

## **Justification of Non-substantial changes to Collection 3060-0463**

The Commission is submitting this non-substantial change request to the Office of Management and Budget (OMB) to revise the instructions for the telecommunications relay services (TRS) Provider Data Request Filing Instructions and Form and the TRS State Data Request Filing Instructions and Form issued by the TRS Fund administrator. All dates have been updated from the 2024 version to the 2025 version, external links have been updated, as needed, document formatting has been adjusted, the logo for the administrator has been updated, and there are several instances where we have fixed spelling, removed repetitive words, and spelled out acronyms. The following is a listing of the other changes, including explanations where the change is not self-explanatory.

In the newer version of the Provider Data Request Filing Instructions:

- 1) Page 2 – The paragraphs under Privacy Act and Paperwork Reduction Statements have replaced the word “we” with the TRS Administrator, Rolka Loube, and grammar has been adjusted for clarity.
- 2) Page 4 – Footnote 1 has been updated to reference recent FCC Orders that provide guidance on the provision and compensation for the different forms of TRS.
- 3) Pages 4-5 – In the paragraph under “Overview” the purpose of the document has been clarified to remove any uncertainty that TRS providers must be aware of the actions of the FCC. The purpose of the document has not changed.
- 4) Page 5 – In the paragraphs under “Annual Filing Rules” the phrase “reporting period” has been replaced with “prior calendar year Reporting Period.” This is a clarifying edit. The meaning of reporting period has not changed. Reference to where information should not be reported have also been removed for clarity. The reportable costs paid by provider have also been clarified by replacing references to “funds” with “costs” or “expenses” and making clear the scope of costs is unreimbursed expenses. No changes to the reported information should occur.
- 5) Page 6 – under “IP-based services,” language has been added to clarify, which TRS providers must fill out the worksheets. Under “Demand” language has been added to clarify for which historical and projected data is requested, and clarify how new providers with limited data submit information. Under “Service Expenses” language has been moved up and added with citation to provide clarification regarding the treatment of start-up costs as Capital Investments, and cost allocations for IP CTS providers. No changes to the scope of reported information should occur.
- 6) Pages 9-10 – in the table under the “Description” for “Research and Development” language and a citation has been added to clarify reportable expenses rather than solely reference the Appendix instructions. In the table under the “Description” for “Other Corporate Overhead” language has been added to clarify support for expenses is required. These changes only clarify information already being reported. No changes to the scope of reported information should occur.
- 7) Page 10 – in the table the cost subcategory “Enforcement Action Expenses” and a description has been added to clarify how providers should report such expenses as the TRS administrator received questions regarding the reporting of this data. This change only clarifies how to report such costs, no changes to the reported information should occur.
- 8) Page 11 – in the table under the “Description” for “Software Expenses” language has been revised to clarify that expenses beyond the mandatory minimum standard means expenses that allow for the provision of functional equivalent service under the statute.

- This change only clarifies the language. No changes to the scope of reported information should occur.
- 9) Page 12 – Under “Communications Assist Statistics” added the calendar years for the to be reported for historical and projected values. This change only clarifies the years being reported. No changes to the scope of reported information should occur.
  - 10) Page 16 – Under “Filing Appendix Instructions” added language to clarify data for the two historical and two projected calendar years should be included in the worksheet. This change only clarifies the data being reported. No changes to the scope of reported information should occur.
  - 11) Page 17 – Under “Recurring Variable Expenses (Direct TRS Operation Expenses)” clarifying that communications assistant data should be reported as full-time or full-time equivalent, include at-home status, and be separated between contracted and provider employed. These changes only clarify how the data has been reported. No changes to the scope of reported information should occur.
  - 12) Pages 17-18 – Under “Administrative Expenses” again clarifying that “expenses above and beyond meeting mandatory minimum standards” is more appropriate phrased as expenses “to enhance functional equivalency.” This change only clarifies the language. No changes to the scope of reported information should occur.
  - 13) Pages 18-19 – Under “Administrative Expenses” reorganizing the listing of expenses related to operational support, engineering, and research and development and clarifying the data and details required in accordance with prior FCC actions with citation. No changes to the scope of reported information should occur.
  - 14) Page 19-20 – Under “Administrative Expenses” add clarification to the cost details to include with the reported Enforcement action expenses and compliance plans. No changes to the scope of reported information should occur.
  - 15) Page 20 – Under “Other TRS Expenses” clarify the scope of Outreach expenses for reporting. This information only clarifies outreach expense reporting. No changes to the scope of reported information should occur.
  - 16) Page 21 – Under “Other TRS Expenses” again clarifying that expenses above and beyond meeting mandatory minimum standards is more appropriate phrased as expenses to preserve and enhance functional equivalency. This change only clarifies the language. No changes to the scope of reported information should occur.
  - 17) Page 22 – Under “Capital Investments” delete repetitive information. Under “Financial Data” add the calendar years for historical and projected expenses and payments requested. These changes only clarify the requests. No changes to the scope of reported information should occur.

In the newer proposed Provider Data Request Form in the Excel spreadsheet, parallel changes have been made under the Instructions Tab and the Appendix Tab.

The version of the State Data Request Filing Instructions:

- 1) Page 2 – The paragraphs under Privacy Act and Paperwork Reduction Statements have replaced the word “we” with the TRS Administrator, Rolka Loube, and grammar has been adjusted for clarity.
- 2) Page 4 – In the paragraph under “Overview” the purpose of the document has been clarified to remove any uncertainty that TRS providers must be aware of the actions of the FCC. The purpose of the document has not changed.
- 3) Page 4 – “Filing Schedule” has been moved from page 7 to page 4 of the document.
- 4) Page 4 – Under “Annual Filing Rules,” the dates of the reporting period have been clarified. No changes to the scope of the reported information should occur.

- 5) Page 5 – Under “Traditional Services,” “Flat Rate Costs,” “Per Minute Costs,” and “Additional Costs Paid to Provider, clarified that State may refer to a state agency or State TRS administrator, replaced Revenue with Costs to correct a typo, and removed references to forms where documents should not be submitted. No changes to the scope of the reported information should occur.
- 6) Page 5 – Under “Annual Filing Forms” added language to clarify that “year for the filing period” refers to the most recent calendar year.

The changes to the forms and instructions did not impact the burden hours or cost for the collection.