

**SUPPORTING STATEMENT
U.S. DEPARTMENT OF COMMERCE
NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION
NTIA/FCC WEB-BASED FREQUENCY COORDINATION SYSTEM
OMB CONTROL NO. 0660-0018**

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

The National Telecommunications and Information Administration (NTIA) developed an Internet web-based system that collects specific identification information from applicants seeking to operate in the 70-80-90 GHz radio frequency (RF) bands that are shared on a co-primary basis by federal and non-federal users. Before this system was put in place, non-federal entities were required to submit an application for RF spectrum support to the Federal Communications Commission (FCC), which would then coordinate with NTIA regarding whether the proposed use would cause harmful interference to existing or planned U.S. Government operations in the identified band. Under that system, non-federal users only had access to FCC licensing databases that contained the physical parameters of radio stations held by private sector licensees. Consequently, in shared bands, non-federal applicants would have to propose frequencies without any knowledge of existing federal assignments in those bands. Under that system, the manual RF assignment process used by the FCC and NTIA took weeks, months, and, in extreme cases, up to a year, to complete.

The web-based system provides a means for non-federal applicants to rapidly determine the availability of RF spectrum in a specific location, or the need for detailed frequency coordination with the U.S. Government of a specific newly proposed assignment within the shared portions of the radio spectrum. The website allows the non-federal applicant's proposed radio site information to be analyzed, and a real-time determination to be made as to whether there is a potential for interference to, or from, existing federal government radio operations in the vicinity of the proposed site. The system also helps expedite the coordination process for non-federal applicants while assuring protection of government data relating to national security. The information provided by non-federal applicants also ensures the protection of the applicant's station from radio frequency interference from future government operations.

Non-federal entities are required to submit information regarding the physical characteristics of the proposed radio station and the proposed location of the operation. This information is necessary to make a determination regarding electromagnetic compatibility among radio stations in the frequency band. The name and address of the proposed licensee of the station is also required. Once the proposed station has been registered in the Government Master File (GMF), it will then be protected from interference as a result of future government installations.

Terms of Clearance Action

A Notice of Action (Approved with change) was issued on September 27, 2007 and the Terms of Clearance stated:

‘NTIA needs to come back with further justification on the use of persistent cookies website and what policy official has signed off on this request.’

The expiration date on the notice was November 30, 2007.

OMB was informed that the website did not contain persistent cookies thus no policy official signature was required. NTIA was instructed to clarify its cookie policy statement and OMB supplied the following:

The Webcoord site uses non-persistent cookies to track that you have LOGGED-ON to the protected area of the web site. For this reason we ask the web site users to enable the "Accept Cookies" option in their preferred browsers. If you decline cookies, you will have difficulty accessing most of the pages of the Webcoord Protected Area. Webcoord Pages only use cookies to retrieve session information, that was originated by this site.

This was added to the website. This supporting statement is required to address the Terms of Clearance and request a three-year approval

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If NTIA’s Information Quality Guidelines apply, state this and confirm that the collection complies with the Guidelines.

The information submitted to the website (<http://freqcoord.ntia.doc.gov/terms.aspx>) is used by NTIA to ensure the mutual compatibility of proposed non-federal radio stations with existing federal radio stations and planned future use. The data is used for analysis on a continuous basis by the federal agencies to assure mutual compatibility of future government operations. If information were disseminated by NTIA in connection with operation of this website, such dissemination will comply with NTIA’s Information Quality Guidelines.

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.

NTIA collects the data by means of an Internet web-based system. The two applications on the website provide real-time responses: (1) obtain either a validation of the coordination of a single frequency, or (2) a notification of the unavailability of a frequency at the one site and further coordination will be required by the FCC and NTIA.

4. Describe efforts to identify duplication.

The web-based system is a novel approach to spectrum management, providing a means for non-federal applicants to determine rapidly the availability of RF spectrum in a specific location, or the need for detailed frequency coordination of a specific newly proposed assignment within the shared portions of the radio spectrum. The type of information requested from non-federal applicants is not only unique to this system, but also specific to the applicant, and therefore, unlikely to be available from any other source. Moreover, no other federal agency collects identical information because no other agency provides the same service. Thus, the information collection does not raise duplication concerns.

5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

The data requested through the website is the minimum data set required to perform an analysis of the potential interference to and from a proposed radio station.

6. Describe the consequences the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

As noted above, this website was developed in order to streamline the spectrum management process. The website allows a non-federal applicant's proposed radio site information to be analyzed, and a real-time determination to be made as to whether there is a potential for interference to, or from, existing federal government radio operations in the vicinity of the potential site. The web-based system helps expedite the coordination process for non-federal applicants while assuring protection of sensitive data about government operations. The information provided by non-federal applicants also ensures the protection of the applicant's station from radio interference from future government operations. Without it, NTIA would have to analyze the non-federal applicant's proposed radio site information manually to determine whether a potential existed for interference to, or from, federal government radio operations in the vicinity of the proposed site. Such a manual check is extraordinarily labor-intensive, taking weeks, months, and, in extreme cases, up to a year to complete.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

The data collection is consistent with OMB guidelines.

8. Provide the information of the PRA Federal Register notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions take by the agency in response to those comments. Describe the efforts to consult with persons outside the agency or to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A Federal Register Notice was published on May 30, 2007 (Vol. 72, page 29983). No comments were received.

The FCC and NTIA had discussions over several years to identify a mechanism that would provide non-federal users with an additional level of information that would expedite the frequency assignment process without compromising information contained within the Government Master File that is either classified or currently not releasable under the Freedom of Information Act (FOIA). In response, NTIA developed this website to assist non-federal users in their efforts to identify available spectrum for use, and also to help expedite the coordination process for federal agencies.

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

NTIA will not provide gifts or payments to respondents.

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

No assurance of confidentiality will be provided to respondents. NTIA will treat the information as business confidential.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

The survey does not contain any questions of a sensitive nature.

12. Provide an estimate in hours of the burden of the collection of information.

The estimation of burden hours -

Estimated Responses - 3, 000

Estimated Time per Response - 15 minutes

Estimated Total Burden Hours - 750

13. Provide an estimate of the total annual cost burden to the respondent or recordkeepers resulting from the collection (excluding the value of the burden hours in #12 above).

Respondents will not incur any costs to use the website. The service will be offered free-of-charge.

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

NTIA has planned and allocated sufficient resources for the operation, and maintenance of the Internet web-based system. There was a one-time software development cost to the federal government of \$12,750 including overhead. This estimate was based on 160 hours each for salaries of GS-13/5 and GS-12/1 Information Technology Analytical Model Development staff.

Currently, the yearly personnel costs including overhead to process the data collected is \$2,399. This estimate is based on the salary of a GS-12/1 employee, working an estimated 15 minutes per day, x 250 workdays x \$31.99/hr (+ 20% overhead) = **\$2,399.25**

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB 83-I

The website had an increase in the number of respondents/responses thus an adjustment is required.

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

NTIA will not publish the data collected.

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

Not applicable.

18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I.

No exceptions are requested.

Terms of Clearance as Stated in Previous Submission -

‘Terms of Clearance: In the "Security, Privacy, and Accessibility Notice", NTIA shall include a section under the title that explicitly states that this information collection is voluntary, that this submission is not required in order to obtain permission to operate in the desired frequency, i.e., if an individual or station desires, they can go through with the FCC process, but it may take considerably longer to coordinate and approve. In addition, a contact for the site operator needs to be included on the site, in case of comments or questions.’

Compliance: The section informing the public that ‘this submission is not required in order to obtain permission to operate...’ has been added to the "**Security, Privacy, and Accessibility Notice**" website. A contact phone number was on the site and contact email address was added.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection of information will not employ statistical methods.