

**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). The PDR forms include: ISP-PDR; ISP-AMD; and ISP-WAV. *Third*, on August 8, 2024, in OMB Control No. 3060-1163, OMB approved *de minimis*, non-substantive changes to this collection (ICR Reference Number: 202408-3060-001). Since the approval in 2024, and due to continued technology issues with the development of the online system, we have made minor, non-substantive, clarifying changes to the ISP forms, questions, and application instructions.

In light of several technology issues that arose during creation of the online forms, the Commission has made additional *de minimis*, non-substantive, clarifying changes to the FCC Forms 235 questions and applicant instructions.

We request that OMB treat this request as a non-substantive change to Control No. 3060-1163 as the changes do not increase burdens on the applicants. OIA includes the following: (1) screenshots of the PDR forms as they will appear for public use in a pdf and (2) the revised instructions.

**OMB Control No. 3060-1163**  
**Section 310(b) Petitions for Declaratory Ruling**  
**May 2025**