

2024

SUPPORTING STATEMENT

A. Justification:

1. The third-party disclosure requirement in 47 CFR 80.868 is necessary to ensure that radiotelephone distress procedures—Card of Instructions—must be securely mounted and displayed in full view of the principal operating position on board certain vessels. Section 80.868 applies to ships that are not required to comply with Subpart W (Global Maritime Distress and Safety System (GMDSS)) of part 80 after receiving an exemption from Subpart W provisions. *See* 47 CFR 80.851.

The Commission is now requesting approval for an extension of this information collection from the Office of Management and Budget for a three-year period.

Statutory authority for this collection of information is contained in 47 U.S.C. 154, 303, 307(e), 309, and 332 of the Communications Act of 1934, as amended, unless otherwise noted.

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

2. The Card of Instructions is information used by a vessel radio operator during an emergency and is designed to assist the radio operator to utilize proper distress procedures when subject to considerable stress or confusion.
3. The Commission considered using information technology to reduce burden. However, the FCC determined that instead of an electronic version, the paper version of the Card of Instructions was an essential, effective, and efficient method to assist radio operators when making distress calls.
4. There are no similar information collection requirements imposed on the respondents. There is no similar data available.
5. In conformance with the Paperwork Reduction Act of 1995, the Commission is making an effort to minimize the burden on all respondents, regardless of size. Therefore, the Commission has limited the information requirements to those absolutely necessary.
6. If the Card of Instructions were not posted, an aid to vessel radio operators during emergency situations would not be available. Safety-related communications could take longer and/or be less useful to search and rescue organizations.

7. There are no special circumstances associated with this collection of information.
8. Pursuant to 5 CFR 1320.8(d), the Commission solicited public comment for 60 days by publishing a notice, which appeared in the Federal Register on July 26, 2024 (89 FR 60631). No PRA comments were received.
9. Respondents will not receive any payments associated with this collection of information.
10. There is no need for confidentiality with this collection.
11. This collection does not address any private matters of a sensitive nature.
12. For Subpart R vessels, § 80.868 not only requires that the Card of Instructions be mounted in full view of the radiotelephone operators' position, but also requires that the instructions remain on display thereafter. Based on the FCC's Universal Licensing System database, the Commission estimates that out of the 2,403 compulsory vessels with active licenses, there are no more than 49 licensees that have ship exemptions and will thus be required to abide by § 80.868.

The Commission further estimates that it will take respondents no more than 10 minutes (0.167 hours) to mount the Card of Instructions; and no additional time to keep it on display.

49 responses x 0.167 hours/response = **8 hours (rounded up)**.

Total Number of Respondents: 49 licensees.

Total Number of Annual Responses: 49 annual responses.

Total Annual Burden Hours: 8 hours.

In-House Cost: The Commission estimates that an employee equivalent of a GS-7, step 5 grade level in Washington D.C. will be responsible for this information collection. Therefore, the in-house cost is as follows: 49 responses x 0.167 hours/response x \$30.37 (GS-7, step 5) = **\$249 (rounded up)**.

13. There are no external costs associated with this information collection.
14. Estimated annual cost to the Federal Government: None.
15. There are no program changes to this information collection. There are adjustments to the collection as follows due to less respondents to this collection: -4,457 to the number of respondents, -4,457 to the annual number of responses and -745 to the annual burden hours.

16. There are no results to publish for this information collection as respondents are only required to mount and display a Card of Instructions.
17. No expiration date will be displayed because forms are not involved with this information collection.
18. There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods:

No statistical methods are employed.