SUPPORTING STATEMENT

This submission is being made pursuant to 44 U.S.C. § 3507 of the Paperwork Reduction Act of 1995 (PRA) to obtain the Office of Management and Budget (OMB) approval to revise the existing information collection, OMB Control No. 3060-0856.

A. Justification:

1. *Circumstances that make the collection necessary.* The Federal Communications Commission (Commission) seeks processing under the PRA, 5 CFR § 1320.5.

The Communications Act of 1934, as amended by the Telecommunications Act of 1996 (Act), directed the Commission to take steps necessary to establish support mechanisms to ensure the delivery of affordable telecommunications service for all Americans, including consumers in high cost areas, low-income consumers, rural health care providers, and eligible schools and libraries. Section 254(h) of the Act, as implemented by the Commission in its *Universal Service Order* (CC Docket No. 96-45, FCC 97-157), established, *inter alia*, the federal schools and libraries universal service support mechanism (E-Rate program).

Under the E-Rate program, eligible schools, libraries, and consortia that include eligible schools and libraries, may apply for discounts ranging from 20 percent to 90 percent of the pre-discount price of eligible equipment and services. The discount levels are based on indicators of need and geographical location, and may change depending on the category of eligible equipment and services selected.

Eligible applicants can seek funding on an annual basis. They commence the application process by seeking bids for eligible equipment and services by filing the FCC Form 470 (approved under OMB Control No. 3060-0806) with the Universal Service Administrative Company (USAC or Administrator), the current administrator of the E-Rate program. After the competitive bidding process concludes, applicants enter into agreements with service providers who will provide the requested eligible equipment and services. Next, applicants seek funding for these equipment and services by filing an FCC Form 471 (approved under OMB Control No. 3060-0806) with USAC once the annual application window opens. After the Administrator reviews the funding request and commits to fund the equipment and services requested, applicants and service providers are required to use FCC Forms 472, 473, and/or 474 (OMB Control No. 3060-0856) to facilitate the processing of discounted payments for the eligible equipment and services procured under the E-Rate program.

On July 23, 2014, the Commission released an Order and Further Notice of Proposed Rulemaking (FNPRM) (WC Docket No. 13-184, FCC 14-99; 79 FR 49160, August 19, 2014) (*2014 First E-Rate Order*) modernizing the E-Rate program. Specifically, the *2014 First E-Rate Order* adopted new rules and procedures to reorient the E-Rate program to focus support on high-speed broadband for schools and libraries while also taking steps to streamline the program. The *2014 First E-Rate Order* also conformed FCC Forms 472 and 473, including changes to the forms' certifications. There were no revisions to FCC Form 474, and all three forms were converted to an online format and submission process.

On December 19, 2014, the Commission released an Order and Order on Reconsideration (WC Docket No. 13-184, FCC 14-189; 80 FR 5961, February 4, 2015) (*2014 Second E-Rate Order*), which implemented the next critical steps to modernize the E-Rate program by maximizing options for

schools and libraries seeking to purchase high-speed broadband and adjusting the E-Rate program spending cap to $3.9 billion. With these improvements, the Commission sought to close the high-speed connectivity gap between rural schools and libraries and their urban and suburban counterparts and provide sufficient and certain funding for high-speed connectivity to and within all eligible schools and libraries.

In February 2021, OMB approved non-substantive changes to the FCC Form 473 to add certification of compliance for service providers participating in the E-Rate Program regarding rules adopted by the Commission in the *Protecting Against National Security Threats to the Communications Supply Chain Through FCC Programs First Report and Order and Order* and the *Second Report and Order*, (WC Docket No. 18-19; FCC 19-121 (*First Report and Order*) and FCC 20-176 (*Second Report and Order*)).

On July 29, 2024, the Commission released a Report and Order and Further Notice of Proposed Rulemaking (WC Docket No. 21-31, FCC 24-76; 89 FR 67303, August 20, 2024 (2024 *Wi-Fi Hotspots Order*)), finding that the off-premises use of wireless mobile Internet services and the concomitant Wi-Fi hotspot devices serve an educational purpose and are eligible for E-Rate support. On September 30, 2025, the Commission adopted the Hotspots Order on Reconsideration (WC Docket No. 21-31, FCC 25-62 (*Hotspots Order on Reconsideration*)), that rescinds the *2024 Wi-Fi Hotspots Order*, and removes the eligibility of E-Rate support for off-premises use of wireless mobile Internet services and the Wi-Fi hotspot devices needed to deliver the services.

Certifications that highlight current E-Rate program rules have been added to FCC Forms 472 and 473-474. For FCC Form 472, the following certification is added: " I certify that this Billed Entity will make all documents requested available to the Administrator as required by 47 C.F.R. § 54.516 (b)." This certification reminds applicants that E-Rate program rules require them to provide to the Administrator requested documents related to their E-Rate requests. Requested documents also help with audits or audit findings. For FCC Form 473, the following certification is added: "I certify that this Service Provider permits the Billed Entity to choose the method of payment for the discounted services from those methods approved by the Administrator as set forth in 47 C.F.R. § 54.514 (c)." This certification is to ensure that service providers are aware of the E-Rate program's rule that allows Billed Entities Applicants to choose the method of payment for the discounted services. To both the FCC Forms 472 and 474, certification language was added reminding the authorized person that they were certifying under perjury and were subject to penalties under the Communications Act and the False Claims Act for any false statement. Finally, minor clarifying edits were also made to the current certifications of the FCC Forms 472/474 and 473 to ensure the accuracy of the forms and for consistency in the certification language.

This submission proposes to revise the currently approved information collection requirements.

Statutory authority for this collection of information is contained in sections 1, 4(i), 4(j), 201-205, 214, 254, 312(d), 312(f), 403 and 503(b) of the Communications Act of 1934, as amended. 5 U.S.C. §§ 553(b)(3), 601-612; 15 U.S.C. §§ 1, 632; 44 U.S.C. § 3506(c)(4); 47 U.S.C. §§ 1, 4(i), 4(j), 201-205, 214, 254, 312(d), 312(f), 403, 503(b).

This information collection includes personally identifiable information (PII) in the form of business contact information, which will be protected in accordance with the Privacy Act. Maintenance and potential disclosure of the PII in this information collection is covered by the FCC-2, Business Contacts and Certifications, System of Records Notice (SORN), posted at

https://www.fcc.gov/managing-director/privacy-transparency/privacy-act-information. A Privacy Act Statement citing the FCC-2 SORN will be provided to respondents at the time the PII is collected.

a. FCC Form 472 "Billed Entity Applicant Reimbursement Form." (Revised to add certification)

Billed entities may pay the full amount for eligible services directly to the service providers and then, once the equipment and/or services have been received, seek reimbursement from USAC to cover the amounts of the discounts for which they have qualified. The FCC Form 472 is used by the billed entity to request such reimbursement from USAC. Based on the rules adopted in the *2014 First E-Rate Order* (FCC 14-99), USAC disburses payments directly to the billed entity to cover the equipment and/or services that have been properly invoiced and paid for. The information on FCC Form 472 enables this direct reimbursement process to the billed entity applicant. This information includes the amount paid for approved equipment and/or services delivered on or after the actual services start date, as reported on the FCC Form 486 (approved under OMB Control No. 3060-0853). Certifications that highlight current E-Rate program rules were added to FCC Forms 472. For FCC Form 472, the following certification is added: " I certify that this Billed Entity will make all documents requested available to the Administrator as required by 47 C.F.R. § 54.516 (b)." The added certification does not create changes to the burden in completing FCC Form 472.

b. FCC Form 473 "Service Provider Annual Certification Form." (Revised to add certifications)

The FCC Form 473 must be filed by service providers to attest that the invoices submitted under the E-Rate program comply with the FCC's rules. Under the rules adopted in the *2014 First E-Rate Order* (FCC 14-99), the service provider must annually submit an FCC Form 473 for each service provider identification number (SPIN). Certifications that highlight current E-Rate program rules were added to FCC Form 473. Additionally, for FCC Form 473, the following certification is added: "I certify that this Service Provider permits the Billed Entity to choose the method of payment for the discounted services from those methods approved by the Administrator as set forth in 47 C.F.R. § 54.514 (c)." Finally, minor clarifying edits were also made to the current certifications of the FCC Form 473 to ensure the accuracy of the forms and for consistency in the certification language. The added certifications does not create changes to the burden in completing FCC Form 473.

c. FCC Form 474 "Service Provider Invoice (SPI) FCC Form 474." (Revised to add certification)

As an alternative to paying in full for eligible equipment and/or services, the billed entity can pay only the amounts for eligible equipment and/or services that have been discounted already by the service provider. Under this alternative, once the equipment and/or services have been received, service providers seek payment from USAC to cover the amounts of the discounts for which the billed entity qualifies. Service providers use the FCC Form 474 to request direct payment for invoices submitted for equipment and/or services that comply with the rules of the E-Rate program. The information on the FCC Form 474 must be received by USAC before a participating service provider can receive payment for the discounted portion of its bill for eligible equipment and/or services to eligible entities. Subsequent to receipt and review of the FCC Form 474, USAC will authorize payment to the service provider based on the invoices. Certification language was added reminding the authorized person that they were certifying under perjury and were subject to penalties under the Communications Act and the False Claims Act for any false statement. Finally, minor clarifying edits were also made to the current certifications of

the FCC Form 474 to ensure the accuracy of the forms and for consistency in the certification language. The added certification does not create changes to the burden in completing FCC Form 474.

2. *Use of Information*. The requirements contained herein are necessary to implement the Congressional mandate for universal service. It provides the Commission and USAC with the necessary information to administer the E-Rate program, determine the amount of support entities seeking funding are eligible to receive, to determine if entities are complying with the Commission's rules, and to prevent waste, fraud, and abuse in the program. The information will also allow the Commission to evaluate the extent to which the E-Rate program is meeting the statutory objectives specified in section 254 of the 1996 Act, the Commission's performance goals established in the *2014 First and Second E-Rate Orders*, and to evaluate the need and feasibility for any future revisions to program rules.

3. *Use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology*. The forms in this information collection are accessible only online. Field description documents of the online FCC Forms 472, 473, and 474 are provided with this submission. Electronic filing permits billed entities and service providers to input data in required fields and have data auto-populated wherever possible and applicable. To reduce billed entities/service provider confusion, the electronic filing process uses progressive disclosure wherever possible, so that an billed entity/service provider is asked to provide only information relevant to their funding request/request for reimbursement.

4. *Efforts to identify duplication*. There will be no duplication of information. The information sought is unique to each billed entity/service provider and similar information is not already available. The Commission does not otherwise collect the information sought in this collection.

5. *Impact on small entities*. Entities directly subject to the requirements in these forms are primarily schools, libraries, school districts, consortia comprised of eligible schools and libraries, and service providers. This information collection is designed to impose the least possible burden on the respondents while ensuring that the Administrator and the Commission have information necessary to administer and improve the E-Rate program.

6. *Consequences if information not collected*. Failing to collect the information, or collecting it less frequently, would prevent the Commission from fulfilling the requirements of section 254 of the 1996 Act, and prevent eligible participants and service providers from seeking and receiving E-Rate reimbursements for eligible equipment and services.

7. *Special circumstances*. There are no special circumstances with this information collection.

8. *Federal Register notice; efforts to consult with persons outside the Commission*. A 60-day notice was published in the *Federal Register* pursuant to 5 C.F.R. § 1320.8(d) on December 4, 2024 (89 FR 96245). On September 30, 2025, the Commission adopted the *Hotspots Order on Reconsideration*, that rescinds the *2024 Wi-Fi Hotspots Order*, and removes the eligibility of E-Rate support for off-premises use of wireless mobile Internet services and the Wi-Fi hotspot devices needed to deliver the services. The Wi-Fi hotspots and service-related rules, including the certifications are no longer applicable and are removed from this information collection.

   We also received one comment in response to this 60-day notice. *See* Comments of State E-rate Coordinator's Alliance (SECA) on Proposed Information Collection Requirements, OMB Control No.

3060-0853 (Universal Service - Schools and Libraries Universal Service Program, FCC Forms 479, 486, and 500) and OMB Control No. 3060-0856 (Universal Service - Schools and Libraries Universal Service Program, FCC Forms 472, 473, and 474) (filed February 3, 2025) (SECA Comments). SECA proposes recommendations to the FCC forms to improve efficiency and simplification of the program. Specifically, SECA proposes that the Children's Internet Protection Act (CIPA) certifications collected on the FCC Form 479 be permitted to cover multiple funding years and that FCC Form 479 not be required for consortia recipients that certify CIPA compliance in a consortia member Letter of Agency (LOA). SECA also proposes that certifications on FCC Form 486 be added to FCC Form 471 as optional certifications to allow applicants to avoid having to submit the FCC Form 486. SECA additionally proposes changes on how to partially reduce funding commitments on FCC Form 500 by having a "I want to partially reduce the funding in one or more of the FRNs" option that includes a checkbox (or equivalent) allowing the applicant to request that the remaining unused balance of the funding request number (FRN) be returned to their category two budget. Finally, SECA requests that applicants not be prohibited from filing an FCC Form 472 when their service provider has not submitted the required Service Provider Annual Certification Form (FCC Form 473).

SECA's proposals that CIPA certifications on FCC Form 479 be permitted to cover multiple funding years and that FCC Form 479 not be required for consortia members that certify CIPA compliance in a LOA are inconsistent with the language of section 254 requiring annual certification. Although the CIPA statute does not prescribe consortia requirements, we do not agree that a certification by the consortium lead alone is sufficient to meet the plain intent that each school and library annually certify their compliance to the Commission. The CIPA statute, 47 U.S.C. § 254 (h)(5)(E)(ii) and (h)(6)(E)(ii), prescribes that each school and library that receives E-Rate funding for Internet and/or internal connections must certify their CIPA compliance to the Commission "during each annual application cycle." FCC Form 479 ensures that schools and libraries meet the requirement to certify CIPA compliance annually and reminds them that they are certifying under penalty of perjury because willfully making false statements on the form can be punished by fine or forfeiture, under the Communications Act, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001. SECA's proposal to use a LOA in lieu of the FCC Form 479 does not meet these statutory requirements.

SECA's proposal that certifications on FCC Form 486 be added to FCC Form 471 as optional certifications to allow applicants to avoid having to submit the FCC Form 486 is outside of the scope of this collection because FCC Form 471 (OMB Control No. 3060-0806) is not a part of this information collection. Additionally, the Commission is considering comments on adding information collected on FCC Form 486 to the FCC Form 471 in an open rulemaking proceeding. *Schools and Libraries Universal Service Support Mechanism, et al.*, CC Docket No. 02-6, et al., Report and Order and Further Notice of Proposed Rulemaking, FCC 23-56, 38 FCC Rcd 6842 (2023). SECA's proposal for the FCC Form 500 to be simplified by having a "I want to partially reduce the funding in one or more of the FRNs" option that includes a checkbox (or equivalent) allowing the applicant to request that the remining unused balance of the FRN be returned to their Category 2 budget is a system-related change rather than a change in the information being collected. The requested system-related change may be considered during future IT enhancements. Additionally, we do not agree with SECA's proposal to allow applicants to file FCC Form 472 before an FCC Form 473 is filed because requiring that the FCC Form 473 has been submitted by the service providers is critical to ensuring program compliance. The Commission takes into consideration ways to simplify the E-Rate process and make it more efficient, but the current process does not impede the information collection and the service providers' certification of FCC Form 473 regarding their compliance with the FCC rules is a key component of permitting reimbursement in the E-Rate program.

9. *Payments or gifts to respondents*. There will be no payments or gifts to respondents.

10. *Assurances of confidentiality*. There is no assurance of confidentiality provided to respondents concerning this information collection. However, respondents may request materials or information submitted to the Commission or to the Administrator be withheld from public inspection under 47 CFR § 0.459 of the FCC's rules.

11. *Questions of a sensitive nature*. This information collection includes personally identifiable information (PII) in the form of business contact information, which will be protected in accordance with the Privacy Act. Maintenance and potential disclosure of the PII in this information collection is covered by the FCC-2, Business Contacts and Certifications, System of Records Notice (SORN), posted at https://www.fcc.gov/managing-director/privacy-transparency/privacy-act-information. A Privacy Act Statement citing the FCC-2 SORN will be provided to respondents at the time the PII is collected.

12. *Estimates of the hour burden of the collection to respondents*. The following represents the hour burden on the collections of information:

    a. **FCC Form 472 – Billed Entity Applicant Reimbursement Form (Number of respondents, number of responses, and hourly wages have changed):**

    (1) Number of respondents: Approximately 8,415 billed entities, which include public school districts, private schools, public library systems, and consortia.

    (2) Frequency of response: On occasion. The frequency depends on the billed entity's reimbursement preference. The form may be prepared as infrequently as one time per year for each set of services that have been approved for discounts, or as frequently as monthly.

    (3) Total number of responses per respondent: In calendar year 2023, there were 22,254 forms filed, or approximately 3 (2.7, but rounded up) responses per billed entity.[1] We used this data as the basis for our calculations below.

    (4) Estimated time per response: 1.5 hours.

    (5) Total annual hour burden: 37,868 hours (rounded)

    8,415 (respondents) x 3 (responses) x 1.5 (hours per response) x 1 (occasionally) = 37,868 (rounded)total annual burden hours.

    (6) Total estimate of in-house cost to respondents: $1,608,990.

[1] Due to the timeframe for invoicing in the E-Rate program, we used funding year (FY) 2023 data as the basis for our supporting calculations because the FY 2024 reimbursement forms have not been submitted yet. Also, the FY 2023 data provides the most current reflection of the E-Rate reimbursement forms because the invoice filing deadline has passed for most FY 2023 funding requests.

(7) Explanation of calculation: We estimate that this obligation will take 8,415 (respondents) x 3 (number of responses) x 1.5 (hours per response) x 1 (occasionally) x $42.49[2] (cost per response) = $1,608,990.

Summary of Estimated Total Annual Burden Hours for FCC Form 472:

Total Number of Respondents: 8,415 respondents

Total Number of Responses: 25,245 responses

Total Annual Hourly Burden: 37,868 hours

b. **FCC Form 473 – Service Provider Annual Certification Form (Number of respondents, number of responses, and hourly wages have changed):**

(1) Number of respondents: Approximately 4,542 service providers.

(2) Frequency of Response: Annually.

(3) Total number of responses per respondent: 1

(4) Estimated time per response: 1.5 hours.

(5) Total annual burden hour: 6,813 hours.

4,542 (respondents) x 1 (responses per respondent) x 1.5 (hours per response) x 1 (times per year) = 6,813 total annual burden hours.

(6) Total estimate of in-house cost to respondents: $289,484

(7) Explanation of calculation: We estimate that this obligation will take approximately 4,542 (respondents) x 1 (responses) x 1 (times per year) x 1.5 (hours per response) x $42.49 (cost per response) = $289,484.

Summary of Estimated Total Annual Burden Hours for FCC Form 473:

Total Number of Respondents: 4,542 respondents

Total Number of Responses: 4,542 responses

Total Annual Hourly Burden: 6,813 hours

[2] The hourly wage was updated based on recent data published May 2024, from the Bureau of Labor Statistics, that shows the mean hourly wage of all occupations in the Washington metropolitan area to be $42.49 (data from May 2023).

c. FCC Form 474 – Service Provider Invoice Form (Number of respondents, number of responses and hourly wages have changed):

(1) Number of respondents: Approximately 2,039 service providers.

(2) Frequency of response: On occasion. The frequency depends on the billed entity's reimbursement preference. The form may be prepared as infrequently as one time per year for each set of services that have been approved for discounts, or as frequently as monthly.

(3) Total number of responses per respondent: 44.37. In calendar year 2023, there were 90,463 forms filed, or approximately 44.37 (rounded up) times per service provider. We used this data as the basis for our calculations below.

(4) Estimated time per response: 1.5 hours.

(5) Total annual hour burden: 135,706 hours.

2,039 (respondents) x 44.37 (responses) x 1.5 (hours per response) x 1 (occasionally) = 135,706 total annual burden hours.

(6) Total estimate of in-house cost to respondents: $5,766,133.

(7) Explanation of calculation: We estimate that this obligation will take 2,039 (respondents) x 44.37 (responses) x 1.5 (hours per response) x 1 (occasionally) x $42.49 (cost per response) = $5,766,133.

Summary of Estimated Total Annual Burden Hours for FCC Form 474:

Total Number of Respondents: 2,039 respondents

Total Number of Responses: 90,470 responses

Total Annual Hourly Burden: 135,706 hours

d. Recordkeeping, Audits, and Inspections

(1) Number of respondents: 12,957 (8,415 Billed Entities and 4,542 service providers)

(2) Frequency of response: On occasion.

(3) Total number of responses per respondent: 1

(4) Hourly burden per respondent: 1 hour (recordkeeping requirement).

(5) Total annual burden:

12,957 (respondents) x 1 (estimated number of responses) x 1 hour (hours per response) = 12,957

(6) Total estimate of in-house cost to respondents: $550,543

(7) Explanation of calculation: We estimate that:

(a) Approximately 12,957 respondents will spend approximately 1 hour to comply with the requirements for recordkeeping. (12,957 respondents x 1 hour x 1 submission = 12,957).

(b) Approximately 12,957 respondents will spend approximately 1 hour to comply with the recordkeeping requirements at a cost of $42.49 per hour.

12,957 hours x $42.49 per hour = $550,543

Summary of Estimated Total Annual Burden Hours for Recordkeeping:

Total Number of Respondents: 12,957 respondents

Total Number of Responses: 12,957 responses

Total Annual Hourly Burden: 12,957 hours

The estimated respondents, responses, and burden hours are listed below:

Information Collection Requirements	Number of Respondents	Total Number of Responses	Hourly Burden Per Response	Total Annual Hourly Burden	Total In-House Cost to the Respondents
a. Schools and Libraries Program FCC Form 472	8,415	25,245	1.5 hour	37,868	$1,608,990
b. Schools and Libraries Program FCC Form 473	4,542	4,542	1.5 hours	6,813	$289,484
c. Schools and Libraries Program FCC Form 474	2,039	90,470	1.5 hours	135,706	$5,766,133
d. Schools and Libraries Program	12,957	12,957	1 hour	12,957	$550,543

Information Collection Requirements	Number of Respondents	Total Number of Responses	Hourly Burden Per Response	Total Annual Hourly Burden	Total In-House Cost to the Respondents
Recordkeeping					
Grand Total	27,953	133,214	5.5 hours	193,344	$8,215,150

13. *Total Annual Costs to Respondents*: Estimates for the cost burden of the collection to respondents. There are no outside contracting costs for this information collection. See the total in item 12 above for the estimated in-house costs to respondents.

14. *Estimates of the cost burden to the Commission*. There will be few, if any, additional costs to the Commission because notice, enforcement, and policy analysis associated with the Universal Service Fund are already part of the Commission's duties. Moreover, there will be minimal cost to the Federal government because a third party, USAC, administers the E-Rate program.

15. *Program changes or adjustments*. The Commission is reporting an adjustment to the total burden hours within this submission. The adjustment is due to updated information on actual submissions of the FCC Form 472, FCC Form 473, and FCC Form 474, and the change in number of respondents. For FCC Form 472: the number of respondents decreased by 1,085 from 9,500 to 8,415; responses decreased by 3,255 from 28,500 to 25,245; and annual burden hours decreased by 4,882 from 42,750 to 37,868. For FCC Form 473: the number of respondents and responses decreased by 458 from 5,000 to 4,542; and the annual burden hours decreased by 687 from 7,500 to 6,813. For FCC Form 474: the number of respondents decreased by 61 from 2,100 to 2,039; the number of responses increased by 27,470 from 63,000 to 90,470; and the annual burden hours increased by 41,206 from 94,500 to 135,706. Overall, for the adjustments, the number of respondents increased by 11,353 from 16,600 to 27,953, the number of responses increased by 36,714 from 96,500 to 133,214, and the total annual burden increased by 48,594 from 144,750 to 193,344.

16. *Collections of information whose results will be published*. Non-proprietary information will be made publicly available for the benefit of all interested parties.

17. *Display of expiration date for OMB approval of information collection*. The Commission seeks continued approval to not display the expiration date for OMB approval of this information collection. The Commission will use an edition date in lieu of the OMB expiration date. This will prevent the Commission from having to repeatedly update the expiration date on the forms each time this collection is submitted to OMB for review and approval. OMB approval of the expiration date of the information collection will be displayed on OMB's website.

18. Exceptions to certification statement for Paperwork Reduction Act Submissions.

    There is an exception to the Certification Statement because of the change in the total annual burden hours being published in the 60/30-day notices in the FR as 195,615 and now it is 193,344. This change is due to the change in the estimated time per response on the FCC Form 473. The estimated time per response was decreased by 0.5 hour from 2.0 hours to 1.5 hours due to the removal of the

data usage reports and non-usage notices that the now rescinded 2024 *Wi-Fi Hotspots Order*, required service providers to provide for WiFi hotspots and services used off premise.

There are no other 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.