SUPPORTING STATEMENT

A. Justification:

1. **On March 26, 2026, the Federal Communications Commission (Commission or FCC) adopted a Report and Order, FCC 26-19 (*Network and Services Modernization Order*), that modified certain recordkeeping or recording requirements that relate to the obligations of incumbent local exchange carriers (ILECs) planning to retire copper communications facilities or make other changes to their networks that might impact interoperability.**

History:

In August 1996, in the *Second Report and Order* (*1996 Order*), the Commission adopted rules and regulations designed to implement certain provisions of section 251 of the Telecommunications Act of 1996 ("1996 Act")[1] and to eliminate operational barriers to competition in the telecommunications services market. Section 251 is designed to accelerate private sector development and deployment of telecommunications technologies and services by spurring competition. Specifically, the *1996 Order* addressed:

(1) LECs' obligations to provide their competitors with dialing parity and non-discriminatory access to certain services and functionalities;

(2) ILECs' duty to make network information disclosures; and

(3) numbering administration.

In the *Second Order on Reconsideration*, released in September 1999 in CC Docket No. 96-98, the Commission resolved and clarified specific issues regarding the non-discriminatory access obligations of local exchange carriers. The Commission also issued an *NPRM* in CC Docket No. 99-273 soliciting comment on issues arising out of developments in, and the convergence of, directory publishing and directory assistance. The *NPRM* sought comment on several issues that may have resulted in new collections of information.

The Commission issued a *First Report and Order* in CC Docket No. 99-273 and adopted several of the information collection requirements it proposed in the *NPRM*. In an effort to implement the requirements and obligations, the Commission adopted the collections of information set forth in subparagraphs (a) through (i) below.

The Commission's *2015 Technology Transitions Order* in WC Docket No. 13-5 significantly updated the Commission's rules regarding the retirement of copper facilities for the first time in a decade to (a) require ILECs to provide notice of planned copper retirements to retail customers when such retirements remove copper to the customers' premises; (b) update and streamline the process by which ILECs notify interconnecting carriers of copper retirements; (c) require notice of copper retirements to state, Tribal, and federal defense authorities; and (d) define the circumstances in which copper retirement notice is required.

On November 16, 2017, the Commission adopted a Report and Order, Declaratory Ruling, and Further Notice of Proposed Rulemaking, FCC 17-154 (*2017 Wireline Infrastructure Order*), that updated the

[1] *See* 47 U.S.C. § 251.

network change disclosure process generally and the copper retirement process specifically by streamlining those processes and reducing the associated regulatory burdens.

The Commission's *2018 Wireline Infrastructure Second Report and Order* in WC Docket No. 17-84 updated the network change disclosure process by reducing the associated regulatory burdens as the changes eliminate notices that are subsumed by notice obligations that remain in force or simply codify procedures available to a small number of incumbent LECs by waiver orders.

On March 26, 2026, the Commission adopted the *Network and Services Modernization Order*, which further modified certain recordkeeping or recording requirements that relate to the obligations of ILECs planning to retire copper communications facilities or make other changes to their networks that might impact interoperability.[2] Paragraph (d) below specifically identifies the requirements that the *Network and Services Modernization Order* modified, all of which reduce the burdens for network change disclosures. All other requirements described were previously approved by the Office of Management and Budget (OMB) and remain unchanged.

Due to the adoption of the *Network and Services Modernization Order*, FCC 26-19, the Commission is submitting this revised information collection to OMB in order to obtain a three-year approval.

Information Collection Requirements – paragraphs (a) through (i):

(a) <u>Sharing of directory assistance and directory listings</u>: Pursuant to 47 U.S.C. § 251(b)(3) and 47 CFR § 51.217, each LEC upon request must provide competing service providers with access to directory assistance (including the LEC's directory assistance databases) and directory listings, in readily accessible magnetic tape, electronic or other convenient formats.

Updates to the directory assistance database shall be made in the same format as the initial transfer (unless the requesting LEC requests otherwise), and shall be performed in a timely manner, taking no longer than those made to the providing LEC's own database.

A LEC shall not provide access to unlisted numbers, or other information that its customer has asked the LEC not to make available. *See* 47 CFR § 51.217(c)(3)(iv).

In the *Second Order on Reconsideration*, the Commission clarified the requirement that a LEC shall provide access to its directory assistance services, including directory assistance databases, and its directory listings. The Commission specified that upon request a providing LEC must provide access to its directory assistance database in any format the competing provider specifies, if the LEC's internal systems can accommodate that format.

In addition, a providing LEC must supply updates to requesting LECs in the same manner as the original transfer and at the same time that updates are made to the providing carrier's database.

(b) <u>Notification regarding format</u>: If a LEC's internal systems do not permit it to provide directory assistance or directory listings in the format specified by the competing provider, the LEC must inform the competing provider that the requested format cannot be accommodated and

[2] In the *Network and Services Modernization Order*, the Commission changed the name of this proceeding from "Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment, GN Docket No. 17-84" to "Reducing Barriers to Network Improvements and Service Changes, Accelerating Network Modernization, WC Docket Nos. 25-209, 25-208."

tell the requesting provider which formats can be accommodated within 30 days of receiving the request. *See* 47 CFR § 51.217(c)(3)(iii).

In the *Second Order on Reconsideration*, the Commission required LECs to inform requesting providers within 30 days if the requested format cannot be accommodated.

(c) Provision of technical information: Pursuant to 47 U.S.C. §§ 251(c)(2)-(3), an ILEC shall provide to a requesting telecommunications carrier technical information about its network facilities sufficient to allow the requesting telecommunications carrier to achieve interconnection and/or access to unbundled network elements. *See* 47 CFR §§ 51.305(g), 51.307(e).

(d) **Revised Information Collection Requirements which Require OMB Approval.**

Public notice of network changes: In the *Network and Services Modernization Order*, the Commission (1) eliminated all filing requirements in the Commission's network change disclosure rules and the Commission's process of issuing public notices for short-term network changes and copper retirements and the associated objection process for interconnected service providers, (2) required that the method of notice the incumbent LEC uses be publicly accessible, and (3) expanded the direct notice requirement for copper retirements and short-term network changes to include 911 service providers[3] and directly interconnecting LECs that support essential functions within 911 networks, including delivering 911 traffic to selective routers for transmission to public safety answering points (PSAPs). In so doing, it revised 47 CFR §§ 51.329 and 51.333.

Pursuant to 47 U.S.C. § 251(c)(5), an ILEC must provide public notice of a network change that either:

(1) will affect a competing service provider's performance or ability to provide service; or

(2) will affect the ILEC's interoperability with other service providers.

The ILEC may fulfill the required notice to the public of network changes by providing public notice through publicly accessible industry fora, industry publications, or the carrier's publicly accessible Internet site.

The ILEC is no longer required to file a certification with the Commission if it provides public notice through industry fora, industry publications, or through its Internet site.

Until the planned change is implemented, an ILEC must keep the notice available for public inspection, and amend the notice to keep the information complete, accurate, and up-to-date. *See* 47 CFR § 51.329.

Generally, an ILEC shall give public notice of planned changes to its network at the make/buy point,[4] but at least twelve months before implementation.

[3] A 911 service provider is defined as an entity that provides 911, E911, or NG911 capabilities such as call routing, automatic location information (ALI), automatic number identification (ANI), or the functional equivalent of those capabilities, directly to a public safety answering point (PSAP), statewide default answering point, or appropriate local emergency authority as defined in 47 CFR § 9.3; and/or operates one or more central offices that directly serve a PSAP.

[4] The make/buy point is the time at which an ILEC decides to make or procure any product the design of which

However, if an ILEC proposes to make changes that can be implemented within twelve months of the make/buy point, public notice must be given at the make/buy point, but at least six months before implementation.

If the changes can be implemented within six months of the make/buy point, public notice may be given pursuant to the short-term notice procedures provided in 47 CFR § 51.333. *See* 47 CFR § 51.331.

If an ILEC wishes to provide less than six months' notice of planned network changes or if the planned network change involves a copper retirement, the ILEC must serve a copy of its public notice upon each telephone exchange service provider that directly interconnects with the ILEC's network, 911 service providers, and directly interconnecting LECs that support essential functions within 911 networks in the affected service areas at least 10 days prior to implementation of a planned short-term network change and at least 90 days prior to implementation of a planned copper retirement. The ILEC is no longer required to file the public notice or a certification with the Commission.

An information service provider or telecommunications service provider that directly interconnects with the ILEC's network may no longer file an objection to the ILEC's short term or copper retirement notice with the Commission.

In the case of a network change necessitated by a *force majeure* event, no advance direct or public notice is required. As soon as practicable, the ILEC must provide public notice that includes the date on which the carrier invoked its disaster recovery plan and must communicate with other directly interconnected telephone exchange service providers to ensure that such carriers are aware of any changes being made to their networks that may impact those carriers' operations. In the case of a network change necessitated by events outside of the ILEC's control, other than *force majeure* events, the ILEC must give notice of the network change as soon as practicable that includes a brief explanation of the circumstances necessitating a reduced waiting period and how the ILEC intends to minimize the impact of the reduced waiting period on directly interconnected telephone exchange service providers. *See* 47 CFR § 51.333(b).

Generally, an ILEC's planned copper retirement shall not become effective until at least 90 days after providing the required direct notice or, in the case of copper facilities not being used to provide service to any customers, until at least 15 days after providing the required direct notice. *See* 47 CFR § 51.333(a)(2).

Lastly, if an ILEC claims that information otherwise required to be disclosed is confidential or proprietary, the ILEC's public notice must include a statement that the ILEC will make further information available to those signing a nondisclosure agreement.

Upon receipt by an ILEC of a competing service provider's request for disclosure of confidential or proprietary information, the applicable public notice period will be tolled until the parties agree on the terms of a nondisclosure agreement. *See* 47 CFR § 51.335.

affects or relies on a new or changed network interface. If the ILEC's proposed changes do not require it to make or buy a product then the make/buy point is the point at which the ILEC makes a definite decision to implement the change.

(e) Burden of proof: Pursuant to 47 U.S.C. § 251(b)(3), a LEC that provides operator services, directory assistance services or directory listings to its customers, or provides telephone numbers, shall permit competing providers of telephone exchange service or telephone toll service to have non-discriminatory access to that service or feature, with no unreasonable dialing delays.

In disputes involving non-discriminatory access to operator services, directory assistance services, or directory listings, a providing LEC shall bear the burden of demonstrating with specificity:

(1) that it is permitting non-discriminatory access; and

(2) that any disparity in access is not caused by factors within its control. *See* 47 CFR § 51.217(e)(1).

In disputes between providing LECs and competing providers involving unreasonable dialing delay in the provision of access to operator services and directory assistance, the burden of proof is on the providing LEC to demonstrate with specificity that it is processing the calls of the competing provider's customers on terms equal to that of similar calls from the providing LEC's own customers. *See* 47 CFR § 51.217(e)(2).

(f) Submission of notice to serve as central office code administrator: Pursuant to 47 U.S.C. § 251(e)(1) and 47 CFR § 52.19(b)(2) of the Commission's rules, a state commission must notify the entity or entities designated by the Commission to serve as central office code administrator(s) for its state that such state commission intends to perform matters related to initiation and development of area code relief planning efforts.

Notification shall be written and shall include a description of the specific functions the state commission intends to perform. Where the North American Numbering Plan ("NANP") Administrator serves as the central office code administrator, such notification must be made within 120 days of the selection of the NANP Administrator. *See* 47 CFR § 52.19(b)(2).

(g) Subscriber list information for Internet directories: In the *1996 NPRM*, the Commission sought comment on whether 47 U.S.C. § 222(e) entitles directory publishers to obtain subscriber list information for use in Internet directories. The Commission concluded in the *First Report and Order* that the phrase "in any format" found in section 222(e) brings within the protections of section 222(e) those entities that seek subscriber list information to publish directories on the Internet.

The Commission further concluded that the phrase "in any format" makes clear Congress's intent not to restrict the kinds of directories that could be published using subscriber list information obtained pursuant to section 222(e). Internet databases that contain subscriber list information clearly fall within the very broad category of "directories in any format." In order for directory publishers to provide accurate directory listing, it is essential that publishers have access to the subscriber list information LECs acquire from their customers.

(h) Provision of nondiscriminatory access to LEC directory assistance databases: In the *1996 NPRM*, the Commission sought comment on whether 47 U.S.C. § 251(b)(3) requires LECs to provide nondiscriminatory access to any non-local directory assistance (DA) data that they use to provide directory assistance to customers within their service areas.

The Commission concluded, in the *First Report and Order*, that LECs should not be required to provide nondiscriminatory access to non-local directory listings since third parties have the same opportunities to secure the information directly. The Commission noted that this was consistent with its finding in the *US West Forbearance Order* where it determined that US West did not exercise monopoly power with respect to obtaining the telephone numbers of subscribers outside its region.

However, to the extent that a carrier does provide access to national DA information to any other directory assistance provider, including another LEC, the Commission determined that it must make that same information available to competing DA providers under nondiscriminatory rates, terms, and conditions.

(i) Listing information to non-telephone exchange or toll service directory assistance providers: The *1996 NPRM* sought comment on whether a non-carrier directory assistance provider is entitled to nondiscriminatory access to directory assistance under 47 U.S.C. § 251(b)(3) when that provider is the agent of a LEC or other carrier that qualifies for the benefits of section 251(b)(3), and whether the Commission should also require nondiscriminatory access to directory assistance for non-carrier directory assistance providers pursuant to sections 201 and 202.

In the *First Report and Order*, the Commission concluded that, when a competitive LEC (CLEC) or an interexchange carrier (IXC) (having entered into an interconnection agreement with the relevant LEC) designates a DA provider to act as its agent, that competing DA provider is entitled to nondiscriminatory access to the providing LEC's local DA database. The DA provider's database access will be consistent with the terms of the relevant interconnection agreement and with the terms of the DA provider's separate agreement with its carrier principal.

The Commission expects that a DA provider's request for access will be accompanied by a letter or other documentation from the CLEC or IXC evidencing its intent that the DA provider receive database access so that it can fulfill its obligations to the CLEC or IXC. The Commission generally found that once carriers or their agents obtain access to the DA database, they may use the information as they wish, as long as they comply with applicable provisions of the Act and the Commission's rules.

The Commission also determined that competing directory assistance providers that offer call completion services for local or toll calls provide telephone exchange or telephone toll services, respectively, and thus qualify for nondiscriminatory access to LEC local directory assistance databases.

Statutory authority for this collection of information is contained in Sections 1, 3, 4, 201, 222, 251 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 153, 154, 201, 222, and 251.

This information collection does not affect individuals or households; thus, there are no impacts under the Privacy Act.

2. In order to encourage competition in the telecommunications services market by lifting operational barriers to entry, the Commission has:

(1) required LECs to provide dialing parity and non-discriminatory access to certain services and functionalities;

(2) required ILECs to provide public notice of network changes; and

(3) established procedures for numbering administration.

These information collection requirements are part of an effort to make local dialing and networks, telephone numbers, operator services, directory assistance, and directory listings available to all competitors on an equal basis, as follows:

(1) Directory listings and the public notice of network changes will be provided to third parties.

(2) Technical information regarding interconnection and/or access to unbundled network elements will be provided by ILECs to requesting telecommunication carriers.

(3) Burden of proof documentation regarding access to a LECs services and features or dialing delay will be provided to the Commission.

(4) Area code relief plans will be provided by state commissions to the central office code administrators.

The Commission concluded in the *Second Order on Reconsideration* that a LEC shall permit competing providers of telephone exchange service and telephone toll service access to its directory assistance services, including directory assistance databases.

The Commission clarified that, upon request, a LEC shall provide access to its directory assistance services, including directory assistance databases, and to its directory listings in any format the competing provider specifies, if the LECs internal systems can accommodate that format. In addition, LECs must supply updates to the requesting LEC in the same manner as the original transfer and at the same time that it provides updates to itself.

These information collection requirements are part of an effort to make directory assistance and directory listings available to all competitors on an equal basis. Additionally, the Commission's *Network and Services Modernization Order* significantly updated the Commission's network change disclosure rules to reduce regulatory barriers to the deployment of next-generation facilities while ensuring continued 911 connectivity**.**

All of the collections implement the requirements of section 251 and/or 222 of the Communications Act of 1934, as amended.

3. In order to facilitate the exchange of directory listings, the Commission has required that a LEC provide directory listings to competing providers in magnetic tape or electronic formats, and that a LEC allow competing providers to access and read the LECs directory assistance databases. It was thought that access to databases would allow competing entities to provide seamless access to directory assistance for their customers and prevent LECs from placing discriminatory conditions or unreasonable delays upon access to this information. This was reaffirmed in the *Second Order on Reconsideration*.

The Commission also concluded that non-discriminatory access requires that updates be provided to requesting LECs in the same manner as the original database transfer, and that such updates be made at the same time as updates are made to the providing carrier's database.

The provision that requires each ILEC to provide sufficient technical information to allow a requesting carrier to achieve interconnection and/or access to unbundled network elements does not specify the format that an ILEC must use to deliver the information. Thus, each ILEC is allowed the flexibility to provide the information in a technological format that is minimally burdensome to its operation.

In addition, the Commission has given ILECs the option to fulfill their network change disclosure obligations by providing public notice through publicly accessible industry fora, industry publications, or on the carrier's publicly accessible Internet sites. Additionally, ILECs have regularly provided notices of network change to interconnecting carriers via electronic mail.

The burden of proof showing required by the Commission in certain enforcement proceedings is a relatively limited information collection, and there does not appear to be a technological method of collection that would significantly reduce this burden.

Because each state commission will provide a unique description of its specific functions and plans regarding area code relief planning, there does not appear to be a technological method of collection by which the Commission could significantly reduce the burden of providing these plans.

4. There will be no duplication of information. The information sought is unique to each carrier, and similar information is not already available from other sources.

5. The collections of information may affect small entities as well as large entities. However, in each instance these requirements were instituted to aid new entrants to the telecommunications market and allow them equal access to the resources available to previously established entities. As some new entrants will be small entities these requirements will benefit such businesses. In addition, for small entities that qualify as rural telephone companies, the 1996 Act provides for the exemption, suspension, or modification of certain requirements. (47 U.S.C. § 251(f)).

6. Failing to collect the information, or collecting it less frequently, would prevent the Commission from implementing Section 251 of the 1996 Act, fostering opportunities for new entrants in the local telephone market, and ensuring reasonable public notice of network changes under Section 251 of the 1996 Act.

7. The requirement that ILECs file their network change notices and associated certifications with the Commission was eliminated. *Network and Services Modernization Order* at paras. 12-15.

8. Pursuant to 5 CFR § 1320.8, the Commission published a 60 Day notice in the Federal Register soliciting public comment. *See* 91 FR 27045, May 13, 2026. No comments were received from the public.

9. The Commission does not anticipate providing any payment or gift to respondents.

10. The Commission is not requesting respondents to submit confidential information to the Commission.

As previously noted, however, each ILEC is to provide public notice of proposed network changes. If an ILEC claims that information that it is required to disclose is confidential or proprietary, the ILEC's public notice must include a statement that the ILEC will make further information available to those signing a nondisclosure agreement.

Upon receipt by an ILEC of a competing service provider's request for disclosure of confidential or proprietary information, the applicable public notice period will be tolled until the parties agree on the terms of a nondisclosure agreement. *See* 47 CFR § 51.335.

11. There are no questions of a sensitive nature with respect to the information collected.

12. The following represents estimates of the burdens associated with the collections of information:

Estimated Burdens for the Information Collection Requirements – paragraphs (a) through (i):
***Note:* The *Network and Services Modernization Order* revised only the burdens described in paragraph (d) below.**

(a) Sharing of directory listings: (*See* 47 U.S.C. § 251(b)(3); 47 CFR § 51.217(c)(3)(ii)).

(1) Number of respondents: 1,169[5] LECs (most of approximately 1,170 ILECs receiving requests for listings, with some of approximately 720 CLECs also receiving requests).

(2) Frequency of response: On occasion reporting requirements.

(3) Total Number of Responses Annually: approximately 426,685 responses.

The Commission estimates that this obligation arises as new competitors enter a LEC's market with a larger initial transfer of data and then smaller updates. The Commission estimates, on average, there are 1,169 LECs that will be required to provide the directory listing information as one initial transfer, and then with updates that could occur as often as approximately 365 other times annually.

1,169 respondents x 365 responses/year = 426,685 responses.

(4) Total Annual Hourly Burden: 426,685 hours.

The Commission estimates that it would take no more than one hour for a LEC to comply with this requirement. We believe that respondents have this information readily available in their electronic database(s) and use sophisticated IT software that can provide automated responses, and which poses only a minimal, incremental burden on the respondents to provide the information.

1,169 respondents x 365 notifications/year x 1 hour/notification = 426,685 hours.

(5) Total "In-House" Costs: $426,685.

The Commission assumes that LECs generally use sophisticated IT software, which poses only a minimal incremental cost burden, to comply with this provision.
426,685 hours x $1/hour = $426,685

(b) Notification Regarding Format (*See* 47 U.S.C. § 251(b)(3); 47 CFR § 51.217(c)(3)(iii)).

(1) Number of Respondents: 50 LECs.

[5] This number is based on an April 21, 2026 search of the FCC's Form 499 Filer Database. *See* https://apps.fcc.gov/cgb/form499/499results.cfm?FilerID=&frn=&operational=1&comm_type=LEC&LegalName=&state=Any+State&R1=and&XML=FALSE https://apps.fcc.gov/cgb/form499/499results.cfm?FilerID=&frn=&operational=1&comm_type=CAP&LegalName=&state=Any+State&R1=and&XML=FALSE.

(2) Frequency of response: On occasion reporting requirements.

(3) Total Number of Responses Annually: 50 responses.

The Commission estimates that annually there are approximately 50 LECs that may have to respond in compliance with this requirement because their internal systems cannot accommodate a requested format for directory assistance or directory listings. We believe that the LECs will prepare approximately one notification annually.

50 LECs x 1 notification/year = 50 responses.

(4) Total Annual Hourly Burden: 50 hours.

The Commission estimates that the 50 LECs will take no more than one hour to notify competitive providers and comply with this requirement.

50 LECs x 1 notification/year x 1 hour/notification = 50 hours.

(5) Total "In-House" Costs: $50.

The Commission assumes that the LECs generally use sophisticated IT software to provide responses, which poses only a minimal incremental cost burden to comply with the notification requirement.

50 hours x $1/hour = $50.

(c) Provision of technical information: (*See* 47 U.S.C. § 251(c)(2)-(3); 47 CFR §§ 51.305(g), 51.307(e)).

(1) Number of respondents: 500 ILECs.

(2) Frequency of response: On occasion reporting requirements.

(3) Total Number of Responses Annually: 12,000 responses.

The Commission estimates that there are approximately 500 ILECs that may need to respond to requests in order to comply with this requirement that an ILEC must provide technical information about the ILEC's network facilities sufficient to allow a requesting carrier to achieve interconnection and/or access to unbundled network elements. We estimate that, on average, these ILECs would have to provide such information 24 times annually.

500 ILECs x 24 responses/year = 12,000 responses.

(4) Total Annual Hourly Burden: 12,000 hours.

The Commission estimates that ILECs would require approximately one hour per request to provide this information, including the time necessary for the ILECs to distribute, maintain, and update the information. We believe that the ILECs will use sophisticated IT software to maintain this information, making it easily accessible.

500 ILECs x 1 hour/responses x 24 responses/year = 12,000 hours.

(5) Total "In-House" Costs: $1,031,784

The Commission assumes that the ILECs use personnel comparable in pay to a GS-13/Step 5 ($66.14/hour) Federal employee, plus 30% overhead, to comply with this requirement to provide technical information to telecommunications carriers.

12,000 hours x $66.14/hour = $ 793,680
30% overhead + $ 238,104
Total: $1,031,784

(d) **Revised:** Public notice of network changes (*See* 47 U.S.C. § 251(c)(5); 47 CFR §§ 51.325-51.335)

The new estimates listed here take into account the rule revisions outlined above and their impact on obligations under our existing rules. These estimates are based on Commission staff's knowledge and familiarity with the availability of the data required.

(1) Number of potential respondents: 585 ILECs.

(2) Frequency of response: On occasion recordkeeping; third party disclosure.

(3) Total Number of Responses Annually: 500 responses.

As the Commission predicted in the *2015 Technology Transitions Order*, the number of copper retirement notices has increased significantly as ILECs continue to decommission aging copper facilities in favor of new technologies. Indeed, the number of copper retirement notices has steadily increased: 104 in 2020; 124 in 2021; 152 in 2022; 169 in 2023; 288 in 2024; and 47 in 2025 before the Wireline Competition Bureau (Bureau) waived the network change disclosure filing requirements. Overall network change disclosures showed a similar trend: 188 in 2020; 192 in 2021; 201 in 2022; 241 in 2023; 440 in 2024; and 71 in 2025 before the Bureau waiver. The Commission believes this trend will continue as ILECs continue to modernize their networks.

The Commission estimates that approximately 30% of annual network change notifications will involve long-term network changes; the other 70% will involve short-term network changes and copper retirements, which must comply with the direct notice requirements in 47 CFR § 51.333. Thus, of the 250 annual responses, the Commission estimates that 75 responses will be long-term network change notifications, and 175 responses will be short-term network change and copper retirement notifications.

250 x 30% = 75 Long-Term Network Change Notifications
250 x 70% = 175 Short-Term Network Change and Copper Retirement Notices

These ILECs are also required to maintain a copy of the public notices and make them available for public inspection until the planned network changes are implemented.

Approximately 250 recordkeeping responses.

Total: 250 notification responses + 250 recordkeeping responses = 500 responses.

(4) Total Annual Hourly Burden: 1,250 hours.

The Commission estimates that the ILECs require approximately 4.5 hours per network change notification, including copper retirements, to publish the information through industry fora, publications or the Internet.

250 Network Change Disclosures x 4.5 hours/notification = 1,125 hours.

The Commission estimates that a respondent will require approximately 2 hours to transmit each Short-Term Network Change and Copper Retirement Notice to each telephone exchange service provider that directly interconnects with the ILEC's network, 911 service providers, and directly interconnecting local exchange service providers that support essential functions within 911 networks in the affected service areas. The Commission believes that respondents can comply with this requirement by using sophisticated IT software, which poses only a minimal, incremental hourly burden on the respondents.

175 Short-Term Network Change and Copper Retirement Notices x 2 hours/transmit notification = 350 hours.

The Commission assumes that most respondents maintain information about their planned network changes on their website, and estimates that respondents require approximately 30 minutes (0.5 hours) annually to maintain this information, updating the information as necessary.

250 respondents x 0.5 hours/year (recordkeeping) = 125 hours

Total: 1,125 hours (notification responses) + 125 hours (recordkeeping) = 1,250 hours.

(5) Total "In-House" Costs: $139,542.

The Commission makes the following assumptions:

The ILECs will use personnel comparable in pay to a GS-15/Step 5 ($91.93/hour) Federal employee, plus 30% overhead, to comply with the notification requirement;

1,125 hours x $91.93/hour =		$103,421
30% overhead	+	$ 31,026
	Total	$134,447

The ILECs will use web site postings and/or personnel comparable in pay to a GS-7/Step 5 ($31.35/hour) Federal employee, plus 30% overhead, to maintain the records.

125 hours x $31.35/hour =		$3,919
30% overhead	+	$1,176
	Total	$5,095

Total: $134,447+ $5,095= $139,542

(e) Burden of proof: (*See* 47 U.S.C. § 251(b)(3); 47 CFR § 51.217(e)).

(1) Number of respondents: 5 LECs.

(2) Frequency of response: On occasion reporting requirement.

(3) Total Number of Responses Annually: 5 responses.

This obligation will arise only when a competing provider alleges that a LEC is failing to provide nondiscriminatory access to features and services, or is subjecting the provider's customers to an unreasonable dialing delay. The Commission estimates that approximately 5 LECs would be subject to this requirement annually.

5 respondents x 1 burden of proof notification/year = 5 notification responses/year.

(4) Total Annual Hourly Burden: 40 hours**.**

The Commission estimates that these disputes would be brought to the Commission perhaps once a year by 5 LECs. We estimate that each respondent requires approximately eight hours annually to comply with this requirement.

5 LECs x 1 notification per LEC/year x 8 hours/notification = 40 hours

(5) Total "In-House" Costs: $4,780.

The Commission assumes that LECs use personnel comparable in pay to a GS-15/Step 5 ($91.93/hour) Federal employee, plus 30% overhead, to comply with this requirement.

40 hours x $91.93/hour = $3,677
30% overhead + $1,103
Total $4,780

(f) Submission of notice to serve as central office code administrator: (See 47 U.S.C § 251(e)(1); 47 CFR § 52.19(b)(2)).

(1) Number of respondents: 1.

(2) Frequency of response: On occasion reporting requirement.

(3) Total Number of Responses Annually: 1 response.

The Commission estimates that there will be approximately one notice submitted annually.

1 respondent x 1 response/year = 1 response

(4) Total Annual Hourly Burden: 1 hour.

The Commission estimates that one respondent will submit a notice annually.
We estimate that this submission requires one hour to prepare.

1 respondent x 1 hour/submission = 1 hour

(5) Total "In-House" Costs: $118.

The Commission assumes that the respondent uses personnel comparable in pay to a GS-15/Step 5 ($91.93/hour) Federal employee, plus 30% overhead, to comply with this requirement.

1 hour x $91.93/hour = $91
30% overhead + $ 27
Total $118

(g) Subscriber list Information for Internet Directories: (*See* 47 U.S.C. § 222(e); 47 CFR §§ 64.2301-64.2345)

(1) Number of respondents: 1,891 LECs.[6]

(2) Frequency of response: On occasion reporting requirements.

(3) Total Number of Responses Annually: 11,346 responses.

The Commission estimates that, on average in any year, approximately 1,891 LECs will receive approximately six requests annually from directory publishers for their subscriber list information for use in compiling Internet directories.

1,891 LECs x 6 requests from directory publishers/year = 11,346 responses

(4) Total Annual Hourly Burden: 11,346 hours.

The Commission estimates that, on average, most respondents require approximately one hour to provide the subscriber list information to directory publishers.

1,891 respondents x 1 hour/subscriber list request x 6 request/year = 11,346 hours.

(5) Total "In-House" Costs: $462,406.

The Commission assumes that LECs use personnel comparable in pay to a GS-7/Step 5 ($31.35/hour) Federal employee, plus 30% overhead, to comply with this requirement.

11,346 hours x $31.35/hour = $355,697
30% overhead + $106,709
Total $462,406

(h) Provision of access to non-local directory assistance listings: (*See* 47 U.S.C. § 251(b)(3); 47 CFR § 51.217).

(1) Number of respondents: 1.

[6] This number is based on an April 21, 2026 search of the FCC's Form 499 Filer Database for both incumbent LECs (1,169) and competitive LECs (722). *See* https://apps.fcc.gov/cgb/form499/499results.cfm?FilerID=&frn=&operational=1&comm_type=LEC&LegalName=&state=Any+State&R1=and&XML=FALSE; https://apps.fcc.gov/cgb/form499/499results.cfm?FilerID=&frn=&operational=1&comm_type=CAP&LegalName=&state=Any+State&R1=and&XML=FALSE.

(2) Frequency of response: On occasion reporting requirements.

(3) Total Number of Responses Annually: 1 response.

The Commission assumes that most LECs do not provide access to directory assistance data from outside their service area. The Commission, therefore, estimates that annually approximately one respondent might be required to provide nondiscriminatory access to any of its non-local directory assistance listings.

1 respondent x 1 response/year = 1 response

(4) Total Annual Hourly Burden: 1 hour.

The Commission estimates that the respondent requires no more than one hour annually to comply with this requirement. We believe that respondents have this information readily available in their electronic database(s) and use sophisticated IT software that can provide automated responses, which poses only a minimal, incremental burden on the respondents to provide the information.

1 respondent x 1 hour/response = 1 hour

(5) Total "In-House" Costs: $1.

The Commission assumes that LECs generally use sophisticated IT software, which poses only a minimal incremental cost burden, to comply with this provision.

1 hour x $1/hour = $1

(i) Listing Information to non-telephone exchange or toll service directory assistance providers: (*See* 47 U.S.C. § 251(b)(3); 47 CFR § 51.217).

(1) Number of respondents: 250 telephone exchange or telephone toll service providers.

(2) Frequency of response: On occasion reporting requirements.

(3) Total Number of Responses Annually: 250 responses.

The Commission estimates that approximately 250 telephone exchange or telephone toll service providers may need to prepare approximately one letter or other documentation annually in order to support its non-telephone exchange or toll service agent's requests for access to a LEC's directory assistance database.

250 LECs x 1 letters or documentation/year = 250 responses/year

(4) Total Annual Hourly Burden: 1,250 hours.

The Commission estimates that telephone exchange or telephone toll service providers may require approximately five hours to prepare the letter or documentation evidencing their intent to request that their agent receive access to a LECs directory assistance database.

250 respondents x 5 hours/letter or other documentation = 1,250 hours

(5) Total "In-House" Costs: $149,385.

The Commission assumes that telephone exchange or telephone toll service providers use personnel comparable in pay to a GS-15/Step 5 ($91.93/hour) Federal employee, plus 30% overhead, to comply with the requirements.

1,250 hours x $91.93/hour = $114,912
30% overhead + $34,473
Total: $149,385

INFORMATION COLLECTION BURDENS

Information Collection Requirements	Respondents	Total Number of Responses	Total Annual Hourly Burden	Total "In-House" Costs
a. Sharing directory listings	1,169	426,685	426,685	$426,685
b. Notification regarding format	50	50	50	$50
c. Provision of technical information	500	12,000	12,000	$1,031,784
d. Public notice of network changes	585	500	1,250	$139,542
e. Burden of proof	5	5	40	$4,780
f. Submission of notice to serve as central office administrator	1	1	1	$118
g. Subscriber list information for Internet directories	1,891	11,346	11,346	$462,406
h. Provision of nondiscriminatory access to non-local directory assistance listings	1	1	1	$1
i. Listing information to non-telephone exchange or toll service directory assistance providers	250	250	1,250	$149,385
TOTALS:	**4,452**	**450,838**	**452,623**	**$2,214,751**

Total Number of Respondents (Cumulative): 4,452.

Total Number of Responses Annually (Cumulative): 450,838 responses.

Total Annual Hourly Burden (Cumulative): 452,623 hours.

Total "In-House" Cost (Cumulative): $2,214,751.

13. The following represents the Commission's estimate of the annual cost burden to respondents or record keepers resulting from the collection of information:

The Commission believes that the respondents have sufficient "in house" staff to address all the information collection requirements using their "in-house" personnel rather than having to contract out this requirement. Thus:

(a) Total annualized capital/startup costs: $0.00

(b) Total annualized costs (O&M):: $0.00

(c) Total annualized cost requested: $0.00

14. The following represents the Commission's estimate of the annual cost burden to respondents or record keepers resulting from the collection of information:

a. Sharing of directory listings: No costs anticipated.

b. Notification Regarding Format: No cost anticipated.

c. Provision of technical information: No costs anticipated.

d. Public notice of network changes: No costs anticipated.

e. Burden of proof: The Commission estimates that it may receive approximately five disputes annually. We estimate that it takes FCC staff approximately six hours to review the allegations in each dispute.

5 notices x 6 hours/review = 30 hours

The Commission uses staff at the GS-15/Step 5 ($91.93/hour) Federal employee, plus 30% overhead for printing and miscellaneous costs, to review these notices.

30 hours x $91.93/hour = $2,758
30% overhead + $ 827
Total $3,585

f. Submission of area code relief plans: No cost anticipated.

g. Subscriber List Information for Internet Directories: No costs anticipated.

h. Provision of access to non-local listings: No costs anticipated.

i. Listing information to non-telephone exchange or toll service directory assistance providers: No costs anticipated.

Total Cost to Federal Government: $3,585

15. The Commission notes the following program changes:

There is a decrease in the total number of respondents from 4,688 to 4,452, (-236), a decrease in the total annual responses from 471,548 to 450,838, (-20,710), and a decrease in the total annual burden hours from 473,068 to 452,623, (-20,445). The reductions in the total annual burden hours are due to (1) the decrease in the pool of respondents (ILECs and CLECs), as reflected in the Commission's Form 499 database, and (2) the elimination of the network change disclosure filing requirements and objection procedures. The annual burdens thus are decreased despite the assumption that the number of network change notices will increase as a result of the program changes, and a change in the number of hours ILECs will need to comply with the new information collection requirements regarding short-term network change and copper retirement notices adopted pursuant to the *Network and Services Modernization Order* will also increase.

There are no adjustments.

16. The Commission does not anticipate that it will publish the results of these collections of information.

17. This information collection does not include forms; thus, the Commission does not intend to seek approval not to display the expiration date for OMB approval of the information collections.

18. There are no exceptions to the Certification Statement.

B. Collections of Information Employing Statistical Methods:

The Commission does not anticipate that the collection of information will employ statistical methods.