

**Supporting Statement**  
**Application-Permit-Special License Unlading/Lading, Overtime Services**  
**1651-0005**

**A. Justification**

1. The Application-Permit-Special License, Unlading-Lading-Overtime Services (Form -3171) is used by commercial carriers and importers as a request for permission to unlade imported merchandise, baggage, or passengers and for overtime services of CBP officers in connection with lading or unlading of merchandise, or the entry or clearance of a vessel, including the boarding of a vessel for preliminary supplies, ship's stores, sea stores, or equipment not to be reladen, which is subject to free or duty-paid entry. Such requests may be required pursuant to 19 CFR 4.10, 4.16, 122.29, 122.38, and 123.8.
2. All merchandise of foreign origin arriving in the United States is subject to assessment of duty and taxes by the U.S. Government. In order to control such foreign merchandise and ensure payment of any duty and taxes due, carriers are required to obtain a permit or special license from CBP before unlading this merchandise. A permit or special license to lade merchandise aboard a carrier for exportation is also required. These permits or special licenses enable CBP to supervise the lading and unlading of carriers. This supervision provides a means of accounting for merchandise imported into the United States and preventing the exportation of merchandise normally prohibited or restricted, such as arms, munitions, and radioactive materials.

Form 3171 serves to facilitate the landing of ship's equipment for repair, adjustment, etc., and the subsequent relading of this equipment aboard the vessel. Several other operations are also facilitated through the use of Form-3171. In the absence of Form-3171, these operations would be more complicated and documentation of the operations would be complex.

The application for a term permit or special license also provides information to show that a bond is in effect to secure payment of duty and taxes on imported merchandise and payment of any overtime charges incurred through the supervision of unlading or lading operations.

The port director will not issue a permit or special license to unlade cargo or equipment of vessels arriving directly or indirectly from any port or place outside the U.S., except when the merchandise has been duly entered or permits issued; or a vessel bond on Form CBP-301, or cash deposit has been given; or the merchandise is to be discharged into the custody of the port director as provided for in 19 U.S.C. 1490(b).

3. CBP will be automating the 3171 as part of the Automated Commercial Environment (ACE). Automation of this form is planned for no later than 2011.
4. The information on Form-3171 is unique and is not duplicated elsewhere.
5. This collection of information does not involve small businesses or entities.
6. The consequence to the Federal program if the collection of information was conducted less frequently would be a loss of revenue and payment of overtime charges incurred due to supervision of lading or unlading operations.
7. This information collection is conducted in a manner consistent with the guidelines of 5 CFR 1320.6.
8. Public comments were solicited through Federal Register notices dated, March 10, 2006 and October 3, 2006. As of this submission, no comments have been received.
9. There is no offer of a monetary or material value for this information collection.
10. No specific assurances of confidentiality are provided for this information collection.
11. There are no questions of a personal or sensitive nature.
12. Estimated Annualized Burden on The Public is 51,870 hours. This is based on an estimated 1,500 respondents averaging 266 responses each for a total of 399,000 responses. The estimated average time per response is .13 hours (8 minutes) per response for a total estimated burden of 51,870 hours.  
  
Estimated Annualized Cost on the Public. The estimated cost to the respondents is \$627,627.00, based on an estimated 51,870 burden hours at an hourly rate of \$12.10.
13. Estimated Record Keeping Burden on the Public. There is no record keeping burden requirement for this information collection.  
  
Estimated Capitalization Cost Burden on the Public. There are no capitalization cost associated with this collection.

14. Estimated cost to the Federal Government associated with this collection is \$1,200,660. This is based on an estimated 40,022 hours expended at an average hourly rate of \$30.00.
  15. No changes were made to this information collection.
  16. This information collection will not be published for statistical purposes.
  17. We will put the expiration date on the form when we receive a Notice of Action from OMB with the new date.
  18. CBP does not request an exception to the certification of this information collection.
- B. No statistical methods were employed.**