

SUPPORTING STATEMENT

A. Justification:

1. The Commission is requesting a revision to its currently approved hearing aid compatibility information collection that applies to wireless service providers. The revision is necessary to implement the final rules promulgated in the 2018 Report and Order in WT Docket No. 17-228, FCC 18-167 (2018 Order), which eliminated unnecessary and outdated information collection requirements for wireless service providers and replaced these requirements for service providers with a revised web site posting and record retention requirement and a streamlined annual certification requirement.¹ The 2018 Order did not make changes to the currently approved reporting requirements for device manufacturers.

The Commission's previous hearing aid compatibility reporting requirements for service providers were intended to provide the Commission with a way to verify compliance with rules requiring service providers to offer specified numbers of hearing aid-compatible handset models, to monitor the status of hearing aid-compatible handset deployment in the marketplace, and to ensure that consumers have access to information about the handset models that serve their needs. The Commission's revised and enhanced web site posting, record retention, and annual certification requirements for service providers are an improved means of promoting those goals. The Commission now seeks approval for new FCC Form 855 and its instructions which will be used to ensure that service providers are in compliance with the Commission's hearing aid compatibility provisions.

To implement the changes made by the 2018 Order, the Commission modified the FCC Form 655 and its instructions for manufacturers. These non-substantive changes to FCC Form 655 and its instructions were already approved by OMB.² The Form 655 and its instructions have been modified to eliminate references to wireless service providers. FCC Form 655 will only be used by device manufacturers on a going forward basis to ensure their compliance with the Commission's hearing aid compatibility provisions.

In a Report and Order in WT Docket 01-309, FCC 03-168, adopted and released in September 2003 (2003 Order), the Commission modified the exemption for telephones used with public mobile services from the requirements of the Hearing Aid Compatibility Act of 1988. The 2003 Order required digital wireless handset manufacturers and service

¹ Notice of the 2018 Order was published in the Federal Register on December 7, 2018 with an effective date for the rules not containing Paper Work Reduction Act implications of January 7, 2019. 83 FR 63098.

² OMB approved non-substantive changes to the Form 655 on February 21, 2019 and additional changes on April 22, 2019 to eliminate references to service providers.

providers to make certain digital wireless handsets capable of effective use with hearing aids. Specifically, the 2003 Order adopted performance benchmarks that required manufacturers and service providers to offer a certain percentage of the total number of handsets they offered as hearing aid-compatible and adopted the American National Standards Institute (ANSI) standard as the applicable technical standard for determining compatibility between wireless handsets and hearing aids. As part of the 2003 Order, manufacturers and service providers were required to label certain handsets they sold with information about their compatibility with hearing aids, and also to report to the Commission (at first every six months, then on an annual basis) on the numbers and types of hearing aid-compatible handsets they were producing or offering to the public. OMB approved the information collection for the 2003 Order on June 7, 2004, under OMB Control Number 3060-0999. Since then, these requirements have been updated and amended.

In February 2008, the Commission adopted final rules in a Report and Order, WT Docket No. 07-250, FCC 08-68 (2008 Order), which updated several of the performance benchmarks for manufacturers and service providers and instituted new requirements for manufacturers to refresh their product lines and for service providers to offer hearing aid-compatible handset models with differing levels of functionality. The Commission also adopted a new version of the ANSI technical standard for measuring hearing aid compatibility and addressed the application of the rules to handsets that operate in multiple frequency bands or air interfaces. In order to avoid potential consumer confusion, the 2008 Order also slightly modified the product labeling requirements.

To assist the Commission in monitoring the implementation of the new requirements and to provide information to the public, the 2008 Order also required manufacturers and service providers to continue to file annual reports on the status of their compliance with these requirements and required manufacturers and service providers that maintain public web sites to publish up-to-date information on those web sites regarding their hearing aid-compatible handset models. The annual reports required by the 2008 Order contained different and additional information than in previous versions of this information collection and, for the first time, were required to be submitted by manufacturers and service providers using electronic FCC Form 655. OMB approved the revisions to the collection, including the new reporting and public web site requirements on June 5, 2009 under OMB Control Number 3060-0999.

On August 5, 2010, the Commission adopted final rules in a Second Report and Order, WT Docket No. 07-250, FCC 10-145 (2010 Order), that among other things, adopted new disclosure requirements for manufacturers and service providers. As a result, in addition to meeting the handset labeling requirement and the web site posting requirement, manufacturers and service providers are also required to disclose to consumers additional information about the functionality and the limitations of their handsets in specific situations. Following release of the 2010 Order, the Commission amended FCC Form 655 to capture information regarding the new disclosure requirements as well as other information important to monitoring compliance with the hearing aid compatibility rules. OMB approved the revised collection, including these disclosure requirements and changes to FCC Form 655, on December 7, 2010, under OMB Control Number 3060-0999.

On April 9, 2012, the Commission adopted final rules in a Third Report and Order, WT Docket No. 07-250, DA 12-550 (2012 Order), that, among other changes, adopted the 2011 revision of the ANSI technical standard as an applicable technical standard alongside the 2007 version that was already in the Commission's rules. Following release of the 2012 Order, the Commission amended FCC Form 655 to capture information regarding new disclosure requirements as well as other information important to monitoring compliance with the hearing aid compatibility rules. OMB approved these disclosure requirements and changes to FCC Form 655 on November 20, 2012, under OMB Control Number 3060-0999.

On November 19, 2015, the Commission adopted final rules in a Fourth Report and Order, WT Docket No. 15-285, FCC 15-155 (2015 Order), that, among other changes, expanded the scope of the Commission's hearing aid compatibility provisions to cover handsets used with any digital terrestrial mobile service that enables two-way, real-time voice communications among members of the public or a substantial portion of the public, including through the use of pre-installed software applications. Following release of the 2015 Order, the Commission was required to amend FCC Form 655 to reflect the newly expanded scope of handsets covered by the hearing aid compatibility provisions, as well as to capture information regarding existing disclosure requirements clarified by the Commission in the 2015 Order. OMB approved these changes to FCC Form 655 on June 5, 2018, under OMB Control Number 3060-0999.

In addition to approving the above changes to the information collection related to the Commission's hearing aid compatibility provisions, OMB approved minor non-substantive revisions to the collection contained in FCC Form 655 on April 15, 2014 and December 11, 2017. The Commission determined that these changes needed to be made to make the form more user-friendly. The changes did not affect the burden hours or the cost of compliance, and they did not require a change in the underlying supporting statement that was part of OMB's previous approval of the form.

The currently approved information collection for the Commission's hearing aid compatibility provisions includes the following requirements:

- (1) Web Site Requirement. Manufacturers and service providers are required to post information related to the hearing aid-compatible handsets they offer on their public web sites. *See* 47 CFR § 20.19(h). The web site requirement is designed to ensure that consumers have critical, up-to-date information between reporting dates on which they can base their search for compatible handsets.
- (2) Reporting Requirement. Manufacturers and service providers must file FCC Form 655 electronically on an annual basis. *See* 47 CFR § 20.19(i). The Commission uses FCC Form 655 as the principle way to monitor compliance with the Commission's hearing aid compatibility provisions.
- (3) Standards Development Requirement. The Commission requires manufacturers and service providers to make available a certain number of digital wireless handsets that meet specific performance levels set forth in an established technical standard developed and periodically revised by ANSI. *See* 47 CFR §§ 20.19(b), (c).

- (4) Labeling and Disclosure Requirement. The Commission requires manufacturers and service providers to comply with certain handset labeling requirements and certain other disclosure requirements that alert consumers about the functionality and the limitations of their handsets in specific situations. *See* 47 CFR § 20.19(f).

Pursuant to the changes made in the recently adopted 2018 Order, the Commission now requests that OMB approve revisions to the currently approved information collection related to service providers' web site posting, record retention, and annual reporting requirements.

Specifically, under the Commission's new rules, service providers must comply with the existing web site posting requirements as well as new requirements that require them to post certain information previously collected by FCC Form 655. All service providers that maintain web sites (other than *de minimis* service providers, which remain exempt from the web site posting requirement) will now be required to post to their web sites the following additional information:

- (1) A list of all non-hearing aid-compatible handset models currently offered, including the level of functionality that each of those models falls under, an explanation of how the functionality of the handsets varies at the different levels;
- (2) A list of all hearing aid-compatible models currently offered, the ratings of those models, and an explanation of the rating system. Each service provider must also specify on its web site, based on the levels of functionality and rating that the service provider has defined, the level that each hearing aid-compatible model falls under, as well as an explanation of how the functionality of the handsets varies at the different levels. Each service provider must also include the marketing model name/number(s) and FCC ID number of each hearing aid-compatible and non-hearing aid-compatible model currently offered;
- (3) A link to a third-party web site as designated by the Commission or Wireless Telecommunications Bureau, with information regarding hearing aid-compatible and non-hearing aid-compatible devices or, alternatively, a clearly marked list of hearing aid-compatible devices that have been offered in the past 24 months but are no longer offered by that provider. For purposes of initial implementation, the Commission designates the Global Accessibility Reporting Initiative (GARI) web site as the third-party web site referred to in this portion of the rule;
- (4) A link to the current FCC web page containing information about the wireless hearing aid compatibility rules and service providers' obligations; and
- (5) A "date stamp" on any web site page containing the above referenced information that indicates when the page was last updated.

Service providers must also retain internal records for discontinued models, to be made available upon Commission request of:

- (1) The ratings, if applicable, of all hearing aid-compatible and non-hearing aid-compatible models no longer offered (if the calendar month/year that model

- was last offered is within 24 months of the current calendar month/year and was last offered in January 2018 or later);
- (2) For models no longer offered (if the calendar month/year that model was last offered is within 24 months of the current calendar month/year), the calendar months and years each hearing aid-compatible and non-hearing aid-compatible model was first and last offered; and
 - (3) The marketing model name/number(s) and FCC ID number of each hearing aid-compatible and non-hearing aid-compatible model no longer offered (if the calendar month/year that model was last offered is within 24 months of the current calendar month/year and was last offered in January 2018 or later).

In addition to these revised web site posting and record retention requirements, the Commission eliminated the requirement that service providers annually file FCC Form 655. Instead, the Commission will require service providers to file a streamlined annual certification using FCC Form 855. The new annual certification requirement applies to all service providers including *de minimis* service providers. Under this new rule, service providers will be required to file a certification by January 15 of each calendar year using new FCC Form 855 which can be accessed using the same electronic interface used for FCC Form 655. The certification will state as follows::

I am a knowledgeable executive [of company x] regarding compliance with the Federal Communications Commission's wireless hearing aid compatibility requirements at a wireless service provider covered by those requirements.

I certify that the provider was [(in full compliance/not in full compliance)] [choose one] at all times during the applicable time period with the Commission's wireless hearing aid compatibility deployment benchmarks and all other relevant wireless hearing aid compatibility requirements.

The company represents and warrants, and I certify by this declaration under penalty of perjury pursuant to 47 CFR § 1.16 that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action pursuant to Sections 501 and 503 of the Act.

If the service provider states that it is "not in full compliance," it must include an explanation of which wireless hearing aid compatibility requirements the wireless service provider was not in full compliance with, and when non-compliance began and (if applicable) ended with respect to each requirement. In addition, as part of the certification, the service provider must submit the name of the signing executive, his or her contact information, the web site address (if applicable) of pages(s) containing hearing aid compatibility information required by Section 20.19(h), and the FCC FRN and the name of the company(ies) covered by the certification. The service provider must also indicate on the certification form the percentage of hearing aid-compatible wireless handsets it made available that year.

In order to implement this new certification requirement, the Commission has created FCC Form 855 and accompanying instructions. Service providers will continue

to register and log into the new online form in the same manner as they did previously for the FCC Form 655. As before, a service provider will provide company identification and contact information and indicate whether it is a *de minimis* service provider. Companies that are *de minimis* service providers must complete the certification requirement but are exempt from the web site posting and record retention requirements and are subject to different handset deployment benchmarks. Once service providers have provided the requested information, the revised form will take them to a certification page where service providers will certify their compliance status. The Commission granted the Wireless Telecommunications Bureau delegated authority to approve or prescribe formats and methods for submission of the reports and certifications. 47 CFR § 20.19(i)(4).

Pursuant to the above explanation, the Commission is requesting a revision of the currently approved information collection for its hearing aid compatibility provisions in order to implement the changes adopted in the 2018 Order. These changes benefit wireless service providers by reducing regulatory burden while continuing to ensure that the Commission can fulfill its obligation to monitor compliance with the current version of the hearing aid compatibility rules and make more complete and accessible information available to consumers. All the other reporting and disclosure requirements previously approved in this collection remain unchanged.

Statutory authority for this collection of information is contained in 47 U.S.C. §§ 151, 154(i), 157, 160, 201, 202, 208, 214, 301, 303, 308, 309(j), 310 and 610.

This collection of information does not affect individuals or households; thus, there are no impacts under the Privacy Act.

2. These information collection modifications have practical utility and will help the Commission fulfill its statutory requirements under the Hearing Aid Compatibility Act. These modifications provide the Commission with a way to verify compliance with rules that require service providers to offer specified numbers of hearing aid-compatible handsets and to monitor the status of hearing aid-compatible handset deployment. These modifications also ensure that consumers have easy access to up-to-date information about hearing aid-compatible handsets that service providers offer. The enhanced web site posting and record retention requirements are an improved means of promoting these goals and functions of the Commission.

3. The Commission's enhanced web site posting, and record retention requirements do not mandate how service providers must configure their web sites or the way information concerning discontinued handset models must be kept. Service providers will continue to have flexibility with the design and administration of their web sites and may maintain the information about discontinued handsets in a manner that works best for them. The web site posting rule only requires that certain information be contained on web sites and that the information be kept up-to-date; the format and manner of presentation is left entirely to the service provider. Similarly, the record retention rule just states what information must be kept and for how long. The Commission's new annual certification requirement will be accomplished electronically using the new FCC Form 855 (<http://wireless.fcc.gov/hac>).

4. By requiring service providers to post and retain the required information, the Commission and consumers will have easy access to this information that is not otherwise readily available. Further, eliminating the obligation for service providers to file FCC Form 655 eliminates the significant burden associated with preparing and submitting that form.

5. The Commission's revised web site posting, record retention, and certification requirements for service providers will not have a significant economic impact on small businesses, organizations, or other small entities. In fact, the Commission's revised provisions completely eliminate the need for all service providers to fill out and file FCC Form 655. This change will reduce an unnecessary regulatory burden. Much of the information that the Commission is requiring service providers to post to their web sites is information that service providers track in the normal course of business and to ensure compliance with the Commission's other hearing aid compatibility provisions. Similarly, the information that service providers are required to retain for 24 months is a subset of this same information and therefore should not impose a significant burden on service providers.

Further, consistent with the Paperwork Reduction Act of 1995, the Commission strives to minimize the regulatory burden on all respondents regardless of size. In the 2018 Order, the Commission considered but rejected more burdensome compliance requirements. For instance, the Commission considered retaining but streamlining the information that is collected in the FCC Form 655. The Commission rejected this approach because it determined that streamlining the form will only result in a minimal reduction of regulatory burden with no corresponding benefit to the public interest.

The Commission also chose to make the elimination of the FCC Form 655 reporting requirement for service providers effective 30 days after publication of the rule in the Federal Register. Therefore, service providers will quickly benefit from the Commission's deregulatory action. Because the new website posting, record retention, and certification obligations will only become effective 30 days following Federal Register publication of OMB approval of the relevant information collection requirements, service providers will have sufficient time to make necessary changes to comply with the rules.

6. Without the revised web site posting, record retention, and certification requirements, the Commission could not fulfill its statutory obligations under the Hearing Aid Compatibility Act and consumers would not have easy access to up-to-date compatibility information.

7. The modifications to the currently approved information collection are consistent with OMB's guidelines as stated in 5 CFR §1320.5(d)(2).

8. Pursuant to 5 CFR §1320.8(d), the Commission initiated a 60-day public comment period on February 26, 2019, 84 FR 6147 seeking comment from the public on the revised information collection requirements contained in this OMB submittal. The Commission did not receive any Paperwork Reduction Act comments from the public in response to the 60-day notice.

9. Respondents will not receive any payments or gifts.

10. Information requested in the certifications may include confidential information. However, covered entities are allowed to request that such materials submitted to the Commission be withheld from public inspection. See 47 CFR § 0.459.

11. None of the modified information collection requirements contained in this submission address any private matters or questions of a sensitive nature.

12. The 2018 Order requires modifications to the currently approved information collection regarding service providers' web site posting, record retention, and reporting requirements. The 2018 Order does not require modifications to the currently approved information collection related to handset manufacturers. Further, the 2018 Order does not require the Commission to make changes to the approved information collection regarding service providers' and handset manufacturers' standards development, labeling and disclosure requirements. Finally, the 2018 Order does not require the Commission to revise the previously approved number of estimated respondents. For the sake of clarity, we include below both currently approved information collection burden estimates and new burden estimates related to the revised service provider requirements.

Estimated Respondents: The 2018 Order does not require the Commission to revise the previously approved number of estimated respondents. There are two groups of entities that this information collection applies to – wireless handset manufacturers and wireless service providers. Consistent with the previously approved information collection, the Commission continues to estimate that there are approximately 25 digital wireless handset manufacturers and approximately 909 operating wireless service providers. Therefore, consistent with the Commission's last information collection submission, the Commission continues to estimate that the total number of estimated respondents for this collection is 934. This number of estimated respondents is the same number of respondents OMD previously approved for this collection.

Estimated total number of respondents: 934 respondents (25 manufacturers + 909 providers).

Web Site Posting Requirement: The web site posting requirement for wireless handset manufacturers that maintain public web sites is unchanged by the 2018 Order. Handset manufacturers are required to post on their web sites information on the number, types, ratings and functionality of hearing aid-compatible handsets offered, as well as an explanation of the rating and functionality of their handsets. All of this information is also required to be included in either their FCC Form 655 annual filing or as part of their product labeling requirement. The reason for the web site posting requirement is to ensure that consumers have access to up-to-date versions of this information. Unlike with the annual filing, web sites must be updated within 30 days of any changes to this information. Because these requirements for manufacturers are unchanged from the previously approved collection, the Commission's burden estimate for web site posting for manufacturers is unchanged. The Commission continues to expect that each manufacturer will spend no more than one and half hours updating their web site postings and will need to update their web postings at most six times per year. As a result, the Commission calculates the web site posting burden for wireless handset manufacturers as follows:

25 manufacturers X 1.0 hour per update X 6 updates per year = 150 hours.

While the 2018 Order did not change the web site posting requirement for handset manufacturers, it did change the web site posting and record retention requirements for service providers as described above. This change in their posting and record retention requirements will ensure that the Commission can continue to fulfill its statutory obligations and that consumers will have up-to-date handset information. Under the new service provider web site posting and record retention requirements, the Commission estimates that the burden for service providers will increase from one hour to no more than an hour and half per update. In addition, consistent with handset manufacturers, the Commission continues to estimate that service providers will need to update their web postings and records at most six times per year. As a result, the Commission calculates the web site posting and record retention burden for wireless service providers as follows:

909 providers X 1.5 hour per update X 6 updates per year = 8,181 hours.

Sub-Total Annual Burden Hours: 8,331 hours (150 hours + 8,181 hours).

Reporting Requirement: The 2018 Order did not affect the annual reporting requirement for wireless handset manufacturers and therefore the burden estimate for this requirement remains the same. Manufacturers must continue to submit FCC Form 655 annually using the Commission's electronic filing system. The Commission continues to expect that manufacturers will utilize staff attorneys to draft and file the reports. As under the currently approved information collection, the Commission estimates the burden for completing and filing an individual report through the Commission's electronic filing system will continue to be two and a half hours. Thus, the annual reporting burden for wireless handset manufacturers is unchanged and continues to be:

One report per manufacturer X 2.5 hours X 25 manufacturers = 63 hours.

While the 2018 Order did not change the reporting requirement for wireless handset manufacturers, it did substantially reduce the reporting burden for wireless service providers. Under the Commission's new approach, service providers no longer need to complete and file FCC Form 655 on an annual basis. Instead, they only need to file a short, streamlined certification, FCC Form 855, stating whether they are in full compliance with the Commission's hearing aid compatibility requirements. This change greatly reduces the reporting burden for service providers while ensuring that the Commission can continue to fulfill its statutory obligations. As with handset manufacturers, the Commission expects that service providers will use staff attorneys to electronically file their certifications. Under the new service provider certification requirement, the Commission estimates that the reporting burden for service providers will be reduced from two and half hours to a half hour per filing.

One certification per provider X 0.5 hours X 909 providers= 454.50 hours.

Sub-Total Annual Burden Hours: 517.50 hours (63 hours + 454.50 hours).

Standard Development: The 2018 Order did not address the standards development process for ensuring that hearing aids are compatible with handsets. As a result, the burden estimate for ongoing discussions concerning the technical standard is unchanged from the currently approved collection. The Commission continues to expect that a subset of approximately 50 of the 934 respondents will meet and make

modifications to the technical standard for the remaining years. The Commission bases the total estimated annual burden hours for the standard development requirement on the following: The Commission anticipates that 12 principal representatives will account for 1,920 hours (12 principal representatives x 160 hours) and 38 representatives will account for 2,280 hours (38 representatives x 60 hours).

Sub-Total Annual Burden Hours: 4,200 hours (1,920 hours + 2,280 hours).

Labeling and Disclosure: The 2018 Order did not change the labeling and disclosure obligations of handset manufacturers and service providers and, therefore, the burden estimate for this requirement stays the same as the currently approved collection. Under the labeling and disclosure requirements, handset manufacturers and service providers must ensure that consumers understand the hearing aid compatibility rating of their handsets and how these handsets will function under certain conditions. These requirements apply to packaging, user manuals, and display cards. The Commission expects that these steps will be taken as part of the normal manufacturing and marketing processes, and that adding information about the performance ratings of wireless handsets will not be a significant additional burden for these entities.

Sub-Total Annual Burden Hours: 0 hours.

Total Annual Burden: By adding together the sub-totals of the annual burden hours outlined above, the Commission estimates that the total annual burden hours for this information collection is 13,048.50 hours rounded to 13,049 hours.

Total Annual Burden Hours: 13,049 hours (rounded) = (8,331 web posting hours + 517.50 reporting hours + 4,200 standards hours + 0 labeling and disclosure hours = 13,048.50).

Total Number of Respondents: 934.

Total Number of Annual Responses: 934.³

Total Annual In-House Cost: The Commission estimates that the respondents' in-house staff attorney will be paid an hourly rate of \$150 per hour. Therefore, the in-house cost for this collection is 13,049 hours (rounded) x \$150 per hour = **\$1,957,350.**

13. There will be no external/contracting costs incurred by the respondents.

14. In the currently approved collection, the Commission indicated that it would likely assign a staff engineer, GS-13, Step 5, at \$52.66 per hour to review FCC Form 655. Along with continuing to use this staff engineer to review the FCC Form 655, the Commission is likely to use this same staff engineer to review the new FCC Form 855 certifications that it will be receiving. The Commission continues to estimate that it will take the staff engineer about 3 hours to review each of the 25 FCC Form 655 annual reports filed by handset manufacturers and that it will probably take the staff engineer

³ Since some of the requirements are calculated in terms of the burden to the respondent pool instead of the actual responses, it is difficult for the Commission to quantify the total number of responses.

about a half-hour to review each of the 909 FCC Form 855 certifications that will be filed annually by service providers. This results in a potential cost to the Federal Government of about \$3,949.50 per year to review the FCC Form 655 reports (25 respondents x 3 hours x \$52.66 = \$3,949.50) and about \$23,933.97 per year to review the FCC Form 855 certifications (909 respondents x 0.5 hours x \$52.66 = \$23,933.97). Therefore, the total likely cost to the Federal Government for this information collection is **\$27,883.47** per year (\$3,949.50 + \$23,933.97 = \$27,883.47).

15. The revisions to the currently approved information collection are a direct result of the Commission's actions in the 2018 Order. These revisions represent program changes and are not adjustments. As explained above, the Commission made changes to the reporting burden for service providers but did not make any changes to device manufacturers' burden. Specifically, the Commission adopted an enhanced web site posting requirement for service providers, a record retention requirement, and a new certification requirement that replaces a much more burdensome reporting requirement. As explained above, the Commission has not made any changes to device manufacturers' burden. Service providers' burden related to standards development and labeling requirements also remain unchanged. The Commission estimates that there will be no change in the total of number of respondents and annual responses. However, the annual burden hours have increased by 909 hours.

16. The Commission will not publish any results from the information collected and the data will not be published for statistical use.

17. The Commission seeks continued OMB approval to not display the expiration date for OMB approval of the information collection on FCC Form 655 as well as approval to not display the expiration date for OMB approval of the information collection on new FCC Form 855. The Commission will use an edition date in lieu of an OMB expiration date. This approach will alleviate Commission staff from having to update the OMB expiration date every time the forms are re-submitted to OMB. Finally, the Commission displays the OMB expiration date, OMB Control Number, and Title of all OMB-approved information collections in 47 CFR § 0.408.

18. There are no exceptions to the "Certification Statement" contained at 5 CFR § 1320.9.

B. Collections of Information Employing Statistical Methods:

The revised information collection does not employ any statistical methods.