

SUPPORTING STATEMENT

A. Justification:

1. *Circumstances that make collection necessary.* The Federal Communications Commission (Commission) requests that the Office of Management and Budget (OMB) approve a revision of the information collection titled "Part 25 of the Commission's Rules Governing the Licensing of, and Spectrum Usage by, Satellite Network Earth Stations and Space Stations" under OMB Control No. 3060-0678, as a result of a recent rulemaking discussed below.

Report and Order (FCC 13-111)

On August 9, 2013, the Commission released a Report and Order (R&O) titled "In the Comprehensive Review of Licensing and Operating Rules for Satellite Services." In this R&O, the Commission adopted comprehensive changes to Part 25 of the Commission's rules, which governs licensing and operation of space stations and earth stations for the provision of satellite communication services. Many of the amendments are substantive changes that are designed to afford licensees as much operational flexibility as possible, while minimizing harmful interference and easing administrative burdens on licensees, applicants, and the Commission. For example, among other things, the amendments eliminated requirements to submit certain technical information in space station applications that is not needed to assess potential interference and provided alternative methods for submitting antenna contour diagrams, increased the number of earth station applications eligible for routine and streamlined processing, removed unnecessary reporting requirements, consolidated the remaining reporting requirements, enhanced reporting of emergency contacts, provided greater flexibility to earth station applicants in verifying antenna performance, and codified the Commission practice of granting a single earth station license that covers multiple antennas located in close proximity to each other. The Commission also updated, improved, and consolidated definitions and technical terms throughout Part 25. The revisions also increased licensees' flexibility to design rain-fade compensation systems as needed.¹

The changes adopted in the R&O will result in a net annualized decrease in 45.5 burden hours to Part 25 applicants and licensees. This submission amends the previous submission to the OMB on March 13, 2013 to reflect these changes. Additionally, to consolidate the various information collection requirements for space and earth stations in one place, this information collection also incorporates other approved information collection requirements under Part 25 into this information collection. Specifically, the revision of OMB Control No. 3060-0678 (Part 25 of the Commission's Rules) will consolidate information collections that are currently under OMB Control Nos. 3060-0768 (28 GHz Band Segmentation Plan), 3060-0955 (2 GHz Mobile Satellite Service Reports), 3060-0962 (Redesignation of the 18 GHz Band), 3060-0994 (Flexibility for Delivery of Communications by MSS Providers), 3060-1013 (Mitigation of Orbital Debris), 3060-1014 (Ku-band NGSO FSS), 3060-1059 (Global Mobile Personal Communications by Satellite (GMPCS)/E911 Call Centers), 3060-1061 (Earth Stations on Board Vessels (ESVs)), 3060-1066 (Renewal of Application for Satellite Space and Earth Station Authorization), 3060-1067 (Qualification Questions), 3060-1095 (Surrenders of Authorizations), 3060-1097 (Rules for Broadcasting Satellite Service), 3060-1106 (Vehicle Mounted Earth Stations (VMES)), 3060-1108 (Consummation of Assignments and Transfers of Control), 3060-1153 (Satellite Digital Radio Service (SDARS)), and 3060-1187 (Earth Stations Aboard Aircraft (ESAA)). Additionally, the two Part 25-related FCC Forms associated with other collections – FCC Form 312-R, which is authorized under

¹ A rain fade compensation system comprises the equipment and software used in a satellite communication earth station to adjust the power level transmitted by the earth station to compensate for signal dispersion and attenuation in the atmosphere caused by precipitation and water vapor in the path between the earth station and the satellite to which it is transmitting.

OMB Control No. 3060-1066, and FCC Form 312-EZ, which is authorized under OMB Control No. 3060-1067 – will now be associated with this consolidated collection under OMB Control No. 3060-0678. This revised collection encompasses a total of 34,155 annual burden hours, with 4,928 respondents. This appears to be a significant increase over the combined burden hour totals of the 17 information collections being consolidated here. This is not the case. The discrepancy is caused the unwieldiness of managing 17 separate collections when the collections are, in fact, interdependent. For example, an applicant filing a space station application will, in most cases, be required to submit information covered by two or more of the 17 collections. This was not initially the case, but has evolved in this manner over the last two decades.

The initial information collection covering the application forms and associated information requirements for commercial space and earth stations were submitted and approved in 1985 in OMB Control No. 3060-0343. At that time, all commercial space stations operated in geostationary orbits (GSOs) and, together with earth stations, were used only to provide fixed-satellite services in the C and Ku frequency bands. In 1996, the Commission received approval for a new collection, in OMB Control No. 3060-0678, that covered applications for all space stations then being authorized, including the non-geostationary satellite orbit (NGSO) “Big LEO” and “Little LEO” satellite services. Since then, many other types of satellite services in many other frequency bands have been introduced. These include several other types of GSO and NGSO mobile-satellite services on various platforms, including ships and airplanes, digital audio radio services, and broadcasting-satellite services. Each of these new services involve information submissions unique to each type of service, in addition to the general information submitted pursuant to the collection covered by 3060-0678. Further, in the last two decades, the Commission has adopted rules requiring all entities to file additional information regardless of the type of service to be offered, such as information relating to a space station operator’s orbital debris mitigation plans.

Rather than modifying 3060-0678 to cover each new collection, the Commission decided to cover each new information collection in a separate collection. As a result, there are now 17 collections associated with the information respondents must provide when filing space and earth station applications. Because, as noted, the information collected in any particular space or earth application is often encompassed by two or more of the 17 separate collections, it has become increasingly unwieldy to ensure that each of the 17 collections accurately reflect both the burden hours associated with filing various types of applications and the number of respondents.

The Commission has therefore decided to consolidate all 17 information collections for Part 25 space and earth station applications in one comprehensive information collection under 3060-0678, using a uniform methodology and consistent assumptions. This will eliminate any redundancies and/or omissions inherent in considering what is actually one information collection as 17 separate information collections, and will more accurately reflect the burden hours associated with each type of space and earth station application.

This submission also amends the instructions to the FCC Form 312, Schedule S application to reflect the changes made in the Report and Order.

The forms that are now covered under this collection are FCC Forms 312-R, 312 EZ, 312 and Schedules S, A and B.²

The statutory authority for this information collection is contained in Sections 4, 301, 302, 303, 307, 308, 309, 332 and 705 of the Communications Act of 1934, as amended; 47 U.S.C. Sections 154, 301, 302, 303, 307, 308, 309, 332 and 705, unless otherwise noted.

² The revision of the burden statements and assignment of OMB control number 3060-0678 have been amended/added for FCC Forms 312-R and 312 EZ. The burden statements have been revised for Schedules A and B. Basically, the data elements are not being revised for Forms 312-R, 312 EZ, and Schedules A and B (FCC Form 312). Only the instructions to FCC Form 312, Schedule S, are the being revised with this submission to OMB.

The information collection requirements do not affect individuals or households; thus there are no impacts under the Privacy Act.

2. *Use of information.* This collection is used by the Commission staff in carrying out its duties concerning satellite communications as required by Sections 4, 301, 302, 303, 307, 308, 309, 310, 332 and 705 of the Communications Act, 47 U.S.C. Sections 301, 302, 303, 307, 308, 309, 332 and 705. This collection is also used by the Commission staff in carrying out its duties under the World Trade Organization (WTO) Basic Telecom Agreement. The information collection requirements accounted for in this collection are needed to determine the technical and legal qualifications and compliance of applicants to operate a station, or, in the case of a non-U.S.-licensed space station, to serve the U.S. market, licensees' compliance with Commission rules and the terms of their licenses, the legal qualifications of a new operator in connection with applications to transfer or assign a license, and to determine whether, and under what conditions, authorizations are in the public interest, convenience and necessity.

As technology advances and new spectrum is allocated for satellite use, applicants for satellite service will continue to submit the information required in 47 CFR Part 25 of the Commission's rules. Without such information, the Commission could not determine whether to permit respondents to provide telecommunication services in the United States. Therefore, the Commission would be unable to fulfill its statutory responsibilities in accordance with the Communications Act of 1934, as amended, and the obligations imposed on parties to the WTO Basic Telecom Agreement.

The information is used by the Commission and other applicants and/or licensees, including but not limited to, the following purposes:

- To determine the qualifications of applicants to provide satellite service, including applicants that are affiliated with foreign entities, or that seek to provide service to the U.S. market from non-U.S.-licensed satellites.
- To facilitate technical coordination of systems among applicants and/or licensees in the various frequency bands. Without such information, the Commission could not implement band plans as set forth in the Table of Allocations of the Commission Rules.
- To facilitate the Commission's efforts to use spectrum more efficiently and to better accommodate the operational needs of licensees.
- To provide operators with greater operational flexibility while ensuring that the operations do not cause harmful interference to the other service providers' operations.
- To examine request for authority to change a controlling interest in the ownership of a space or earth station licensee.
- To assist the Commission in considering whether FCC rules require modification to accommodate the changing market.
- To ensure that licensees comply with all Commission rules and the terms and conditions of the license.
- To monitor the Mobile Satellite Service (MSS) carriers' establishment of call centers which are essential to provide emergency services, such as handling emergency 911 telephone calls from American citizens. The recordkeeping and reporting requirements include data on MSS call center use such as the aggregate number of calls that the call centers receive and the number of calls that required forwarding to a local public safety answering point. The Commission uses this data to monitor compliance with the call center requirement and track usage trends.

- To issue Public Notices to announce the surrenders of authorization to the general public. The Commission's release of Public Notices is critical to keeping the general public abreast of the licensees' discontinuance of telecommunications services.

3. *Technological collection techniques.* Applicants are required to complete and file the "Application for Satellite Space and Earth Station Authorizations" (FCC Form 312 (including associated Schedule A, S, or B, where appropriate), FCC Form 312 EZ, or FCC Form 312-R with the Commission electronically via the International Bureau Filing System ("MyIBFS"). In 2005, the Commission received approval from OMB for mandatory electronic filing of all Part 25 (satellite, earth station, and Ancillary Terrestrial Component (ATC) applications under OMB Control No. 3060-0678. Applicants requesting authority for operation of space stations must complete Schedule S of that form. Those requesting authority for operation of earth stations must complete Schedule B. Those requests to transfer or assign authorizations must complete Schedule A. A total of 100 percent of these documents are filed electronically in MyIBFS.

In addition, applicants are required to file narrative information that describes how they have met certain requirements. For example, applicants file narratives to describe what measures they have undertaken to mitigate orbital debris. Licensees file narratives to demonstrate they have met milestone requirements. The majority of this information can be uploaded electronically into IBFS.

There are no specific Commission rules pertaining to surrenders of authorizations because it is voluntary on the part of the licensee. However, the Commission established policies for processing surrenders of authorizations electronically as stated in the Public Notice (DA 06-569). In December 2006, the Commission received approval for mandatory electronic filing of surrenders of authorizations for Part 25 licensees under OMB Control No. 3060-1095.

In September 2007, the OMB approved mandatory electronic filing of consummations of assignments and transfers of control of licenses for all satellite services. A total of 100 percent of that collection involves the use of electronic collection techniques. In addition, Satellite Digital Audio Radio Service (SDARS) licensees may provide required notification of terrestrial repeater deployment to Wireless Communications Services licensees via electronic mail or other electronic media. If requested to do so, SDARS licensees may also transmit inventories of their repeater networks to Commission staff via electronic mail or other electronic media. Consequently, 100% of the information provided under those rules can be submitted electronically.

4. *Efforts to identify duplication.* The agency does not impose similar information collection requirements on the respondents. However, we note that earth station licensees are required to file the FCC Form 312-R with the Commission in lieu of the "Application for Renewal of Radio Station License in Specified Services" (FCC Form 405; OMB approved under OMB Control No. 3060-0093). The FCC Form 312-R was created to have a form specifically designated for the renewal of earth station licenses and to facilitate the electronic filing of renewals of earth station licenses in the International Bureau Filing System (IBFS). The FCC Form 405 continues to be used by common carriers and Multipoint Distribution Service non-common carriers to apply for renewal of radio station licenses at the Commission. The FCC Form 405 could not be made available on the IBFS because this database system is only used in connection with International Bureau filings.

5. *Impact on small entities.* In conformance with the PRA, the Commission is making an effort to minimize the burden on all respondents, regardless of size. The Commission has limited the information collection requirements to those that are absolutely necessary for evaluating and processing an application and for deterring possible abuses of the application process. Further, the changes in this Report and Order benefit all licensees by streamlining the regulatory processes and reducing the cost associated with obtaining and maintaining authority to operate the various systems. Indeed, we estimate the revised rules will result in a decrease in 45.5 annualized burden hours. Further, the specific impact on small entities for

the 17 separate information collections previously approved by OMB is consolidated into this collection and their impact on small businesses/entities is summarized below.

Consummation of Assignments and Transfers of Control. As stated and approved in OMB Control No. 3060-1108, the Commission's implementation of the consummation module will decrease costs for small businesses or other small entities because they would not have to incur postage costs to mail letters. Furthermore, there is no cost to the applicant to complete an on-line form (consummation module) in the electronic IBFS.

Earth Stations Aboard Aircraft (ESAA). As stated and approved in OMB Control No. 3060-1187, the Commission believes that information collection requirement of the *ESAA Report and Order* in IB Docket Nos. 12-376 and 05-20 (FCC 12-161) will not have a substantial impact on any small entities. The Commission solicited comment on alternatives for more efficient processing of ESAA applications and simplification of ESAA procedures. The Commission also sought comment on streamlining the application process for ESAA operations by permitting blanket licensing of multiple ESAA terminals in a single application, as an alternative to requiring all ESAA terminals to be licensed individually. In adopting blanket licensing for conforming ESAA terminals, the *Report and Order* simplified the application process for ESAA and establishes licensing terms consistent with other similar services. Thus, the rules should reduce the costs associated with obtaining and maintaining authority to operate an ESAA network.

Earth Stations on Board Vessels (ESVs). As stated and approved in OMB Control No. 3060-1061, the information collection does not have a significant economic impact on small entities and benefits both large and small entities by allowing greater operational flexibility in providing ESV service.

Flexibility for Delivery of Communications by MSS Providers. As stated and approved in OMB Control No. 3060-0994, the information collection requirements will not have a significant economic impact small businesses.

Global Mobile Personal Communications by Satellite (GMPCS)/E911 Call Centers. As stated and approved in OMB Control No. 3060-1059, the Commission sought comment from the public on the potential impact of the Commission's rules on small entities during the NPRM stage of the rulemaking process. Small businesses are not likely to have the financial ability to become Mobile-Satellite Service system operators because of the high implementation costs, including construction of satellite space stations and rocket launch (generally hundreds of millions of dollars). The Commission requested comment on the number and identity of small entities that would be significantly impacted by the rule changes. Furthermore, the agency sought comment on whether the rules would have a disproportionate impact on small entities. Additionally, the Commission sought comment generally on steps that it could take to ensure that small entities are not disproportionately impacted, if any such steps are necessary. The agency did not receive comments from the public that indicated that the rule changes would adversely impact small entities.

Ku-band NGSO FSS. As stated and approved in OMB Control No. 3060-1014, small businesses do not have the financial ability to become Non-Geostationary Satellite Orbit Fixed Satellite Service system operators because of the high implementation costs, including construction of satellite space stations and rocket launch (generally hundreds of millions of dollars). Therefore, this information collection does not have a significant economic impact on a substantial number of small entities.

Mitigation of Orbital Debris. As stated and approved in OMB Control No. 3060-1013, the information collection requirements related to the mitigation of orbital debris affect space station operators. Small businesses are not likely to have the financial ability to become space station operators because of the high implementation costs, including construction of satellite space stations and rocket launch (generally hundreds of millions of dollars). In any case, the Commission concluded that the costs of disclosing

orbital debris mitigation plans are not unduly burdensome when balanced against the public interest benefits of preserving safe and affordable access to space. It is expected that small entities, including businesses with fewer than 25 employees, will have the resources to prepare and disclose orbital debris mitigation plans because preparing plan utilizes engineering and legal resources similar to those currently used in the space station licensing process. Many software tools useful in preparing orbital debris mitigation plans are available for free via the Internet such as via the orbital debris mitigation website of NASA's Johnson Space Center (www.orbitaldebris.jsc.nasa.gov).

The Second Report, FCC 11-93, reduced information collection requirements for all licensees, including small businesses, by amending FCC rules to provide automatic authorization for certain satellite maneuvers, such as qualifying orbit-raising maneuvers or end-of-life disposal maneuvers that previously required licensees to apply for prior FCC authorization.

Redesignation of the 18 GHz Band. As stated and approved in OMB Control No. 3060-0962, small businesses do not have the financial ability to become Non-Geostationary Satellite Orbit Fixed Satellite Service system operators because of the high implementation costs, including construction of satellite space stations and rocket launch. Since the spectrum and orbital resources available for assignment are not open to new entrants, we estimate that only about five applicants will be authorized by the Commission to provide these services. The applicants are not small businesses because they have revenues in excess of \$12.5 million annually or have parent companies or investors that have revenues in excess of \$12.5 million annually. The Commission has, therefore, certified that the rules do not have a significant economic impact on a substantial number of small entities.

Rules for Broadcasting Satellite Service. As stated and approved in OMB Control No. 3060-1097, the Commission believes that the information collection requirements resulting from the Second Report and Order in IB Docket No. 06-123 (FCC 11-93) will not have a substantial impact on any small entities because the parties impacted by the Second Report and Order rarely qualify as a small business entity as defined by the Small Business Administration rules.

SDARS. As stated and approved in OMB Control No. 3060-1153, the information collection requirements related to applicants and licensees in the Satellite Digital Audio Radio Service (SDARS) do not have a substantial impact on any small entities. There is only one SDARS licensee, Sirius XM Radio Inc., which reported revenues of \$3.7 billion in 2013.

Vehicle Mounted Earth Stations (VMES). As stated and approved in OMB Control No. 3060-1106, the information collection requirements do not have a significant economic impact on small entities. The 15-year license term and primary protection from interference in the conventional Ku-bands are beneficial to licensees. Additionally, the application process has been streamlined to permit blanket licensing of multiple VMES terminals in a single application, as an alternative to requiring all VMES terminals to be licensed individually. These changes have reduced the costs associated with obtaining and maintaining authority to operate a VMES network.

6. *Consequences if information is not collected.* If the various data in this collection were collected less frequently or not filed in conjunction with our rules, then:

- The Commission would not be able to carry out its mandate to determine that grant of an application is in the public interest, as required by statute.
- The Commission would not be able to ensure that licensees are operating in accordance with Commission rules.
- The Commission would not be able to determine whether a given system could operate without causing harmful interference to other satellite services. In other words, many existing radio

services, both satellite and terrestrial, could potentially be interrupted by interference caused by other systems on the same frequencies.

- The Commission would not be able to advance its goals of managing spectrum efficiently and promoting broadband technologies to benefit American consumers throughout the United States.

In other words, inefficient use of spectrum would result in hindering the provision of new or enhanced telecommunications services to the public.

- The Commission would not be able to mitigate the potential harmful effects of orbital debris accumulation. Without such information collection requirements, the growth in the orbital debris population may limit the usefulness of space for communications and other uses in the future by raising the costs and lowering the reliability of space-based systems. Furthermore, the effects of collisions involving orbital debris can be catastrophic and may cause significant damage to functional spacecraft or to persons or property on the surface of the Earth, if the debris re-enters the Earth's atmosphere in an uncontrolled manner.
- The Commission would not have the necessary information with which to grant Mobile-Satellite Service (MSS) operators the authority to operate ATC systems. This would result in financial losses to these entities and prevent them from maximizing the value of their assigned spectrum.
- There would be less flexibility in how the different types of Earth Stations on Vessels (ESV) systems may operate without causing harmful interference to the FSS. For instance, ESV systems that operate with a constant level of power and use low power techniques would still be required to adhere to the 0.2 degree antenna pointing error requirement even though following that rule would not be necessary to protect the FSS.
- There would continue to be regulatory uncertainty with respect to Vehicle Mounted Earth Stations (VMES) and other satellite services that operate in the Ku-band within the United States.
- The Commission would not be able to confirm the MSS carriers' compliance with the Global Mobile Personal Communications by Satellite (GMPCS)/E911 Call Center rules. Additionally, the agency would not have data on MSS call center use in order to determine whether the Commission should modify its rules to accommodate the current market. This is possible because the rules require that MSS carriers file a post-implementation report with the Commission annually and maintain record of this report.
- The Commission would not have critical information to determine whether to approve a change in a controlling interest in the ownership of a license, as required by statute.
- Licensees would be required to submit surrenders of authorizations to the Commission by letter which is more time consuming than submitting such requests to the Commission electronically. In addition, Commission staff would spend an extensive amount of time processing surrenders of authorizations received by letter. The collection of information saves time for both licensees and Commission staff since they are received in MyIBFS electronically and include only the information that is essential to process the requests in a timely manner. Furthermore, the e-filing module expedites the Commission staff's announcement of surrenders of authorizations via Public Notice.

7. *Special circumstances.* The Commission does not have any new or amended information collection requirements that are not consistent with the general information collection guidelines in 5 CFR § 1320.

8. *Federal Register notice; efforts to consult with persons outside the Commission.* On April 3, 2014, the Commission published a 60-day notice in the Federal Register (79 FR 18686). The comment period ended on June 2, 2014. No comments were received from the public in response to the notice.

9. *Payments or gifts to respondents.* Respondents will not receive any payments or gifts in connection with these information collection requirements.
10. *Assurances of confidentiality.* There is no need for confidentiality with this collection of information.
11. *Questions of a sensitive nature.* This information collection does not address any matters of a private or sensitive nature.
12. *Estimates of the hour burden of the collection to respondents.* The following represents the frequency of response³, time per response, total annual burden hours, and explanation of burden estimates for the 4,880 respondents and 4,928 responses to this information collection:

I. Applications for Initial Licenses, Registrations, or Market Access Grants

- a. **Space Stations:** Based on actual filings the Commission has received over the last five years, there are approximately 29 space station applications/notifications filed per year. This number is an average and the actual number of applications may be substantially greater or less in any given year.

- i. **General requirements** (47 C.F.R. §§ 25.111(b), 25.114(a), (b), (c)(1), (c)(2), (c)(3), (c)(4)(i), (c)(4)(ii), (c)(4)(v), (c)(4)(vi), (c)(8), (c)(10), (c)(11), (d)(6), 25.128(d), 25.128(e)) (previously approved under OMB Control No. 3060-0678); (47 CFR §§ 25.114(c)(5) and (c)(7) or (c)(6), and 25.114(d)(14)(i)-(v)) (previously approved under OMB Control No. 3060-1013).

- (1) Number of respondents: 29. 11 applications per year for U.S. space station licenses, 8 applications per year for authority to serve the U.S. market with a non-U.S.-licensed space station, and 10 applications per year from U.S. earth station applicants for authority to communicate with non-U.S.-licensed space stations that have not been previously granted U.S. market access.
- (2) Number of responses: 29.
- (3) Frequency of response: One time.
- (4) Annual hour burden per respondent: The total annual burden associated with the general requirements is 1,740 hours (29 responses x 60 hours/response = 1,740 hours).

ii. Additional Service-Specific Requirements

1. **FSS GSO Applications** (47 C.F.R. § 25.140(a)) (previously approved under OMB Control No. 3060-0678).

³ Throughout this collection, the Commission reports the frequency of response for each information requirement. This reflects the number of times a particular respondent is required to submit that particular information. Thus, the term "one time" refers to a collection where a respondent need only submit that particular information once. Over the course of any year, however, one or more other respondents will be required to submit the same type of information. For example, licensees are required to submit documentation that they have met the "critical design review" milestone for a particular space station (see Section X.c.). Once a licensee provides this information, it need not file this information again. Other respondents, however, will be required to submit this type of evidence when the milestones for their space stations are due. On average, the Critical Design Review (CDR) milestones for five space stations become due each year. Consequently, in Section X.c., we have listed the annual number of responses as "5" and the frequency of response as "one time." We use the term "on occasion" to refer to a collection where each respondent may be required to submit particular information more than once, but there is no requirement that they submit that information on a regular basis. We use the term "annually" to describe information that respondents must submit to us once each year.

- (1) Number of respondents: 20.
- (2) Number of responses: 20.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 80 hours (20 responses x 4 hours/response = 80 hours).

2. FSS NGSO Applications (47 C.F.R. §§ 25.145(c)(1) and (2), and 25.146(g)) (previously approved under OMB Control No. 3060-1014).

- (1) Number of respondents: 1.
- (2) Number of responses: 1.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 3 hours (1 response x 3 hours/response = 3 hours).

3. DBS Applications (47 C.F.R. §§ 25.114(d)(11), (13), (18), and 25.148) (previously approved under OMB Control No. 3060-0678).

- (1) Number of respondents: 1.
- (2) Number of responses: 1.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 8 hours (1 response x 8 hours/response = 8 hours).

4. 17/24 GHz BSS Applications (47 C.F.R. §§ 25.114(d)(7), 25.114(d)(15)(iv), (d)(16), (d)(17), (d)(18), and 25.264(a)-(d)) (previously approved under OMB Control No. 3060-1097); (47 C.F.R. §§ 25.140(b) and (c)) (previously approved under OMB Control No. 3060-0678).

- (1) Number of respondents: 2.
- (2) Number of responses: 2.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 160 hours (2 responses x 80 hours/response = 160 hours).

5. SDARS Applications (47 C.F.R. § 25.144(a)) (previously approved under OMB Control Nos. 3060-0678 and 3060-1153).

- (1) Number of respondents: 1.
- (2) Number of responses: 1.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 1 hour (1 respondent x 1 hour/ response = 1 hour).

6. MSS GSO Applications (47 C.F.R. §§ 25.142(a), (b)(2)(ii) or 25.143(b), (c), (d)) (previously approved under OMB Control No. 3060-0955).

- (1) Number of respondents: 1.
- (2) Number of responses: 1.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 4 hours (1 response x 4 hours/response = 4 hours).

7. MSS NGSO Applications (47 C.F.R. §§ 25.142(a), (b)(2)(ii), 25.143(b), (c), (d), and 25.250(b), 25.279) (previously approved under OMB Control No. 3060-0955).

- (1) Number of respondents: 2.
- (2) Number of responses: 2.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 12 hours (2 responses x 6 hours/response = 12 hours).

8. ATC Applications (Flexibility for Delivery of Communications By Mobile Satellite Service Providers in the 2 GHz Band, the L Band, and the 1.6/2.4 GHz Band) (47 C.F.R. §§ 25.149, 25.252, 25.253, and 25.254) (previously approved under OMB Control No. 3060-0994).

- (1) Number of respondents: 1.
- (2) Number of responses: 1.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 50 hours (1 response x 50 hours/response = 50 hours).

b. Earth Stations: Data collection requirements for earth station authorizations differ significantly from space station authorizations. An earth station's design, capability, and service offering (for example, fixed or mobile service) determine the information collected. However, there is a general group of data requirements for all earth station applications, as shown in subparagraph i. below.

i. General Requirements (47 CFR §§ 25.110, 25.115(j), 25.130, 25.131, 25.132, 25.133, 25.137, 25.218, 25.220, and 25.203) (previously approved under OMB Control Nos. 3060-0678 and 3060-0955).

- (1) Number of respondents: 699.
- (2) Number of responses: 699.
- (3) Frequency of response: One time and Third Party Disclosure in accordance with 47 C.F.R. § 25.203.⁴

⁴ Of the estimated 8 hours per response, the one-time filing accounts for approximately 7 hours per response and the third party disclosure accounts for approximately 1 hour per response.

- (4) Annual hour burden: The total annual hour burden is 5,592 (699 responses x 8 hours/response = 5,592 hours)

ii. Applications Eligible for Autogrant Licensing (i.e., Form 312 EZ; for licenses or registrations for Fixed Satellite Service or Temporary Fixed earth stations meeting routine processing criteria) (47 C.F.R. §§ 25.115(a)(2) and (e) and 25.138 (d) and (e)) (previously approved under OMB Control No. 3060-1067).

- (1) Number of respondents: 39.
(2) Number of responses: 39.
(3) Frequency of response: One time.
(4) Annual hour burden: The total annual hour burden is 234 hours (39 responses x 6 hours = 234 hours).

iii. Applications Not Eligible for Autogrant Licensing (i.e., Form 312 and Schedule B) (See General Requirements above and 47 CFR §§ 25.115(a)(1), (f), (h) and 25.138(b), (c), (d), and (e)).

- (1) Number of respondents: 679.
(2) Number of responses: 679.
(3) Frequency of response: One time.
(4) Annual hour burden: The total annual hour burden is 2,716 hours (679 responses x 4 hours/response = 2,716 hours).

iv. Applications Requesting Market Access for Non-U.S. Licensed Space Stations (i.e., Form 312, Schedule B and Schedule S) (47 CFR §§ 25.114 and 25.137) (previously approved under OMB Control No. 3060-0678).

- (1) Number of respondents: 10.
(2) Number of responses: 10.
(3) Frequency of response: One time.
(4) Annual hour burden: The total annual hour burden is 800 hours (10 responses x 80 hours/response = 800 hours).

v. Registrations for Receive-Only Earth Stations (i.e., Form 312, Schedule B) (47 C.F.R. §§ 25.131(a), (d), (j), and (l), and 25.115(b)) (previously approved under OMB Control No. 3060-0678).

- (1) Number of respondents: 69.
(2) Number of responses: 69.
(3) Frequency of response: One time.
(4) Annual hour burden: The total annual hour burden is 138 hours (69 responses x 2 hours/response = 138 hours).

vi. Additional Requirements for Other Types of Earth Stations (previously approved under OMB Control No. 3060-0678).

- 1. CSAT** (47 C.F.R. § 25.115(c)(2)(i)) (previously approved under OMB Control No. 3060-0678).

- (1) Number of respondents: 10.
- (2) Number of responses: 10.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 400 hours (10 responses x 40 hours/response = 400).

2. VSAT (47 C.F.R. §§ 25.134(g)(5), and 25.115(c)(1)) (previously approved under OMB Control No. 3060-0678).

- (1) Number of respondents: 25.
- (2) Number of responses: 25.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual burden hours is 500 hours (25 responses x 20 hours/response = 500).

3. ESV (47 C.F.R. §§ 25.221, 25.222, and 25.132(b)(3)) (previously approved under OMB Control No. 3060-1061).

- (1) Number of respondents: 2.
- (2) Number of responses: 2.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 120 hours (2 responses x 60 hours/response = 120 hours).

4. VMES (47 C.F.R. §§ 25.226(b)(1)(i)-(iv)(A) and (B), 25.226(b)(2)(i)-(iv), 25.226(b)(3)-(b)(8), 25.225(d)(1) and (3), and 25.132(b)(3)) (previously approved under OMB Control No. 3060-1106).

- (1) Number of respondents: 4.
- (2) Number of responses: 4.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 240 hours (4 responses x 60 hours/response = 240 hours).

5. ESAA (47 C.F.R. §§ 25.227(b)(1)-(8), 25.225(d)(1)-(3), and 25.132(b)(3)) (previously approved under OMB Control No. 3060-1187).

- (1) Number of respondents: 6.
- (2) Number of responses: 6.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 480 hours (6 responses x 80 hours/response = 480 hours).

6. Temporary Fixed (47 C.F.R. §§ 25.110, and 25.277) (previously approved under OMB Control No. 3060-0678).

- (1) Number of respondents: 20.

- (2) Number of responses: 20.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 160 hours (20 responses x 8 hours/response = 160 hours).

7. MSS (47 C.F.R. §§ 25.115(d), 25.129(c), 25.135, and 25.258(c)) (previously approved under OMB Control Nos. 3060-0678 and 3060-0955).

- (1) Number of respondents: 20.
- (2) Number of responses: 20.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 160 hours (20 responses x 8 hours/response = 160 hours).

8. 17/24 GHz BSS (47 C.F.R. §§ 25.115(g) and 25.223) (previously approved under OMB Control Nos. 3060-0678 and 3060-1097).

- (1) Number of respondents: 3.
- (2) Number of responses: 3.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 24 hours (3 responses x 8 hours/response = 24 hours).

9. SDARS Terrestrial Repeaters (47 C.F.R. §§ 25.144(e) 25.263(b), (c), and not codified (para. 278 of SDARS 2nd R&O) (previously approved under OMB Control No. 3060-1153) and 25.403 and 25.404).

- (1) Number of respondents: 1.
- (2) Number of responses: 1.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 4 hour (1 response x 4 hours/response = 4 hours).

II. Modifications of Existing Licenses and Market Access Grants

a. Space Station (47 C.F.R. § 25.117) (previously approved under OMB Control No. 3060-0678).

- (1) Number of respondents: 32.
- (2) Number of responses: 32.
- (3) Frequency of response: On occasion.
- (4) Annual hour burden: The total annual hour burden is 512 hours (32 responses x 16 hours/response = 512 hours).

b. Earth Station (47 C.F.R. §§ 25.117, and 25.133(c)) (previously approved under OMB Control No. 3060-0678).

- (1) Number of respondents: 211.

- (2) Number of responses: 211.
- (3) Frequency of response: On occasion.
- (4) Annual hour burden: The total annual hour burden is 4,220 hours (211 responses x 20 hours/response = 4,220 hours).

III. Amendments of Pending Applications and Market Access Grants

a. Space Station (47 C.F.R. §§ 25.116 and 25.137) (previously approved under OMB Control No. 3060-0678).

- (1) Number of respondents: 25.
- (2) Number of responses: 25
- (3) Frequency of response: On occasion.
- (4) Annual hour burden: The total annual hour burden is 137.5 hours (25 responses x 5.5 hours/response = 137.5 hours).

b. Earth Station (47 C.F.R. §§ 25.116 and 25.137) (previously approved under OMB Control No. 3060-0678).

- (1) Number of respondents: 62.
- (2) Number of responses: 62.
- (3) Frequency of response: On occasion.
- (4) Annual hour burden: The total annual hour burden is 248 hours (62 responses x 4 hours/response = 248 hours).

IV. Transfers of Control (47 C.F.R. § 25.119) or Assignments (47 C.F.R. § 25.119) (Form 312 and Schedule A) (previously approved under OMB Control No. 3060-1108).

A. Transfers of Control (47 C.F.R. § 25.119) (previously approved under OMB Control No. 3060-1108).

a. Space Station

- (1) Number of respondents: 10.
- (2) Number of responses: 10.
- (3) Frequency of response: On occasion.
- (4) Annual hour burden: The total annual hour burden is 90 hours (10 responses x 9 hours/response = 90 hours).

b. Earth Station

- (1) Number of respondents: 181.
- (2) Number of responses: 181.
- (3) Frequency of response: On occasion.
- (4) Annual hour burden: The total annual hour burden is 1,629 hours (181 responses x 9 hours/response = 1,629 hours).

B. Assignments (47 C.F.R. § 25.119) (previously approved under OMB Control No. 3060-1108).

a. Space Station

- (1) Number of respondents: 4.
- (2) Number of responses: 4.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 36 hours (4 operators x 9 hours/response = 36 hours).

b. Earth Station

- (1) Number of respondents: 170.
- (2) Number of responses: 170.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 1,530 hours (170 responses x 9 hours/response = 1,530 hours).

V. Applications for Special Temporary Authority (Form 312 and Narrative) (47 C.F.R. § 25.120) (previously approved under OMB Control No. 3060-0678).

a. Space Station

- (1) Number of respondents: 127.
- (2) Number of responses: 127.
- (3) Frequency of response: On occasion.
- (4) Annual hour burden: The total annual hour burden is 1,016 hours (127 responses x 8 hours/response = 1,016 hours).

b. Earth Station

- (5) Number of respondents: 453.
- (6) Number of responses: 453.
- (7) Frequency of response: On occasion.
- (8) Annual hour burden: The total annual hour burden is 3,624 hours (453 responses x 8 hours/response = 3,624 hours).

VI. Earth Station License Renewals (FCC Form 312-R) (47 C.F.R. §§ 25.121(e), 25.131(h), and 25.138(g)) (previously approved under OMB Control No. 3060-1066).

- (1) Number of respondents: 482.
- (2) Number of response: 482.
- (3) Frequency of response: On occasion.
- (4) Annual hour burden: The total annual hour burden is 4,820 hours (482 operators x 10 hours/response = 4,820 hours).

VII. Surrenders of Authorizations (previously approved under OMB Control No. 3060-1095).

a. Space Station

- (1) Number of respondents: 1.

- (2) Number of responses: 1.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 1 hour (1 response x 1 hour/response = 1 hour).

b. Earth Station

- (1) Number of respondents: 133.
- (2) Number of responses: 133.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 133 hours (133 responses x 1 hour/response = 133 hours).

VIII. Annual Reporting Requirements for Space Station Operators (47 C.F.R. § 25.170). (Consolidates previously approved information collections scattered throughout the Commission's rules into new Section 25.170. Also, expands this reporting requirement to cover space station operators in the Direct Broadcast Satellite Service and the Earth Exploration Satellite Service, who were not previously subject to annual reporting obligations.) (Previously approved under OMB Control Nos. 3060-0678, 3060-00955, 3060-0962, 3060-0994, 3060-1014, 3060-1059, and 3060-1153).

- (1) Number of respondents: 34 (operators of U.S.-licensed space stations or operators on non-U.S.-licensed space stations granted U.S. market access).
- (2) Number of responses: 34.
- (3) Frequency of response: Annual.
- (4) Annual hour burden: The total annual hour burden is 272 hours (34 responses x 8 hours = 272 hours).

IX. General Notification Requirements

a. Commence Construction at Own Risk (47 C.F.R. §§ 25.113(b) and (f)) (previously approved under OMB Control Nos. 3060-0678 and 3060-0994).

- (1) Number of respondents: 4 (3 applicants planning the construction of U.S.-licensed space stations and 1 MSS/ATC licensee providing commence construction and testing notification).
- (2) Number of responses: 4.
- (3) Frequency of response: One time.
- (4) Annual hour burden: The total annual hour burden is 4 hours (4 responses x 1 hour/response = 4 hours).

b. Bringing In-Orbit Spare Into Use (47 C.F.R. § 25.113(h)) (previously approved under OMB Control No. 3060-1108).

- (1) Number of respondents: 3.
- (2) Number of responses: 3.
- (3) Frequency of response: On occasion.
- (4) Annual hour burden: The total annual hour burden is 1.5 hours (3 responses x .5 hours/response = 1.5 hours).

c. NGSO Replacement Satellites (47 CFR § 25.143(c)) (previously approved under OMB Control No. 3060-0955).

- (1) Number of respondents: 4.
- (2) Number of responses: 4.
- (3) Frequency of response: On occasion.
- (4) Annual hour burden: The total annual hour burden is 8 hours (4 responses x 2 hours/response = 8 hours).

d. Modification of Space Station Licenses Not Requiring Prior Authorization (47 C.F.R. §§ 25.118(e)(3)-(9) and (f)) (previously approved under OMB Control No. 3060-0678).

- (1) Number of respondents: 4.
- (2) Number of responses: 4.
- (3) Frequency of response: On occasion.
- (4) Annual hour burden: The total annual hour burden is 8 hours (4 responses x 2 hours/response = 8 hours).

e. Modifications of Earth Station Licenses Not Requiring Prior Authorization (47 C.F.R. §§ 25.118(a), and (a)(4)) (previously approved under OMB Control No. 3060-0678).

- (1) Number of respondents: 10.
- (2) Number of responses: 10.
- (3) Frequency of response: On occasion.
- (4) Annual hour burden: The total annual hour burden is 80 hours (10 responses x 8 hours/response = 80 hours).

f. Temporary Fixed Operation Local Coordination Reports (47 C.F.R. § 25.277(c)) (previously approved under OMB Control No. 3060-0678).

- (1) Number of respondents: 100.
- (2) Number of responses: 100.
- (3) Frequency of response: On occasion.
- (4) Annual hour burden: The total annual hour burden is 800 hours (100 responses x 8 hours/response = 800 hours).

g. Completion of Earth Station Construction (47 CFR §§ 25.133(b) and (d)) (previously approved under OMB Control No. 3060-0955).

- (1) Number of respondents: 699.
- (2) Number of responses: 699.
- (3) Frequency of response: One time.

- (4) Annual hour burden: The total annual hour burden is 699 hours (699 responses x 1 hour/response = 699 hours).

h. ATC Service Initiation Notice (47 CFR § 25.149(f)) (previously approved under OMB Control No. 3060-0994).

- (1) Number of respondents: 2.
(2) Number of responses: 2.
(3) Frequency of response: One time.
(4) Annual hour burden: The total annual hour burden is 2 hours (2 responses x 1 hour/response = 2 hours).

i. Ka-Band Space Station Operators Notifications (Pursuant to FCC 96-311 and 47 C.F.R. § 25.258) (previously approved under OMB Control No. 3060-0768).

- (1) Number of respondents: 6.
(2) Number of responses: 6.
(3) Frequency of response: Third party disclosure.
(4) Annual hour burden: The total annual hour burden is 6 hours (6 responses x 1 hour/response = 6 hours).

j. Consummation of Transfer and Control (previously approved under OMB Control No. 3060-1108).

- (1) Number of respondents: 365.
(2) Number of responses: 365.
(3) Frequency of response: One time.
(4) Annual hour burden: The total annual hour burden is 365 hours (365 responses x 1 hour/response = 365 hours).

k. Results of In-Orbit Testing (47 C.F.R. §§ 25.173(a) and (b)).

- (1) Number of respondents: 5.
(2) Number of responses: 5.
(3) Frequency of response: One time.
(4) Annual hour burden: The total annual hour burden is 5 hours (5 responses x 1 hour/response = 5 hours).

l. Contact Information Updates (47 C.F.R. §§ 25.171, 25.172, 25.259(b), 25.260(b), and 25.271(f)).

- (1) Number of respondents: 25.
(2) Number of responses: 25.
(3) Frequency of response: On occasion.

- (4) Annual hour burden: The total annual hour burden is 12.5 hours (25 responses x .5 hour/response = 12.5hours).

m. Third Party Disclosures Requirements

- i. **SDARS** (47 C.F.R. § 25.263(b)) (previously approved under OMB Control No. 3060-1153).

- (1) Number of respondents: 1.
(2) Number of responses: 25.
(3) Frequency of response: Third party disclosure.
(4) Annual hour burden: The total annual hour burden is 25 hours (1 respondent x 25 responses x 1 hour/response = 25 hours).

- ii. **ATC** (47 C.F.R. § 25.149) (previously approved under OMB Control No. 3060-0994).

- (1) Number of respondents: 1.
(2) Number of responses: 25.
(3) Frequency of response: Third party disclosure.
(4) Annual hour burden: The total annual hour burden is 25 hours (1 respondent x 25 responses x 1 hour/response = 25 hours).

- iii. **ESV** (47 C.F.R. § 25.221(a)(11)) (previously approved under OMB Control No. 3060-1061).

- (1) Number of respondents: 4.
(2) Number of responses: 4.
(3) Frequency of response: Third party disclosure.
(4) Annual hour burden: The total annual hour burden is 4 hours (4 responses x 1 hour/response = 4 hours).

- iv. **VMES** (47 C.F.R. § 25.226(c)(1) and (2)) (previously approved under OMB Control No. 3060-1106).

- (1) Number of respondents: 4.
(2) Number of responses: 4.
(3) Frequency of response: Third party disclosure.
(4) Annual hour burden: The total annual hour burden is 4 hours (4 responses x 1 hour/response = 4 hours).

- v. **ESAA** (47 C.F.R. § 25.227(c)(1)) (previously approved under OMB Control No. 3060-1187).

- (1) Number of respondents: 6.
(2) Number of responses: 6.
(3) Frequency of response: Third party disclosure.

- (4) Annual hour burden: The total annual hour burden is 6 hours (6 responses x 1 hour/response = 6 hours).

X. Milestones and Bonds (47 C.F.R. §§ 25.164(a), (b), (c), (d), (e), and (f), and 25.165) (previously approved under OMB Control No. 3060-0678).

a. Bonds (previously approved under OMB Control No. 3060-0678).

- (1) Number of respondents: 5.
(2) Number of responses: 5.
(3) Frequency of response: On occasion.
(4) Annual hour burden per respondent: The total annual hour burden is 10 hours (5 responses x 2 hours/response = 10 hours).

b. Contract (previously approved under OMB Control No. 3060-0678).

- (1) Number of respondents: 5.
(2) Number of responses: 5.
(3) Frequency of response: One time.
(4) Annual hour burden: The total annual hour burden is 40 hours (5 responses x 8 hours/response = 40 hours).

c. Critical Design Review (previously approved under OMB Control No. 3060-0678).

- (1) Number of respondents: 5.
(2) Number of responses: 5.
(3) Frequency of response: One time.
(4) Annual hour burden: The total annual hour burden is 80 hours (5 responses x 16 hours = 80 hours).

d. Start Construction (previously approved under OMB Control No. 3060-0678).

- (1) Number of respondents: 5.
(2) Number of responses: 5.
(3) Frequency of response: One time.
(4) Annual hour burden: The total annual hour burden is 10 hours (5 responses x 2 hours/response = 10 hours).

e. Launch and Operate (previously approved under OMB Control No. 3060-0678).

- (1) Number of respondents: 5.
(2) Number of responses: 5.
(3) Frequency of response: One time.

- (4) Annual hour burden: The total annual hour burden is 5 hours (5 responses x 1 hour/response = 5 hours).

f. Launch and Operate Entire NGSO Constellation (previously approved under OMB Control No. 3060-0678).

- (1) Number of respondents: 1.
(2) Number of responses: 1.
(3) Frequency of response: One time.
(4) Annual hour burden: The total annual hour burden is 1 hour (1 response x 1 hour/response = 1 hour).

XI. Global Mobile Personal Communications by Satellite (GMPCS)/E911 Call Centers. (47 C.F.R. § 25.284) (previously approved under OMB Control No. 3060-1059).

- (1) Number of respondents: 4.
(2) Number of responses: 4.
(3) Frequency of response: Annual.
(4) Annual hour burden: The total annual hour burden is 4 hours (4 responses x 1 hour/response = 4 hours).

XII. Recordkeeping Requirement (47 C.F.R. §§ 25.221(a)(4), 25.221(a)(5), 25.221(a)(11), 25.222(a)(4), 25.222(a)(5), 25.226(a)(6), 25.227(a)(6), 25.263(c), and 25.284) (previously approved under OMB Control Nos. 3060-0678, 3060-0994, 3060-1061, 3060-1106, 3060-1153, 3060-1059, and 3060-1187).

- (1) Number of respondents: 37.
(2) Number of responses: 37.
(3) Frequency of response: Recordkeeping requirement.
(4) Annual hour burden: The total annual hour burden is 55.5 hours (37 responses x 1.5 hours = 55.5 hours).

B. TOTALS:

Total number of respondents: **4,880 respondents.**

I(a)(i) [29]+ I(a)(ii)(1) [20] + I(a)(ii)(2) [1] + I(a)(ii)(3) [1] + I(a)(ii)(4) [2] + I(a)(ii)(5) [1] + I(a)(ii)(6) [1] + I(a)(ii)(7) [2] + I(a)(ii)(8) [1] + I(b)(i) [699]+ I(b)(ii) [39]+ I(b)(iii) [679]+ I(b)(iv) [10]+ I(b)(v) [69]+ I(b)(vi)(1) [10]+ I(b)(vi)(2) [25] + I(b)(vi)(3) [2] + I(b)(vi)(4) [4] + I(b)(vi)(5) [6] + I(b)(vi)(6) [20] + I(b)(vi)(7) [20]+ I(b)(vi)(8) [3]+I(b)(vi)(9) [1]+ II(a) [32] + II(b) [211] +III(a) [25] + III(b) [62] + IV(A)(a) [10] + IV(A)(b) [181] + IV(B)(a) [4] +IV(B)(b) [170]+ V(a) [127] + V(b) [453] + VI [482] + VII(a) [1] + VII(b) [133] + VIII [34] +IX(a) [4] + IX(b) [3] + IX(c) [4]+ IX(d) [4] + IX(e) [10] + IX(f) [100] + IX(g) [699] + IX(h) [2]+ IX(i) [6] + IX(j) [365] + IX(k) [5] + IX(l) [25] + IX(m)(i)[1] + IX(m)(ii) [1] + IX(m)(iii) [4] + IX(m)(iv) [4] + IX(m)(v) [6] + X(a) [5] + X(b) [5] + X(c) [5] + X(d) [5] + X(e) [5] + X(f) [1] + XI [4] + XII [37] = **4,880**.

Range of hours per response: **.5-80**.

Total number of responses: **4,928 responses**.

I(a)(i) [29]+ I(a)(ii)(1) [20] + I(a)(ii)(2) [1] + I(a)(ii)(3) [1] + I(a)(ii)(4) [2] + I(a)(ii)(5) [1] + I(a)(ii)(6) [1] + I(a)(ii)(7) [2] + I(a)(ii)(8) [1] + I(b)(i) [699]+ I(b)(ii) [39]+ I(b)(iii) [679]+ I(b)(iv) [10]+ I(b)(v) [69]+ I(b)(vi)(1) [10]+ I(b)(vi)(2) [25] + I(b)(vi)(3) [2] + I(b)(vi)(4) [4] + I(b)(vi)(5) [6] + I(b)(vi)(6) [20] + I(b)(vi)(7) [20]+ I(b)(vi)(8) [3]+I(b)(vi)(9) [1]+ II(a) [32] + II(b) [211] +III(a) [25] + III(b) [62] + IV(A)(a) [10] + IV(A)(b) [181] + IV(B)(a) [4] +IV(B)(b) [170]+ V(a) [127] + V(b) [453] + VI [482] + VII(a) [1] + VII(b) [133] + VIII [34] +IX(a) [4] + IX(b) [3] + IX(c) [4]+ IX(d) [4] + IX(e) [10] + IX(f) [100] + IX(g) [699] + IX(h) [2]+ IX(i) [6] + IX(j) [365] + IX(k) [5] + IX(l) [25] + IX(m)(i)[25] + IX(m)(ii) [25] + IX(m)(iii) [4] + IX(m)(iv) [4] + IX(m)(v) [6] + X(a) [5] + X(b) [5] + X(c) [5] + X(d) [5] + X(e) [5] + X(f) [1] + XI [4] + XII [37] = **4,928**.

Range of hours per response: **.5-80**.

Total number of burden hours: **34,155**.

I(a)(i) [1740]+ I(a)(ii)(1) [80] + I(a)(ii)(2) [3] + I(a)(ii)(3) [8] + I(a)(ii)(4) [160] + I(a)(ii)(5) [1] + I(a)(ii)(6) [4] + I(a)(ii)(7) [12] + I(a)(ii)(8) [50] + I(b)(i) [5592]+ I(b)(ii) [234]+ I(b)(iii) [2716]+ I(b)(iv) [800]+ I(b)(v) [138]+ I(b)(vi)(1) [400]+ I(b)(vi)(2) [500] + I(b)(vi)(3) [120] + I(b)(vi)(4) [240] + I(b)(vi)(5) [480] + I(b)(vi)(6) [160] + I(b)(vi)(7) [160]+ I(b)(vi)(8) [24]+I(b)(vi)(9) [4]+ II(a) [512] + II(b) [4220] +III(a) [137.5] + III(b) [248] + IV(A)(a) [90] + IV(A)(b) [1629] + IV(B)(a) [36] +IV(B)(b) [1530] + V(a) [1016] + V(b) [3624] + VI [4820] + VII(a) [1] + VII(b) [133] + VIII [272] +IX(a) [4] + IX(b) [1.5] + IX(c) [8]+ IX(d) [8] + IX(e) [80] + IX(f) [800] + IX(g) [699] + IX(h) [2]+ IX(i) [6] + IX(j) [365] + IX(k) [5] + IX(l) [12.5] + IX(m)(i) [25] + IX(m)(ii) [25] + IX(m)(iii) [4] + IX(m)(iv) [4] + IX(m)(v) [6] + X(a) [10] + X(b) [40] + X(c) [80] + X(d) [10] + X(e) [5] + X(f) [1] + XI [4] + XII [55.5] = **34,155**.

TOTAL "In-house Cost" – In-house staff who will be working on the information collection requirements contained in the chart above is estimated to have an hourly salary of \$60/hour. Therefore, the in-house costs to respondents are **34,155 Total Annual Burden hours X \$60/hour = \$2,049,300.00**.

Several of the information collections included in this consolidated collection had not been updated recently and were approaching the time for renewal. In those collections, the in-house staff costs had been estimated at \$40 or \$50 per hour rather than the current \$60 per hour. Some of the change in total in-house cost is therefore the result of this upward unified estimated cost.

13. *Estimates of the cost burden of the collection to respondents.*

Respondents are assumed to use outside legal or engineering assistance in order to complete their filing with the Commission. In addition to their in-house legal and engineering staffs, space station and earth station operators often rely on outside attorneys and engineers to assist with some of the

information collection requirements in Part 25. We estimate that the hourly rates for outside legal and engineering assistance are \$300/hour and \$250/hour, respectively. These figures are based on a small survey of local firms in the D.C. area and are conservative estimates. Because outside attorneys and engineers are used in approximately equal proportions, we use an average rate of \$275/hour to arrive at the cost burden for outside assistance. The amount of hourly work performed by outside parties varies with the type and complexity of the application. Based on our experience, we estimate that operators will engage outside attorneys and engineers in preparing 1,164 of the total number of responses filed annually, with an average of 8.8 hours spent per response. Consequently, the total cost burden for outside assistance is **\$2,816,880** (\$275 x 1,164 responses x 8.8 hours per response).

Application Filing Fees⁵: \$7,181,905.23. Based on actual Commission filings over the past five years, we estimated that 90% of applications fees involve GSO space stations and 10% involve NGSO space stations. The application fees associated with NGSO applications are nearly four times higher than the fees for GSO applications. Accordingly, we weighted the total number of applications for each fee category to accurately reflect those differences in the estimated total fees collected. The weighting for previous information collection submissions was 50/50. Based on industry trends favoring GSO technology, the previous weighting greatly overestimated application filing fees. This Supporting Statement represents a more accurate estimation. For earth station application filing fees, an average of the range of application filing fees was used.

Total Annualized Cost:

Total Costs to the Industry	Totals
Estimated Application Filing Fees	\$7,181,905.23
Estimated Cost of Outside Legal/Engineering Assistance	\$2,816,880.00
Total Cost to Respondents	\$9,998,785.00 (rounded)

14. *Estimate of Annualized Cost to the Federal Government.*

The estimate of annualized cost to the Federal government is summarized in the chart below.

⁵ See Appendix A for Table of Calculations.

As shown in the chart, the annualized costs to the Federal government are **\$1,822,095.00**

The chart contains total staff salaries, burden hours and annualized costs.

Federal Government Staff	Number of Staff	Salary Per Hour	Annual Burden Hours	Annualized Costs
GS-15/Step 5 Attorney	9	\$67.88	1,500	\$916,380.00
GS-14/Step 5 Attorney	3	\$57.70	1,500	\$259,650.00
GS-12/Step 5 Attorney	1	\$41.07	1,500	\$61,605.00
GS-15/Step 5 Engineers	2	\$67.88	2,000	\$271,520.00
GS-14/Step 5 Engineers	2	\$57.70	2,000	\$230,800
GS-12/Step 5 Paralegal	1	\$41.07	500	\$20,535.00
GS-12/Step 5 Industry Analyst	1	\$41.07	1,500	\$61,605.00
	19		10,500	\$1,822,095.00

15. *Program changes or adjustments.* This is a revised collection. The public burden for the collections contained herein is 34,155 burden hours. The total burden hours currently contained in the 17 separate, OMB-approved information collections related to Part 25 requirements is 13,475. Of this total, 13,215 hours are being incorporated into this consolidated collection. (The remaining 260 hours will remain in the separate collections.) Thus, it appears that this revised information collection imposes an increase of 20,904 total burden hours on respondents (34,155 hours minus 13,215 hours). This is not the case. The difference results from using a uniform methodology and eliminating the duplications and/or omissions inherent in maintaining 17 separate information collections for what is, in reality, one information collection. Indeed, the August 2013 *Report and Order* triggering this revised collection contained a net annualized decrease of 38 burden hours.

This net 45.5 hour reduction is comprised of a net annualized increase of 41.5 hours due to new requirements imposed by the *Report and Order* and a net annualized decrease of 87 hours due to streamlining measures in that *Report and Order*. Specifically, the *Report and Order* adopted new rules expanding the annual reporting requirement to cover Direct Broadcast Service (DBS) and Earth Exploration Satellite Service (EESS). Previously, these licensees were excluded from the annual reporting requirement that applied to all other space station licensees. (See 47 C.F.R. 25.170). This requirement expands the number of annual responses by three (two DBS licensees, one EESS licensee), resulting in an increase in hour burden of 24 hours (3 responses x 8 hours per response). In addition, the *Report and Order* adopted a new rule requiring licensees to report the results of-in orbit testing to the Commission after launch of a satellite. (See 47 C.F.R. 25.173(a) and (b)). This results in an increase of 5 annual burden hours (5 responses x 1 hour per response). Last, the Report and Order adopted a new rule requiring licensees to update contact information within 10 days of a change. (See 47 C.F.R. 25.171, 25.172, 25.259(b), 25.260(b), and 25.271(f)). This results in an increase of 12.5 annual burden hours (25 responses x .5 hour per response). The total annual burden hours of these three new requirements are 41.5 hours (24+5+12.5). Conversely, the *Report and Order* eliminated several other requirements, resulting in a reduction

in annual burden hours. It eliminated the requirement for space station applicants to fill out a number of "blocks" in Schedule S to Form 312 and to provide certain technical information regarding their spacecraft antenna, resulting in a time savings of approximately 3 hours per space station application. This results in a decrease of 87 annual burden hours (29 responses x 3 hours). Thus, the changes adopted in the *Report and Order* resulted in a net annualized decrease of 45.5 hours (87-41.5).

When comparing the totals of the 17 separate information collections with the totals in the new consolidated information collection, the increase in annual burden hours from 13,215 to 34,155, the increase in the number of respondents from 2,222 to 4,928, and the increase in annual burden hours per response from 5.9 hours (13,215 hours divided by 2,222 respondents) to 6.9 hours (34,155 hours divided by 4,928) do not reflect real increases. Rather, it reflects a more accurate accounting of the information collections when viewed as a whole, rather than as 17 separate collections. In fact, as noted, the rule changes in the June 2013 R&O that triggered this revised information collection submission result in a decrease of 46 annual burden hours.

In addition to these differences, the new information collection contains a significant decrease in the total annualized cost to respondents, from \$22,202,335 (the total from the 17 existing collections) to \$9,998,785.00. The difference is due to the figure used as the average application fee for space station applications. The previous number assumed an equal number of applications are filed annually for geostationary satellite orbit (GSO) space stations, and non-geostationary satellite orbit space stations (NGSOs). In the last few years, however, there has been an industry trend heavily favoring the filing of applications for GSO space stations. In fact, based on an accounting of the numbers of GSO and NGSO applications filed over the last five years, the ratio of GSO to NGSO applications is now approximately 9 to 1. Because the application fees associated with GSO applications is significantly lower than the fees associated with NGSO applications (for example, \$120,005 to \$413,295 for initial license applications), the previous cost number greatly overestimated annualized application fees. Using an estimate that 90% of space station applications relate to GSO satellites, rather than using a 50-50 split, the estimated application filing fees, and, therefore, the total cost to respondents, are significantly lower.

16. *Collections of information whose results will be published.* The data will not be published for statistical use.

17. *Display of expiration date for OMB approval of information collection.* We continue to seek a waiver of the requirement to display the expiration date of OMB approval on the FCC Form 312 (including associated Schedule A, S, and B), FCC Form 312 EZ, and FCC Form 312 R and wish to instead display an edition date. If these forms remain unchanged when it is time to renew OMB approval for this collection, the Commission would be required to destroy all stock on hand displaying the old expiration dates and then reprint and redistribute the forms with the new expiration date. Additionally, it would require the Commission to modify the electronic versions as well. This would be an undue burden on Commission resources and may lead to confusion among licensees.

18. *Exceptions to the certification statement for Paperwork Reduction Act submissions.* There are no exceptions to the Certification Statement.

B. Collections of Information Employing Statistical Methods:

No statistical methods are employed.

Appendix A

Application Filing Fees
 (in dollars)

Type of Filing	No. of Applications	Filing Fee	Subtotals	Totals
I. Applications for Initial Licenses, Registrations, or Market Access Grants				
a. Space Stations:				
FSS GSO	10	120,005.00	1,200,050.00	
FSS NGSO	1	413,295.00	413,295.00	
				1,613,345.00
b. Earth Stations:				
single		2,615.00		
lead		5,795.00		
blanket		9,655.00		
(average earth station application fee)	699	6,021.67		4,209,147.33
II. Modifications of Existing Licenses and Market Access Grants				
a. Space Station				
GSO	29	8,575.00	248,675.00	
NGSO	3	29,525.00	88,575.00	
				337,250.00
b. Earth Station	211	180.00		37,980.00
III. Amendments of Pending Applications and Market Access Grants				
a. Space Station				
GSO	23	1,715.00	39,445.00	
NGSO	2	5,910.00	11,820.00	
				51,265.00
b. Earth Station	211	180.00		37,980.00

IV. Transfers of Control and Assignments				
A. Transfers of Control (T/C)				
a. Space Station				
	9	8,575.00	77,175.00	
	1	11,815.00	11,815.00	
				88,990.00
b. Earth Station		60.00		
		2,585.00		
(average earth station T/C fee)	181	1,322.50		239,372.50
B. Assignments				
a. Space Station	4	9,232.60		36,930.40
b. Earth Station	170	1,322.50		224,825.00
V. Applications for Special Temporary Authority				
a. Space Station				
	114	860.00	98,040.00	
	13	2,960.00	38,480.00	
				136,520.00
b. Earth Station	453	180.00		81,540.00
VI. Earth Station License Renewals	482	180.00		86,760.00
Totals				7,181,905.23