

## Performance Evaluation of Numbering Vendor(s)

### 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 requesting Office of Management and Budget (OMB) approval for this revised information collection. These collections of information are annual performance satisfaction surveys of its vendor(s) acting as administrators for various telephone number management functions. These functions may be performed by one or multiple vendors under one or multiple contracts. The vendor(s) act pursuant to their contract(s) with the Federal Communications Commission (FCC) and the FCC's numbering rules. See 47 CFR § 52.1 *et seq.*

The Commission has authority to perform these surveys pursuant to the FCC's numbering rules and section 251(e)(1) of the Telecommunications Act of 1996. See 47 U.S.C. § 251(e)(1). Section 251(e)(1) provides authority to the Commission to "create or designate one or more impartial entities to administer telecommunications numbering" and gives the Commission "exclusive jurisdiction over those portions of the North American Numbering Plan that pertain to the United States." 47 U.S.C. § 251(e)(1).

The surveys will be designed and administered by the Numbering Administration Oversight Working Group (NAOWG), of the North American Numbering Council (NANC). The NANC is a Federal Advisory Committee established under the Federal Advisory Committee Act. The NANC advises the FCC and makes recommendations, reached through consensus, that foster efficient and impartial number administration. The NANC is composed of representatives of telecommunications carriers, regulators, cable providers, Voice Over Internet Protocol (VoIP) providers, industry associations, vendors, and consumer advocates. Working groups, including the NAOWG, made up of industry experts, have been established by the NANC to assist in its efforts. The NANC charter can be found at <https://www.fcc.gov/files/charter-north-american-numbering-council>.

The relevant contract(s) require that the Commission and/or its designee shall develop and conduct a performance survey for each administrator. The results of these consumer satisfaction surveys will

provide the FCC with indicators on how well the vendor(s) are acting as the North American Numbering Program Administrator (NANPA), Pooling Administrator (PA), Routing Number Administrator (RNA), and Reassigned Numbers Database Administrator (RNDA) is meeting its contractual obligations and accomplishing its mission as the NANPA/PA/RNA/RNDA.

At least a portion of the survey results will be incorporated into the annual performance evaluation reports for the NANPA/PA/RNA/RNDA. The full survey results or a subset of those results may also be published in the annual performance evaluation reports of the NANPA/PA/RNA/RNDA or made publicly available on the NANC's website at [www.nanc-chair.org](http://www.nanc-chair.org). The specific names and other identifying information of any entity submitting data will be removed from any publication of the results. However, aggregated results by category of respondent (e.g., regulators, providers) may be published.

Personally identifiable information (PII) in the form of business contact information will be collected and maintained in accordance with the FCC-2, Business Contacts and Certifications System of Records Notice (SORN), posted at <https://www.fcc.gov/managing-director/privacy-transparency/privacy-act-information>. There is no intention by the NAOWG, NANC, the RNDA, or the Commission to make this business contact information publicly available.

***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 had made of the information received from the current collection.***

The survey results provide specific information to the FCC regarding where it needs to make adjustments to the NANPA/PA/RNA/RNDA's policies and procedures. The survey results provide feedback to the FCC to help it determine if the NANPA/PA/RNA/RNDA's users believe the vendor(s) have successfully met their contractual obligations.

***3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical or other technological techniques or other forms of information technology, e.g., permitting electronic submissions 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.***

All responses may be submitted electronically via a web portal. We conclude that this approach will allow for the rapid collection and analysis of the data.

**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.**

No similar process is in place to collect information related to the performance of the NANPA/PA/RNA/RNDA.

**5. If the collection of information will have significant economic impacts on small businesses, organizations or other small entities, describe any methods used to minimize the burden.**

Certain providers responding to the survey are also small businesses. The limited amount of time necessary to complete the survey and the ability to use a readily accessible web portal to submit responses will limit the impact on small entities. This information collection will not have a significant economic impact on a substantial number of small entities/businesses.

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

If the Commission does not collect the data, it will be unable to evaluate the vendor(s) performance as the NANPA/PA/RNA/RNDA pursuant to the vendor(s) contract(s). It will lack the necessary information to modify the vendor(s) policies and procedures. This will, in turn, harm the Commission's abilities to meet its policy goals related to numbering.

**7. Explain any special circumstance that would cause an information collection in a manner inconsistent with the guidelines in 5 C.F.R. § 1320.5(d)(2).**

There are no special circumstances that would cause an information collection in a manner inconsistent with the guidelines in 5 C.F.R. § 1320.5(d)(2).

**8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 C.F.R. § 1320.5(d), soliciting comments on the information prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to those comments. 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 on August 15, 2024 published at 89 FR 66386, seeking public comment on the information collection requirements contained in this supporting statement. No comments were received from the public as a result of this notice.

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

There will be no payments in exchange for participation in this study.

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

The surveys will collect PII in the form of business contact information. The surveys will include a Privacy Act Statement which provides notice of how this information will be maintained and potentially disclosed in accordance with the FCC-2, Business Contacts and Certifications System of Records Notice (SORN), posted at <https://www.fcc.gov/managing-director/privacy-transparency/privacy-act-information>. The Commission has directed NAOWG and NANC not to publish or otherwise release or disseminate this information except as provided in the FCC-2 SORN.

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

This information collection does not address any private 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 responses, 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 the estimated hour burden, and explain the reasons for the variance.**

We estimate that the burden to fill out each survey will be 15 minutes. Our estimate includes the time to log-in to the portal as well as respond to the survey questions.

**The total time burden for the surveys is estimated at 1,561 hours.**

***NANPA Annual Burden Estimate***

Total Estimated Burden: **386 burden hours.**

This estimate is based on an estimated **1,542 respondents x 0.25 hours per response x 1 response per year for a total of 386 burden hours**

**1,542 respondents x 0.25 hours per response x 1 response per year = 386 hours**

The 15 minute estimate per response is based on: an estimated 5 minutes to log-in and 10 minutes to complete and submit the survey.

The 1,542 respondent estimate is based on:

1,400 active NANPA users that are service providers  
52 representatives of state and territorial regulatory agencies.  
90 active NANPA users that are neither service providers nor representatives of state and territorial regulatory agencies.

The 1 response per year estimate is based on a single survey conducted each year pursuant to the NANPA contract.

### ***PA Annual Burden Estimate***

Total Estimated Burden: **386 burden hours.**

This estimate is based on an estimated **1,542 respondents x 0.25 hours per response x 1 response per year for a total of 386 burden hours**

**1,542 respondents x 0.25 hours per response x 1 response per year = 386 hours**

The 15 minute estimate per response is based on: an estimated 5 minutes to log-in and 10 minutes to complete and submit the survey.

The 1,542 respondent estimate is based on:

1,400 active PA users that are service providers  
52 representatives of state and territorial regulatory agencies.  
90 active PA users that are neither service providers nor representatives of state and territorial regulatory agencies.

The 1 response per year estimate is based on a single survey conducted each year pursuant to the PA contract.

### ***RNA Annual Burden Estimate***

Total Estimated Burden: **386 burden hours.**

This estimate is based on an estimated **1,542 respondents x 0.25 hours per response x 1 response per year for a total of 386 burden hours**

**1,542 respondents x 0.25 hours per response x 1 response per year = 386 hours**

The 15 minute estimate per response is based on: an estimated 5 minutes to log-in and 10 minutes to complete and submit the survey.

The 1,542 respondent estimate is based on:

1,400 active RNA users that are service providers

52 representatives of state and territorial regulatory agencies.  
90 active RNA users that are neither service providers nor representatives of state and territorial regulatory agencies.

The 1 response per year estimate is based on a single survey conducted each year pursuant to the RNA contract.

### ***RNDA Annual Burden Estimate***

Total Estimated Burden: **403 burden hours.**

This estimate is based on an estimated 1,611 respondents x 0.25 hours per response x 1 response per year for a total of **403 burden hours**

**1,611 respondents x 0.25 hours per response x 1 response per year = 403 hours**

The 15 minute estimate per response is based on: an estimated 5 minutes to log-in and 10 minutes to complete and submit the survey.

The 1,611 respondent estimate is based on:

1,082 active RND users that are service providers/service provider agents  
529 active RND users that are callers/caller agents.

The 1 response per year estimate is based on the applicable user survey (service provider or caller) conducted to each user entity pursuant to the RNDA contract.

**Total Number of Respondents and Total Annual Responses: 6,237 (1,542 + 1,542 + 1,542 + 1,611)**

**Total Burden for all surveys: 1,561 (386 + 386 + 386 + 403) hours.**

**13. Provide an estimate of 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.**

This information collection is based on responses submitted to a web portal administered by the NAOWG. It will impose no cost burden on the respondents or recordkeepers.

**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).**

An outside party, the NAOWG, administers this collection. The NAOWG is not provided funding for the administration of this collection.

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

This is a revised information collection. The Commission is reporting adjustments to the total number of respondents and total annual responses of +76 (from 6,161 to 6,237) and total annual burden hours of +21 (from 1,540 to 1,561) which are due to the Commission re-evaluating the previous figures used in this collection to better reflect experience in administrating the collection.

The Commission is also reporting a program change due to modifications to the survey forms, including an increase in the number of questions on each form. However, the Commission concludes that this increase in questions will not materially increase the response time per form.

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

At least a portion of the survey results will be incorporated into the annual performance evaluation reports for the NANPA/PA/RNA/RNDA. The full survey results or a subset of those results may also be published in the annual performance evaluation reports of the NANPA/PA/RNA/RNDA or made publicly available on the NANC's website at [www.nanc-chair.org](http://www.nanc-chair.org). Any published information would not include PII.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reason that a display would be inappropriate.**

The Commission is seeking continued OMB approval to not display the OMB expiration date for OMB approval of the information collection. OMB approval of the expiration date will be displayed on OMB's website.

**18. Explain any exceptions to the statement certifying compliance with 5 C.F.R. § 1320.9(d) and the related provisions of § 1320.8(b)(3).**

There are no exceptions to the Certification Statement.

**B. Collections of Information Employing Statistical Methods**

This collection of information does not employ statistical methods, including sampling. Nevertheless, the information contained in this Part B of the supporting statement is included to better understand the design and purpose of the surveys.