

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 Federal Communications Commission (Commission) is submitting this request to the Office of Management and Budget (OMB) for approval of a new information collection with regard to the notification and recordkeeping requirement rules set forth in the *Facilitating Implementation of Next Generation 911 Services (NG911) Report and Order* adopted on July 18, 2024, in PS Docket Nos. 21-479 and 18-64.¹

Background.

Like communications networks generally, 911 networks are evolving from Time Division Multiplexing (TDM)-based circuit-switched architectures to Internet Protocol (IP)-based architectures. With the transition to Next Generation 911 (NG911), the circuit-switched architecture of legacy 911 will eventually be entirely replaced by IP-based technologies and applications that provide all of the same functions as the legacy 911 system, as well as new capabilities.

Despite investments in these new capabilities, however, some states report experiencing delays in originating service providers (OSPs) connecting to their Emergency Services IP Networks (ESInets).² Disputes with OSPs include issues of both cost allocation and the points to which the OSPs will deliver 911 traffic.³ In addition, some commenters to the proceeding contend that some OSPs have financial incentives to delay transitioning from legacy 911 to NG911, resulting in protracted disputes and mounting costs for 911 Authorities, and further contributing to delays.⁴ As a result of these delays, 911 Authorities incur prolonged and compounded costs because they must maintain both legacy and IP networks during the transition.⁵ The lack of rules creates uncertainty for 911 stakeholders and increases delays in the transition. In addition, the increased costs incurred to support both 911 and NG911 systems concurrently while the transition to NG911 is delayed reduce the limited amount of funding actually available to

¹ *Facilitating Implementation of Next Generation 911 Services (NG911); Location-Based Routing for Wireless 911 Calls*, PS Docket Nos. 21-479 and 18-64, Report and Order, FCC 24-78, 2024 WL 3507091 (*NG911 Report and Order*). The *NG911 Report and Order* was corrected via two errata released on September 5, 2024, and October 1, 2024.

² *NG911 Report and Order* at *12, n.115. OSPs are providers that originate 911 traffic, specifically wireline providers; commercial mobile radio service (CMRS) providers, excluding mobile satellite service (MSS) operators to the same extent as set forth in 47 CFR § 9.10(a); covered text providers, as defined in 47 CFR § 9.10(q)(1); interconnected Voice over Internet Protocol (VoIP) providers, including all entities subject to subpart D of part 9; and Internet-based Telecommunications Relay Service (TRS) providers that are directly involved with routing 911 traffic, pursuant to subpart E of part 9. *Id.* at *81, Appendix A at § 9.28. An ESInet is “[a]n Internet Protocol (IP)-based network that is managed or operated by a 911 Authority or its agents or vendors and that is used for emergency services communications, including Next Generation 911.” *Id.* at *80, Appendix A at § 9.28.

³ *NG911 Report and Order* at *12, n.116.

⁴ *Id.* at *12, n.117.

⁵ *Id.* at *12, n.118.

implement NG911 itself, further stalling the eventual transition to lifesaving NG911 technology across the country.

The goal of this proceeding is to advance the transition to NG911, which, in its end state, will facilitate interoperability and 911 system resilience, improve connections between 911 call centers, and support the transmission of text, photos, videos, and data to PSAPs by individuals seeking emergency assistance. It will also reduce costs for 911 Authorities, as they will no longer need to maintain legacy networks. To facilitate the NG911 transition, the Commission adopted rules that require OSPs—wireline providers, Commercial Mobile Radio Service (CMRS) providers, covered text providers, providers of interconnected Voice over Internet Protocol (VoIP) services, and providers of Internet-based Telecommunications Relay Service (Internet-based TRS) (collectively, OSPs)—to take actions to start or continue the transition to NG911 in coordination with 911 Authorities.⁶ Associated with these rules, the Commission seeks OMB approval for notification and recordkeeping requirements applicable to 911 Authorities and OSPs, as described in more detail herein.

Specifically, we require OSPs to take steps in two phases to complete all translation and routing to deliver 911 traffic, including associated routing and location information, in the requested IP-based format. These requirements are intended to correspond to and complement the readiness phases for 911 Authorities, such that once a 911 Authority is ready to receive NG911 traffic in a specific IP format, the OSP will be required to deliver it in that format. In Phase 1, OSPs will be required to deliver 911 traffic in a basic Session Initiation Protocol (SIP) format to NG911 Delivery Points designated by the 911 Authority in the 911 Authority’s state or territory, and complete connectivity testing.⁷ In Phase 2, OSPs will be required to deliver 911 traffic in SIP format that complies with NG911 commonly accepted standards to NG911 Delivery Points designated by the 911 Authority in the 911 Authority’s state or territory, install and put into operation all necessary equipment, software, and other infrastructure, and complete connectivity testing.⁸ For each phase, OSPs must meet certain implementation deadlines.⁹ OSPs must bear the financial responsibility for such transmission, including costs associated with completing any needed TDM-to-IP translation and the costs of delivering associated routing and location information in the requested IP-based format.¹⁰ To facilitate collaboration between 911 Authorities and OSPs, the rules also permit 911 Authorities and OSPs to enter into mutual agreements that modify the Phase 1/Phase 2 terms and timelines.

This rulemaking necessitates three information collections. First, 911 Authorities that wish to make Phase 1 or Phase 2 valid requests for delivery of 911 traffic in IP-based formats must provide notification containing certain certifications and information to either serving OPSs or to a registry to be

⁶ In the *NG911 Report and Order*, “wireline provider” means “[a] local exchange carrier (as defined in 47 U.S.C. [§] 153(32)) that provides service using wire communication (as defined in 47 U.S.C. [§] 153(59)),” and “covered text provider” has the meaning given such term under 47 CFR § 9.10(q)(1). The terms “CMRS,” “interconnected VoIP service,” and “Internet-based TRS” have the meanings identified in 47 CFR § 9.3. *NG911 Report and Order* at *2, n.1

⁷ See 47 CFR 9.29(a), 9.32.

⁸ See 47 CFR §§ 9.29(b), 9.32.

⁹ See 47 CFR § 9.30.

¹⁰ See 47 CFR 9.33.

made available by the Commission.¹¹ These notifications are necessary to trigger OSPs' responsibilities and obligations under the rules, as well as their implementation deadlines, which will advance the transition to NG911. Since some respondents may choose the registry notification option, we seek OMB approval for a 911 Authority NG911 Valid Request Form, which asks 911 Authorities to provide certifications and information as required by the rules and allows 911 Authorities to notify OSPs via a centralized registry rather than on an individual basis. 911 Authorities complete and electronically file the 911 Authority NG911 Valid Request Form with the Commission to (1) indicate that the 911 Authority is ready to accept IP-based formatted 911 traffic, and (2) provide 911 Authority contact information and other information necessary to notify OSPs of the 911 Authority's readiness. PSHSB has prepared a 911 Authority NG911 Valid Request Form for this purpose. An example of the form is attached to this Supporting Statement.

Second, OSPs that wish to challenge 911 Authorities' valid requests may submit a petition to the Public Safety and Homeland Security Bureau (PSHSB) within 60 days of the receipt of a Phase 1 or 2 request from a 911 Authority.¹² Such challenge petitions must meet applicable procedural requirements and must be in the form of an affidavit that contains certain supporting information. Consistent with existing rules, the affected 911 Authority may file an opposition to the OSP's challenge petition, and filing parties must serve a copy of the document on the other party at the time of filing.¹³

Third, the NG911 rules permit 911 Authorities and OSPs to enter into voluntary mutual agreements that establish terms different from the rules adopted in the *NG911 Report and Order*.¹⁴ Within 30 days of the date when any such agreement is executed, or subsequently modified or terminated, the participating OSP must notify the Commission and provide information about alternative terms and transition deadlines.¹⁵

In this Supporting Statement, the Commission provides current information on the numbers of OSPs and 911 Authorities (respondents) affected by this information collection and the burden hour estimate for the respondents to meet the reporting requirement. The information collections contained in the adopted rules are necessary and vital to the effective implementation of NG911 nationwide. The *NG911 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 *NG911 Report and Order* for a three-year period.

The information collection requirements associated with the rules set forth in the *NG911 Report and Order* are described below.

Information Collection Requirements

¹¹ See 47 CFR § 9.31(a)-(b).

¹² See 47 CFR § 9.31(c).

¹³ See 47 CFR § 9.31(c)(6).

¹⁴ See 47 CFR § 9.34(a).

¹⁵ See 47 CFR § 9.34(b).

The *NG911 Report and Order* adopted rules defining the prerequisites that 911 Authorities must meet in order to make a valid request for delivery of 911 traffic in IP-based transmission formats to OSPs for compliance with the requirements of Phase 1 and Phase 2.¹⁶ The requirements that 911 Authorities must meet to make a valid request to OSPs for delivery of 911 traffic in Phase 1 or Phase 2 format are the following:

Section 9.31(a) – Phase 1 valid request.¹⁷ A 911 Authority’s request for delivery of 911 traffic in the manner specified in Section 9.29(a) of the rules is a Phase 1 valid request if the requesting 911 Authority

- Section 9.31(a)(1) – Certifies that it has installed and placed into operation all of the infrastructure needed to receive 911 traffic in an IP-based SIP format and transmit such traffic to the PSAP(s) connected to it;
- Section 9.31(a)(2) – Certifies that it has obtained commitments from any ESInet provider, Next Generation 911 Core Services provider, and/or call handling equipment provider needed to facilitate and complete connectivity testing within the compliance timeframe applicable to the originating service provider;
- Section 9.31(a)(3) – Certifies that it is authorized to submit a valid request for the NG911 network to receive 911 traffic in an IP-based SIP format;
- Section 9.31(a)(4) – Identifies the NG911 Delivery Point(s) designated pursuant to Section 9.32 of the rules; and
- Section 9.31(a)(5) – Provides notification to the originating service provider that includes the information and certifications set forth in paragraphs (a)(1) through (4) of this section. Notification by the 911 Authority via a registry made available by the Commission in accordance with requirements established in connection therewith, or any other written notification reasonably acceptable to the originating service provider, shall constitute sufficient notification for purposes of this paragraph.

Section 9.31(b) – Phase 2 valid request.¹⁸ A 911 Authority’s request for delivery of 911 traffic in the manner specified in Section 9.29(b) of the rules is a Phase 2 valid request if the requesting 911 Authority

- Section 9.31(b)(1) – Certifies that it has installed and placed into operation all of the infrastructure needed to receive 911 traffic in an IP-based SIP format that complies with NG911 commonly accepted standards and transmit such traffic to the PSAP(s) connected to it;
- Section 9.31(b)(2) – Certifies that its ESInet is connected to a fully functioning Next Generation 911 Core Services network that can provide access to a Location Validation Function and interface with a Location Information Server or its functional equivalent provided by the originating service provider;

¹⁶ The Commission adopted this type of valid request process in previous 911 transition rulemakings, including its rules for the transition to enhanced 911 (E911) and text-to-911. See 47 CFR § 9.10(d), (m) and IC No. 3060-0813 (requests for enhanced 911 service); 47 CFR § 9.10(q)(10) and IC No. 3060-1204 (requests for text-to-911 service).

¹⁷ 47 CFR § 9.31(a).

¹⁸ 47 CFR § 9.31(b).

- Section 9.31(b)(3) – Certifies that it has obtained commitments from any ESInet provider, Next Generation 911 Core Services provider, and/or call handling equipment provider needed to facilitate and complete connectivity testing within the compliance timeframe applicable to the originating service provider;
- Section 9.31(b)(4) – Certifies that it is authorized to submit a valid request for the NG911 network to receive 911 traffic in an IP-based SIP format that complies with NG911 commonly accepted standards;
- Section 9.31(b)(5) – Identifies the NG911 Delivery Point(s) designated pursuant to Section 9.32 of the rules; and
- Section 9.31(b)(6) – Provides notification to the originating service provider that includes the information and certifications set forth in paragraphs (b)(1) through (5) of this section. Notification by the 911 Authority via a registry made available by the Commission in accordance with requirements established in connection therewith, or any other written notification reasonably acceptable to the originating service provider, shall constitute sufficient notification for purposes of this paragraph.

Next, the *NG911 Report and Order* adopted rules permitting OSPs to challenge 911 Authorities' requests, subject to the Commission's procedural requirements for filing petitions.¹⁹

Section 9.31(c) – *Originating service providers' petitions challenging 911 Authorities' request.*²⁰ Within 60 days of the receipt of a Phase 1 or 2 request from a 911 Authority, an originating service provider may submit a petition to the Public Safety and Homeland Security Bureau asserting that the 911 Authority's request does not satisfy a condition set forth in paragraph (a) or (b) of this section for a Phase 1 or Phase 2 valid request. The Public Safety and Homeland Security Bureau may review the petition and determine whether to pause the implementation deadline for that originating service provider, affirm the request of the 911 Authority as valid, or take other action as necessary.

- Section 9.31(c)(1) – The petition process shall be subject to the procedural requirements set forth in Sections 1.41, 1.45, and 1.47 of this chapter.
- Section 9.31(c)(2) – The petition must be in the form of an affidavit signed by a director or officer of the originating service provider, documenting:
 - Section 9.31(c)(2)(i) – The basis for the originating service provider's assertion that the 911 Authority's request does not satisfy one or more of the conditions set forth in paragraphs (a) or (b) of this section for a Phase 1 or Phase 2 valid request.
 - Section 9.31(c)(2)(ii) – Each of the specific steps the originating service provider has taken to implement the Phase 1 requirements set forth in Section 9.29(a) of the rules or the Phase 2 requirements set forth in Section 9.29(b) of the rules.
 - Section 9.31(c)(2)(iii) – The basis for the originating service provider's assertion that it cannot make further implementation efforts until the 911 Authority satisfies the conditions set forth in paragraphs (a) or (b) of this section for a Phase 1 or Phase 2 valid request.

¹⁹ 47 CFR §§ 1.41, 1.45, 1.47.

²⁰ 47 CFR § 9.31(c).

- Section 9.31(c)(2)(iv) – The specific steps that remain to be completed by the originating service provider and, to the extent known, the 911 Authority or other parties before the originating service provider can implement the Phase 1 requirements set forth in § 9.29(a) or the Phase 2 requirements set forth in Section 9.29(b) of the rules.
- Section 9.31(c)(3) – All affidavits must be correct. The originating service provider’s director or officer who signs the affidavit has the duty to personally determine that the affidavit is correct. If the affidavit is incorrect, he or she, as well as the originating service provider, may be subject to enforcement action.
- Section 9.31(c)(4) – An originating service provider may not file an inadequate or incomplete petition. If an originating service provider’s petition is inadequate and/or incomplete and the originating service provider has not met its obligations as set forth in Sections 9.29(a) or (b) of the rules at the time of the relevant deadline, the originating service provider may be considered noncompliant with the applicable rules as if the petition had not been filed.
- Section 9.31(c)(5) – An originating service provider that challenges a 911 Authority’s valid request must describe all steps taken toward implementing the Phase 1 requirements set forth in Section 9.29(a) of the rules or the Phase 2 requirements set forth in Section 9.29(b) of the rules that are not dependent on the readiness of the 911 Authority.
- Section 9.31(c)(6) – The 911 Authority may file an opposition to the originating service provider’s petition and the originating service provider may file a reply to the opposition in accordance with Section 1.45 of this chapter. A copy of the document (petition, opposition, or reply) must be served on the other party (911 Authority or originating service provider) at the time of the filing in accordance with Section 1.47 of this chapter.

Finally, the *NG911 Report and Order* adopted rules permitting 911 Authorities and OSPs to enter into mutual agreements that modify the Phase 1/Phase 2 terms and timelines, subject to OSP reporting requirements.²¹

Section 9.34(a) – Nothing in this subpart shall prevent 911 Authorities and originating service providers from establishing, by mutual consent, terms different from the requirements set forth in §§ 9.29 through 9.33.²²

Section 9.34(b) – If a 911 Authority and an originating service provider enter into an agreement pursuant to paragraph (a) of this section, within 30 days of the date when any such agreement is executed, the originating service provider must notify the Commission of the agreement. The notification must identify with specificity each requirement in the rules that is impacted by the agreement and must state with specificity how the terms of the agreement differ from each impacted rule. The same notification is required if the 911 Authority and originating service provider amend, modify, or terminate the agreement.²³

²¹ The Commission adopted this type of mutual agreement process in the previous 911 transition rulemaking for text-to-911. See 47 CFR § 9.10(q)(10)(ii) and IC No. 3060-1204 (notification by a covered text provider to the Commission of the dates and terms of an alternative timeframe for text-to-911 implementation).

²² 47 CFR § 9.34(a).

²³ 47 CFR § 9.34(b).

Statutory authority for this collection is contained in Sections 1, 2, 4(i), 201, 214, 222, 225, 251(e), 301, 303, 316, and 332 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 152, 154(i), 201, 214, 222, 225, 251(e), 301, 303, 316, 332; the Wireless Communications and Public Safety Act of 1999, Pub. L. No. 106-81, as amended, 47 U.S.C. §§ 615 note, 615, 615a, 615a-1, 615b; and Section 106 of the Twenty-First Century Communications and Video Accessibility Act of 2010, Pub. L. No. 111-260, 47 U.S.C. § 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 information collection and reporting requirements contained in these rules will facilitate the effective implementation of NG911 by the Commission, public safety entities, and OSPs alike. In addition, these information collections will help show that 911 Authorities are ready to receive NG911 traffic at designated NG911 Delivery Points, and reduce the possibility that OSPs receive premature requests for NG911 service, while maintaining flexibility for 911 Authorities and OSPs to reach alternative agreements.

Valid Requests. OSPs will use the information collected pursuant to Section 9.31(a) and (b) that is submitted by 911 Authorities to trigger their NG911 transition obligations described in Section 9.29(a) and (b), respectively, and their NG911 implementation deadlines set forth in Section 9.30(a) and (b), respectively. OSPs will receive notifications either directly from 911 Authorities, or from a registry where 911 Authorities may submit notifications. The Bureau will open a new docket for 911 Authorities to file valid requests in the Commission's Electronic Comment Filing System (ECFS),²⁴ which will serve as notification to OSPs and trigger OSP compliance deadlines under the rules. ECFS will serve as the notification; provided, however, that the Commission may migrate to another platform for the registry. To the extent that 911 Authorities submit their valid request notifications in a registry made available by the Commission pursuant to Section 9.31(a)(5) and (b)(6), PSHSB will use the information collected pursuant to Section 9.31(a) and (b) to monitor the progress of valid requests at each phase of the NG911 transition and to keep track of implementation deadlines associated with each valid request.

OSP Challenge Petitions. PSHSB will use the information collected pursuant to Section 9.31(c) that is submitted by the OSPs in their petitions challenging 911 Authorities' valid requests, as well as information submitted by 911 Authorities who file oppositions to such petitions and information submitted by OSPs who file replies to such oppositions, to determine whether to pause the implementation deadline for that OSP, affirm that the request of the 911 Authority is valid, or take other action as necessary.²⁵ The requirements should simplify the enforcement and complaint process for both OSPs and 911 Authorities regarding OSPs' implementation deadlines.

Alternative Agreements. In addition, the information collected pursuant to Section 9.34(a) and (b) provides the Commission with awareness of any changes to the default obligations of OSPs.

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

²⁴ ECFS serves as the repository for official records in the FCC's docketed proceedings. The public can use ECFS to retrieve any document in the system.

²⁵ *NG911 Report and Order* at *38, para. 111.

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.

Most records, if not all, will be generated, transmitted, and stored electronically. Authorities will be able to access the registry electronically from the Commission's website and submit valid requests at their convenience. The Bureau will open a new docket in the Commission's ECFS for submission of valid request forms. The Commission believes that information technology facilitates the exchange of information and reduces the burdens on parties with respect to the notifications required by the rules.

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.

This agency does not impose any similar information collection requirements on the respondents. There are no similar data available.

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

In conformance with the PRA, the Commission allows 100 percent of respondents to file or mutually exchange their notification information electronically. The Commission has minimized the burden of reporting requirements on businesses and governmental jurisdictions identified as small by the SBA. First, in response to comments, the Commission adopted use of a Commission-owned registry for valid 911 authority readiness requests as the most efficient and least burdensome method of communication between 911 Authorities and OSPs. As noted above, the Bureau will open a new docket for 911 Authorities to file valid requests in ECFS, which will serve as notification to OSPs and trigger OSP compliance deadlines under the rules. ECFS will serve as the notification; provided, however, that the Commission may migrate to another platform for the registry. The Commission has limited the information requirements to those necessary either for evaluating and including the incoming data in the registry or for facilitating the exchange of third-party notification information as set forth by the rules. The registry is intended to facilitate and streamline the exchange of information between the 911 Authority and the OSPs to make the notification process more efficient and less burdensome. OSPs will therefore be able to determine the readiness of 911 Authorities that they serve and thereby comply with the applicable compliance timeframes to deliver 911 traffic in the requested IP-based format to NG911 Delivery Points.

To minimize the impact on small businesses, which most of the rural incumbent local exchange carriers (RLECs), non-nationwide CMRS providers, and Internet-based TRS providers affected by these rules would be considered, the Commission took several steps to ease the burden to these entities. For example, the Commission afforded RLECs, non-nationwide CMRS providers, and Internet-based TRS providers an additional six months longer to meet the Phase 1 and Phase 2 compliance requirements than non-rural wireline providers, nationwide CMRS providers, covered text providers, and interconnected VoIP providers, have to comply.²⁶ Non-rural wireline providers, nationwide CMRS providers, covered text providers, and interconnected VoIP providers have six months after receiving a valid request under

²⁶ See 47 CFR § 9.30.

each phase to comply, whereas RLECs, non-nationwide CMRS providers, and Internet-based TRS providers have twelve months after receiving a valid request under each phase to comply with the rules.²⁷

In addition, small entities will further benefit from the Commission's adoption of provisions that allow OSPs and 911 Authorities to enter into agreements that establish alternate timeframes for meeting the requirements.²⁸ The flexibility to negotiate an alternative timeframe that meets an OSP's business and financial needs is a significant step by the Commission that could minimize the economic impact for small entities. However, the adopted rule imposes notification requirements OSPs must make to the Commission regarding any alternate arrangements.²⁹

The Commission considered but declined to implement any additional and new data collections for monitoring performance and compliance with the NG911 rules the Commission adopted.

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.

If the information such as notifications of valid requests is not collected, 911 Authorities would continue to bear the cost of maintaining legacy network gateways (LNGs) to accommodate OSPs that have not transitioned to IP delivery of 911 traffic. If the information such as petitions is not collected, OSPs would have no recourse to challenge 911 Authorities' requests for IP 911 call delivery. If the information such as alternative agreements is not collected, the Commission would have no insight into mutually agreed-upon alternative timeframes and terms, and thus, no way to determine whether the Commission should pursue enforcement action against any perceived departures from the default rules. These information collection requirements are essential mechanisms to improve the 911 system and to ensure that OSPs take steps to complete all translation and routing to deliver 911 traffic, including associated routing and location information, in the requested IP-based format.

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 October 15, 2024 (89 FR 83012) (60-Day Notice) to solicit the views of industry and the general public. The Commission has received one comment in response to the 60-Day Notice in the *Federal Register*.

NTCA–The Rural Broadband Association and various Rural Local Exchange Carrier groups (NTCA and the RLEC Parties) collectively filed a comment³⁰ directed toward the process by which an

²⁷ *Id.*

²⁸ See 47 CFR § 9.34(a).

²⁹ See 47 CFR § 9.34(b).

OSP can file a petition to challenge a 911 Authority's readiness to make a valid request.³¹ NTCA and the RLEC Parties contend that the Commission's total annual cost estimate, which was reported to be no cost in the 60-Day Notice,³² fails to consider the nature of the costs that small providers will incur with respect to the NG911 rules at issue, and thus the Commission has not satisfied the directives of the Paperwork Reduction Act.³³ NTCA and the RLEC Parties argue that the 60-Day Notice does not explain how its estimate of over 10,000 annual hours "will somehow translate to 'zero' costs to OSPs."³⁴

NTCA and the RLEC Parties state that "an OSP that is of the belief that a state 911 Authority cannot meet its obligations under either Phase 1 of Phase 2 of the NG911 rules must obtain information as to the physical network infrastructure that the state 911 Authority has, or lacks, and evaluate the capabilities of such infrastructure via-a-vis applicable technical standards."³⁵ NTCA and the RLEC Parties continue, "[t]he OSP must then incorporate the result of this information-gathering process and conclusions that arise from this process into a petition with a signed affidavit and pursuant to a rule that specifically notes that the affidavit must be 'correct' under penalty of enforcement."³⁶

NTCA and the RLEC Parties contend that "[e]ven if in-house staff were to perform some or all of these functions for an OSP," the OSP's compliance obligations "would not be costless, given that those staff are presumably not volunteers and the time spent on such efforts come at the opportunity cost of performing other functions. That said, most of these companies will likely be compelled to seek the assistance of outside consultants and attorneys for guidance with rules as complex as these and especially given the need to submit supporting affidavits."³⁷

As a preliminary matter, we note that in-house costs are identified in Section 12 of this Supporting Statement but are not reported as annual burden costs in Section 13, consistent with OMB guidelines.

In response to NTCA and the RLEC Parties' comment, the Commission has revised its total annual cost estimate, which is detailed in Question 13 of this Supporting Statement. In particular, the Commission has added cost estimates to account for: (1) OSPs hiring outside legal and engineering consultants to assist in filing petitions challenging 911 Authorities' requests; (2) 911 Authorities hiring outside legal and engineering consultants to assist in filing oppositions; and (3) OSPs hiring outside legal and engineering consultants to assist in filing replies. As shown in Question 13 below, these changes increase the total annual cost burden to respondents from no cost to \$902,000.00.

Unrelated to the NTCA and RLEC Parties' comment, the Commission also adjusts its estimated number of respondents slightly downward for OSPs filing challenge petitions and replies, and for 911 Authorities filing oppositions. As part of the 60-Day Notice estimated burden of 10,012 hours, the

³⁰ NTCA and the RLEC Parties Comments (rec. Dec. 16, 2024).

³¹ *Id.* at 2.

³² 60-Day Notice, 89 FR at 83012.

³³ NTCA and the RLEC Parties Comments at 3.

³⁴ *Id.* at 4.

³⁵ *Id.*

³⁶ *Id.* at 4-5.

³⁷ *Id.* at 5.

Commission had previously estimated that OSPs would file petitions challenging 5% of 911 Authority requests for NG911 service for the basis of its burden calculation. To allow the Commission to better estimate the number of *respondents* that would be affected, the Commission instead estimates that 5% of OSPs would file challenge petitions against 911 Authority requests for NG911 service. This adjustment of the Commission's estimate also affects the numbers of 911 Authorities filing oppositions and OSPs filing replies. As shown in Question 12 below, these revisions regarding the estimated number of OSP and 911 Authority respondents associated with challenge petitions slightly reduce the total estimated in-house annual burden from the 60-Day Notice's estimated burden of 10,012 hours to a burden of 9,932 hours, which is a reduction of 80 hours.³⁸

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.

911 Authorities and OSPs may request confidential treatment under the Commission's existing confidentiality rules³⁹ for materials submitted pursuant to these requirements, specifying the information they wish to keep confidential and providing the required justification. For example, OSPs may request confidential treatment of required documentation that must be included in petitions to challenge 911 Authorities' requests under Section 9.31(c)(2) and (5), or which rule requirements are impacted by a mutual agreement with a 911 Authority, and how terms of the agreement differ from an impacted rule under Section 9.34(b). 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.⁴⁰

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 the numbers of respondents (911 Authorities and OSPs) affected by the rules as follows:

³⁸ 60-Day Notice, 89 FR at 83012.

³⁹ See 47 CFR § 0.459.

⁴⁰ The Commission's privacy rules, including those governing the use, disclosure, and access to CPNI, are at 47 CFR §§ 64.2001-64.2011.

A 911 Authority means a “State, territorial, regional, Tribal, or local governmental entity that operates or has administrative authority over all or any aspect of a communications network for the receipt of 911 traffic at NG911 Delivery Points and for the transmission of such traffic from that point to PSAPs.”⁴¹ We estimate that there are 56 state and territorial government entities,⁴² 574 tribal governmental entities,⁴³ and 3,135 local governmental entities.⁴⁴ State 911 Authorities could include state-level governmental entities such as state emergency management agencies or state public utility commissions. We do not have data on the number of regional governmental entities that may comprise 911 Authorities, and we do not have information on whether *every* governmental entity counted above meets the 911 Authority definition, i.e., a governmental entity “that operates or has administrative authority over all or any aspect of a communications network for the receipt of 911 traffic at NG911 Delivery Points and for the transmission of such traffic from that point to PSAPs.” However, to avoid undercounting the number of respondents and underestimating the burdens, the Commission estimates that all 3,765 governmental entities counted above are 911 Authorities that are affected by the rules. We do not have information on how many states and territories will submit valid requests on behalf of entire states, including tribal and local governments.

OSP respondents affected by the rules include wireline providers, CMRS providers, covered text providers, interconnected VoIP providers, and Internet-based TRS providers.⁴⁵ First, the Voice Telephone Services Report indicates that there are 59 CMRS providers and 2,342 wireline and interconnected VoIP providers.⁴⁶ Next, the category of covered text providers includes all CMRS providers and interconnected text messaging application providers.⁴⁷ We estimate that there are 33 interconnected text messaging application providers based on a Commission staff survey of text messaging applications available through the Apple, Google, and Microsoft application stores. Accordingly, adding 33 interconnected text messaging application providers to the figure of 59 CMRS providers above, we estimate that 92 covered text providers are affected by the rules. Finally, the Commission estimates that there are 14 Internet-based TRS providers affected by the rules.⁴⁸ Accordingly, the Commission estimates a total of 2,448 OSP respondents.

⁴¹ *NG911 Report and Order* at *2, n.2.

⁴² In this number, we include the 50 states and six jurisdictions: the District of Columbia, Puerto Rico, the U.S. Virgin Islands, American Samoa, Guam, and the Northern Mariana Islands.

⁴³ U.S. Department of Interior, Indian Affairs, *About Us*, <https://www.bia.gov/about-us> (last visited July 24, 2024) (“There are 574 federally recognized American Indian tribes and Alaska Native Villages in the United States.”).

⁴⁴ NENA, *9-1-1 Statistics*, <https://www.nena.org/page/911Statistics> (last visited July 24, 2024) (“As of February 2021, the United States has . . . 3,135 counties, which include parishes, independent cities, boroughs, and Census areas.”).

⁴⁵ *NG911 Report and Order* at *2.

⁴⁶ Federal Communications Commission, Office of Economics and Analytics, Industry Analysis Division, Voice Telephone Services: Status as of June 30, 2022 at 10, Table 2 (August 2023), <https://docs.fcc.gov/public/attachments/DOC-396138A1.pdf>.

⁴⁷ See 47 CFR § 9.10(q)(1).

⁴⁸ Federal Communications Commission, *Internet-Based TRS Providers* (June 12, 2024), <https://www.fcc.gov/general/internet-based-trs-providers>. To avoid double-counting burdens for any providers of more than one service, our number of 14 Internet-based TRS providers excludes Internet Protocol Relay Service provider T-Mobile USA, Inc., which we already count as a CMRS provider.

Thus, the Commission estimates that this information collection will have a total of 6,213 respondents (3,765 911 Authorities + 2,448 OSPs).

Estimates of the burden hours for the collection of information are as follows:

a. Section 9.31(a)-(b) – 911 Authority Notifications of Valid Requests: The Commission estimates that over the three-year period of the information collection, all 911 Authorities will make Phase 1 and Phase 2 valid requests for delivery of 911 traffic in IP-based formats by providing notification containing certain certifications and information⁴⁹ via one of two permissible methods: either to a registry to be made available by the Commission, or directly to serving OSPs.⁵⁰ We need not estimate what percentage of 911 Authorities will choose which notification method, because we determine that, in either case, a 911 Authority may submit notification in a single action that has the same hourly burden. In the former case, a 911 Authority will provide the required certifications and information in the Commission registry in a single session. In the latter case, we assume that each 911 Authority will serve a single notification to all OSPs that serve its jurisdiction in a single action (e.g., an email to multiple OSP recipients containing the same notification). Regardless of the notification method, we estimate that 911 Authorities will need 2 hours to draft the certifications and information for a valid request and submit the notification for each phase. We account for two phases of notifications—that is, two responses per respondent—in our burden estimates. Further, we expect 911 Authorities to implement NG911 and submit valid request notifications on a rolling basis as their technical capability and funding permit. Although the Commission reported that some 911 Authorities who have already achieved Phase 1 connectivity may initiate a Phase 2 request without having to first issue a Phase 1 request,⁵¹ and other 911 Authorities may not be ready to accept IP-based formatted 911 traffic by the end of the three-year period, for burden calculation purposes we assume that all 911 Authorities will submit both Phase 1 and Phase 2 notifications within the three-year period.

As required by Section 9.31(a)(5), a Phase 1 valid request notification must contain the following certifications and information:

- Certification that the 911 Authority has installed and placed into operation all of the infrastructure needed to receive 911 traffic in an IP-based SIP format and transmit such traffic to the PSAP(s) connected to it (Section 9.31(a)(1));
- Certification that the 911 Authority has obtained commitments from any ESInet provider, Next Generation 911 Core Services provider, and/or call handling equipment provider needed to facilitate and complete connectivity testing within the compliance timeframe applicable to the originating service provider (Section 9.31(a)(2));
- Certification that the 911 Authority is authorized to submit a valid request for the NG911 network to receive 911 traffic in an IP-based SIP format (Section 9.31(a)(3)); and
- Identification of the NG911 Delivery Point(s) designated pursuant to Section 9.32 of the rules (Section 9.31(a)(4)).

As required by Section 9.31(b)(6), a Phase 2 valid request notification must contain the following certifications and information:

⁴⁹ See 47 CFR § 9.31(a)(1)-(4) and (b)(1)-(5).

⁵⁰ See 47 CFR § 9.31(a)(5) and (b)(6).

⁵¹ *NG911 Report and Order* at *42, para. 123.

- Certification that the 911 Authority has installed and placed into operation all of the infrastructure needed to receive 911 traffic in an IP-based SIP format that complies with NG911 commonly accepted standards and transmit such traffic to the PSAP(s) connected to it (Section 9.31(b)(1));
- Certification that the 911 Authority's ESInet is connected to a fully functioning Next Generation 911 Core Services network that can provide access to a Location Validation Function and interface with a Location Information Server or its functional equivalent provided by the originating service provider (Section 9.31(b)(2));
- Certification that the 911 Authority has obtained commitments from any ESInet provider, Next Generation 911 Core Services provider, and/or call handling equipment provider needed to facilitate and complete connectivity testing within the compliance timeframe applicable to the originating service provider (Section 9.31(b)(3));
- Certification that the 911 Authority is authorized to submit a valid request for the NG911 network to receive 911 traffic in an IP-based SIP format that complies with NG911 commonly accepted standards (Section 9.31(b)(4)); and
- Identification of the NG911 Delivery Point(s) designated pursuant to Section 9.32 of the rules (Section 9.31(b)(5)).

For those 911 Authorities that choose the registry notification option, PSHSB will make a form available on its website. PSHSB will provide more detailed guidance to respondents on the registry, filing NG911 valid requests, and a link to the form in a future public notice.⁵²

Total Number of Respondents Notifying the Registry or OSPs on an Annual Basis:

3,765 911 Authorities / 3 years = **1,255 respondents.**

Frequency of Response:

1 notification x 2 phases = **2 responses.**

Total Number of Responses Annually:

1,255 911 Authorities/annually x 2 notifications = **2,510 responses.**

Total Annual Burden Hours:

2,510 responses/annually x 2 hours/notification = **5,020 hours.**

b. Section 9.31(c) – OSP Petitions to Challenge 911 Authorities' Requests: This component of the in-house hour burden and annualized cost estimate covers: (1) OSP petitions to challenge 911 Authorities requests, (2) 911 Authority oppositions to OSP challenge petitions, and (3) OSP replies to 911 Authority oppositions. (1) The Commission estimates that over the three-year period of the information collection, 5% of OSPs will challenge a 911 Authority request for service (Phase 1 or Phase 2). Specifically, over the three-year period of the information collection, 122 OSPs will opt to file a challenge petition (2,448 OSPs x 1 petition x 0.05). Accordingly, we estimate that annually, 41 OSP respondents will file 1 petition each (122 OSPs / 3). Section 9.31(c) requires an OSP that wishes to file a petition to submit the petition to PSHSB within 60 days of the receipt of a Phase 1 or 2 request from a

⁵² See *id.* at *37, para. 107 (directing PSHSB to open a new docket and issue guidance regarding filing of NG911 valid requests).

911 Authority.⁵³ We estimate that OSPs will need 40 hours to draft a petition in the form of an affidavit that documents the information required in the rules,⁵⁴ file the petition consistent with the Commission's procedural requirements,⁵⁵ and serve a copy of the petition on the affected 911 Authority(ies).⁵⁶ (2) Next, Section 9.31(c)(6) allows the 911 Authority to file an opposition to a petition. Over the three-year period, we estimate that all 911 Authorities whose requests are challenged will file oppositions, or 126 911 Authorities. We estimate that the time a 911 Authority respondent will take to draft and file an opposition and serve a copy of the petition on the affected party(ies) will be half of the time to draft and file an initial petition, or 20 hours. (3) Finally, Section 9.31(c)(6) allows the OSP to file a reply to an opposition. Over the three-year period, we estimate that all 126 OSPs who filed petitions will also file replies to such oppositions. However, we do not count these reply respondents as unique respondents, because we expect them to be the same respondents who file challenge petitions. We estimate that the time an OSP respondent will take to draft and file a reply is the same burden as for an opposition, or 20 hours. We calculate the burdens for the three portions as follows:

(1) Petitions:

Number of OSP Respondents Challenging 911 Authorities' Requests on an Annual Basis:

$(2,448 \text{ OSPs} \times 1 \text{ petition} \times 0.05 / 3 \text{ years}) \text{ OSPs} = 41 \text{ respondents (rounded up)}$.

Frequency of Response:

1 petition = 1 response.

Number of Responses Annually:

$41 \text{ OSPs/annually} \times 1 \text{ response} = 41 \text{ responses}$.

Annual Burden Hours:

$41 \text{ responses/annually} \times 40 \text{ hours/petition} = 1,640 \text{ hours}$.

(2) Oppositions:

Number of 911 Authority Respondents Filing Oppositions to Petitions on an Annual Basis:

$1 \text{ 911 Authority / petition} \times 41 \text{ petitions} = 41 \text{ respondents}$.

Frequency of Response:

1 opposition = 1 response.

Number of Responses Annually:

$41 \text{ 911 Authorities/annually} \times 1 \text{ response} = 41 \text{ responses}$.

Annual Burden Hours:

$41 \text{ responses/annually} \times 20 \text{ hours/opposition} = 820 \text{ hours}$.

⁵³ See 47 CFR § 9.31(c).

⁵⁴ See 47 CFR § 9.31(c)(2), (5).

⁵⁵ See 47 CFR § 9.31(c)(1).

⁵⁶ See 47 CFR § 9.31(c)(6).

(3) Replies:

Number of OSP Respondents Filing Replies to Oppositions:

1 OSP / opposition x 41 oppositions = 41 respondents (same respondents as (1)).

Frequency of Response:

1 reply = 1 response.

Number of Responses Annually:

41 OSPs/annually x 1 response = 41 responses.

Annual Burden Hours:

41 responses/annually x 20 hours/reply = 820 hours.

Subtotals for Section 9.31(c):

Number of Respondents on an Annual Basis:

41 OSPs + 41 911 Authorities = **82 respondents.**

Frequency of Response:

1 petition + 1 opposition + 1 reply = **3 responses.**

Number of Responses Annually:

41 petitions + 41 oppositions + 41 replies = **123 responses.**

Annual Burden Hours:

1,640 + 820 + 820 = **3,280 hours.**

c. Section 9.34(a)-(b) – OSP Notifications of Mutual Agreements:

The Commission estimates that over the three-year period of the information collection, one-quarter of all 2,448 OSPs ($2,448 / 4 = 612$ OSPs (rounded up)) will reach a mutual agreement on an alternative timeframe for implementation with a 911 Authority in the U.S. Section 9.34(b) requires OSPs to notify the Commission within 30 days of the date when any such agreement is executed.⁵⁷ The notification must identify with specificity each requirement in the rules that is impacted by the agreement and must state with specificity how the terms of the agreement differ from each impacted rule.⁵⁸ The same notification is required if the 911 Authority and originating service provider amend, modify, or terminate the agreement.⁵⁹

The Commission anticipates that the work to draft and report this information for the notification will take no longer than a week of five business days. The Commission believes that one attorney would be sufficient to complete this task in this time frame, resulting in a total OSP cost of 8 work-hours. Further, as with 911 Authorities' submissions of valid request notifications, we expect OSPs and 911 Authorities to enter into mutual agreements on a rolling basis.

⁵⁷ See 47 CFR § 9.34(b).

⁵⁸ *Id.*

⁵⁹ *Id.*

Total Number of Respondents on an Annual basis:

612 OSPs / 3 years = **204 responses.**

Frequency of Response: 1 response.

Number of Responses:

204 OSPs x 1 certification and reporting submission = **204 responses.**

Annual Burden Hours:

204 OSPs x 1 notification and reporting submission (using 1 attorney) x 8 hours of work = **1,632 hours.**

Totals for Burden to the Respondents:

a.	Section 9.31(a)-(b) – 911 Authority Notifications of Valid Requests	=	5,020 hours
b.	Section 9.31(c) – OSP Petitions to Challenge 911 Authorities’ Requests	=	3,280 hours
c.	Section 9.34(a)-(b) – OSP Notifications of Mutual Agreements	=	<u>1,632 hours</u>
			9,932 hours

Total Number of Annual Respondents: 1,255 + 82 + 204 = 1,541 Respondents

Total Number of Annual Responses: 2,510 + 123 + 204 = 2,837 Responses

Total Annual Burden Hours: 5,020 + 3,280 + 1,632 = 9,932 Hours

ANNUAL IN-HOUSE COSTS TO RESPONDENTS:

The Commission estimates the hourly wage of a 911 Authority full-time senior public safety official submitting notifications of valid requests to either the Commission or OSPs, and drafting and submitting oppositions to petitions, to be the equivalent to a GS-14 Step 5 @ \$77.38/hour.⁶⁰ The Commission also estimates the hourly wage of an OSP full-time in-house regulatory staff employee that will be drafting and submitting petitions, replies, and/or notifications of mutual agreements to the Commission to be \$70.08/hour.⁶¹

- a. *Section 9.31(a)-(b) – 911 Authority Notifications of Valid Requests:* 2,510 responses x 2 hours x \$77.38/hr. = **\$388,447.60**
- b. *Section 9.31(c) – OSP Petitions to Challenge 911 Authorities’ Requests:* 41 responses x 40 hours x \$70.08/hr. = **\$114,931.20**

Section 9.31(c)(6) – 911 Authority Oppositions to Petitions: 41 responses x 20 hours x \$77.38/hr. = **\$63,451.60**

Section 9.31(c)(6) – OSP Replies to Oppositions: 41 responses x 20 hours x \$70.08/hr. = **\$57,465.60**

⁶⁰ Based on Office of Personnel Management (OPM), *2025 General Schedule (GS) Locality Pay Table, Hourly Rate (locality: DC-MD-VA-WVA-PA)*, https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/DCB_h.pdf.

⁶¹ This wage is based on data from the U.S. Bureau of Labor Statistics for lawyers. See U.S. Bureau of Labor Statistics, *Occupational Outlook Handbook, Lawyers* (Apr. 17, 2024), <https://www.bls.gov/ooh/legal/lawyers.htm>.

Subtotal for Section 9.31(c) and 9.31(c)(6): \$114,931.20 + \$63,451.60 + \$57,465.60 =
\$235,848.40

- c. *Section 9.34(a)-(b) – OSP Notifications of Mutual Agreements:* 204 responses x 8 hours x
\$70.08/hr. = **\$114,370.56**

Total Annual “In-House” Costs:

\$388,447.60 + \$235,848.40 + \$114,370.56 = \$738,666.56

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

While the Commission does not believe that this information collection will impose any cost burden on respondents from either capital or start-up costs, we believe that this information collection will impose cost burdens on respondents in the operation and maintenance and purchase of services. Specifically, in response to considerations raised by NTCA and the RLEC Parties in their comment, we estimate that the second component of this information collection (the provisions in Section 9.31(c) allowing OSPs to challenge 911 Authorities’ requests) will impose cost burdens on respondents for the purchase of outside services.

a. Section 9.31(a)-(b) – 911 Authority Notifications of Valid Requests: The Commission estimates that this component of the information collection will impose no cost burden on respondents from capital or start-up costs, or from operation and maintenance and purchase of services.

b. Section 9.31(c) – OSP Petitions to Challenge 911 Authorities’ Requests: As indicated above, the Commission anticipates that this component of the information collection will impose cost burdens on respondents for the purchase of outside services. This estimate covers the costs of purchasing outside services for: (1) OSP petitions to challenge 911 Authorities requests, (2) 911 Authority oppositions to OSP challenge petitions, and (3) OSP replies to 911 Authority oppositions. The Commission assumes that OSPs and 911 Authorities will contract outside services to assist with recordkeeping, perform technical evaluations, and prepare and submit legal documents to the Commission. Specifically, we assume OSPs and 911 Authorities will hire one outside attorney and one outside engineer for each response. We further assume that the outside attorneys and engineers together will work the same total number of burden hours on each response that we estimate for the in-house burdens associated with this rule (see Question 12(b)). (E.g., for an OSP petition, the outside attorney and engineer each will work 20 hours, for a total of 40 hours.) The Commission estimates that the outside contracting cost for attorneys is \$300 per hour; and the outside contracting cost for engineers is \$250 per hour.

(1) Section 9.31(c) – OSP Petitions to Challenge 911 Authorities’ Requests:

Outside attorney:

Number of outside attorneys per response: 1 outside attorney.

41 responses x 20 hours per response x \$300 per hour = \$246,000.00

Outside engineer:

Number of outside engineers per response: 1 outside engineer.

41 responses x 20 hours per response x \$250 per hour = \$205,000.00

Subtotal cost burden for petitions:

$$\$246,000.00 + \$205,000.00 = \mathbf{\$451,000.00}$$

(2) Section 9.31(c)(6) – 911 Authority Oppositions to Petitions:

Outside attorney:

Number of outside attorneys per response: 1 outside attorney.

$$41 \text{ responses} \times 10 \text{ hours per response} \times \$300 \text{ per hour} = \$123,000.00$$

Outside engineer:

Number of outside engineers per response: 1 outside engineer.

$$41 \text{ responses} \times 10 \text{ hours per response} \times \$250 \text{ per hour} = \$102,500.00$$

Subtotal cost burden for oppositions:

$$\$123,000.00 + \$102,500.00 = \mathbf{\$225,500.00}$$

(3) Section 9.31(c)(6) – OSP Replies to Oppositions:

Outside attorney:

Number of outside attorneys per response: 1 outside attorney.

$$41 \text{ responses} \times 10 \text{ hours per response} \times \$300 \text{ per hour} = \$123,000.00$$

Outside engineer:

Number of outside engineers per response: 1 outside engineer.

$$41 \text{ responses} \times 10 \text{ hours per response} \times \$250 \text{ per hour} = \$102,500.00$$

Subtotal cost burden for replies:

$$\$123,000.00 + \$102,500.00 = \mathbf{\$225,500.00}$$

Subtotal for Section 9.31(c):

$$\$451,000.00 + \$225,500.00 + \$225,500.00 = \mathbf{\$902,000.00}$$

c. Section 9.34(a)-(b) – OSP Notifications of Mutual Agreements: The Commission estimates that this component of the information collection will impose no cost burden on respondents from capital or start-up costs, or from operation and maintenance and purchase of services.

TOTAL ANNUAL COST BURDEN TO RESPONDENTS:

$$\mathbf{\$0 + \$902,000.00 + \$0 = \$902,000.00}$$

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 of 1,541, total annual responses of 2,837 and the total annual burden hours of + 9,932 due to the adoption of FCC 24-78. 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 911 Authorities' submitted Phase 1 and Phase 2 valid request notifications in the registry on the Commission's website. The Commission also has reserved the right to publish any or all of petitions to challenge 911 Authorities' requests, oppositions, replies, and notifications of mutual agreements on the Commission's website. Specifically, the Bureau will open one or more new dockets in ECFS for valid requests, challenge petitions, and mutual agreements.

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 are exceptions to the Certification Statement. The Commission reported the total number of respondents as 1,543, total annual responses as 2,840, total annual burden hours as 10,012 and reported no costs in the 60-day notice published on October 15, 2024 (89 FR 83012). After receiving a comment from the public, the Commission re-evaluated its burden estimates. The total number of respondents are 1,541, total annual responses are 2,837, total annual burden hours are 9,932, and total annual costs are \$902,000, which are stated in the 30-day notice and 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.