

SUPPORTING STATEMENT**A. Justification****1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

The Federal Communications Commission (Commission) seeks renewal of the information collection associated with its Mandatory Disaster Response Initiative (MDRI). The MDRI is necessary to ensure the nation's communications networks are able to provide a significant lifeline for those in need during disasters and other emergencies. Catastrophic weather events, including Hurricane Ida, earthquakes in Puerto Rico, severe winter storms in Texas, and active hurricane and wildfire seasons, have demonstrated however that the United States' communications infrastructure is susceptible to disruption during disaster events. To address this issue, the Commission adopted a *Report and Order* in June 2022 to improve the reliability and resiliency of mobile wireless networks.¹ In the *Report and Order*, the Commission introduced the MDRI and specified requirements for facilities-based mobile wireless providers to comply with the MDRI.² A subsequent, related *Order on Reconsideration* was released on September 15, 2023 that provides clarification and partial reconsideration of the elements of the MDRI.³

Safe Harbor Letter. As an alternative to implementing some of the MDRI's provisions, a provider may file a letter explaining that it truthfully and accurately asserts compliance with certain provisions and has implemented internal procedures to ensure that it remains in compliance with these provisions. These provisions are (i) fostering mutual aid among wireless providers during emergencies, (ii) enhancing municipal preparedness and restoration by convening with local government public safety representatives to develop best practices, and establishing a provider/PSAP contact database, (iii) increasing consumer readiness and preparation through development and dissemination with consumer groups of Consumer Readiness Checklist, and (iv) improving public awareness and stakeholder communications on service and restoration status. However, the Commission does not extend this "safe harbor" mechanism to MDRI rules requiring that providers implement bilateral roaming arrangements (4.17(a)(1)), test their roaming functionality (4.17(b)), provide reports to the Commission detailing the timing, duration, and effectiveness of their implementation of the MDRI (4.17(c)) or retain copies of roaming under disaster arrangements (RuDs) (4.17(d)).⁴

¹ See *Resilient Networks; Amendments to Part 4 of the Commission's Rules Concerning Disruptions to Communications; New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, PS Docket Nos. 21-346 and 15-80, ET Docket No. 04-35, Report and Order, 37 FCC Rcd 8059, 8063-77, paras. 10-48 (2022) (*Report and Order*).

² See *Report and Order*, 37 FCC Rcd at 8060-61, para. 3.

³ See *Resilient Networks; Amendments to part 4 of the Commission's Rules Concerning Disruptions to Communications; New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, PS Docket Nos. 21-346 and 15-80; ET Docket No. 04-35, Order on Reconsideration, 38 FCC Rcd 8685 (2023) (*Order on Reconsideration*).

⁴ Since the Commission first submitted its supporting statement for this information collection, seven among the nation's 75 facilities-based mobile wireless providers voluntarily filed letters with the Commission attesting to their implementation of conditions necessary to obtain the benefits of a legal safe harbor from enforcement of the MDRI rules. Accordingly, this supporting statement attributes only to the remaining 68 providers that have not yet filed a safe harbor letter with the Commission the one-time costs associated with the MDRI's safe harbor provision. These 68 providers may still file a letter with the Commission containing the attestations necessary to obtain the benefits of

The information sought in this collection is necessary for the administration of the rule and vital to ensuring that the nation's mobile wireless networks are more operational during disaster events, thus better fulfilling their role as critical lifelines to those in need in times of emergency.

The collection is authorized under the authority contained in Sections 1, 4(i), 4(j), 4(o), 201(b), 214(d), 218, 251(e)(3), 301, 303(b), 303(g), 303(j), 303(r), 307, 309(a), 309(j), 316, 332, 403, 615a-1, and 615c of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 154(i)-(j) & (o), 201(b), 214(d), 218, 251(e)(3), 301, 303(b), 303(g), 303(j), 303(r), 307, 309(a), 309(j), 316, 332, 403, 615a-1, and 615c.

This information collection does not affect individuals or households; thus, there are no impacts under the Privacy Act.⁵

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.

This information collection is used by various types of entities to realize and retain significant public safety benefits. For example:

- Consumers and consumer groups use the Consumer Readiness Checklists prepared and disseminated by providers to increase consumer education and improve consumer preparedness for disasters and other emergencies.⁶
- Providers use the information obtained pursuant to the testing requirements of the MDRI's provision (b) to ensure that roaming will work expeditiously in times of emergencies and to better understand their network capabilities related to roaming, including to better understand the extent to which roaming can be performed in a way that does not compromise a provider's service to its own customers.⁷ Providers also use this information so that they can optimize, debug, and diagnose their networks well in advance of emergencies, ensuring that these networks roam as effectively as possible when a disaster strikes, ultimately saving lives

a legal safe harbor, and would incur one-time burdens as a result. This 68-provider count would decrease in subsequent years if additional providers were to file a safe harbor letter. This estimated one-time burden would not be removed from this information collection unless all facilities-based mobile wireless providers submitted a safe harbor letter with the Commission. Notwithstanding, the Commission continues to require all 75 facilities-based mobile wireless providers to comply with requirements that implicate annual costs, and that are not specific to the legal safe harbor: after-action reporting, retaining Roaming under Disaster arrangements (RuDs), and written denial of roaming requests and testing of roaming capabilities. *See Report and Order*, 37 FCC Rcd at 8070, para. 29.

⁵ 5 U.S.C. § 552(a).

⁶ *E.g.*, Letter from Joan Marsh, AT&T; Charles McKee, Sprint; Grant Spellmeyer, U.S. Cellular; Scott Bergmann, CTIA; Steve Sharkey, T-Mobile; and William H. Johnson, Verizon, to Marlene Dortch, Secretary, Federal Communications Commission, PS Docket Nos. 11-60 and 13-239 (Apr. 27, 2016), <http://www.ctia.org/docs/default-source/fcc-filings/160427-final-network-resiliency-commitment-letter.pdf> at 3; *see also, e.g., Improving the Resiliency of Mobile Wireless Communications Networks; Reliability and Continuity of Communications Networks, Including Broadband Technologies*, PS Docket No. 13-239 (terminated), PS Docket No. 11-60, Order, 31 FCC Rcd 13745, 13750-51, para. 15 (2016).

⁷ *Report and Order*, 37 FCC Rcd at 8070, para. 31.

and property.⁸

- The Commission uses information contained in the reports provided to it pursuant to the reporting requirements of the MDRI's provision (c) to gauge the effectiveness of the MDRI provisions and as a basis for potential future improvements to the MDRI and other programs in furtherance of public safety.⁹
- The Commission uses the RuDs retained by providers pursuant to the MDRI's provision (d) to effectively gauge compliance with the MDRI's roaming provision at minimal cost to providers.¹⁰ The Commission may also use this information to resolve disputes related to the roaming agreements, including the negotiation of the agreements.¹¹
- Requesting providers use the information included in a host provider's written denial of a roaming request to evaluate the substance of the reasons for denial so that the requesting provider can make a renewed request at an appropriate time later, if warranted.¹² The Commission may use this information to gain insight into modifications that would facilitate a future roaming agreement or create a record in the event a dispute arises.¹³
- The Commission may use the information supplied in providers' "safe harbor" letters to assess the sufficiency of a provider's efforts to comply with the Commission's rules and to ensure that providers are accountable for failures to comply.¹⁴

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 encourages providers subject to the information collection requirements to use all forms of information technology, including electronic submission methods, wherever it would be cost effective and efficient for the provider to do so. The Commission believes that all requirements of this information collection can be satisfied efficiently by electronic means. The Commission, however, has not mandated specific means of collection so as to allow providers the maximum flexibility to perform collections using those means that are least burdensome to it, so long as they meet the requirements specified in the *Report and Order*.

4. Describe efforts to identify duplication.

This information collection is unique to the Commission's MDRI rules and is not duplicated elsewhere. The Commission is not aware of any already available information collections that involve similar rules or requirements related to implementing reasonable RuDs, implementing mutual

⁸ *Id.*

⁹ *Id.* at 8071, para. 33.

¹⁰ *Id.* at 8068, para. 24.

¹¹ *Id.* at 8065-66, para. 16.

¹² *Id.* at 8068, para. 22.

¹³ *Id.*

¹⁴ *Id.* at 8069, para. 28.

aid agreements among providers, enhancing municipal preparedness and restoration, increasing consumer readiness and preparation, improving public awareness and stakeholder communications on service and restoration status or testing and reporting required by the MDRI.

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

The collection has been carefully designed to minimize the time and burden on small businesses and other small entities to comply with the MDRI rules while still allowing the Commission to achieve its objectives. The requirements are only applicable to facilities-based mobile wireless providers and thus other small entity providers that may be capable of roaming are not subject to the adopted provisions. Moreover, several of the requirements are based on or incorporate industry-developed standards and programs and are consistent with existing Commission requirements. In developing the requirement that facilities-based mobile wireless providers provide reasonable RuDs when technically feasible, for instance, the Commission defined “reasonable roaming” as roaming that does not disturb, but includes compliance with, the Commission’s existing requirements that voice roaming arrangements be just, reasonable, and non-discriminatory, and that data roaming arrangements be commercially reasonable. Consistency with existing industry standards and Commission requirements increases the likelihood that small entities already have processes and procedures in place to facilitate compliance with the rules and may only incur incremental costs, which will minimize the impact for these entities.

6. Describe the consequences to 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 this collection were not performed, the Commission would not have any information on how providers prepared for disasters and emergencies and whether or not this preparation was successfully implemented in actions like roaming, aid, and other safety preparedness activities. This collection informs the Commission, the public, and other providers about what does and does not work for disasters, which enables providers to prepare for future disasters with lessons learned and critical feedback. As the Commission reasoned in the Report and Order, requiring providers to submit reports about its implementation of the MDRI helps the Commission gauge the effectiveness of these provisions and potential future improvements in furtherance of public safety.¹⁵ A failure to collect this information would thus adversely impact the Commission’s ability to carry out its Congressionally-mandated objective of aiding the national defense and promoting the safety of life and property by regulating wire and radio communications.

If the collection were to be performed less frequently, the Commission would not have reliable information on the effectiveness of the MDRI in the aftermath of disasters and assurances that providers are taking steps necessary to comply with the MDRI and achieve greater network reliability and resiliency. In some cases (e.g., related to the issuance of written roaming denials by host providers to requesting providers), providers would not otherwise have sufficient information available to ensure that their customers remain connected to critical services during emergency events to the maximum extent possible. A failure to collect this information would thus adversely impact the Commission’s ability to carry out its Congressionally-mandated objective of aiding the national defense and promoting the safety of life and property by regulating wire and radio communications. In the Report and Order, the Commission rejected the views of Verizon and other commenters that

¹⁵ *Id.*

suggested that reports should be filed only annually as it found that such reports would be most accurate or useful if they were provided shortly after a disaster event has concluded.¹⁶

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).

This collection of information is consistent with the guidelines in 5 CFR § 1320.5(d)(2). The collection requires providers to submit reports to the Commission detailing the timing, duration and effectiveness of their implementation of the MDRI's provisions within 60 days of when the Public Safety and Homeland Security Bureau issues a Public Notice announcing such reports must be filed for providers operating in a certain geographic area in the aftermath of a disaster. Because disaster events occur with an unpredictable frequency and geographic span, the Commission cannot rule out the possibility that providers would be required to supply such reports to the Commission more often than quarterly on occasion.

Similarly, providers may include information in these reports that could constitute proprietary trade secrets and/or other confidential information. In the *Order on Reconsideration*, the Commission provided a presumption of confidentiality for filed RuDs which eliminates the additional step for small entities of having to submit a request for confidential treatment under section 0.459 of the Commission's rules when filing an RuD with the Commission when requested.¹⁷

A failure to collect this information would adversely impact the Commission's ability to carry out its Congressionally-mandated objective of aiding the national defense and promoting the safety of life and property by regulating wire and radio communications. Other than through these reports, which providers may be required to submit more often than quarterly on occasion (as described in the paragraph immediately above), the Commission does not expect this information collection to require that respondents report information to the Commission more often than quarterly.

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.

The Commission published a 60-day notice in the Federal Register seeking comments from the public on July 28, 2026 (91 FR 47238). No PRA Comments were received from the public.

9. Explain any decision to provide any payment or gift to respondents, other than the remuneration of contractors or grantees.

The Commission will not provide any payment or gift to respondents.

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

The collection does not require a System of Records Notice (SORN) or Privacy Impact Assessment (PIA).

¹⁶ *Id.* at 8696, para. 34.

¹⁷ *Id.* at 8685, para. 1; *see also id.* at 8697-98, paras. 39-40.

The collection will require providers to submit reports to the Commission detailing the timing, duration and effectiveness of their implementation of the MDRI's provisions within 60 days of when the Public Safety and Homeland Security Bureau issues a Public Notice announcing such reports must be filed for providers operating in a certain geographic area in the aftermath of a disaster. Providers may include information in these reports that could constitute proprietary trade secrets and/or other confidential information. As explained above and in the *Order on Reconsideration*, such submissions shall be treated as presumptively confidential.¹⁸

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

There are no questions of a sensitive nature involved with this collection of information.

12. Provide estimates of the burden hours for the collection of information.

Burden estimates are calculated below. We estimate that 75 facilities-based mobile wireless providers must 1) perform annual testing of their roaming capabilities and related coordination processes, with such testing performed bilaterally with other providers that may foreseeably roam, or request roaming from, the provider during times of disaster or other exigency; 2) submit reports to the Commission detailing the timing, duration, and effectiveness of their implementation of the Mandatory Disaster Response Initiative's provisions in this section within 60 days of when the Public Safety and Homeland Security Bureau issues a Public Notice announcing such reports must be filed for providers operating in a certain geographic area in the aftermath of a disaster; and 3) retain RuDs for a period of at least one year after their expiration and supply copies of such agreements to the Commission promptly upon Commission request.

As noted above, providers may obtain "safe harbor" as to provisions (ii)-(v) of the MDRI if they implement, or continue their implementation of, corresponding provisions of the Framework pertaining to mutual aid, municipal preparedness, and consumer readiness. Seven among the nation's 75 facilities-based mobile wireless providers have filed a safe harbor letter in the *Resilient Networks* docket. The estimates below consider that the remaining respondents (an estimated 68 providers) may still choose to voluntarily implement the safe harbor provisions and obtain the benefits of the legal safe harbor as a result, and therefore we continue to account for those possible one-time "in-house" burdens and costs. The safe harbor provisions implicate the PRA burden. Implementing corresponding provisions of MDRI does not. Thus, calculations of the estimated burden below are an upper limit on the actual burden to respondents in practice.

a. Municipal Preparedness

Providers that implement the safe harbor are estimated to incur a one-time or initial burden to "establish[] a provider/PSAP contact database." This represents the burden for entering information that a provider already has available regarding PSAP contact information in database form.

Burden Estimate for Establishing a Provider/PSAP Contact Database

- Number of Respondents: **68**
- Frequency of response: **One-time**
- Total Number of Responses: 68 respondents × 1 response/respondent = **68 total responses**
- Average response time per response: **20 hours**
- One-Time Hour Burden: 68 responses × 20 hours/response = **1,360 hours**

¹⁸ *Id.* at 8697-98, paras. 39-40.

Estimate of cost across all respondents:

- One-time “in-house” cost: $1,360 \text{ hours} \times \$95.45/\text{hour} = \$129,812$

Method of estimation:

We estimate that each provider that implements the municipal preparedness element of the Framework will incur a one-time burden of 20 hours to enter information it already has on-hand on PSAP contact information into a database. In arriving at this estimate, we have taken into account that such information will likely be entered in electronic form. The Commission estimates the hourly wage of a full-time employee who will be responsible for these efforts as \$95.45/hour, inclusive of benefits. In developing this estimate, the Commission has relied on data on 2025 national wage information from the Bureau of Labor and Statistics. The median hourly cost for software developers is \$95.45, which is the median hourly wage of \$65.38 increased by 46% to include benefits.¹⁹ In arriving at this estimate, we have assumed that each provider will undertake the step of creating a database for the first time. We note, however, that many providers already likely implement this step as a matter of existing business practices and so will incur no or only minimal incremental costs to implement the provision of the Framework corresponding to provision (a)(3).

b. Consumer Readiness

Providers that implement the safe harbor are estimated to incur a one-time burden to generate and an annually recurring burden to disseminate with consumer groups a Consumer Readiness Checklist.

Burden Estimate for Generating a Consumer Readiness Checklist

- Number of Respondents: **68**
- Frequency of response: **One-time**
- Total Number of Responses: $68 \text{ respondents} \times 1 \text{ response/respondent} = \mathbf{68 \text{ total responses}}$
- Average response time per response: **1 hour**
- One-time Hour Burden: $68 \text{ responses} \times 1 \text{ hours/response} = \mathbf{68 \text{ hours}}$

Burden Estimate for Disseminating a Consumer Readiness Checklist

- Number of Respondents: **75**
- Frequency of response: **Once annually**
- Total Number of Responses: $75 \text{ respondents} \times 1 \text{ response/respondent} = \mathbf{75 \text{ total responses}}$
- Average response time per response: **1 hour**
- Annual Hour Burden: $75 \text{ responses} \times 1 \text{ hour/response} = \mathbf{75 \text{ hours}}$

Estimate of cost across all respondents:

- One-time “in-house” cost for generating: $68 \text{ hours} \times \$52.47/\text{hour} = \mathbf{\$3,568}$ (rounded up)
- Annualized “in-house” cost for disseminating: $75 \text{ hours} \times \$52.47/\text{hour} = \mathbf{\$3,936}$ (rounded up)

¹⁹ See Bureau of Labor and Statistics, *Occupational Employment and Wage Statistics, Occupational Employment and Wages, May 2022, 15-1252 Software Developers*, <https://www.bls.gov/oes/2022/may/oes151252.htm> (last visited June 4, 2026). We calculate the applicable benefits markup by using Bureau of Labor Statistics data, as of December 2025, where civilian wages and salaries averaged \$33.45/hour and benefits averaged \$15.33/hour. Using these figures, we calculate that benefits constituted a markup of $\$15.33/\$33.45 \sim 46\%$. Taking 46% for cost of benefits (\$30.07/hour), we determine an hourly compensation of \$95.45/hour (\$65.38/hour + \$30.07/hour). See Press Release, U.S. Bureau of Labor Statistics, *Employer Costs for Employee Compensation—December 2025* (Mar. 20, 2026), <https://www.bls.gov/news.release/pdf/eccec.pdf>.

Method of estimation:

We estimate that providers will, on average, require one hour to gather the necessary information to draft the Consumer Readiness Checklist, reflecting that much of this information has likely already been gathered in the normal course of business and is readily available to respondents.²⁰ We estimate that each provider will, on average, engage in dissemination of a Consumer Readiness Checklist once annually and that the burden of dissemination is also one hour. In arriving at these estimates, we have taken into account that such dissemination may occur through electronic distribution lists (e.g., e-mail), social media channels and other forms of communications. The Commission estimates the hourly wage of a full-time employee who will be responsible for these efforts as \$52.47/hour, inclusive of benefits. In developing this estimate, the Commission has relied on data on 2025 national wage information from the Bureau of Labor and Statistics. The median hourly cost for public relation specialists is \$52.47, which is the median hourly wage of \$35.94 increased by 46% to include benefits.²¹

c. Testing of Roaming Capabilities

Providers are estimated to incur a recurring burden to perform annual testing of their roaming capabilities and related coordination processes. This testing must be performed bilaterally with other providers that may foreseeably roam, or request roaming from, a given provider including, without limitation, between providers whose geographic coverage areas overlap.²²

Burden Estimate for Annual Testing

- Number of Respondents: **75**
- Frequency of response: **Once annually**
- Total Number of Responses: 75 respondents × 5 responses/respondent = **375 total responses**
- Average response time per response: **3 hours**
- Annual Hour Burden: 375 responses × 3 hours/response = **1,125 hours**

Estimate of cost across all respondents:

- Annualized “in-house” cost: 1,125 hours × \$95.45/hour = **\$107,382** (rounded up)

Method of estimation:

This estimate assumes that each provider will perform testing annually, as required in the MDRI’s provision (b), and will conduct the described bilateral testing with five other providers, on average. We further assume that the testing will require 3 hours per testing partner. In arriving at these estimates, we have taken into account that such testing will likely take advantage of electronic and other automated means. The Commission estimates the hourly wage of a full-time employee who will be responsible for these efforts as \$95.45/hour, inclusive of benefits. In developing this estimate, the Commission has relied on data on 2025 national wage information from the Bureau of Labor and Statistics. The median hourly cost for software developers is \$95.45, which is the median hourly wage of \$65.38 increased by 46% to include benefits²³

²⁰ *Report and Order*, 37 FCC Rcd at 8073-74, paras. 40-42.

²¹ See U.S. Bureau of Labor and Statistics, *Occupational Employment and Wage Statistics (OEWS) Profiles*, 27-3031 Public Relations Specialists, https://data.bls.gov/oesprofile/?major_group=270000&occupation=273031&measure=01&areas=INDUSTRY,STATE,MSA (last visited June 10, 2026).

²² *Report and Order*, 37 FCC Rcd at 8070, para. 30.

²³ See Bureau of Labor and Statistics, *Occupational Employment and Wage Statistics, Occupational Employment and Wages, May 2022, 15-1252 Software Developers*, <https://www.bls.gov/oes/2022/may/oes151252.htm> (last

d. After-Action Reporting

Providers are estimated to incur a recurring burden to prepare and transmit reports to the Commission detailing the timing, duration and effectiveness of their implementation of the MDRI within 60 days of when the Commission's Public Safety and Homeland Security Bureau issues a Public Notice announcing such reports must be filed for providers operating in a certain geographic area.

Burden Estimate for Reporting

- Number of Respondents: **75**
- Frequency of response: **Four times annually**
- Total Number of Responses: 75 respondents $\times$ 4 responses/respondent = **300 total responses**
- Average response time per response: **5 hours**
- Annual Hour Burden: 300 responses $\times$ 5 hours/response = **1,500 hours**

Estimate of cost across all respondents:

- Annualized "in-house" cost: 1,500 hours $\times$ \$112.07/hour = **\$168,105**

Method of estimation:

This estimate assumes that each provider will be required to complete four reports annually in response to a Public Safety and Homeland Security Bureau issued Public Notice. The exact number of such reports is unknowable given the variation in disaster events and the possibility that the Public Safety and Homeland Security Bureau will take a case-by-case approach on whether to make a request for reports in response to each disaster. The estimate above is therefore an expected upper limit on the total number of responses that the Commission expects to collect from each provider, on average, on an annual basis. In arriving at these estimates, we have taken into account that such testing will likely take advantage of electronic and other automated means. The Commission estimates the hourly wage of a full-time employee who will be responsible for these efforts as \$112.07/hour, inclusive of benefits. In developing this estimate, the Commission has relied on data on 2025 national wage information from the Bureau of Labor and Statistics. The median hourly cost for lawyers is \$112.07, which is the median hourly wage of \$76.76 increased by 46% to include benefits.²⁴

e. Retaining RuDs

Providers are estimated to incur a recurring burden to retain RuDs for at least one year after expiration and supply them to the Commission upon request.

Burden Estimate for RuDs

- Number of Respondents: **75**
- Frequency of response: **Once annually**
- Total Number of Responses: 75 respondents $\times$ 1 responses/respondent = **75 total responses**
- Average response time per response: **1 hour**
- Annual Hour Burden: 75 responses $\times$ 1 hour/response = **75 hours**

visited June 4, 2026).

²⁴ See U.S. Bureau of Labor and Statistics, *Occupational Employment and Wage Statistics, Occupational Employment and Wages, May 2023, 23-1011 Lawyers*, <https://www.bls.gov/oes/2023/may/oes231011.htm> (last visited June 4, 2026).

Estimate of cost across all respondents:

- Annualized “in-house” cost: 75 hours × \$112.07/hour = **\$8,406** (rounded up)

Method of estimation:

This estimate assumes that each provider will store a copy of RuDs by paper or electronic methods and supply a copy to the Commission once annually. While the Commission expects that providers will submit copies to the Commission less than once annually on average, this assumption is used for simplicity and is expected to yield an upper limit on actual burden. In arriving at these estimates, we have taken into account that such retaining and supplying of RuDs will likely take advantage of electronic and other automated means. The Commission estimates the hourly wage of a full-time employee who will be responsible for these efforts as \$112.07/hour, inclusive of benefits. In developing this estimate, the Commission has relied on data on 2025 national wage information from the Bureau of Labor and Statistics. The median hourly cost for lawyers is \$112.07, which is the median hourly wage of \$76.76 increased by 46% to include benefits.²⁵

f. Written Denial of Roaming Requests

The MDRI specifies that when a provider receiving a roaming request denies the request, it must specify so in writing to the requesting provider, preferably with the specific reasons why roaming is infeasible.²⁶ Providers are estimated to incur a recurring burden to prepare and transmit such written denial requests.

Burden Estimate for Written Denials

- Number of Respondents: **75**
- Frequency of response: **12 times annually**
- Total Number of Responses: 75 respondents × 12 responses/respondent = **900 total responses**
- Average response time per response: **2 hours**
- Annual Hour Burden: 900 responses × 2 hours / response = **1,800 hours**

Estimate of cost across all respondents for this provision:

- Annualized “in-house” cost: 1,800 hours × \$95.45/hour = **\$171,810**

Method of estimation:

This estimate assumes that each provider will deny up to 12 roaming requests per year. The exact number of such denials is unknowable given the variation in disaster events and the inability to know exactly how a given provider’s network capabilities will be impacted by specific disaster events. The estimate above is an expected upper limit on the total number of denials that the Commission expects providers will issue, on average, on an annual basis. In arriving at these estimates, we have taken into account that preparation and transmittal will likely take advantage of electronic and other automated means. The Commission estimates the hourly wage of a full-time employee who will be responsible for these efforts as \$95.45/hour, inclusive of benefits. In developing this estimate, the Commission has relied on data on 2025 national wage information from the Bureau of Labor and Statistics. The median hourly cost for software developers is \$95.45, which is the median hourly wage of \$65.38 increased by 46% to include benefits to include benefits.²⁷

²⁵ See *id.*

²⁶ *Report and Order*, 37 FCC Rcd at 8068, para. 22.

²⁷ See Bureau of Labor and Statistics, *Occupational Employment and Wage Statistics, Occupational Employment and Wages, May 2022, 15-1252 Software Developers*, <https://www.bls.gov/oes/2022/may/oes151252.htm> (last

g. Safe Harbor Letters

As noted above, providers may obtain “safe harbor” as to certain provisions of the MDRI if they implement, or continue their implementation of, provisions of the Framework. Namely, a provider that files a letter with the Commission truthfully and accurately asserting, pursuant to section 1.16 of the Commission’s rules,²⁸ that it complies with the Framework’s existing provisions corresponding to MDRI provisions (a)(2)-(a)(5) and has implemented internal procedures to ensure that it remains in compliance with these provisions, is presumed by the Commission to have complied with the MDRI’s provisions (a)(2)-(a)(5).²⁹ Providers are estimated to incur a one-time burden to prepare and transmit such letters to the Commission.

Burden Estimate for Safe Harbor Letters

- Number of Respondents: **68**
- Frequency of response: One-time reporting requirement
- Total Number of Responses: 68 respondents × 1 response/respondent = **68 total responses**
- Average response time per response: 3 hours
- One-Time Hour Burden: 68 responses × 3 hours/response = **204 hours**

Estimate of cost across all respondents for this provision:

- One time cost: 204 hours × \$112.07/hour = **\$22,863** (rounded up)

Method of estimation:

Seven among the estimated 75 facilities-based mobile wireless providers have already filed a letter with the Commission asserting their eligibility for the legal safe harbor. Accordingly, we estimate that 68 providers may still apply for safe harbor, and hence incur the burden of filing a letter containing the appropriate attestations. This is an expected upper estimate on the number of providers that could seek safe harbor and thus an upper estimate on total burden. In arriving at these estimates, we have taken into account that preparing and transmitting letters will likely take advantage of electronic and other automated means. The Commission estimates the hourly wage of a full-time employee who will be responsible for these efforts as \$112.07/hour, inclusive of benefits. In developing this estimate, the Commission has relied on data on 2025 national wage information from the Bureau of Labor and Statistics. The median hourly cost for lawyers is \$112.07, which is the median hourly wage of \$76.76 increased by 46% to include benefits.³⁰

Cumulative Estimated One-Time Burden (Totals)

- Total one-time respondents: **68 respondents**
- Total one-time responses: 68 (municipal preparedness responses) + 68 (consumer readiness responses – creation) + 68 (safe harbor letter responses) = **204 responses**
- Total one-time hours burden = 1,360 (municipal preparedness responses) + 68 (consumer readiness responses - creation) + 204 (safe harbor letter responses) = **1,632 hours**

visited June 4, 2026).

²⁸ 47 CFR § 1.16.

²⁹ *Report and Order*, 37 FCC Rcd at 8069-70, paras. 28-29.

³⁰ See U.S. Bureau of Labor and Statistics, *Occupational Employment and Wage Statistics, Occupational Employment and Wages, May 2023, 23-1011 Lawyers*, <https://www.bls.gov/oes/2023/may/oes231011.htm> (last visited June 4, 2026).

- Total one-time “in-house” costs = \$129,812 (municipal preparedness responses) + \$3,568 (consumer readiness responses - creation) + \$22,863 (safe harbor letter responses) = **\$156,243**

Cumulative Estimated Annual Burden (Totals)

- Total annual respondents: **75 respondents**
- Total annual responses: 75 (consumer readiness responses - dissemination) + 375 (testing roaming) + 300 (after-action reporting) + 75 (retaining RuDs) + (900 written denials of roaming) = **1,725 responses**
- Total recurring hours burden on an annualized basis = 75 hours (consumer readiness responses – dissemination) + 1,125 hours (testing roaming) + 1,500 hours (after-action reporting) + 75 hours (retaining RuDs) + 1,800 hours (written denial of roaming requests) = **4,575 hours** (4,575 hours / 75 respondents = 61 hours)
- Total recurring “in-house” costs on an annualized basis = \$3,936 (consumer readiness responses – dissemination) + \$107,382 (testing roaming) + \$168,105 (after-action reporting) + \$8,406 (retaining RuDs) + \$171,810 (written denial of roaming requests) = **\$459,639**

As such, the Commission estimates the cumulative total responses and burdens as follows:

- Total annual respondents: **75 respondents**
- Total annual responses: 68 responses (one-time responses annualized across 3 years) + 1,725 responses (annual) = **1,793 responses**
- 544 hours (one-time burden annualized across 3 years) + 4,575 hours (annual) = **5,119 hours**

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.

There is no outside cost to the respondents.

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

The Commission does not expect to incur costs beyond the normal labor costs for staff.

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

The Commission is reporting adjustments to this existing information collection. The total number of responses has increased from 1,725 to 1,793 (+68). The number of burden hours has increased from 4,575 hours to 5,119 hours (+544). These changes are the result of adjustments that arise from (1) the method of estimating total responses and burdens being modified to newly capture one-time responses and burdens, and (2) seven providers having completed their one-time reporting burdens since the last estimate.

There are no program changes.

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

The Commission does not have any current plans to publish results from this information collection.

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

The Commission is requesting a waiver of the requirement to display the OMB expiration date on the surveys because the Commission is not producing any survey forms associated with this collection. The OMB Control Number, title and expiration date, will be displayed on OMB's website.

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:

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