

PAPERWORK REDUCTION ACT SUBMISSION
Supporting Statement

Agency: Federal Bureau of Investigation

Title: National Instant Criminal Background Check System (NICS)

Forms: Federal Firearms Licensee (FFL) Enrollment E-Check Enrollment Form
FFL Officer/Employee Acknowledgment of Responsibilities under the
National Instant Criminal Background Check System (NICS) Form

OMB No: 1110-0026

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The NICS Section is requesting the Office of Management and Budget (OMB) approve the Paperwork Reduction Act submission for an extension of the Federal Firearms Licensee (FFL) Enrollment/E-Check Enrollment Form and the FFL Officer/Employee Acknowledgment of Responsibilities under the NICS Form. No revisions have been made to the forms.

The Federal Firearms Licensee (FFL) Enrollment/E-Check Enrollment Form and the directions were previously combined into a one-page two-sided document to reduce the amount of paper used. Two blocks on the form, the license type and the enrollment type, were eliminated at that time to reduce the burden on the applicant as it was decided the configuration of the characters of the FFL number indicate the license type. The sections the applicant completes on the form will indicate to the NICS Section which enrollment type is being requested, thereby eliminating time on the applicant's part of checking the block.

The FFL Officer/Employee Acknowledgment of Responsibilities under the NICS Form remains a one-page form. The directions form continues to be a two-sided single page document. These two forms are part of a packet that is sent to new FFLs upon their request to enroll in NICS. A two-page letter that explains how the NICS works, the contents of the packet, and what to do with the forms is included for OMB's review.

The Federal Firearms Licensee (FFL) Enrollment/E-Check Enrollment Form is necessary to register new FFLs into the NICS so that the FFLs may be able to access the NICS via telephone and/or internet by E-Check to initiate NICS firearm checks. It will also be necessary for some FFLs who are already enrolled in the NICS to register for the NICS E-Check only if they wish to conduct NICS checks via the internet. Once completed, this form is sent to the NICS Section for the enrollment process to be completed. The enrollment needs completed one time, unless the business goes under new ownership. If that were to occur, a new form would need completed and sent to the NICS Section.

The FFL Officer/Employee Acknowledgment of Responsibilities under the NICS Form is required and is to be signed by all of the FFL's employees who conduct NICS firearm checks. The directions section includes: use of the NICS, access to the NICS, disclosure, audits, and FFL data integrity. All completed copies of the form are kept at the FFL's place of business.

The NICS Section requests to continue to keep the same number, 1110-0026, on both forms as they are distributed together and both must be completed in order to legally gain and maintain access to initiate NICS firearm checks.

A. JUSTIFICATION

1. Circumstances of the collection

In November 1993, the Brady Handgun Violence Prevention Act (Brady Act), Public Law 103-159, requiring FFLs to request background checks on individuals attempting to purchase a firearm, was signed into law. The permanent provisions of the Brady Act, which went into effect on November 30, 1998, required the Attorney General to establish a NICS that FFLs may contact by telephone or other electronic means in addition to the telephone for information to be supplied within three business days on whether the receipt of a firearm by a prospective transferee would violate section 922 (g) or (n) of title 18, United States Code, or state law.

The FFLs currently contact the NICS Section by using a toll-free number and provide the requisite information to a service representative who initiates the check on their behalf. Furthermore, Title 28, *Code of Federal Regulations* (CFR), Part 25, Subpart A—The NICS, allows for the development of other electronic means of contact as alternatives in addition to the telephone. Therefore, from early in the NICS development, the NICS Section's vision has included providing FFLs with an alternative means, commonly referred to as “electronic access,” to initiate NICS checks.

The NICS Section, in a joint effort with the FBI Information Technology Management Section (ITMS), Lockheed Martin Energy Systems, Science Applications International Corporation (SAIC), and an FFL focus group developed the NICS E-Check. This function enables FFLs to initiate an unassisted NICS background check for firearm transfers via the Internet.

An enrollment form for a prospective FFL to enroll with the NICS to initiate gun checks either by phone, by the NICS E-Check, or by both means has been developed and will be available to the FFLs by mail or as a downloadable document on the NICS webpage. This form is the Federal Firearms Licensee (FFL) Enrollment/E-Check Enrollment Form.

The FFL Officer/Employee Acknowledgment of Responsibilities under the NICS Form is to be read

and signed by all of the FFL's employees who conduct NICS checks. All completed copies of the form are kept at the FFL's place of business.

We request to continue to keep the same number, 1110-0026, on both forms as they are distributed together and both must be completed in order for the FFL to be enrolled in the NICS. Only enrolled FFLs can legally gain and maintain access to initiate NICS checks.

2. Purpose and Use of the Information

The information collected on the Federal Firearms Licensee (FFL) Enrollment/E-Check Enrollment Form is necessary for enrollment of the FFLs so that the FFL may access the NICS in order to legally initiate NICS checks. Without being enrolled as an authorized user, the FFL cannot request a NICS check. Congress required the Attorney General to ensure the privacy and security of the system as they recognized the possibility that the system could be used improperly; therefore, the NICS must be able to verify that an FFL is authorized to access the NICS. Information from the enrollment form will be entered into the NICS by NICS Section employees and can be viewed by NICS Section employees only. Verification of the information when a NICS check is conducted will protect the integrity and security of the NICS and protect the privacy and security of the FFL's information provided to the NICS. It only needs completed one time, unless the business goes under new ownership. If that were to occur, a new form would need completed and sent to the NICS Section.

Additionally, the FFL Officer/Employee Acknowledgment of Responsibilities under the NICS Form is a legal document which must be read and signed by all FFLs and their employees serviced by the NICS Section as an acknowledgment of their rights, responsibilities, and obligations as authorized users of the NICS. Under the authority of the Brady Act, 18 U.S.C Chapter 44, as implemented by 28 C.F.R. Part 25, the FBI requires completion of the acknowledgment statement on the form by all FFLs as a condition of being granted NICS inquiry privileges. The NICS has been established within the FBI's Criminal Justice Information Services (CJIS) Division for the purpose of performing instant background checks on prospective firearm transferees. The primary purpose of this acknowledgment is to ensure that FFLs accessing and using the NICS understand and accept the attendant obligations and responsibilities.

This acknowledgment will be used to identify and validate those FFLs who may be granted NICS inquiry privileges, to legally obligate the FFL to comply with these obligations and responsibilities, and as evidence of an FFL's knowledge and acceptance of these obligations and responsibilities whenever such matters may be in issue. Completion of this acknowledgment on the enrollment form by an FFL is voluntary, but an FFL which does not complete this acknowledgment will not be able to make a NICS inquiry. Local or state agencies, FFLs, or individuals violating 28 C.F.R. Part 25, subpart A, shall be subject to a fine not to exceed \$10,000 and subject to cancellation of NICS inquiry for misuse or unauthorized access as outlined in 28 C.F.R. Part 25, subpart A, section 25.11. This form may be duplicated as required and completed copies of this form must be retained by the FFL in their place of business. This form is not to be returned to the NICS Section.

3. Use of Automated, Electronic, Mechanical, or Technological Collection of Techniques

The Federal Firearms Licensee (FFL) Enrollment/E-Check Enrollment Form is available to the FFL by mail in the initial enrollment packet, by the FFL calling the Customer Service Center at the NICS Section to have a copy mailed, or by the FFL downloading a copy from the Internet. The respondents must mail the Federal Firearms Licensee (FFL) Enrollment/E-Check Enrollment Form back to the NICS Section, as an original signature must be retained on file by the NICS, because the technology does not provide the capability to capture the signature electronically. If the applicant is signing up to be a FFL only, without a request to sign up for the NICS E-check, it would be permissible for the form to be faxed or mailed.

The FFL Officer/Employee Acknowledgment of Responsibilities under the NICS Form is also available to the FFL by mail in the initial enrollment packet, by the FFL calling the Customer Service Center at the NICS Section to have a copy mailed, or by the FFL downloading a copy from the Internet. Once completed, the form remains with the FFL to be kept on file to indicate that all employees have read and understood the responsibilities of being a NICS user.

4. Efforts to Identify Duplication

Both the FFL Officer/Employee Acknowledgment of Responsibilities under the NICS Form and the Federal Firearms Licensee (FFL) Enrollment/E-Check Enrollment Form will be sent to those FFLs to complete that have not signed up with the NICS or E-check and also to the FFLs upon request. These forms are only required to be completed one time; therefore, there would be no duplication. The only time the forms would be completed a second time would be if there would be a change in FFL ownership. In that event, the NICS Section would have to be notified and a new form must be signed.

As of May 3, 2006, the number of FFLs enrolled in NICS is approximately 42,270. The number of FFLs enrolled in the NICS E-Check as of May 3, 2006, is 1,639. A total of 51,947 enrollment packets were mailed previously and will not be mailed again. Only those FFLs who did not receive a mailing will be sent enrollment packets in the future; therefore, there will be no duplication.

5. Impact on Small Business

The collection of information will not have a significant impact on small businesses.

6. Consequences of not Collecting Data

The Federal Firearms Licensee (FFL) Enrollment/E-Check Enrollment Form will be filled out only once, unless the business goes under new ownership. If that were to occur, a new form would need completed and sent to the NICS Section. Without using this form, an FFL could not be enrolled as an authorized user; thus, the FFL would not be able to request a NICS check. If the FFL Officer/Employee Acknowledgment of Responsibilities under the NICS Forms are not collected, the FBI will be unable to verify that the FFL has been apprized of their legal rights and responsibilities as authorized users of the NICS. In the event of misuse of the system, the FBI

will be unable to prosecute the misuser if there is no legally binding evidence that the FFL understood what uses are authorized, and what are not. These forms also will be filled out only once.

7. Special Circumstances

The Federal Firearms Licensee (FFL) Enrollment/E-Check Enrollment Form will be filled out only once, unless the business goes under new ownership.

The FFL Officer/Employee Acknowledgment of Responsibilities under the NICS Forms can be reproduced and are to be completed by all employees of each FFL that will be initiating NICS checks. The completed forms are to be kept on file at the FFL's place of business indefinitely.

8. Outside Consultation

When the form was first developed, the FBI contacted the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and state law enforcement agencies to respond to the information collection effort. Revisions were reviewed by a representative of the ATF.

9. Payment to Respondents

There is no payment made or gift to an individual who provides the required information to the NICS.

10. Assurance of Confidentiality

All information will be held confidential in accordance with Title 42, United States Code Section 3789(g). Information will be utilized by the NICS solely in connection with firearm background checks conducted through the Brady Act and the regulations promulgated thereunder.

11. Justification for Sensitive Questions

The only question on either form that would be of a sensitive nature would be mother's maiden name. The maiden name is requested as a security feature of the NICS E-check enrollment. This will be used to verify the identity of the NICS E-check user. This protects the integrity of the NICS and protects the FFL's information.

12. Estimates of Hour Burden

The average response time for reading the directions for the Federal Firearms Licensee (FFL) Enrollment/E-Check Enrollment Form is estimated to be two minutes; time to complete the form is estimated to be three minutes; and the time it takes to assemble, mail, or fax the form to the FBI is estimated to be three minutes, for a total of eight minutes. It is estimated that enrollment occurs at approximately 500 per month for a total of 6,000 per year. The average hour burden for this specific form is $6,000 \times 8 \text{ minutes}/60 = 800$ hours.

The FFL Officer/Employee Acknowledgment of Responsibilities Form takes approximately

three minutes to read the responsibilities and two minutes to complete the form, for a total of five minutes. The average hour burden for this specific form is $6,000 \times 5 \text{ minutes}/60 = 500$ hours.

The accompanying letter mailed with the packet takes an additional two minutes to read which would be $6,000 \times 2 \text{ minutes}/60 = 200$ hours.

The entire process of reading the letter and completing both forms would take 15 minutes per respondent. The average hour burden for completing both forms and reading the accompanying letter would be $6,000 \times 15/60 = 1,500$ hours.

13. Estimates of Cost Burden

The individual will be burdened with a one-time cost to mail the Federal Firearms Licensee (FFL) Enrollment/E-Check Enrollment Form, which if mailed alone would be 39 cents. It is anticipated that the individual will not need to complete the form again unless there is a change in ownership of the business, so this is a one time cost.

Initially, the NICS plans to print 6,000 copies of the forms which it will keep on hand and also mail to the ATF Distribution Center.

With 6,000 respondents, the total cost burden to the individual would be:

$6,000 \text{ respondents} \times 39\text{¢} = \$2,340$ cost burden to the public.

The cost burden to the government is \$1,200 in form preparation. The cost of the government mailing the form to the FFL or to the ATF is \$10,410. The cost of staff and equipment is prorated. It is absorbed proportionally among the CJIS Division. The CJIS Division Copy Center is continuously manned with three copy machines. The total cost burden to the government is \$11,610. This is reflected in the itemized estimate included in Item A.14.

14. Estimates of Annualized Cost to the Federal Government

Item A.14

<u>Form Preparation</u> \$1,200	Total Form Preparation cost \$1,200
<u>Staff/Equipment</u> - This figure is absorbed proportionally among the CJIS Division. The CJIS Division Copy Center is continuously manned with three copy machines.	Total Staffing/Equipment Cost Cost prorated among all areas of service
<u>Mailing/Postage</u> \$10,410	Total Mailing/Postage cost \$10,410
TOTAL COST BURDEN TO GOVERNMENT	\$ 11,610

15. Reasons for Program Changes

The estimated amount of packets to be mailed remains the same; however, the cost to the government has been reduced as cheaper mailing rates have been selected. Approximately half of the FFL packets will be mailed at the standard rate and the other half will be mailed at the first class presort rate so that FFLs on the west coast can receive their packets in an expeditious manner. The ATF Distribution Center will receive boxes of packets that will be mailed in bulk for individual distribution by the ATF, also cutting the cost.

Additionally, the staff and equipment costs are now prorated among all areas of service and the figure is absorbed proportionally among the CJIS Division as the CJIS Division is continuously manned with three copy machines.

16. Plans for Tabulation and Publication

The data collected will be utilized by the NICS solely in connection with firearm background checks conducted through the Brady Act and the regulations promulgated thereunder. The information will be maintained in a database for use by FBI employees, or FBI contract employees. This information will not be published.

17. Requests for Approval not to display OMB Expiration Date

The NICS Section is requesting the OMB to not display an expiration date on either form. We

will be mailing the form to FFLs and state POCs. Administratively, it would be extremely difficult to remove all of the old forms from all of those businesses. In addition, some individuals may obtain copies of the form and wait an extensive period of time before submitting the form to us. It would be impossible to know which individuals may possess an older form. Therefore, it would not be practical for a date to be displayed.

Another consideration is that if FFLs review their files and see that their employees signed the FFL Officer/Employee Acknowledgment of Responsibilities Form prior to the expiration date of the form, they may erroneously believe that the form needs signed again and may duplicate efforts by having employees read and fill out the form again.

18. Exceptions to the Certification Statement

No exceptions to the certification statement are requested.

B. Collection of Information Employing Statistical Methods

This collection of information does not employ statistical methods.

**Attachment 1:
Certification Statement**

Paperwork Reduction Act Certification Statement

In submitting this request for OMB approval, I certify that the requirements of the Privacy Act and OMB directives have been complied with, including paperwork regulations, statistical standards or directives, and any other information policy directives promulgated under Section 5 CFR 1320.

Eugene W. Donaldson
Section Chief
NICS Section

Date

Attachment 2:

Collection
Form

Federal Firearms Licensee (FFL) Enrollment/E-Check Enrollment Form

Attachment 3:

**Collection
Form**

**FFL Officer/Employee Acknowledgment of Responsibilities under the National Instant
Criminal Background Check System (NICS) Form**

Attachment 4:

Letter to FFL explaining contents of packet

Attachment 5:

**Confidentiality
Legislation**

42 U.S.C.A. § 3789(g)

Attachment 6:

**Authorizing
Legislation**

Public Law 103-159

Attachment 7:

Authorizing

Legislation

28 C.F.R. § 25.1

Attachment 8:

60 Day

Federal Register Notice

Department of Justice

Billing Number: 4410-13

Federal Bureau of Investigation

National Instant Criminal Background Check System Section

Agency Information Collection Activities:

Proposed collection, comments requested

ACTION: 60 Day Notice of Information Collection Under Review:

Extension of a currently approved collection;

Federal Firearms Licensee (FFL) Enrollment/E-Check Enrollment Form

FFL Officer/Employee Acknowledgment of Responsibilities under the
National Instant Criminal Background Check System (NICS) Form

The Department of Justice (DOJ), Federal Bureau of Investigation (FBI), National Instant Criminal Background Check System (NICS) Section has submitted the following information collection request to the Office of Management and Budget (OMB) for review and approval in accordance with the Paperwork Reduction Act of 1995. The proposed information collection is published to obtain comments from the public and affected agencies. Comments are encouraged and will be accepted for 60 days until [The Federal Register will insert 60 days from the date this notice is published in the Federal Register]. This process is conducted in accordance with 5 CFR 1320.10.

If you have comments, especially on the estimated public burden or associated response time, suggestions, or need a copy of the proposed information collection instrument with instructions or additional information, please contact Natalie Goff, Management and Program Analyst, Federal Bureau of Investigation, Criminal Justice Information Services (CJIS) Division , NICS

Section, Module A-3, 1000 Custer Hollow Road, Clarksburg, West Virginia 26306, or facsimile at (304) 625-2356.

Written comments and suggestions from the public and affected agencies concerning the proposed collection of information are encouraged. Your comments should address one or more of the following four points:

- (1) Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the agency/component, including whether the information will have practical utility;
- (2) Evaluate the accuracy of the agency's/component's estimate of the burden of the proposed collection of the information, including the validity of the methodology and assumptions used;
- (3) Enhance the quality, utility, and clarity of the information to be collected; and
- (4) Minimize the burden of the collection of information on those who are to respond, including the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.

Overview of this information:

- (1) **Type of Information Collection:** Extension of a Currently Approved Collection

(2) Title of the Form:

Federal Firearms Licensee (FFL) Enrollment/E-Check Enrollment Form
FFL Officer/Employee Acknowledgment of Responsibilities under the
National Instant Criminal Background Check System (NICS) Form

(3) Agency Form Number, if any, and the applicable component of the department sponsoring the collection:

Form Number: 1110-0026.

Sponsor: Criminal Justice Information Services (CJIS) Division of the Federal Bureau of Investigation (FBI), Department of Justice (DOJ)

(4) Affected Public who will be asked or required to respond, as well as a brief abstract:

Primary: Any Federal Firearms Licensee (FFL) or State Point of Contact

(POC) requesting access to conduct NICS Checks telephonically or by the Internet through the NICS E-Check.

Brief Abstract: The Brady Handgun Violence Prevention Act of 1993, required the Attorney General to establish a national instant criminal background check

system that any Federal Firearms Licensee may contact, by telephone or by other electronic means, such as the NICS E-Check, for information, to be supplied immediately, on whether receipt of a firearm to a prospective purchaser would violate state or federal law. Information pertaining to licensees who may contact the NICS is being collected to manage and control access to the NICS and to the NICS E-Check, to ensure appropriate resources are available to support the NICS, and also to ensure the privacy and security of NICS information.

(5) An estimate of the total number of respondents and the amount of time estimated for an average respondent to respond:

It is estimated that enrollment occurs at approximately 500 per month for a total of 6,000 per year.

The average response time for reading the directions for the Federal Firearms Licensee Enrollment/E-Check Enrollment Form is estimated to be two minutes; time to complete the form is estimated to be three minutes; and the time it takes to assemble, mail, or fax the form to the FBI is estimated to be three minutes, for a total of eight minutes. It is estimated that enrollment occurs at approximately 500 per month for a total of 6,000 per year.

The average hour burden for this specific form is $6,000 \times 8 \text{ minutes} / 60 = 800$ hours.

The FFL Officer/Employee Acknowledgment of Responsibilities Form takes approximately three minutes to read the responsibilities and two minutes to complete the form, for a total of five minutes. The average hour burden for this specific form is $6,000 \times 5 \text{ minutes}/60 = 500$ hours.

The accompanying letter mailed with the packet takes an additional two minutes to read which would be $6,000 \times 2 \text{ minutes}/60 = 200$ hours.

The entire process of reading the letter and completing both forms would take 15 minutes per respondent. The average hour burden for completing both forms and reading the accompanying letter would be $6,000 \times 15/60 = 1,500$ hours

(6) An estimate of the total public burden (in hours) associated with the collection:

The entire process of reading the letter and completing both forms would take 15 minutes per respondent. The average hour burden for completing both forms and reading the accompanying letter would be $6,000 \times 15/60 = 1,500$ hours.

If additional information is required, contact: Mr. Robert B. Briggs, Department Clearance Officer, United States Department of Justice, Information Management and Security Staff, Justice Management Division, Suite 1600, Patrick Henry Building, 601 D Street, NW, Washington, D.C. 20530.

Robert B. Briggs

Date

Department Clearance Officer

United States Department of Justice

Attachment 9:
30 Day
Federal Register Notice

Department of Justice

Billing Number: 4410-13

Federal Bureau of Investigation

National Instant Criminal Background Check System Section

Agency Information Collection Activities:

Proposed collection, comments requested

ACTION: 30 Day Notice of Information Collection Under Review:

Extension of a currently approved collection;

Federal Firearms Licensee (FFL) Enrollment/E-Check Enrollment Form

FFL Officer/Employee Acknowledgment of Responsibilities under the
National Instant Criminal Background Check System (NICS) Form

The Department of Justice (DOJ), Federal Bureau of Investigation (FBI), National Instant Criminal Background Check System (NICS) Section has submitted the following information collection request to the Office of Management and Budget (OMB) for review and approval in accordance with the Paperwork Reduction Act of 1995. The proposed information collection is published to obtain comments from the public and affected agencies. This proposed information collection was previously published in the Federal Register (Volume , Number, pages) on (DATE), allowing for a 60 day comment period.

The purpose of this notice is to allow for an additional 30 days for public comment until [The Federal Register will insert the date 30 days from the date this notice is published in the Federal Register]. This process is conducted in accordance with 5 CFR 1320.10.

Written comments and/or suggestions regarding the items contained in this notice, especially the estimated public burden and associated response time, should be directed to the Office of Management and Budget, Office of Information and Regulatory Affairs, Attention Department of Justice Desk Officer, Washington, D.C. 20503. Additionally, comments may be submitted to OMB via facsimile to (202) 395-7285.

Written comments and suggestions from the public and affected agencies concerning the proposed collection of information are encouraged. Your comments should address one or more of the following four points:

- (1) Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the agency/component, including whether the information will have practical utility;
- (2) Evaluate the accuracy of the agency's/component's estimate of the burden of the proposed collection of the information, including the validity of the methodology and assumptions used;
- (3) Enhance the quality, utility, and clarity of the information to be collected; and
- (4) Minimize the burden of the collection of information on those who are to respond, including the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g.,

permitting electronic submission of responses.

Overview of this information:

(1) **Type of Information Collection:** Extension of a Currently Approved Collection

(2) **Title of the Form:**

Federal Firearms Licensee (FFL) Enrollment/E-Check Enrollment Form

FFL Officer/Employee Acknowledgment of Responsibilities under the

National Instant Criminal Background Check System (NICS) Form

(3) **Agency Form Number, if any, and the applicable component of the department sponsoring the collection:**

Form Number: 1110-0026.

Sponsor: Criminal Justice Information Services (CJIS) Division of the Federal

Bureau of Investigation (FBI), Department of Justice (DOJ)

(4) **Affected Public who will be asked or required to respond, as well as a brief abstract:**

Primary: Any Federal Firearms Licensee (FFL) or State Point of Contact

(POC) requesting access to conduct NICS Checks telephonically or by the

Internet through the NICS E-Check.

Brief Abstract:

The Brady Handgun Violence Prevention Act of 1993, required the Attorney General to establish a national instant criminal background check system that any Federal Firearms Licensee may contact, by telephone or by other electronic means, such as the NICS E-Check, for information, to be supplied immediately, on whether receipt of a firearm to a prospective purchaser would violate state or federal law. Information pertaining to licensees who may contact the NICS is being collected to manage and control access to the NICS and to the NICS E-Check, to ensure appropriate resources are available to support the NICS, and also to ensure the privacy and security of NICS information.

(5) An estimate of the total number of respondents and the amount of time estimated for an average respondent to respond:

It is estimated that enrollment occurs at approximately 500 per month for a total of 6,000 per year.

The average response time for reading the directions for the Federal Firearms Licensee Enrollment/E-Check Enrollment Form is estimated to be two minutes; time to complete the form is estimated to be three minutes; and the time it takes to assemble, mail, or fax the form to the FBI is estimated to be three minutes, for a

total of eight minutes.

The average hour burden for this specific form is $6,000 \times 8 \text{ minutes}/60 = 800$ hours.

The FFL Officer/Employee Acknowledgment of Responsibilities Form takes approximately three minutes to read the responsibilities and two minutes to complete the form, for a total of five minutes. The average hour burden for this specific form is $6,000 \times 5 \text{ minutes}/60 = 500$ hours.

The accompanying letter mailed with the packet takes an additional two minutes to read which would be $6,000 \times 2 \text{ minutes}/60 = 200$ hours.

The entire process of reading the letter and completing both forms would take 15 minutes per respondent. The average hour burden for completing both forms and reading the accompanying letter would be $6,000 \times 15/60 = 1,500$ hours

(6) An estimate of the total public burden (in hours) associated with the collection:

The entire process of reading the letter and completing both forms would take 15 minutes per respondent. The average hour burden for completing both forms and reading the accompanying letter would be $6,000 \times 15/60 = 1,500$ hours

If additional information is required, contact: Mr. Robert B. Briggs, Department Clearance Officer, United States Department of Justice, Information Management and Security Staff, Justice Management Division, Suite 1600, Patrick Henry Building, 601 D Street, NW, Washington, D.C. 20530.

Robert B. Briggs

Department Clearance Officer

United States Department of Justice

Date