

FHH Telecom Law

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A Hard Look at Hard Copy

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The perversely titled "Paperwork Reduction Act" requires the Office of Management and Budget (OMB), part of the White House complex, to monitor how much paperwork the Government imposes on the public.

As Government agencies go, the FCC is relatively light on paperwork requirements. But it does have a few. One applies to manufacturers of computers and certain other consumer products -- a procedure called Declaration of Conformity (DoC). This entails testing the product, keeping files of the test results and certain other data, and providing an information sheet to consumers.

As part of its paperwork reduction responsibilities, OMB recently placed additional paperwork in the Federal Register. This item estimates that DoC requirements affect 4,000 respondents and take an average of 18 hours per response, for a total annual burden of 76,000 hours and \$12 million dollars.

The public is invited to create still more paperwork in the form of comments on the accuracy of this estimate.

Perhaps the public will file comments to remind OMB that $4,000 \times 18$ is 72,000, not 76,000. The public might also mention that DoC preparation works out to \$157.89 per hour, which is pretty good money. (We might go into the business ourselves.)

And maybe the public will note that OMB left out the time that it (the public) spent puzzling over the DoC information sheet it got with its Christmas laptop this year, before finally throwing it away. If 200 million consumers each spend one minute in real paperwork reduction -- *i.e.*, discarding their DoC sheets -- that's 3.33 million hours. At \$157.89 per hour, it adds up to half a billion dollars, probably enough to pay for a year of OMB paperwork reduction activities.

The public could also point out that any errors in OMB's estimate can have no discernable effects in the real world. In the name of reducing paperwork, the Government has not only created more, but ensured that it cannot serve any useful purpose.

Here in Washington, we're not the least bit surprised.

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Total burden on the public: definitely excessive.