFR § 25.228(f))

Number of respondents: 4.

Number of responses: 4.

Frequency of response: Third party disclosure.

Annual hour burden: The total annual hour burden is 4 hours (4 responses x 1 hour/response = 4 hours).

c. ESAA (47 CFR § 25.228(g))

Number of respondents: 10.

Number of responses: 10.

Frequency of response: Third party disclosure.

Annual hour burden: The total annual hour burden is 10 hours (10 responses x 1 hour/response = 10 hours).

4. 17/24 GHz DBS (47 CFR § 25.203(m))

Number of respondents: 3.

Number of responses: 3.

Frequency of responses: Once.

Annual hour burden: The total annual hour burden is 27 hours (3 responses x 12 hours = 12 hours).

X. Milestones and Bonds

A. GSO Launch and Operate Milestone (47 CFR § 25.164(f))

Number of respondents: 4.

Number of responses: 4.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 4 hours (4 responses x 1 hour/response = 4 hours).

B. NGSO Launch and Operate Milestone (47 CFR § 25.164(f))

Number of respondents: 4.

Number of responses: 8.

Frequency of response: Two times.

Annual hour burden: The total annual hour burden is 8 hours (8 response x 1 hour/response = 8 hours).

C. Application-Stage Bond (47 CFR § 25.165(f))

Number of respondents: 1.

Number of responses: 1.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 2 hours (1 response x 2 hours/response = 2 hours).

D. Post-Licensing Bond (47 CFR § 25.165(a))

Number of respondents: 4.

Number of responses: 4.

Frequency of response: On occasion.

Annual hour burden: The total annual hour burden is 8 hours (4 responses x 2 hours/response = 8 hours).

XI. Global Mobile Personal Communications by Satellite/E911 Call Centers (47 CFR § 9.18)⁶

Number of respondents: 4.

Number of responses: 4.

Frequency of response: Annual.

Annual hour burden: The total annual hour burden is 4 hours (4 responses x 1 hour/response = 4 hours).

XII. Recordkeeping Requirement (47 CFR §§ 25.115 (f), (g)(1), 25.263(c),)

Number of respondents: 1.

Number of responses: 1.

Frequency of response: Recordkeeping requirement.

Annual hour burden: The total annual hour burden is .5 hours (1 response x .5 hours = .5 hours).

XIII. 3.7-4.2 GHz Information Collection Order (FCC 18-91)

A. Additional Information on Temporary Fixed Earth Stations in 3.7-4.2 GHz (FCC 18-91)

Number of respondents: 70.

Number of responses: 70.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 420 hours (70 responses x 6 hours/response = 420 hours).

B. Additional Information on Space Stations in 3.7-4.2 GHz (FCC 18-91)

Number of respondents: 49.⁷

Number of responses: 49.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 1,960 hours (49 responses x 40 hours/response = 1,960 hours).

XIV. Supplemental Coverage from Space (FCC 24-28) Additional Requirements (47 CFR § 25.125(b)(1)-(2), 25.125(c))

Number of respondents: 10

Number of responses: 10.

Frequency of response: One time.

Annual hour burden: The total annual hour burden is 100 hours (10 responses x 10 hours/response = 100 hours).

⁶ Previously, the Commission required the information in section 25.284, but in 2019, the Commission moved the requirement (without changes) to section 9.18 of its rules. 47 CFR § 9.18; *see Implementing Kari's Law and Section 506 of RAY BAUM'S Act; Inquiry Concerning 911 Access, Routing, and Location in Enterprise Communications Systems; Amending the Definition of Interconnected VoIP Service in Section 9.3 of the Commission's Rules*, PS Docket Nos. 18-261 and 17-239, GN Docket No. 11-117, Report and Order, 34 FCC Rcd 6607 (2019).

⁷ Respondents are calculated on a per-space station basis.

XIV. TOTALS (COMPLETE)

Total number of respondents: 3,535

Total number of responses: 3,587

Range of hours per response: .5-80

Total number of burden hours: 27,619.5 rounded to 27,620

In-house Cost: In-house staff who will be working on the information collection requirements contained in the chart above are estimated to have an hourly salary of \$60/hour. The total overall in-house cost to respondents is **\$1,657,200** (27,620 total burden hours x \$60/hour = \$1,657,200).

13. *Estimates of the cost burden of the collection to respondents.*

Outside Cost: Respondents are assumed to use outside legal or engineering assistance to complete their filing with the Commission. This is because, in addition to their in-house legal and engineering staffs, space station and earth station operators often rely on outside attorneys and engineers to assist with some of the information collection requirements in part 25. We estimate that the hourly rates for outside legal and engineering assistance are \$300/hour and \$250/hour, respectively. These figures are based on a small survey of local firms in the Washington, D.C. area and are conservative estimates. Because outside attorneys and engineers are used in approximately equal proportions, we use an average rate of \$275/hour to arrive at the cost burden for outside assistance. The amount of hourly work performed by outside parties varies with the type and complexity of the application. Based on our experience, we estimate that operators will engage outside attorneys and engineers in preparing 899 of the total number of responses filed annually, with an average of 9.3 hours spent per response. Consequently, the total cost burden for outside assistance is **\$2,299,275**. (899 responses x 9.3 hours per response = 8,361 burden hours. 8,361 burden hours x \$275/hour = \$2,299,275.)

Application Filing Fees:⁸ **\$1,854,991.82**. This estimate is based on actual Commission filings over the past several years, as well as the estimates supplied in this statement, taking into account an estimate of the number of filings under the Commission's new rules adopted in the *SCS Report and Order*.

Total Annualized Cost:

Total Costs to the Industry	Totals
Estimated Application Filing Fees	\$1,854,991.82
Estimated Cost of Outside Legal/Engineering Assistance	\$2,299,275.00
Total Cost to Respondents	\$4,154,266.82 rounded to \$4,154,267

14. *Estimate of Annualized Cost to the Federal Government.*

The estimate of annualized cost to the Federal government is summarized in the chart below.

As shown in the chart, the annualized costs to the Federal government are **\$2,791,471.53**.

⁸ See Appendix A below for a table of calculations.

The chart contains total staff salaries, burden hours, and annualized costs.

Federal Government Staff	Number of Staff	Salary Per Hour	Annual Burden Hours	Annualized Costs
GS-15/Step 5 Attorney	6	\$89.04	1,514	\$808,839.36
GS-14/Step 5 Attorney	3	\$75.70	1,517	\$344,510.70
GS-13/Step 5 Attorney	1	\$64.06	1,517	\$97,179.02
GS-12/Step 5 Attorney	1	\$53.87	1,517	\$ 81,720.79
GS-15/Step 5 Engineer	11	\$89.04	694	\$679,731.36
GS-14/Step 5 Engineer	3	\$75.70	2,002	\$454,654.20
GS-12/Step 5 Paralegal	1	\$53.87	500	\$26,935.00
GS-12/Step 5 Industry Analyst	1	\$53.87	1,508	\$81,235.96
GS-12/Step 5 Telecom Specialist	2	\$53.87	2,011	\$216,665.14
Total	29		12,780	\$2,791,471.53

15. *Program changes or adjustments.* The updates to this collection as a result of the revised rules adopted in the *SCS Report and Order* include +20 annual number of respondents, +20 annual number of responses, +444 to the annual burden hours, and + \$230,380 to the annual burden cost. The program changes reflect a small increase in the estimated annual burden hours as a result of the changes adopted in the *SCS Report and Order*, and include additional application fees and costs of outside legal/engineering assistance associated with these additional estimated applications.

16. *Collections of information whose results will be published.* The data will not be published for statistical use.

17. *Display of expiration date for OMB approval of information collection.* The Commission continues to seek a waiver of the requirement to display the expiration date of OMB approval on the FCC Form 312 (including associated Schedules A, B, and S) and FCC Form 312-R and wish to instead display an edition date. If these forms remain unchanged when it is time to renew OMB approval for this collection, the Commission would be required to destroy all stock on hand displaying the old expiration dates and then reprint and redistribute the forms with the new expiration date. Additionally, it would require the Commission to modify the electronic versions as well. This would be an undue burden on Commission resources and may lead to confusion among licensees.

18. *Exceptions to the certification statement for Paperwork Reduction Act submissions.* There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

No statistical methods are employed.

APPENDIX A
Application Costs (in Dollars)⁹

Type of Filing	No. of Applications	Filing Fee	Subtotals	Totals
I. Applications for Initial Licenses				
a. Space Stations				
GSO	9	3,965	35,685	
NGSO	11	16,795	184,745	
Small Satellite	5	2,425	12,125	
				232,555
b. Earth Stations:				
Fixed or Temporary Fixed Transmit or Transmit/Receive Earth Stations				
Initial application, Single site		400		
Initial Application, Multiple sites		7,270		
(average earth station application fee)	226	3,835		866,710
Receive Only Earth Stations				
Single		195		
Multiple		520		
Blanket		400		
(average earth station application fee)	2	371.66		743.32
Mobile Earth Station Blanket Authorization (ESIMs total)	12	910		10,920
II. Modifications of Existing Licenses				
a. Space Station	44	2,785		122,540
b. Earth Station	165	610		100,650

⁹ See 47 C.F.R. § 1.1107.

III. Amendments of Pending Applications				
a. Space Station	10	1,810		18,100
b. Earth Station				
Single Site		480		
Multiple Site		705		
(average earth station application fee)	34	592.50		20,145
IV. Transfers of Control and Assignments				
A. Transfers of Control (T/C)				
a. Space Station				
First call sign		830		
Additional call signs (each)		445		
(average space station T/C fee)	4	636.50		2,546
b. Earth Station				
First call sign		830		
Additional call signs (each)		445		
(average earth station T/C fee)	155	637.50		98,812.50
B. Assignments				
a. Space Station				
First call sign		830		
Additional call signs (each)		445		
(average space station assignment fee)	3	637.50		1,912.50
b. Earth Station				
First call sign		830		
Additional call signs (each)		445		
(average earth station assignment fee)	81	637.50		51,637.50
V. Applications for Special Temporary Authority				
a. Space Station	77	1,600		123,200
b. Earth Station	753	220		165,660

VI. Earth Station License Renewals				
Single Site		130		
Multiple Sites		160		
Average Earth Station Fee	268	145		38,860
TOTALS				1,854,991.82