

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION
3090-XXXX, Mobile Now Act**

B. Collections of Information Employing Statistical Methods

1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection methods to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

Organization	Membership / Recipients	Estimated Response Rate
State Broadband Leaders Network	40	75%
FCC Intergovernmental Advisory Committee	30	10 – 33%
National League of Cities	1900	20 – 30%
National Association of Regional Councils	180	10 – 33%
State Broadband POCs	65	10 – 33%
State GIS POCs	105	10 – 33%
Municipal Leagues	49	10 – 33%
Total / Average	2,369	38.57%

GSA developed a list of contact organizations as noted in the table above. GSA contacted the organizations and obtained membership numbers from each organization, which totals to 2,369 members.

This is a new data collection and therefore actual response rates have not been previously recorded. Where the information was available, we obtained response rates from prior surveys conducted by these organizations. GSA also conducted internet research and found that while there was no industry standard average response rate, the estimated response rates for a survey fell between 10 and 33 percent. Where there were not concrete or previous response rates for these organizations, we utilized the 10 – 33% estimate. The average total estimated response rate is 38.57% (when using the high end of response rate ranges). Our research indicated that responses were higher when the survey was sent by someone the recipient knew; and GSA is partnering with the above mentioned organizations to send the surveys to their membership.

2. Describe the procedures for the collection of information, including:

- Statistical methodology for stratification and sample selection.
- Estimation procedure.

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- Degree of accuracy needed for the purpose described in the justification.
- Unusual problems requiring specialized sampling procedures,
- Any use of periodic (less frequent than annual) data collection cycles to reduce burden.

The survey and a series of draft emails will be sent to the organizations identified in number 1 above. Those organizations will send the emails and survey to their memberships. The survey will be open for 2 weeks, and recipients will be sent a reminder email after 1 week, and then again 2 days prior to the survey closing. GSA has made all questions in the survey mandatory; striving for more complete responses to help with the analysis of the survey.

The survey was developed in Qualtrics, an online survey application. Qualtrics has a number of quality, methodology and analytical functions to help us ensure normalization and evaluate the survey results, such as regression cards, cluster analysis, and “StatsIQ.” GSA has enabled a “bot check” which ensures the response is being provided by a person. We have also taken steps to prevent “ballot stuffing” by ensuring a recipient can only take the survey once. We will also look at a report that shows how long the recipient took to complete the survey, location, progress, etc. These features will help us identify and address outliers, and to better analyze the responses.

3. Describe methods to maximize response rates and to deal with issues of nonresponse. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

GSA plans to maximize response rates in a number of ways. First, we intend to have the survey come from an organization the recipient is already a member of (receiving the survey from someone they know has been shown to increase response rates). Second, we have drafted a message to be sent 2-3 days prior to the survey, a one week reminder, and a message to be sent 2 days before the survey closes. Our research has indicated that follow up reminders increase response rates by between 10 and 20 percent. GSA is also utilizing straightforward survey questions that keep the time required to complete the survey less than 10 minutes in total. Further, we have had the survey reviewed by multiple parties, as described in further detail in number 4 below.

The goal of the survey is to confirm the information we have previously identified in our discussion with states, local governments, and/or their representative, and to help support that the feedback received to date is accurate. We assume given the timing of the Act and due date of the report that we will be making recommendations based on a small percentage of the “state and local government” representatives. We also assume some bias based on overlapping laws and regulations, such as broadband work currently being undertaken by the FCC. Depending on the nature of the survey responses, detailed descriptions of the relevant assumptions and caveats will be included in the report.

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4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of test may be submitted for approval separately or in combination with the main collection of information.

GSA has tested the survey in multiple ways. The survey was reviewed by GSA’s Office of Customer Experience (OCE) who focus on improving customer experience and fostering a customer-first mentality; this office also sets GSA survey standards and best practices. We incorporated all recommended changes provided by the OCE. The system the survey was developed in, Qualtrics, has a number of built in quality and methodology features, including “[ExpertReview](#)” which evaluates the survey as it is built and provides feedback to increase the usability and data quality of the survey. GSA incorporated the edits recommended by the system and has an ExpertReview rating of “Great.” GSA also socialized the survey with the federal agencies that are mandated by the Act to consult on the study and report to Congress (the agencies include: NIST, NTIA, FCC, OMB, and DOI). GSA incorporated the feedback and edits suggested by the consultation group. Finally, GSA reviewed the survey with 5 members of the FCC Intergovernmental Advisory Committee (IAC). The IAC is comprised of 30 state and local government members. The 5 members who reviewed the survey were from 2 states, 2 cities, and 1 tribe, and therefore representative of our survey population. The IAC members had no recommended edits and noted that they thought the survey was well written and would be easy to complete. They also noted that they thought we would have a high response rate and that the data would provide good insight for the report.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractors, grantees, or other person(s) who will actually collect or analyze the information for the agency.

The GSA Qualtrics Team was consulted for the development of this survey and will work with Jennie Campbell, the GSA project lead for GSA’s requirements under Section 608(d) of the MOBILE NOW Act, to run post survey analytics using built in functionality within Qualtrics, and if necessary through Tableau. Jennie Campbell and her team, including contractor support, will review and summarize the survey responses for inclusion in the Congressional report.