

SUPPORTING STATEMENT

A. Justification.

- 1. Explain in detail the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Provide a copy of the appropriate section of each statute and regulation mandating or authorizing the information collection.**

The Federal Communications Commission (Commission) is requesting that the Office of Management and Budget (OMB) approve revisions to OMB Control No. 3060-0944 to incorporate the requirements adopted by the Commission in the *Submarine Cable Report and Order*.¹ The *Submarine Cable Report and Order* modernized the Commission's submarine cable rules to facilitate infrastructure deployment, while strengthening national security. Submarine cables serve as the backbone of global communications, carrying 99% of global Internet traffic. To support growing demand and address evolving national security threats, the Commission updated its rules and procedures to streamline and improve the timeliness and transparency of its submarine cable licensing process. The Commission also modernized the process by identifying entities that pose a threat to submarine cable systems, such as foreign adversaries, and adopted common sense measures to preclude them from accessing the nation's communications networks. The updates will provide greater certainty for applicants, while making targeted improvements to address national security threats.²

Specifically, in the *Submarine Cable Report and Order*, the Commission:

¹ *Review of Submarine Cable Landing License Rules and Procedures to Assess Evolving National Security, Law Enforcement, Foreign Policy, and Trade Policy Risks; Amendment of the Schedule of Application Fees Set Forth in Sections 1.1102 through 1.1109 of the Commission's Rules*, OI Docket No. 24-523, MD Docket No. 24-524, Report and Order and Further Notice of Proposed Rulemaking, FCC 25-49, 40 FCC Rcd 6481 (2025) (*Submarine Cable Report and Order*); corrected by Erratum, <https://docs.fcc.gov/public/attachments/DOC-414544A1.pdf> (OIA and OMD, rel. Sep. 16, 2025); corrected by Second Erratum, <https://docs.fcc.gov/public/attachments/DOC-415107A1.pdf> (OIA and OMD, rel. Oct. 24, 2025); Cable Landing License Act of 1921, 47 U.S.C. §§ 34-39 (Cable Landing License Act), and Executive Order No. 10530, section 5(a) (May 12, 1954) (Executive Order 10530), reprinted as amended in 3 U.S.C. § 301.

² See generally *Submarine Cable Report and Order*.

- Clarified when a cable landing license is required under the Cable Landing License Act to provide regulatory certainty to submarine cable owners and operators;
- Updated application requirements and definitions to provide a clear regulatory framework, while also making targeted adjustments for national security purposes;
- Modernized the definition of “submarine cable system” to better reflect the range of technological advancements and components of current systems;
- Adopted foreign adversary definitions to protect the security of submarine cables by:
 - Presumptively precluding the grant of applications filed by an applicant owned by, controlled by, or subject to the jurisdiction or direction of a foreign adversary and/or identified on the Commission’s Covered List, among others;
 - Adopting a presumption that denial of an application is warranted where an applicant seeks to land a submarine cable in a foreign adversary country or add a new landing located in a foreign adversary country;
 - Prohibiting licensees from entering into certain IRU or capacity lease arrangements, where it would give a foreign adversary-controlled entity the ability to install, own, or manage Submarine Line Terminal Equipment (SLTE) on a submarine cable landing in the United States;
- Required licensees owned by, controlled by, or subject to the jurisdiction or direction of a foreign adversary and/or identified on the Covered List, among others, to file a Foreign Adversary Annual Report to protect submarine cable infrastructure; and
- Required applicants to make certifications, including cybersecurity and physical security certifications, to help protect national security and law enforcement interests and assist the Commission in its ongoing regulatory obligations.³

OMB Approval for Non-Substantive Changes. On September 11, 2025, OMB approved a non-substantive change approval request related to the *Submarine Cable Report and Order*.⁴ On October 27, 2025, the Commission published a notice in the Federal Register announcing the effective date of the

³ See generally *Submarine Cable Report and Order*. With respect to the submarine cable circuit capacity collection, the Commission also eliminated the Cable Operator Report and modified the existing Capacity Holder Report, which is reflected in OMB Control No. 3060-1156. The Commission also adopted a one-time information collection requiring licensees to provide information about the licensed submarine cables, the licensees, and the SLTE owners and operators on licensed cables to assist in the Commission’s national security efforts, which will be completed in the future and cost estimates provided in OMB Control No. 3060-0944.

rules adopted in the *Submarine Cable Report and Order* except for amendatory instructions (§1.767), 7 (§1.768), 10 (§1.70002), 11 (§1.70003), 12 (§§1.70005 and 1.70006), 13 (§1.70007), 14 (§§1.70008 and 1.70009), 15 (§§1.70011 through 1.70013), 16 (§1.70016), 17 (§1.70017), 18 (§1.70020), 19 (§§1.70023 and 1.70024), and 22 (§43.82).⁵

New Online ICFS Forms. Relatedly, the Commission transitioned its International Communications Filing System (ICFS) to a new cloud-based platform in June 2025.⁶ Following OMB’s approval of modifications to this information collection, the Commission will develop and submit for OMB review revised submarine cable application forms and new forms to comply with the new requirements. Until the new and revised electronic forms are approved by OMB, submarine cable applicants and licensees will be required to provide the information required by the *Submarine Cable Report and Order* by submitting the current application forms and providing additional information as required in an attachment filed in ICFS.

Authority for the Information Collection: The Commission has statutory authority for this information collection under sections 1, 4(i), 4(j), 201-255, 303(r), 403, 413 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 154(i), 154(j), 201-255, 303(r), 403, 413, and the Cable Landing License Act of 1921, 47 U.S.C. §§ 34-39, and Executive Order No. 10530, section 5(a) (May 12, 1954) reprinted as amended in 3 U.S.C. § 301.⁷

⁴ Office of Management and Budget, Notice of Office of Management and Budget Action, OMB Control No. 3060-0944 (Sep. 11, 2025), https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202508-3060-007#. The expiration date is May 31, 2027.

⁵ Federal Communications Commission, Review of Submarine Cable Landing License Rules and Procedures To Assess Evolving National Security, Law Enforcement, Foreign Policy, and Trade Policy Risks, 90 Fed Reg 48648 (Oct. 27, 2025).

⁶ *Space Bureau and Office of International Affairs Announce the Launch of New International Communications Filing System (ICFS)*, Public Notice, 40 FCC Rcd 4059 (SB and OIA 2025).

⁷ *Submarine Cable Report and Order*, 40 FCC Rcd at 6624, para. 334; 47 U.S.C. §§ 151, 154(i), 154(j), 201-255, 303(r), 403, 413; 47 U.S.C. §§ 34-39; Executive Order 10530.

- 2. Indicate how, by whom and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The *Submarine Report and Order* took action to protect the security, integrity, and resilience of the nation’s critical submarine cable infrastructure by adopting proposals to implement certain information requirements, certification requirements, conditions, and prohibitions that will enable the Commission to identify and mitigate foreign adversary threats.⁸ The new and revised information collections apply to applicants and licensees and include new requirements to initial applications for a cable landing license; certifications; routine conditions; requests for special temporary authority; foreign carrier affiliation notifications; modification applications; substantial assignment and transfer of control applications; *pro forma* assignment and transfer of control notifications; foreign adversary annual reports; and renewal or extension applications. The collection of this information is critical to the Commission’s review of submarine cable applications and cable landing licensees for national security purposes and will advance its efforts to protect the security, integrity, and resilience of this critical U.S. infrastructure.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical or other technological techniques or other forms of information technology, e.g., permitting electronic submissions of responses, and the basis for the decision for adopting this means of collection.**

The Commission offers electronic filing for submitting submarine cable applications and other filings through ICFS, its current electronic filing system. ICFS allows applicants and licensees to submit their applications and upload responsive documents to comply with the Commission’s rules. ICFS is a secure system that also allows applicants to request the confidentiality of information.

- 4. Describe efforts to identify duplication.**

⁸ *Submarine Cable Report and Order*, 40 FCC Rcd at 6490, para. 19.

The new rules ensure that applicants and licensees will not provide duplicate information and will provide specific information for the Commission to conduct its review of applications and licensees to improve its assessment of national security risks.

5. If the collection of information will have significant economic impacts on small business, organizations or other small entities, describe any methods used to minimize the burden on these entities.

To reduce the costs and burdens on carriers, including small entities, the rules adopted in the *Submarine Cable Report and Order* are limited to only those information collections necessary to serve the public interest and national security. To minimize any burdens, the *Submarine Cable Report and Order* adopted, for example, a cybersecurity and physical security compliance requirement that is flexible and can be customized for different types of entities. The Commission did not require any particular framework, but rather found that applicants and licensees will presumptively satisfy the Commission's cybersecurity and physical security risk management plan requirement if their plan is structured according to an established risk management framework.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing the burden.

If the information collections are not conducted or are conducted less frequently, the Commission would be unable to carry out its mandate under the Cable Landing License Act and Executive Order 10530. The new and modified information collections are necessary to advance the Commission's comprehensive strategy to build a more secure and resilient communications supply chain through rules that place a strong emphasis on preventing and mitigating national security risks from foreign adversaries, while still allowing investment from United States allies and partners. The new and modified information collections are essential to preserve the Commission's ability to protect the security, integrity, and resilience of submarine cable systems by targeting foreign adversary threats to this critical U.S. infrastructure.

7. Explain any special circumstances that would cause an information collected in a manner inconsistent with OMB’s guidelines which are stated in 5 C.F.R. § 1320.5(d)(2).

There are no special circumstances that would cause information collected in a manner inconsistent with OMB’s guidelines in 5 CFR § 1320.5(d)(2).

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.

On February 10, 2026, a 60-day notice was published in the Federal Register to solicit comments from the public with regard to this information collection. [91 FR 5948]

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

No payment or gift will be given to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or Agency policy.

Any applicant or licensee submitting information or materials to the Commission may submit a request that such information not be made routinely available for public inspection, pursuant to 47 CFR § 0.459 of the Commission’s rules.⁹ Each such request must contain a statement of the reasons for

⁹ 47 CFR § 0.459.

withholding the materials from inspection and of the facts upon which those records are based.¹⁰

11. Provide additional justification for any questions of a sensitive nature.

The collection of information does not include any questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information.

The information collection requirements are summarized below.

Submarine Cable Applications (Table A/Row 1). Table A/Row 1 includes burden estimates for rule changes that apply to initial applications for a cable landing license; applications for modification, substantial assignment, substantial transfer of control, and renewal or extension of a cable landing license; notifications of *pro forma* assignment and transfer of control of a cable landing license; applications for special temporary authority; and foreign carrier affiliation notifications.¹¹

While most recent filings have involved a single applicant or licensee—largely due to hyper scalers—we will continue to assume an average of three respondents per application to maintain a conservative estimate.¹² We estimate that approximately 43 applications would be filed each year. Therefore, we estimate that approximately 129 respondents will undergo the application process each year (43 x 3). We note that joint applicants collectively file a single application via ICFS, in which each applicant submits requisite information and certifications in its respective portion of the form, instead of filing an individual application on behalf of each applicant.¹³ The Commission estimated in the *Submarine Cable Report and Order* that the preparation of each application will require 160 hours of

¹⁰ 47 CFR § 0.459(b).

¹¹ 47 CFR §§ 1.70005, 1.70006, 1.70007, 1.70008, 1.70009, 1.70011, 1.70012, 1.70013, 1.70016, 1.70020.

¹² See *Submarine Cable Report and Order*, 40 FCC Rcd at 6588, n.740.

work by attorneys and 160 hours of work by support staff.¹⁴

Estimate of Cybersecurity Certification (Table A/Row 2). Table A/Row 2 includes additional burden estimates associated with certifying compliance with baseline cybersecurity and physical security standards in an application, including creating and implementing the cybersecurity and physical security risk management plans.¹⁵ Each applicant is required to make this certification in an initial application for a cable landing license or an application for modification, substantial assignment, substantial transfer of control, and renewal or extension of a cable landing license.¹⁶ We estimate that the preparation of this certification, including creating and implementing the cybersecurity and physical security risk management plans, will require 100 hours work by a General and Operations Manager.¹⁷

¹³ Based on internal staff analysis, between January 1, 2022 and December 31, 2024, the Commission received: (1) 18 applications for new cable landing licenses, which produces an annual average of approximately 6 applications per year; (2) 9 applications for modification of a cable landing license, which produces an annual average of approximately 3 applications per year; (3) 15 applications for substantial assignment or substantial transfer of control of a cable landing license, which produces an annual average of approximately 5 applications per year; (4) 48 notifications of a *pro forma* assignment or transfer of control, which produces an annual average of approximately 16 notifications per year; (5) 11 applications for renewal or extension of a cable landing license filed, which produces an annual average of approximately 4 applications per year ($11 / 3 = 3.6$ rounded up to 4 applications per year); (6) 27 applications for special temporary authority, which produces an annual average of approximately 9 applications per year; and (7) 1 foreign carrier affiliation notification, which produces an annual average of approximately 0 notifications per year. We estimate that the annual number of submarine cable applications submitted would therefore be approximately 43 applications ($6 + 3 + 5 + 16 + 4 + 9$).

¹⁴ See *Submarine Cable Report and Order*, 40 FCC Rcd at 6589, para. 236.

¹⁵ 47 CFR §§ 1.70005(k) and (m), 1.70006(c), 1.70007(q), 1.70011(a)(2) and (b)(4), 1.70012(b)(7), 1.70013(b)(8), 1.70020(b). Table A/Row 2 encompasses the requirements in 47 CFR § 1.70024(a)(1) and (b). 47 CFR § 1.70024(a)(1) (requiring licensees whose cable landing license was granted before the effective date of the rule to implement a cybersecurity and physical security risk management plan within one year of the effective date or, if the licensee does not commence service by this timeframe, as of the date the submarine cable is placed into service); 47 CFR § 1.70024(b) (requiring applicants—whose application for a cable landing license is filed prior to the effective date of the rule and remains pending on or after the effective date—to submit a certification, within 30 days of the effective date, that they will create and implement a cybersecurity and physical security risk management plan as of the date the submarine cable is placed into service).

¹⁶ See also 47 CFR §§ 1.70013(b)(8), 1.70007(q).

¹⁷ See *Submarine Cable Report and Order*, 40 FCC Rcd at 6589, para. 236 & n.747.

Foreign Adversary Annual Report (Table A/Row 3). We conservatively estimate that at least 25 entities will need to file a Foreign Adversary Annual Report.¹⁸ We estimate that preparation of the Foreign Adversary Annual Report will require 12 hours of work by attorneys and 12 hours of work by support staff.¹⁹

One-Time Covered List Certification (Table A/Row 4). Table A/Row 4 provides burden estimates associated with the one-time Covered List certification that is required of licensees within 60 days of the effective date of the rule.²⁰ Below, we calculate the annual burdens for the year when the one-time certification requirement is effective. We estimate that approximately 135 entities will need to file the one-time Covered List certification. We estimate that preparation of the certification will require 2 hours of work by an attorney and 2 hours of work by support staff.

One-Time Cybersecurity Certification (Table A/Row 5). Table A/Row 5 includes burden estimates associated with the one-time cybersecurity and physical security certification that is required of licensees within 30 days of the effective date of the rule.²¹ Below, we calculate the annual burdens for the year when the one-time certification requirement is effective.

¹⁸ 47 CFR §§ 1.70007(v), 1.70017.

¹⁹ See *Submarine Cable Report and Order*, 40 FCC Rcd at 6590, para. 236.

²⁰ 47 CFR § 1.70023 (requiring each cable landing licensee to submit a certification, within 60 days of the effective date of the rule, that it will not add to its submarine cable system(s) under its respective license(s) equipment or services identified on the Covered List; except, this condition shall not apply to a licensee that is identified on the Covered List whose cable landing license was or is granted prior to the effective date of the rule).

²¹ 47 CFR § 1.70024(a)(2) (requiring a licensee—whose cable landing license was granted before the effective date of the rule—to submit a certification, within 30 days of the effective date of the rule, that it will implement a cybersecurity and physical security risk management plan consistent with the requirements in 47 CFR § 1.70006(c)).

TABLE A						
Submarine Cable Burden Estimates						
	Information Collection	Annual # of Respondents²²	Annual # of Responses	Annual Frequency of Responses	Average Hours Per Response	Annual Burden Hours²³
1	Submarine Cable Applications	129	43	1	320	13,760
2	Cybersecurity and Physical Security Certification (applications)	129	129	1	100	12,900
3	Foreign Adversary Annual Report	25	25	1	24	600
4	One-Time Covered List Certification (existing licensees)	135	135	1	4	540
5	One-Time Cybersecurity and Physical Security	140	140	1	4	560

²² For purposes of computing, the total annual number of respondents includes the estimate of 129 respondents that file a submarine cable application and make the cybersecurity and physical security certification in the application. We do not duplicate this estimate of 129 respondents in the total count of respondents.

²³ We calculate the annual burden hours for each information collection by multiplying the annual number of responses and the average hours per response.

Certification (existing licensees)					
Total	429	472			28,360

Cumulative Totals:²⁴

- **Annual Respondents:** 429
- **Annual Responses:** 472
- **Annual Burden Hours:** 28,360
 - **Therefore, the respondents’ burden hours are:** 14,180²⁵
- **Annual In-House Cost:** \$1,088,456.55

Annual In-House Costs: We estimate that 50% of the burden hours are incurred by in-house staff. The cost of in-house counsel is estimated at \$87.86 per hour.²⁶ We estimate that in-house staff is paid at an estimated rate of \$41.45 per hour.²⁷ The cost of a General and Operations Manager is estimated at \$90.16 per hour.²⁸

Total Annual In-House Cost: \$1,088,456.55

- $(14,900 \text{ hours} / 2)^{29} \times 50\% \times \$87.86/\text{hour} = \$327,278.50$

²⁴ These estimates include the annual burdens for the year when the one-time certification requirement is effective.

²⁵ We estimate that 50% of the burden hours are incurred by in-house staff.

²⁶ See Bureau of Labor Statistics, Occupational Employment and Wages, *Occupational Employment and Wage Statistics (OEWS) Profiles—May 2024 OEWS Profiles*, 23-1011 Lawyers, <https://data.bls.gov/oesprofile/> (“Mean Hourly Wage”).

²⁷ See Bureau of Labor Statistics, Occupational Employment and Wages, *Occupational Employment and Wage Statistics (OEWS) Profiles—May 2024 OEWS Profiles*, 23-2099 Legal Support Workers, All Other, <https://data.bls.gov/oesprofile/> (“Mean Hourly Wage”).

²⁸ The estimate accounts for compensation of approximately \$62.18 per hour, which when accounting for a benefits estimate of 45% becomes \$90.16 (= \$62.18 × 1.45). *Submarine Cable Report and Order*, 40 FCC Rcd at 6589, para. 236 & n.747.

- o $(14,900 \text{ hours} / 2)^{30} \times 50\% \times \$41.45/\text{hour} = \$154,401.25$
- o $13,460 \text{ hours}^{31} \times 50\% \times \$90.16/\text{hour} = \$606,776.80$

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (Do not include the cost of any burden hours shown in items 12 and 14.).

Annual Burden Cost:

(a) Capital and Start-up Costs: 0

(b) Operation and Maintenance Costs

Outside Legal/Engineering Assistance: We estimate that the respondents will require outside legal and engineering assistance for 50% of the burden hours.³² The cost of outside legal and engineering assistance is estimated at \$300 per hour. The figure is based on a small survey of local firms in the D.C. area and is considered a conservative estimate.

- **Cumulative Total:**

- o $28,360 \text{ hours} \times 50\% \times \$300/\text{hour} = \mathbf{\$4,254,000}$

²⁹ This estimate includes the hours of work by attorneys associated with Submarine Cable Applications, Foreign Adversary Annual Report, and One-Time Covered List Certification.

³⁰ This estimate includes the hours of work by support staff associated with Submarine Cable Applications, Foreign Adversary Annual Report, and One-Time Covered List Certification.

³¹ This estimate includes the burden hours associated with the Cybersecurity and Physical Security Certifications (applications and one-time certification).

³² The rules and requirements in this collection will not require respondents to maintain any special equipment.

Application and Foreign Adversary Annual Report Filing Fees: The Commission adopted a new schedule of application fees in 2020 and updated it in 2024.³³ Additionally, in the *Submarine Cable Report and Order*, the Commission adopted the requirement that licensees must pay a fee

when submitting the Foreign Adversary Annual Reports.³⁴ The current fees are shown in the table below.

- The total of application and Foreign Adversary Annual Report filing fees: **\$100,490**

Submarine Cable Application Filing Fees	Number of Applications Per Year (annualized basis (2022-2024))	Application Fees	Cost
Submarine Cable Landing License	6	\$4,505	\$27,030
Special Temporary Authority	9	\$755	\$6,795
Prior Consent to Assignment/Transfer of Control	5	\$1,445	\$7,225
Pro Forma Assignment/Transfer of	16	\$470	\$7,520

³³ 2020 *Application Fees Report and Order*; 2025 *Application Fees Order*.

³⁴ *Submarine Cable Report and Order*, 40 FCC Rcd at 6571, para. 186.

Control			
Foreign Carrier Affiliation Notification	0	\$580	\$0
Modification	3	\$1,445	\$ 4,335
Renewal	4	\$2,865	\$ 11,460
Waiver	0	\$375	\$0
Foreign Adversary Annual Report	25	\$1,445	\$36,125
Total	68		\$100,490

(c) Total Annual Cost Burden: $\$4,254,000 + \$100,490 = \$4,354,490$

14. Provide estimates of annualized costs to the Federal government.

We make the following estimates for the total annual cost to the Federal Government to review and process the submarine cable applications and Foreign Adversary Annual Reports that applicants and licensees file annually, in accordance with OMB guidance.³⁵ Below, we address Commission and Committee annualized costs separately.³⁶

³⁵ 5 CFR § 1320.5(d)(iii) (“The agency shall also seek to minimize the cost to itself of collecting, processing, and using the information, but shall not do so by means of shifting disproportionate costs or burdens onto the public.”).

³⁶ While we are utilizing the best available cost information, there are certain limitations to our data. For example, we have aggregated only total costs for ICFS that are not broken down by incremental costs due to the difficulty in identifying what those incremental costs are. We utilized the lowest cost collection and analysis methodology consistent with the ultimate purpose and goals of mandatory electronic filing, which simplify and reduce filing burdens for applicants and licensees and the Federal Government.

Federal Communications Commission Cost. As the Commission stated in the *2020 Application Fees Notice* and adopted in the *2020 Application Fees Report and Order*, the review of all submarine

cable applications includes industry analyst processing and review, staff attorney review, and supervisory review, and varies based on the complexity of the application and whether the application is referred to the Committee.³⁷ The Commission’s application fees are based on government costs for processing applications up through first line supervisor review.³⁸ The costs for review of applications up through the point of grant could, and in most instances will, exceed the costs through first line review. For example, these costs might include staff time for follow-up inquiries with applicants for additional information, higher-level supervisory review, and ICFS administrative work related to granting and tracking applications. The estimated Commission costs described below reflect these additional costs for complete processing and grant of submarine cable applications.

The estimated annual cost to the government for Commission staff review of the estimated annual 68 submarine cable applications and Foreign Adversary Annual Reports is below.

Federal Government Staff	Number of Staff	Salary Per Hour	Hourly Cost	Annual Burden Hours	Annual Costs
GS-15/Step 5 Attorney (Average 14 Applications/Reports @ 10 Hours Per Filing)	3	\$91.93	\$275.79	420	\$115,831.80
GS-14/Step 5 Attorney	2	\$78.15	\$156.30	280	\$43,764.00

³⁷ *2020 Application Fees Report and Order; Amendment of the Schedule of Application Fees Set Forth in Sections 1.1102 Through 1.1109 of the Commission’s Rules*, MD Docket No. 20-270, Notice of Proposed Rulemaking, 36 FCC Rcd 1618, paras. 140-145 (2020).

³⁸ *2020 Application Fees Report and Order*, 35 FCC Rcd at 15093, para. 12 (“We estimated the direct labor costs to process a particular application by multiplying an estimate of the number of hours needed for each task, up through first-level supervisory tasks required to process the application. . .”).

(Average 14 Applications/Reports @ 10 Hours Per Filing)					
GS-14/Step 5 Telecommunications Specialist (68 Applications/Reports @ 3 Hours Per Filing)	1	\$78.15	\$78.15	204	\$15,942.60
Total	6				\$175,538.40

The estimated annualized cost to the Commission is the sum of the costs for staff review of all submarine cable applications and Foreign Adversary Annual Reports, both with and without application fees.³⁹ **\$175,538.40**

Committee Cost. The Commission coordinated with the Committee on its costs for reviewing the applications for national security and law enforcement concerns.⁴⁰ The Committee provided the information included here. The Committee anticipated that it will incur costs for development and maintenance of an online portal for the filing and retention of Standard Question responses that we reported previously.⁴¹ While the online portal has not been developed at this time, the cost estimate for the portal is still accurate for purposes of computing costs and would apply if the Committee develops the portal at a future time. A portion of the technical cost for the Committee’s portal is attributable to one-time start-up costs. According to the Committee, current budgetary estimates prevent the Committee from determining precisely how much of technical cost can be attributed to start-up costs. The Committee also anticipates that it will incur staff costs for review of the responses. The costs provided by the Committee are summarized below.

³⁹ The estimate is an increase of \$99,552.40 from the estimated cost to the Commission reported in our last supporting statement in 2024 of \$75,986. The increase in government cost estimates is based on the Commission’s reevaluation and assessment in the Application Fees proceeding and the inclusion of the Foreign Adversary Annual Reports.

⁴⁰ 47 CFR §§ 1.40001, 1.40003.

⁴¹ 2024 Supporting Statement.

Technical Costs	Cost ⁴²
Fixed Start Up, Implementation and Hosting Cost for Public Portal ⁴³	\$792,754
Annual Labor Costs	
Attorney Review Cost (10 Hours Per Matter x \$109.82 Per GS-15 Attorney x 12 Matters)	\$13,178
Support Staff Cost (14 Hours Per Matter x \$157.90 Per Hour x 12 Matters)	\$26,527
Total Annual Labor Cost	\$39,705

- 1) Estimate of Total Annualized Cost to the Federal Government (Commission Cost and Committee Cost):

⁴² The costs reflected in this table are based on cost information provided to the Commission by the Committee.

⁴³ The Committee’s portal would be designed to process and store all Standard Questions responses, not only those for submarine cable applications. Three types of Commission applications (and consequently three different Commission information collections) are associated with the Standard Questions: submarine cable applications (OMB Control No. 3060-0944), international section 214 authorization applications (OMB Control No. 3060-0686), and section 310 foreign ownership petitions for declaratory ruling (OMB Control No. 3060-1163). The overall total technical cost that the Committee estimated for its portal is \$2,416,934. The Committee estimates that 32.8% of all Commission applications referred to the Committee will be submarine cable applications and the proportionate amount of portal technical costs that can be attributed to submarine cable applications is \$792,754 (i.e., 32.8% of \$2,416,934). The Committee similarly estimated and we report below the proportional amount of labor costs associated with the Committee’s review of Standard Questions in connection with submarine cable applications.

The estimated total annualized cost to the **Federal Government** for this collection is the sum of the Commission's annual costs and the Committee's annual costs: \$175,538.40 + \$792,754 + \$39,705 = **\$1,007,997.40**

15. Explain the reasons for any program changes or adjustments reported.

As a result of the rules adopted in the *Submarine Cable Report and Order*, submarine cable applicants and licensees will be required to submit additional information in applications, certifications, and for a subset of existing licensees, a new annual foreign adversary report to the Commission. The newly adopted rules overall increased the number of respondents and the hours that respondents will need to prepare and submit submarine cable applications, the Foreign Adversary Annual Report, and other filings. Therefore, the Commission's program changes for the collection are as follows: an increase in the annual number of respondents from 41 to 429 (an increase of 388 respondents); an increase in the annual number of responses from 118 to 472 (an increase of 354 responses); an increase in annual burden hours from 960 to 14,180 hours (an increase of 13,220 hours); and an increase in annual costs from \$340,255 to \$4,354,490 (an increase of \$4,014,235).⁴⁴

16. For collections of information whose results will be published, outline plans for tabulation and publication.

The Commission does not plan to publish the information for statistical use.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

⁴⁴ See FCC, Supporting Statement, OMB Control No. 3060-0944 (Apr. 2, 2024), https://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr=202404-3060-003 (2024 Supporting Statement).

OMB Control No. 3060-0944

Cable Landing License Act

Executive Order 10530

47 CFR §§ 1.70000 – 1.70024, 1.40001, 1.40003

April 2026

The Commission does not seek approval to not display the expiration date for OMB approval of the information collection.

18. Explain any exceptions to the statement certifying compliance with 5 C.F.R. § 1320.9 and the related provisions of 5 C.F.R. § 1320.8(b)(3).

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

This collection of information does not anticipate the use of statistical methods.