NON-SUBSTANTIVE CHANGE REQUEST JUSTIFICATION
OMB Control No. OMB Control No. 3060-1163
FCC Forms 235

The Commission's Office of International Affairs (OIA) is requesting Office of Management and Budget (OMB) approval for *de minimis*, non-substantive changes to the questions and instructions for this information collection. *First*, on May 29, 2024, in OMB Control No. 3060-1163, OMB approved rules adopted in the *Executive Branch Review Order* and the *Executive Branch Standard Questions Order*. In the *Executive Branch Review Order*, the Commission created new information collection requirements associated with certain applications, petitions for a declaratory ruling (PDR) with reportable foreign ownership, that will be reviewed by the relevant Executive Branch agencies for national security, law enforcement, foreign policy, and trade policy issues, as well as other changes. In the *Executive Branch Standard Questions Order*, the Commission adopted the Standard Questions – a baseline set of national security and law enforcement questions covering the five categories of information. The Standard Questions for a PDR consist of separate questionnaires for (a) new PDR; and (b) a supplement for the provision of personally identifiable information (PII). *Second*, on May 29, 2024, in OMB Control No. 3060-1163, OMB also approved new electronic forms as part of the Commission's modernization of its online, web-based electronic filing system – the International Communications filing system (ICFS).

In light of several technology issues that arose during creation of the online forms, the Commission has made *de minimis*, non-substantive, clarifying changes to the FCC Forms 235 questions and applicant instructions. The Executive Branch agencies made have made two non-substantive, organizational changes to the way they will collect responses to the Standard Questions. First, the Executive Branch agencies created subject matter worksheets (Submission Exemplars) for collection of information that is requested in the Standard Questions. The attached Submission Exemplars are Excel spreadsheet workbooks that have the data columns annotated to indicate how each one corresponds with specific questions in the OMB-approved PDR Standard Questions. Second, the Executive Branch agencies modified the PII supplement by splitting single data fields (such as "Date and Place of Birth") into two data fields, re-ordering the data fields, and adding data fields derived from other questions in the OMB-approved Standard Questions. The attached revised PII supplement, which is a part of the Submission Exemplars, shows how each data field corresponds to the OMB-approved Standard Questions. The Submission Exemplars will improve the Executive Branch agencies' ability to process and review applicant information in response to the Standard Questions, do not impose additional burdens, and instead will likely reduce burdens on applicants over time.

Once the rules are effective, the Commission will place the Standard Questions, PII supplement, and Submission Exemplars on its website so that applicants will be able to view and download them. Instructions for the PDR forms (FCC 235 series) will be available for applicants within ICFS after OMB approves the non-substantive changes to the forms and instructions. The PDR forms include: ISP-PDR; ISP-AMD; and ISP-WAV.

Office of International Affairs includes the following: (1) screenshots of the PDR forms as they will appear for public use in a pdf (we note that some questions branch off into different sub-questions, and not all possibilities may be depicted in a single pdf); (2) the revised instructions; and (3) the Submission Exemplars, which include the revised PII supplement. We request that OMB treat this as a non-substantive change to Control No. 3060-1163 as the changes do not increase burdens on the applicants.