

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.

**Circumstances Necessitating Change to Information Collection:** The Federal Communications Commission (FCC or Commission) is requesting Office of Management and Budget (OMB) approval for a revision of this information collection. The revision results from a *Report and Order* (FCC 13-158) adopted by the Commission on December 12, 2013, requiring certain 911 communications providers (Covered 911 Service Providers) to notify public safety answering points (PSAPs) of major disruptions in 911 service with more specific information within specified time limits. These changes result in an increased estimate of burden-hours for Covered 911 Service Providers.

Since 1992, the FCC has required telecommunications carriers (other than cellular and satellite providers) to report significant disruptions to voice and paging communications services.<sup>1</sup> In 2004, by *Report and Order*, the Commission superseded the original reporting requirements, and created a new Part 4 of Title 47 of the Code of Federal Regulations (C.F.R.) to house the modified and expanded outage reporting requirements embodied in the existing service disruption rules.<sup>2</sup> Among other things, the *Report and Order* extended the reporting requirements to include disruptions to wireless and satellite communications. In 2012, the Commission further expanded its Part 4 outage reporting requirements<sup>3</sup> to interconnected voice over Internet protocol (VoIP) providers.<sup>4</sup> These rules required covered service providers to notify "911 special facilities," such as PSAPs, of major disruptions in 911 service, but they only required notification "as soon as possible" with "all available information that may be useful."<sup>5</sup>

In June 2012, a powerful derecho storm struck the Midwest and Mid-Atlantic United States, causing widespread disruptions in 911 service. Across the storm's path, at least seventy-seven PSAPs serving more than 3.6 million people in six states lost some

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<sup>1</sup> See former 47 C.F.R. Section 63.100 (2003) (first adopted in 1992). See In the Matter of Notification by Common Carriers of Service Disruptions, CC Docket No. 91-273, *Report and Order*, 7 FCC Rcd 2010 (1992); *Memorandum Opinion and Order and Further Notice of Proposed Rulemaking*, 8 FCC Rcd 8517 (1993); *Second Report and Order*, 9 FCC Rcd 3911 (1994); *Order on Reconsideration of Second Report and Order*, 10 FCC Rcd 11764 (1995).

<sup>2</sup> See In the Matter of New Part 4 of the Commission's Rules Concerning Disruptions to Communications, ET Docket No. 04-35, FCC 04-188, *Report and Order and Further Notice of Proposed Rulemaking*, 19 FCC Rcd 16830 (2004) (*Part 4 Order*).

<sup>3</sup> 47 C.F.R. Part 4.

<sup>4</sup> See The Proposed Extension of Part 4 of the Commission's Rules Regarding Outage Reporting to Interconnected Voice Over Internet Protocol Service Providers and Broadband Internet Service Providers, PS Docket No. 11-82, *Report and Order*, 27 FCC Rcd 2650 (2012).

<sup>5</sup> See *Part 4 Order*, 19 F.C.C. Rcd. at 16925-26.

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degree of network connectivity, including vital information on the location of 911 callers.<sup>6</sup> At least seventeen 911 call centers in three states lost service completely, affecting the ability of more than two million residents to reach 911.<sup>7</sup> Through its inquiry into these 911 outages, the Commission learned that many PSAPs' efforts to restore service were complicated by inadequate information and otherwise ineffective communication by service providers. Multiple PSAPs stated that they contacted their 911 service provider to report a loss of service before being contacted by the provider, and others received notification in the form of "cryptic" e-mails that referenced problems in one central office but did not specify all of the jurisdictions affected.<sup>8</sup> Inadequate information from service providers during the derecho also led some PSAPs to activate ineffective reroutes of 911 calls, or to keep a reroute active even though service had been restored on the original route.<sup>9</sup>

**Revised Information Collection Requirements:** On December 12, 2013, the Commission adopted a *Report and Order* amending section 4.9 of its rules to require more specific 911 outage notifications to PSAPs within specified time periods.<sup>10</sup> Under the new rule, Covered 911 Service Providers must notify PSAPs of outages that potentially affect a 911 special facility within thirty minutes of discovering the outage and provide contact information such as a name, telephone number, and e-mail for follow-up. Whenever additional material information becomes available, but no later than two hours after the initial contact, the Covered 911 Service Provider must communicate additional detail to the PSAP, including the nature of the outage, its best-known cause, the geographic scope of the outage, and the estimated time for repairs.<sup>11</sup> Notifications must be transmitted by telephone and in writing via electronic means, unless the PSAP and service provider have agreed in advance to an alternative method.<sup>12</sup> The Commission observed that these changes "will provide more guidance on expectations for providers, and increased compliance with the outage notification rules."<sup>13</sup> The new requirements apply only to entities defined as Covered 911 Service

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<sup>6</sup> See FCC PUB. SAFETY & HOMELAND SEC. BUREAU, IMPACT OF THE JUNE 2012 DERECHO ON COMMUNICATIONS NETWORKS AND SERVICES: REPORT AND RECOMMENDATIONS at 3-4 (PSHSB, rel. Jan. 10, 2013), available at <http://www.fcc.gov/document/derecho-report-and-recommendations> (*Derecho Report*).

<sup>7</sup> *Id.* at 4.

<sup>8</sup> See *id.* at 29, 34.

<sup>9</sup> *Id.* at 43.

<sup>10</sup> See 47 C.F.R. § 4.9(h); In the Matter of Improving 911 Reliability; Reliability and Continuity of Communications Networks, Including Broadband Technologies, PS Docket Nos. 13-75, 11-60, *Report and Order*, 28 FCC Rcd 17476 (Dec. 12, 2013), available at [http://transition.fcc.gov/Daily\\_Releases/Daily\\_Business/2013/db1212/FCC-13-158A1.pdf](http://transition.fcc.gov/Daily_Releases/Daily_Business/2013/db1212/FCC-13-158A1.pdf) (*911 Reliability Order*).

<sup>11</sup> *911 Reliability Order*, 28 FCC Rcd at 17526-27, ¶¶ 140-141.

<sup>12</sup> *Id.* at 17527-28, ¶ 144.

<sup>13</sup> *Id.* at 17528, ¶ 146.

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Providers under FCC rules,<sup>14</sup> and outage reporting obligations for other entities remain unchanged. Accordingly, this Supporting Statement focuses on the new information collection burden for Covered 911 Service Providers rather than the existing burden for communications outage reporting generally, which was approved by OMB most recently in 2012.<sup>15</sup> However, the Commission does include the existing burden as a part of this collection when accounting for the total burden hours covered by this information collection because the requirements still remain a part of this collection and remain unchanged since last approved by the OMB.

Statutory authority for this collection of information is contained in 47 U.S.C. sections 151, 154(i)-(j) & (o), 201(b), 214(d), 218, 251(e)(3), 301, 303(b), 303(g), 303(r), 307, 309(a), 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.

**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.**

As stated in previous filings for this information collection, the general purpose of the Commission's Part 4 rules is to gather sufficient information regarding disruptions to telecommunications to facilitate FCC monitoring, analysis, and investigation of the reliability and security of voice, paging, and interconnected VoIP communications services, and to identify and act on potential threats to our Nation's telecommunications infrastructure. The FCC uses this information collection to identify the duration, magnitude, root causes, contributing factors, and preventive measures taken with respect to significant outages, and to take swift remedial action as required in appropriate circumstances. The Commission also maintains an ongoing dialog with reporting entities, as well as with the communications industry at large, generally regarding lessons learned from the information collection in order to foster better understanding of the root causes of significant outages, and to explore preventive measures in the future so as to mitigate the potential impact of such outages on the Nation and the American public. Collection of such information through the Commission's Network Outage Reporting System (NORS) has already been approved by OMB and is not affected by these revisions.

The new obligations referenced here involve information provided to third parties (*i.e.*, PSAPs and other "911 special facilities") that are potentially experiencing a 911 outage. While the amended rule will not result in new or different information submitted directly to the FCC, it will require Covered 911 Service Providers to transmit more specific information to PSAPs to improve their situational awareness and ability to

<sup>14</sup> See 47 C.F.R. § 12.4(a)(4); *911 Reliability Order*, 28 FCC Rcd at 17488, ¶ 36.

<sup>15</sup> See Supporting Statement, OMB Control No. 3060-0484, Extension of Part 4 Outage Reporting to Interconnected Voice over Internet Protocol (VoIP) Services (July 2012).

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respond to 911 outages. Such notifications are necessary because PSAP personnel depend on reliable 911 service to answer emergency calls and dispatch help when needed. When 911 service is compromised, PSAPs require prompt notification and useful information about the outage so that they may make alternate plans to reroute calls until service is restored.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

The Part 4 information collection is administered by the FCC's Public Safety and Homeland Security Bureau (PSHSB), which maintains an Internet portal for the electronic submission of NORS outage reports.<sup>16</sup> This electronic filing requirement entails entering the required information using Commission-approved Web-based outage report templates that are available online at the NORS Internet Web portal. The completion of these online templates results in the information being electronically entered into the Commission's NORS reporting data base in real-time.

As noted above, this revision requires information to be transmitted to third parties, not directly to the FCC. Therefore, it would not be feasible to use the NORS Web portal, or any other automated system administered by the FCC, to collect information intended for individual PSAPs. The rules do, however, provide flexibility in how Covered 911 Service Providers notify PSAPs of 911 outages, including through electronic methods such as e-mail.<sup>17</sup> Furthermore, the rules allow Covered 911 Service Providers and PSAPs to agree in advance to any other mutually acceptable method of communication, providing additional opportunities for technology to reduce the burden of compliance.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in item 2 above.**

The revised information collection adds specificity to an existing FCC rule, and this agency does not impose any similar information collection on respondents. Useful data about 911 outages is not available from any source other than the associated service provider. News reports, for example, are often anecdotal and do not provide reliable information about a 911 outage in time for a PSAP to take action to mitigate any loss of

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<sup>16</sup> See 47 C.F.R. Section 4.11. In the event of technical impediments to using the Web-based system during the Notification stage, then a written Notification to the Commission by email, Fax, courier, or U.S. mail may alternatively be used.

<sup>17</sup> See 47 C.F.R. § 4.9(h).

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service. Many Covered 911 Service Providers indicate that they already collect the required outage information for internal use, and for submission to the FCC through required NORS reports, which have already been approved by OMB. Therefore, the obligation to provide more specific outage notifications to PSAPs will not generally require collection of new or different information, only a more consistent effort to ensure that transmission of such information is timely and complete. As demonstrated during the June 2012 derecho, the previous requirement to notify PSAPs of 911 outages "as soon as possible" with "all available information that may be useful" was not sufficiently detailed or enforceable to ensure that affected PSAPs received actionable information.

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

In accordance with the Paperwork Reduction Act of 1995, the Commission sought to minimize the burden on all respondents, regardless of size. The revisions here limit the information collection requirements to those absolutely necessary to promote safety of life and property. Although the Commission sought and received comments on possible exemptions or waivers for small or rural entities, it concluded that overriding public safety concerns require the revised information collection to apply equally to all Covered 911 Service Providers. While small or rural service providers may have limited resources or operate in remote areas, the Commission noted that "911 is no less a critical public service in any part of the nation, and we decline to establish two tiers of 911 reliability based on economics or geography."<sup>18</sup>

As noted throughout the *Report and Order*, it is likely that all Covered 911 Service Providers, including small businesses, already collect the information the Commission expects them to share with PSAPs because they have a strong interest to know the existence of and the circumstances behind any significant network outage. All Covered 911 Service Providers, including small entities, also have a strong interest in ensuring that their PSAP customers receive adequate service and support to continue serving the public in an emergency. In the Commission's view, establishing more specific outage notification requirements will promote both public safety and network reliability without imposing unnecessary burdens on industry.

In order to further limit the impact on small businesses or other small entities, the PSAP notification requirement is subject to threshold criteria for outage reports specified in the rules.<sup>19</sup> The Commission's experience suggests that small entities may never experience a 911 outage that reaches the reportable threshold. Were a small Covered 911

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<sup>18</sup> *911 Reliability Order*, Appendix C, ¶ 15.

<sup>19</sup> See 47 C.F.R. § 4.5(e) (defining "an outage that potentially affects a 911 special facility," in part, as "a loss of communications to PSAP(s) potentially affecting at least 900,000 user-minutes and . . . last[ing] 30 minutes or more" or "a loss of 911 call processing capabilities in one or more E-911 tandems/selective routers for at least 30 minutes duration").

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Service Provider to experience an outage of reportable impact, the rules provide flexibility that will help minimize the burden of compliance.

**6. Describe the consequences to a Federal program or policy activity, if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reduce burden.**

The FCC has a statutory mandate to “promot[e] the safety of life and property through the use of wire and radio communications,”<sup>20</sup> and Congress has delegated to the Commission specific responsibilities to “designate 911 as the universal emergency telephone number for reporting an emergency to appropriate authorities and requesting assistance.”<sup>21</sup> The Commission’s efforts to ensure that such reports and requests for assistance can reliably be transmitted are “necessary in the public interest to carry out” these provisions of the Communications Act.<sup>22</sup>

Outage notification to PSAPs is a critical component of the Commission’s efforts to protect public safety by ensuring that 911 communications are as reliable and resilient as possible. As demonstrated during the 2012 derecho, a more general requirement to notify PSAPs of 911 outages “as soon as possible” with “all available information that may be useful” proved insufficient to inform affected PSAPs of service disruptions during a major emergency, or to hold service providers accountable for failure to provide such information. If no reporting of 911 outages to PSAPs – or different thresholds for reporting – were to be required, the Commission would be impeded from fulfilling its statutory obligations under the Communications Act to promote the reliability and security of the nation’s 911 networks for the benefit of all Americans.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with the criteria listed in supporting statement.**

This revised information collection is consistent with the requirements of 5 C.F.R. § 1320 and the criteria listed in this Supporting Statement. We do not anticipate circumstances that would result in a collection of information in an inconsistent manner.

**8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency’s notice, required by 5 CFR 1320.8(d), soliciting comments on the information prior to submission to OMB.**

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<sup>20</sup> 47 U.S.C. § 151.

<sup>21</sup> 47 U.S.C. § 251(e)(3).

<sup>22</sup> 47 U.S.C. § 201(b). See also IP-Enabled Services; E911 Requirements for IP-Enabled Service Providers, *First Report and Order and Notice of Proposed Rulemaking*, 20 FCC Rcd 10245 ¶ 34 (2005), *aff’d sub nom. Nuvio Corp. v. FCC*, 473 F.3d 302 (D.C. Cir. 2007) (*VoIP 911 Order*) (recognizing plenary authority under Section 251(e) to require “network changes” needed to ensure safe, reliable, nationwide 911 system).

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**-Describe 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.**

The *Notice of Proposed Rulemaking* (“*Notice*”) in this proceeding requested public comment on proposals to expand and/or clarify the Commission’s rules regarding 911 outage notification to PSAPs.<sup>23</sup> Specifically, the *Notice* included a proposal to require such notification “immediately by telephone and in writing via electronic means.”<sup>24</sup> Ultimately, based on the record developed in this proceeding, including in-person meetings with representatives of affected 911 service providers, the Commission determined that the amended rules described above would be more flexible and less burdensome than those proposed in the *Notice*. The *Report and Order* adopted in this proceeding on December 12, 2013, contained more extensive discussion on the potential impact of this revised information collection, in which the Commission analyzed in detail parties’ comments.<sup>25</sup>

On July 1, 2014, pursuant to 5 CFR Section 1320.8, a 60 Day Notice was published in the Federal Register (See **79 FR 37316**) for the revised information collection requirements contained in this collection with comments due on or before **(date)**. The Commission did not receive any comments following publication of the Notice.

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

No payment or gift to respondents has been or will be made in connection to this information collection.

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

Outage reports filed with the Commission pursuant to Part 4 are presumed confidential.<sup>26</sup> The information in those filings may be shared with the Department of Homeland Security only under appropriate confidential disclosure provisions. Other persons seeking disclosure must follow the procedures delineated in 47 C.F.R. Sections 0.457 and 0.459 of the Commission's rules for requests for and disclosure of information.

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<sup>23</sup> See In the Matter of Improving 911 Reliability; Reliability and Continuity of Communications Networks, Including Broadband Technologies, PS Docket No. 13-75, PS Docket No. 11-60, *Notice of Proposed Rulemaking*, 28 FCC Rcd 3414, 3443 ¶ 70 (2013).

<sup>24</sup> *Id.*

<sup>25</sup> See *911 Reliability Order*, ¶¶ 139-147.

<sup>26</sup> See 47 C.F.R. Section 4.2.

The revisions noted here do not affect the confidential treatment of information provided to the FCC through NORS reports.

As discussed above, this revision requires information to be transmitted to third parties, not directly to the FCC. Accordingly, the Commission cannot, and does not, guarantee confidentiality of information provided directly to PSAPs. As government entities directly involved in law enforcement, however, PSAPs are well aware of the need to protect sensitive information and have no incentive to disclose information that could compromise fair competition or public safety and national security.

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

This collection of information does not address any matters of a sensitive nature.

**12. Provide estimates of the hour burden of the collection of information. The statement should: indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance.**

Under the new rule, Covered 911 Service Providers must notify PSAPs of outages that potentially affect a 911 special facility within thirty minutes of discovering the outage has reached the reporting threshold and provide contact information such as a name, telephone number, and e-mail for follow-up. Whenever additional material information becomes available, but no later than two hours after the initial contact, the Covered 911 Service Provider must communicate additional detail to the PSAP, including the nature of the outage, its best-known cause, the geographic scope of the outage, and the estimated time for repairs.<sup>27</sup> Notifications must be transmitted by telephone and in writing via electronic means, unless the PSAP and service provider have agreed in advance to an alternative method.<sup>28</sup>

**Number of Respondents:** We estimate that no more than 1,000 entities serving roughly 7,000 PSAPs will be considered Covered 911 Service Providers under this rule. We previously reported a total of 118 respondents subject to existing outage reporting requirements.<sup>29</sup> At least some of these respondents are also likely to be considered Covered 911 Service Providers under the new rule. Thus, to avoid double-counting those providers, we estimate that the revised total will not exceed 1,100 entities, including Covered 911 Service Providers.

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<sup>27</sup> *911 Reliability Order*, 28 FCC Rcd at 17526-27, ¶¶ 140-141.

<sup>28</sup> *Id.* at 17527-28, ¶ 144.

<sup>29</sup> See Supporting Statement, OMB Control No. 3060-0484, Extension of Part 4 Outage Reporting to Interconnected Voice over Internet Protocol (VoIP) Services at 14 (July 2012).

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**Frequency of Response:** The FCC received 446 NORS reports in 2013 involving reportable disruptions to the 911/E911 capabilities of wireline service providers. This number is consistent with past years. We do not include NORS reports involving wireless 911 capabilities because the definition of Covered 911 Service Provider adopted in the *911 Reliability Order* is unlikely to include wireless providers.<sup>30</sup> Accordingly, we expect that approximately 446 incidents will occur each year requiring a Covered 911 Service Provider to notify a PSAP of a 911 outage. If there are 1,000 Covered 911 Service Providers, we expect each one to experience an average of 0.446 reportable 911 outages annually, although that number may vary as discussed below.

We previously reported a total of 15,444 responses per year for all existing outage reporting obligations under Part 4.<sup>31</sup> The revisions discussed here do not change this calculation because the outage reports used as a basis for estimating reportable disruptions to the 911/E911 capabilities are already included in the total.

**Annual Hour Burden:** The existing information collection already approved by OMB includes three components: a Notification that an outage has occurred, an Initial Report containing detailed information on the outage, and a Final Report containing detailed information concerning the outage and how it was resolved. We have previously estimated that reporting entities will require 15 minutes to file a Notification with the Commission and that the more detailed Initial Report will ordinarily not take more than 45 minutes to complete and submit to the Commission. We further estimated that respondents will ordinarily not need more than one hour to complete and submit electronically a Final Report to the Commission within 30 days after the outage was discovered. Thus, the total time needed to file all reports pertinent to each outage that meets or exceeds the reporting threshold criteria were estimated to be less than two (2) hours as follows:

15 minutes [Notification] + 45 minutes [Initial Report] + 1 hour [Final Report]  
= 2 hours maximum

Assuming Covered 911 Service Providers already comply with existing obligations to notify PSAPs of 911 outages “as soon as possible” with “all available information that may be useful,” the incremental burden of this rule will be limited to the labor necessary to ensure that notifications are timely and include required information. Because service providers indicate that they already collect most or all of the specified information (*i.e.*, nature of outage, best-known cause, geographic scope, and estimated time for repairs) in the normal course of business, we conclude that each notification will require no more

<sup>30</sup> See *id.* at 17490, ¶ 39 (noting that “we do not intend today’s rules to apply to wireless providers, VoIP providers, backhaul providers, Internet service providers (ISPs), or commercial data centers based on the functions they currently provide in 911 networks, assuming they do not provide the functions of a Covered 911 Service Provider under our definition”).

<sup>31</sup> See Supporting Statement, OMB Control No. 3060-0484, Extension of Part 4 Outage Reporting to Interconnected Voice over Internet Protocol (VoIP) Services at 14 (July 2012).

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than 30 minutes (0.5 hours) of additional labor. This estimate includes the initial contact within 30 minutes of discovering the outage, which is likely to be a short conversation lasting no more than a few minutes, and the more detailed follow-up within two hours, which may take somewhat longer. The rule does not require Covered 911 Service Providers to maintain *continuous* contact with a PSAP for any amount of time. PSAPs and service providers may also agree in advance to alternative methods of notification that may further reduce the burden of compliance.

**Additional Burden hours:** 446 reportable 911 outages annually \* 0.5 hours per notification = 223 hours annual burden. If there are 1,000 Covered 911 Service Providers, the average burden for each is 0.223 hours.

**Additional In-House Cost:** 446 reportable 911 outages annually \* 0.5 hours per notification \* one technician at \$80.00/hour = \$17,840. If there are 1,000 Covered 911 Service Providers, the average in-house cost for each is \$18.

We previously estimated a total of 29,647 annual burden hours and \$855,000 in annual in-house costs<sup>32</sup> for all existing outage reporting obligation under Part 4. The revisions discussed here increase those estimates by 223 annual burden hours for a total of 29,870 hours and \$872,840<sup>33</sup> in annual in-house costs. As noted above, if the existing information collection required approximately two hours per reportable outage and the revised requirements add approximately one-half hour of additional labor, we now estimate the total time per response to be 2.5 hours.

**Method of Calculating Burden:** These calculations reflect only the burden of complying with new rules for Covered 911 Service Providers regarding timely and specific 911 outage notification to PSAPs. As discussed above, these revisions do not change the number of entities required to file NORS outage reports or the scope of information collected in those reports. That said, we expect the incremental burden of these revisions to be modest because the existing information collection, which has already been approved by OMB, already required communications providers to notify PSAPs of 911 outages “as soon as possible” with “all available information that may be useful.” These revisions merely add specificity to that preexisting obligation. Thus, the hour burden estimated here is significantly lower than the total hour burden for Part 4 outage reporting in general.

**Variance in Burden:** Although we estimate that as many as 1,000 entities may qualify as Covered 911 Service Providers under this rule, a small fraction of those entities – likely no more than a dozen – serve the vast majority of PSAPs in the United States. Large entities that serve numerous PSAPs nationwide are likely to experience more reportable 911 outages annually and will account for most of the burden hours associated

<sup>32</sup> 29,647 hours yearly / 2080 hours annual work time = 14.25 work years. \$60,000 x 14.25 working years = \$855,000.

<sup>33</sup> \$855,000 + \$17,840 = \$872,840.

with this information collection. Smaller entities, which may serve only one PSAP in a limited geographic area, may never reach the threshold for a reportable outage, and if they do, the annual burden of such infrequent notifications will be relatively small.

**Summary of Respondents and Burden:**

**Total Number of Respondents: 1,100.**

**Total Number of Annual Responses: 15,444.**

**Total Annual Burden Hours: 29,870 hours.**

**Total Annual In-House Costs: \$872,840.**

**13. Provide estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in items 12 and 14).**

We previously estimated no capital and startup costs, no purchases of additional equipment, or operation, maintenance, and purchase of services costs associated with existing Part 4 outage reporting obligations. The new requirements will not result in additional operating and maintenance expenses. Therefore, the total remains \$0.

**14. Provide estimates of annualized costs to the Federal government. Also provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expenses that would not have been incurred without this collection of information.**

We previously estimated \$483,640.60 in total annual costs to the Federal government for administration of all Part 4 outage reporting requirements.<sup>34</sup> The revisions to this information collection do not require any new information to be submitted to the FCC. Therefore, there are no additional costs to the Federal government. However, the Commission recalculated the cost to the Federal Government because the Federal Government pay scale has changes since this collection was last by OMB. The revised calculations are as follows:

We estimate that the total annual cost to the Federal Government, based on the salaries of three engineers (GS-15 step 5), two engineers (GS-13 step 5), an attorney (GS-15 step 5), and an IT Developer (GS-15 step 5):

Each spends approximately ½ (1040 hours) of their work time each year on the information collected as follows:

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<sup>34</sup> See Supporting Statement, OMB Control No. 3060-0484, Extension of Part 4 Outage Reporting to Interconnected Voice over Internet Protocol (VoIP) Services at 15 (July 2012).

**OMB Control Number: 3060-0484**  
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**August 2014**

(One) Attorney \$70,595.20	GS-15 step 5 at \$67.88/hr wage.	\$67.88 x 1040 x 1 =
(Three) Engineers \$211,785.60	GS-15 step 5 at \$67.88/hr wage.	\$67.88 x 1040 x 3 =
(One) IT Developer \$70,595.20	GS-15 step 5 at \$67.88/hr wage.	\$67.88 x 1040 x 1 =
(Two) Engineers \$101,566.40	GS-13 step 5 at \$48.83/hr wage.	\$48.83 x 1040 x 2 =
		<b>TOTAL: \$454,542.40</b>

**15. Explain the reasons for any program changes or adjustments for this information collection.**

This is a revision to the existing information collection for the Commission's Part 4 communications outage reporting rules. The revision affects only the obligation of Covered 911 Service Providers to notify PSAPs of major disruptions in 911 service; it does not change the outage reporting obligations of other entities. These revisions were necessary because of untimely and inadequate 911 outage notification to multiple PSAPs during the June 2012 derecho storm. Under the revised information collection, PSAPs will receive more specific information at specific times to assist in their response to emergency calls. Therefore, there are program changes/increases to this collection as a result of the notification requirements adopted in FCC 13-158. These program changes are as follows: an increase of 982 to the number of respondents and an increase in the annual burden hours of 223 hours.

There are no adjustments to this collection.

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

The FCC does not plan to publish this information.

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

The Commission does not intend to seek approval not to display the expiration date of the revisions to this information collection.

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**18. Explain any exceptions to the Certification Statement identified in Item 19,  
"Certification of Paperwork Reduction Act Submissions."**

There are no exceptions to the Certification Statement.

**B. Collections of Information Employing Statistical Methods:**

The revisions to this information collection do not employ any statistical methods.