

NON-SUBSTANTIVE CHANGE REQUEST JUSTIFICATION
OMB Control No. 3060-0798
FCC Forms 601

The Commission submits to the Office of Management and Budget (OMB) for approval the following non-substantive change to the FCC Form 601 that will implement a solution aimed at easing the administrative burdens for both license applicants and FCC staff in offshore spectrum licensing. Specifically, the change will add an additional option to more accurately identify offshore fixed station locations on the FCC Form 601 and its associated schedules.

Offshore spectrum is utilized in a site-based paradigm in many spectrum bands to provide for narrowband spectrum access in the Gulf of Mexico and in other U.S. territorial waters in the Atlantic and Pacific Oceans, including areas adjacent to the Continental U.S., Alaska, Hawaii, Puerto Rico, the U.S. Virgin Islands, American Samoa, Guam, and the Northern Mariana Islands. The majority of site-based offshore authorizations are for Private Land Mobile Radio services, radiolocation services, aviation-ground services, and maritime coast stations.

Currently, the FCC Form 601 does not have an option that license applicants can select for offshore locations that accurately identifies the physical location of its fixed station location as being offshore. License applicants utilize a work around approach that entails listing the county and state that most closely matches the offshore location, but this approach is typically inaccurate and subsequently triggers application offlines and FCC staff intervention before a license can be granted. This work around also makes it impossible to identify offshore licenses on the face of the license because there is no reference to the location being offshore in its fixed location description.

Accordingly, the change requested will add the abbreviation of "OF" for offshore as an option for license applicants to select in describing the fixed station location in Schedule D, M and I of the FCC Form 601. No new information is being collected, as we currently collect and request that license applicants describe the location of their fixed stations using the abbreviations for states, jurisdictions, and areas; the requested change simply adds offshore (OF) to the list of abbreviations already contained in the FCC Form 601. This change will simplify the licensing process for offshore stations and eliminate the need for time-consuming work-around approaches, resulting in more efficient license processing for both license applicants and FCC staff.

The drop down selection for each of the questions referenced below will be updated to include 'OF' (Offshore) as a selection. The FCC Form 601 Instructions are being revised as follows:

Main Form Appendix II Current text:

STATE TABLE

Abbreviations for States, Jurisdictions, and Areas

AL	Alabama	ND	North Dakota
AK	Alaska	OH	Ohio
AZ	Arizona	OK	Oklahoma
AR	Arkansas	OR	Oregon
CA	California	PA	Pennsylvania
CO	Colorado	RI	Rhode Island
CT	Connecticut	SC	South Carolina
DE	Delaware	SD	South Dakota
DC	District of Columbia	TN	Tennessee
FL	Florida	TX	Texas
GA	Georgia	UT	Utah
GM	Gulf of Mexico	VT	Vermont
HI	Hawaii	VA	Virginia
ID	Idaho	WA	Washington
IL	Illinois	WV	West Virginia
IN	Indiana	WI	Wisconsin
IA	Iowa	WY	Wyoming
KS	Kansas		
KY	Kentucky	AS	American Samoa
LA	Louisiana	GU	Guam
ME	Maine	MP	Northern Mariana Islands
MD	Maryland	PR	Puerto Rico
MA	Massachusetts	UM	U.S. Territories: (Baker Island, Howland Island, Jarvis Island, Johnston Atoll, Kingman Reef, Midway Island, Navassa Island, Palmyra Atoll and Wake Island)
MI	Michigan		
MN	Minnesota	VI	Virgin Islands
MS	Mississippi		
MO	Missouri	AA	Armed Forces-Americas (excluding Canada)
MT	Montana	AE	Armed Forces-(Europe, Middle East, Africa, Canada)
NE	Nebraska	AP	Armed Forces-Pacific
NV	Nevada		
NH	New Hampshire		
NJ	New Jersey		
NM	New Mexico		
NY	New York		
NC	North Carolina		

Main Form Appendix II Revised text:

Appendix II is being revised to add OF Offshore as an option, we are also proposing to move the GM, Gulf of Mexico selection from the section of the appendix listing states to the end of the listing where we list other non-state options.

STATE TABLE

Abbreviations for States, Jurisdictions, and Areas

AL	Alabama	NC	North Carolina
AK	Alaska	ND	North Dakota
AZ	Arizona	OH	Ohio
AR	Arkansas	OK	Oklahoma
CA	California	OR	Oregon
CO	Colorado	PA	Pennsylvania
CT	Connecticut	RI	Rhode Island
DE	Delaware	SC	South Carolina
DC	District of Columbia	SD	South Dakota
FL	Florida	TN	Tennessee
GA	Georgia	TX	Texas
HI	Hawaii	UT	Utah
ID	Idaho	VT	Vermont
IL	Illinois	VA	Virginia
IN	Indiana	WA	Washington
IA	Iowa	WV	West Virginia
KS	Kansas	WI	Wisconsin
KY	Kentucky	WY	Wyoming
LA	Louisiana		
ME	Maine	AS	American Samoa
MD	Maryland	GM	Gulf of Mexico
MA	Massachusetts	GU	Guam
MI	Michigan	MP	Northern Mariana Islands
MN	Minnesota	OF	Offshore
MS	Mississippi	PR	Puerto Rico
MO	Missouri	UM	U.S. Territories: (Baker Island, Howland Island, Jarvis Island, Johnston Atoll, Kingman Reef, Midway Island, Navassa Island, Palmyra Atoll, and Wake Island)
MT	Montana		
NE	Nebraska		
NV	Nevada		
NH	New Hampshire	VI	Virgin Islands
NJ	New Jersey	AA	Armed Forces-America (Excluding Canada)
NM	New Mexico	AE	Armed Forces-(Europe, Middle East, Africa, Canada)
NY	New York	AP	Armed Forces-Pacific

Schedule D Item 12 Current Text:

Item 12 This item must be completed with the County/Borough/Parish or equivalent entity in which the station is located unless any of the following pertain to the Fixed Location:

- The City entered in Item 10 is an Independent City that is not affiliated with a County/Borough/Parish (i.e., Baltimore, MD)
- The State code entered in Item 11 does not have Counties/Boroughs/Parishes, enter the equivalent entity (i.e., Puerto Rico, Virgin Islands)
- The State code entered in Item 11 is GM, Gulf of Mexico

NOTE: If the nearest City, County/Borough/Parish or equivalent entity and State are located in a bordering County/Borough/Parish or equivalent entity and/or State, enter a complete description of the location in Item 9 as shown in the example. Complete Item 10 if a City, Town or Village within the station's County/Borough/Parish or equivalent entity is nearby, and complete Items 11 and 12 with the County/Borough/Parish or equivalent entity and State in which the coordinates are actually located.

- Example:
- (Street) Summit Mtn near Palo Verde, Imperial County, CA
 - (City) Palo Verde
 - (State) AZ
 - (County/Borough/Parish) La Paz

Area Locations

For area locations, respond to items 9-12 as specified in the table in the instructions for Item 4:

Item 9 This item is not applicable for area locations and should be left blank.

Item 10 If 'P' was entered in Item 4, enter the city or town name of the location in this item. This item is required only if Item 12 is blank.

Item 11 If 'P', 'C', 'S', or 'X' was entered in Item 4, enter the State of the location in this item (if 'X' was entered in Item 4, enter the State of the primary control station). Refer to FCC 601 Main Form Instructions, Appendix II, for a list of valid state, jurisdiction, and area codes.

Item 12 If 'C', 'P' or 'X' was entered in Item 4, enter the County/Borough/Parish or equivalent entity of the location in this item.

This item is always required for area of operation code 'C'.

This item is required for area of operation code 'P' except when: (a) the City entered in Item 10 is an Independent City that is not affiliated with a County/Borough/Parish (*i.e.*, Baltimore, MD), or (b) the State entered in Item 11 is 'GM' (Gulf of Mexico).

Schedule D Item 12 Revised Text:

Item 12 This item must be completed with the County/Borough/Parish or equivalent entity in which the station is located unless any of the following pertain to the Fixed Location:

- d) The City entered in Item 10 is an Independent City that is not affiliated with a County/Borough/Parish (*i.e.*, Baltimore, MD)
- e) The State code entered in Item 11 does not have Counties/Boroughs/Parishes, enter the equivalent entity (*i.e.*, Puerto Rico, Virgin Islands)
- f) The State code entered in Item 11 is GM, Gulf of Mexico, or OF, Offshore

NOTE: If the nearest City, County/Borough/Parish or equivalent entity and State are located in a bordering County/Borough/Parish or equivalent entity and/or State, enter a complete description of the location in Item 9 as shown in the example. Complete Item 10 if a City, Town or Village within the station's County/Borough/Parish or equivalent entity is nearby, and complete Items 11 and 12 with the County/Borough/Parish or equivalent entity and State in which the coordinates are actually located.

Example: 9) (Street) Summit Mtn near Palo Verde, Imperial County, CA
 13) (City) Palo Verde
 14) (State) AZ
 15) (County/Borough/Parish) La Paz

Area Locations

For area locations, respond to items 9-12 as specified in the table in the instructions for Item 4:

Item 9 This item is not applicable for area locations and should be left blank.

Item 10 If 'P' was entered in Item 4, enter the city or town name of the location in this item. This item is required only if Item 12 is blank.

Item 11 If 'P', 'C', 'S', or 'X' was entered in Item 4, enter the State of the location in this item (if 'X' was entered in Item 4, enter the State of the primary control station). Refer to FCC 601 Main Form Instructions, Appendix II, for a list of valid state, jurisdiction, and area codes.

Item 12 If 'C', 'P' or 'X' was entered in Item 4, enter the County/Borough/Parish or equivalent entity of the location in this item.

This item is always required for area of operation code 'C'.

This item is required for area of operation code 'P' except when: (a) the City entered in Item 10 is an Independent City that is not affiliated with a County/Borough/Parish (*i.e.*, Baltimore, MD), or (b) the State entered in Item 11 is 'GM' (Gulf of Mexico), or 'OF' (Offshore).

Schedule I Location Data Item 12 Current Text:

Item 12 This item must be completed with the County/Borough/Parish or equivalent entity in which the Station is located unless any of the following pertain:

- a) the city entered in Item 10 is an Independent City that is not affiliated with a County/Borough/Parish (i.e., Baltimore, MD)
- b) the State code entered in Item 11 is GM, Gulf of Mexico.

NOTE: If the nearest City, County/Borough/Parish or equivalent entity and State are located in a bordering county/borough/parish or equivalent entity and/or state, enter a complete description of the location in Item 9 as shown in this example. Complete Item 10 if a City, Town or Village within the Station's County/Borough/Parish or equivalent entity is nearby and complete Items 11 and 12 with the County/Borough/Parish or equivalent entity and State in which the coordinates are actually located.

Example: 9) (Street) Summit Mtn near Palo Verde, Imperial County, CA
 10) (City)
 11) (State) AZ
 12) (County/Borough/Parish) La Paz

Area Locations

For area locations, respond to Items 9-12 as specified in the table in the instructions for Item

4: Item 9 This item is not applicable for area locations and should be left blank.

Item 10 If 'P' was entered in Item 4, enter the city or town name of the location in this item. This item is required only if Item 12 is blank.

Item 11 If 'P', 'C', or 'S' was entered in Item 4, enter the State of the location in this item. Refer to FCC 601 Main Form Instructions, Appendix II, for a list of valid state, jurisdiction, and area codes.

Item 12 If 'P' or 'C' was entered in Item 4, enter the County/Borough/Parish or equivalent entity of the location in this item. This item is always required for area of operation code 'C'. This item is also required for area of operation code 'P' except when: (a) the city entered in Item 10 is an Independent City that is not affiliated with a County/Borough/Parish (i.e., Baltimore, MD), or (b) the State entered in Item 11 is 'GM' (Gulf of Mexico).

Schedule I Location Data Item 12 Revised Text:

Item 12 This item must be completed with the County/Borough/Parish or equivalent entity in which the Station is located unless any of the following pertain:

- c) the city entered in Item 10 is an Independent City that is not affiliated with a County/Borough/Parish (i.e., Baltimore, MD)
- d) the State code entered in Item 11 is GM, Gulf of Mexico, or OF, Offshore

NOTE: If the nearest City, County/Borough/Parish or equivalent entity and State are located in a bordering county/borough/parish or equivalent entity and/or state, enter a complete description of the location in Item 9 as shown in this example. Complete Item 10 if a City, Town or Village within the Station's County/Borough/Parish or equivalent entity is nearby and complete Items 11 and 12 with the County/Borough/Parish or equivalent entity and State in which the coordinates are actually located.

Example: 9) (Street) Summit Mtn near Palo Verde, Imperial County, CA
 13) (City)
 14) (State) AZ
 15) (County/Borough/Parish) La Paz

Area Locations

For area locations, respond to Items 9-12 as specified in the table in the instructions for Item

4: Item 9 This item is not applicable for area locations and should be left blank.

Item 10 If 'P' was entered in Item 4, enter the city or town name of the location in this item. This item is required only if Item 12 is blank.

Item 11 If 'P', 'C', or 'S' was entered in Item 4, enter the State of the location in this item. Refer to FCC 601 Main Form Instructions, Appendix II, for a list of valid state, jurisdiction, and area codes.

Item 12 If 'P' or 'C' was entered in Item 4, enter the County/Borough/Parish or equivalent entity of the location in this item. This item is always required for area of operation code 'C'. This item is also required for area of operation code 'P' except when: (a) the city entered in Item 10 is an Independent City that is not affiliated with a County/Borough/Parish (i.e., Baltimore, MD), or (b) the State entered in Item 11 is 'GM' (Gulf of Mexico), or 'OF' (Offshore).

Schedule M Item 8 Current Text:

Item 8 (Not required for ITS) This item must be completed with the County/Borough/Parish or equivalent entity in which the Transmitter is located unless any of the following pertain to the Transmit Station location:

- a) the city entered in Item 7 is an Independent City that is not affiliated with a County/Borough/Parish (i.e., Baltimore, MD)
- b) the State code entered in Item 9 is GM, Gulf of Mexico

Schedule M Item 8 Revised Text:

Item 8 (Not required for ITS) This item must be completed with the County/Borough/Parish or equivalent entity in which the Transmitter is located unless any of the following pertain to the Transmit Station location:

- c) the city entered in Item 7 is an Independent City that is not affiliated with a County/Borough/Parish (i.e., Baltimore, MD)
- d) the State code entered in Item 9 is GM, Gulf of Mexico or OF, Offshore.