

SUPPORTING STATEMENT
U.S. Department of Commerce
National Telecommunications and Information Administration
Broadband Technology Opportunities Program (BTOP) Quarterly
and Annual Performance Progress Reports
OMB Control No. 0660-0037

A. JUSTIFICATION

This is an emergency review request to revise the currently approved information collection format required for National Telecommunication and Information Administration (NTIA) to obtain annual performance information from Broadband Technology Opportunities Program (BTOP) infrastructure grant recipients will enable NTIA to further facilitate monitoring and oversight efforts of existing grants and more accurately track project progress against program specific objectives critical to the success of the program. NTIA is requesting approval by November 30, 2011.

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

The American Recovery and Reinvestment Act of 2009 (Recovery Act) appropriated \$4.7 billion for BTOP to support the deployment of broadband infrastructure, enhance and expand public computer centers, encourage sustainable adoption of broadband service, and develop and maintain a nationwide public map of broadband service capability and availability.

Section 6001 of the Recovery Act establishes five core purposes to be advanced by projects funded under BTOP:

- (1) To provide access to broadband service to consumers residing in unserved areas of the country;
- (2) To provide improved access to broadband service to underserved areas of the country;
- (3) To provide broadband access, education, and support to community anchor institutions (*e.g.*, schools, libraries, medical facilities), or organizations and agencies serving vulnerable populations (*e.g.*, low-income, unemployed, aged), or job-creating strategic facilities located in state or federally designated economic development areas;
- (4) To improve access to, and use of, broadband service by public safety agencies; and
- (5) To stimulate the demand for broadband, economic growth, and job creation.

To ensure that these five core purposes are achieved, the Recovery Act mandates that funds distributed under its authority be subject to an unprecedented level of transparency and accountability. This includes an increased level of monitoring and oversight to ensure that Recovery Act funds are used for their authorized purposes; steps are in place to prevent waste, fraud or abuse; and BTOP projects avoid unnecessary delay and cost-overruns and meet targets and goals.

In addition to increased levels of monitoring and oversight, BTOP projects must adhere to mandatory timelines requiring them to demonstrate that each project will be substantially completed within two years of the grant's issuance date and finished within three years of the grant award. If projects have not been completed or funds have not been spent within this timeline, NTIA shall reclaim them to the extent permitted by law. In light of these pressing timelines, NTIA has been directed to establish aggressive targets, consistent with programmatic objectives, for outlaying the remaining funds and completing BTOP grant projects.

To enable NTIA to properly achieve this increased level of oversight and monitoring and verify that BTOP projects are meeting established targets and goals within the mandated timeframes, the Recovery Act stipulates that the Assistant Secretary of Commerce for Communications and Information:

- (1) shall require any entity receiving a BTOP grant to report quarterly, in a format specified by the Assistant Secretary, on such entity's use of assistance and progress fulfilling the objectives of the grant;
- (2) may establish additional reporting and information requirements for any recipient of any assistance made pursuant to the BTOP grant; and
- (3) shall establish appropriate mechanisms to ensure appropriate use and compliance with all terms of any use of funds made available under a BTOP grant.

To comply with these stipulations, NTIA has developed and utilized Performance Progress Reports (PPRs) to capture quarterly and annual reports for each project type (Infrastructure, Public Computer Center, and Sustainable Broadband Adoption). Each PPR provides updates on fundamental project milestones and key performance indicators that allow NTIA to measure project progress and ensure proper monitoring and compliance with program rules.

NTIA has reviewed recent PPRs, submitted on September 30, 2011, and assessed the individual responses provided by BTOP grant recipients and concluded that several key questions on the existing annual Infrastructure PPR need to be clarified if NTIA is to receive the appropriate level of detail necessary to ensure BTOP projects are meeting established targets and goals within mandated timeframes. For example, the existing annual PPR provides text boxes for BTOP awardees to provide narrative descriptions of their interconnection agreements and peering and transit agreements, two data elements that contribute to key objectives of a middle mile broadband or comprehensive community infrastructure project. To date, the data provided by BTOP awardees in the text boxes has not included the level of detail necessary for NTIA to adequately assess the progress of BTOP funded projects. As a result, NTIA is seeking to modify its existing annual PPR for Infrastructure awards by clarifying and revising the format of the questions so that the required data will be submitted in a more accurate and consistent fashion. Additionally, NTIA is requesting Infrastructure recipients provide updated mapping information in order to better monitor the current status and impact of broadband deployment in each of the funded project areas. The data submitted as a result of the proposed modified annual PPR will enable NTIA to assess more accurately the progress of BTOP projects in relation to established implementation and performance indicators and to better monitor project compliance with applicable grant award terms and conditions.

The revision adds three questions to the form which directs recipients to an addendum (Excel) document.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

NTIA will collect the supplemental project implementation information of each individual BTOP infrastructure grantee through annual PPRs. Currently, the annual PPR, submitted voluntarily at the end of each calendar year, asks a series of questions that broadly address BTOP programmatic objectives and outcomes, BTOP program requirements, and information needs of external audiences. The supplemental information request will expand the Infrastructure annual PPR by adding a series of questions that focus on specific BTOP objectives and outcomes allowing NTIA to more accurately assess and evaluate awardees progress towards BTOP's program goals and better monitor grant compliance with award terms and conditions. The specific information covered by the proposed modified annual PPR focuses on key performance areas previously identified as part of BTOP specific reporting requirements. The additional questions require more detailed information relating to:

- **Community Anchor Institutions (CAIs)** – meaning schools, libraries, medical and healthcare providers, public safety entities, community colleges and other institutions of higher education, and other community support organizations and agencies that provide outreach, access, equipment, and support services to facilitate greater use of broadband service by vulnerable populations, including low-income, the unemployed, and the elderly.
- **Points of Presence (POPs)** - meaning the location where an interexchange carrier establishes a physical presence in a geographic area and local exchange carriers terminate broadband access services. The term is also applied to Internet gateways or so-called “carrier hotels,” where a broadband network may interconnect with the Internet or high-capacity transport networks.
- **Network Maps** - meaning a map, in an electronic file format compatible with Google Earth, which identifies the most up-to-date route plan for a BTOP project, including segments of project that have been completed and/or are part of planned construction.

NTIA intends to use the information collected to better track project progress against program specific objectives and further facilitate monitoring and oversight efforts of existing grants. NTIA will make annual PPRs available to the public on its website, pursuant to the Recovery Act and the two BTOP Notices of Funds Availability (NOFAs). On an annual basis, NTIA will publicly post a data extract in Excel format that contains a subset of key metrics and performance data for each report. Recipients' proprietary information will remain confidential. NTIA has taken special steps to ensure maximum utility, accuracy, integrity, and objectivity of the information to be collected in accordance with NTIA's published Information Quality Guidelines. Federal Program Officers will verify the accuracy of performance reporting information submitted by recipients through monitoring activities. These activities will include

frequent communication with recipients and may, under certain circumstances, also include desk reviews of reports and/or site visits.

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 will have grant recipients submit their annual performance progress reports through its existing post-award monitoring database/document transfer system. Recipients subject to this request are already familiar with the system and successfully utilizing it to meet current grant performance reporting requirements.

The post-award monitoring system allows grant recipients to submit program specific performance reports. The system interfaces with the National Oceanic and Atmospheric Administration (NOAA) grant management system. Using data from these sources, the system automatically populates relevant sections of grant recipient reports so that grant recipients are not forced to re-enter information that exists elsewhere.

If any grant recipients have difficulty submitting their reports online, NTIA will work with them to find alternative methods of submission.

4. Describe efforts to identify duplication.

NTIA has taken care to ensure that reporting forms will not ask for information already submitted by grant recipients in other reports. Also, as previously mentioned, the post award monitoring system will populate relevant fields of reports with information from the NOAA grant management system as well as the BTOP application database.

BTOP PPRs ask specific questions relating to BTOP awards and their operational performance. The main objective of the performance report is to capture key data and information that are specific to BTOP and each recipient's award. This information can only be collected from recipients and is not available elsewhere.

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

BTOP grant recipients include a variety of small entities, including schools, local governments, libraries, and for-profit and non-profit companies. To minimize the burden on these entities, NTIA will have grant recipients submit their annual PPRs through its existing post-award monitoring database/document transfer system. All recipients subject to this request are already familiar with the system and successfully utilizing it to meet current grant performance reporting requirements. However, NTIA will work with grant recipients to provide other solutions to minimize the burden, as necessary.

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

If this supplemental information is not collected, NTIA will be substantially impaired in fulfilling regulatory and statutory requirements imposed by the Recovery Act and the Department of Commerce's implementation of OMB's Uniform Administrative Requirements.

In addition, NTIA's ability to accurately determine the progress of BTOP projects is vital to ensuring project effectiveness and implementing proper oversight and monitoring activities. If the additional information requested on annual reports is not collected, NTIA will be unable to accurately assess the progress and impact of BTOP projects and be more limited in its efforts to identify project risks, address project issues, and implement timely and necessary monitoring and oversight.

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

This information collection is consistent with OMB guidelines.

8. Provide a copy 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 taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency 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 soliciting public comment on this revision by November 30, 2011, will be submitted to coincide with the submission of this information collection request (copy in ROCIS).

NTIA has engaged the services of Booz Allen Hamilton to support the development of post-award management process, including the annual PPRs and to calculate burden estimates.

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

Not Applicable.

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

NTIA will protect confidential and proprietary information from public disclosure to the fullest extent authorized by applicable law, including the "Freedom of Information Act," as amended

(5 U.S.C. § 552 *et seq.*), the “Trade Secrets Act,” as amended (18 U.S.C. § 1905 *et seq.*), and the “Economic Espionage Act of 1996,” as amended (18 U.S.C. § 1831 *et seq.*).

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.

Not Applicable.

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

NTIA has developed burden estimates for annual reports for the Infrastructure funding category based on the activity breakdown analysis of reporting forms. A team of consultants reviewed the forms, including the supplemental questions, in detail. Each individual reviewer estimated how much time it would take for them to perform the following activities:

- Reviewing instructions;
- Collecting and processing information;
- Adjusting existing practices to comply with the rules of information collection;
- Searching data sources;
- Completing and reviewing the response (on a field-by-field basis); and
- Transmitting and disclosing the information

First, the analysis team averaged out their burden hours for each activity, not including the supplemental questions, to produce an activity breakdown for the current annual Infrastructure PPR. Then, each individual added up the hour burden. However, the burden resulting from the supplemental questions has been separated out to provide specific detail about impact to the estimated burden of hours to collect the information.

Infrastructure Grants (121 respondents)				
Type of Form	Annual Responses Required	Total Responses Expected	Hour Burden Per Response	Aggregate Hour Burden
Current Annual Report	1	123	3.94	485
Additional Questions Burden	1	121	2	242
NEW AGGREGATE ANNUAL TOTAL	1	121	5.94	727

NTIA is not revising the other forms previously approved as part of this information collection. Therefore, the hour burden for these forms will not change.

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

NTIA does not anticipate any additional cost burden to the BTOP grant recipients resulting from this collection of information.

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

This is a recurring collection of limited cost to NTIA. NTIA will collect and store the information in electronic format for a maximum of 121 responses annually and will not need to acquire additional information systems for the collection and storage of data. Therefore, costs associated with printing, equipment, and support services are incidental to general NTIA administrative and infrastructure costs. The cost of reviewing the additional responses is a small portion of the salaries of staff time assigned to the program. Total annual staff time to review the annual reports including the additional questions is not expected to exceed 600 hours, which is less the 1% of total program staff time.

Estimated Cost: 600 hours annually at \$55 per hour (based on GS-14 staff salary) = \$ 33,000.

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

This revision is a program change increase of 234 burden hours due to the new survey questions and addendum; and an adjustment decrease of -2 respondents/responses due to a revised estimate. The chart below is a summary of the proposed modified questions for the annual infrastructure PPR and the addendum document (Excel spreadsheet) provides the required detailed information (in IC List as part of infrastructure PPR). The proposed modified questions focus on reporting categories NTIA previously identified as part of its BTOP specific reporting requirements.

Questions for the Proposed Addendum to the Annual Project Performance Report	Rationale for Revised Data Request
<p>1. Please provide an updated list of Community Anchor Institutions (CAIs) that you have connected and plan to connect to your network. The list should include only those CAIs that you will connect as part of your BTOP grant project within your grant’s period of performance. Include the following information:</p>	<p>Pub. L. No. 111-5, 123 Stat, 115, 128 (2009) Sec 6001 (i)(5) states that the Assistant Secretary shall create and maintain a database "to allow that public to understand and monitor the grants awarded under the program." This data request will allow NTIA to more accurately identify the Community Anchor Institutions that are the beneficiaries of BTOP-funded projects. The information NTIA seeks under this request will enable the public to better understand and monitor the grants awarded under the BTOP program.</p>
<p>2. Please provide a list of community pairs that are receiving new or improved broadband service as a result of BTOP grant funds. Typically, these community pairs are defined by connections between Points of Presence</p>	<p>Pub. L. No. 111-5, 123 Stat, 115, 128 (2009) Sec 6001 (i)(5) states that the Assistant Secretary shall create and maintain a database "to allow that public to understand and monitor the grants awarded under the program." The questions related to peering and transport</p>

Questions for the Proposed Addendum to the Annual Project Performance Report	Rationale for Revised Data Request
<p>(POPs) in two communities. BTOP awardees are asked to identify all community pairs where BTOP funds were used for any of the following: 1) to construct a new POP, 2) to install or upgrade equipment in one of the two POPs constituting a community pair, or 3) to construct or improve the network that connects the POPs. When listing the community pairs associated with your project, please include all POPs that provide transport to an Internet gateway or carrier hotel. For example, if BTOP funds were used to deploy or upgrade a POP or segments that connects to an existing Internet gateway on your network, please specify as a community pair the improved POP and Internet Gateway pair. Similarly, if BTOP funds were used to acquire a connection to an Internet gateway or carrier hotel operated by another provider, please include this link in the list of community pairs you provide.</p>	<p>agreements in the existing Annual PPR are text boxes. The text boxes provide limited opportunity for awardees to provide the data necessary to illustrate the significance of the agreements. The revised data request identifies the specific elements of interconnection and peering agreements (including the location of the network interconnection points or POPs and the speed of the transit agreements) that best demonstrate the impact of such agreements on the funded service areas of a BTOP project. Understanding the location where the interconnection occurs allows NTIA to more accurately identify the communities that are and will be the beneficiaries of BTOP-funded projects. With this data, NTIA will be able to identify the benefits that should be accruing to the residents of those communities. The information NTIA seeks under this request will enable the public to better understand and monitor the grants awarded under the BTOP program.</p>
<p>3. Network Mapping- Please provide up-to-date network route maps in a single file, in a Google Earth compatible format (e.g., KMZ file). Maps should reasonable approximations and do not have to be based on GPS or survey information at each point. These maps should have individual layers for each of the following:</p>	<p>Maps that identify the location (at reasonable approximations) of broadband facilities both constructed and leased with BTOP funds will help the public to understand and monitor the grants awarded under the BTOP program and will facilitate NTIA's efforts to monitor compliance and track project progress against program specific project objectives that awardees set forth in their application for BTOP funds.</p>

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

Information from infrastructure grant recipients' annual PPRs will be made available to the public via the NTIA website.

NTIA is required to make publicly available on the Internet a list of each entity that has applied for a grant, a description of each application, the status of each application, the name of each entity receiving funds, the purpose for which the entity is receiving funds, each quarterly report, and other information as the Assistant Secretary deems necessary to meet BTOP objectives.

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. The expiration date for OMB approval will be displayed on the paper and electronic versions of the PPR.

18. Explain each exception to the certification statement in Item 19.

No exceptions are requested.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

The collection of information will not employ statistical methods.