

**1 Supporting Statement A  
for  
Paperwork Reduction Act Submission**

**OMB Control Number 1018-0007**

**Annual Certification of Hunting and Sport Fishing Licenses Issued  
50 CFR 80**

**FWS Forms 3-154a and 3-154b**

**1. Explain the circumstances that make the collection of information necessary.**

The Federal Aid in Wildlife Restoration Act (16 U.S.C. 669-669i) and the Federal Aid in Sport Fish Restoration Act (16 U.S.C. 777-777k) provide Federal assistance to the States for management and restoration of fish and wildlife. These Acts and our regulations at 50 CFR 80.10 require that States and territories annually certify hunting and sport fishing license sales in order for the Fish and Wildlife Service (we, Service) to apportion funds under formulas provided in the Acts.

**2. Indicate how, by whom, how frequently, and for what purpose the information is to be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, explain how the collection complies with all applicable Information Quality Guidelines.**

States and territorial grantees complete FWS Form 3-154b to indicate the total hunting and fishing licenses issued and the dollar amounts involved. This summary includes all paid and nonpaid licenses, tags, stamps, and permits issued for hunting (both firearm and bow) and for sport or recreational fishing.

Grantees then take the data from FWS Form 3-154b, eliminate all duplicates, and use FWS Form 3-154a to certify the number of paid hunting and fishing license holders.

Our Division of Federal Assistance uses this information to apportion funds to State fish and wildlife agencies under the Acts. During Fiscal Years 2005 and 2006, we apportioned \$468,766,296 under the Wildlife Restoration Program and \$585,538,914 under the Sport Fish Restoration Program.

States, nonprofit organizations, and commercial entities use the information to track statistics and identify economic and participatory trends and anomalies.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology. , e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden [and specifically how this collection meets GPEA requirements].**

FWS Forms 3-154a and 3-155b are available online at <http://www.fws.gov/forms/> in a fillable format. Respondents can complete the forms online, but then must mail or email the form to us. We receive much of the summary information electronically, although not all States and territories submit summary information in that manner.

**4. Describe efforts to identify duplication.**

There are no other forms that collect similar information.

**5. If the collection of information impacts small businesses or other small entities, describe the methods used to minimize burden.**

We collect the data from State and territorial grantees only; therefore, there is no significant impact on small entities.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

Failure to submit these certifications may result in grant funds being partially or totally withheld pending receipt of this certification.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- \* requiring respondents to report information to the agency more often than quarterly;
- \* requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- \* requiring respondents to submit more than an original and two copies of any document;
- \* requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- \* in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- \* requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- \* that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- \* requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special circumstances that require us to collect this information in a manner inconsistent with OMB guidelines.

**8. Provide the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice (or in response to a PRA statement) and describe actions taken by the agency in response to these comments.**

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. [Please list the names, titles, addresses, and phone numbers of persons contacted.]**

On July 24, 2006, we published in the Federal Register (71 FR 41831) a notice requesting public comment on this information collection. The comment period ended on September 22, 2006. We did not receive any comments in response to this notice. Additionally, we conducted a public outreach and solicited input from:

Lisa Evans, State of Alaska, [lisa\\_evans@fishgame.state.ak.us](mailto:lisa_evans@fishgame.state.ak.us)  
 Tom Niebauer, State of Wisconsin, [Thomas.niebauer@dnr.state.wi.us](mailto:Thomas.niebauer@dnr.state.wi.us)  
 Keith Sexon, State of Kansas, [keiths@wp.state.ks.us](mailto:keiths@wp.state.ks.us)

We asked (1) whether or not our burden estimates are accurate, (2) if our instructions are clear, and (3) for suggestions to improve the process. All of those we contacted believed that the forms were useful and served the intended purpose and that instructions were clear. Each provided a different response regarding the time it takes to complete the form. We have averaged their responses and increased our estimates of burden accordingly (see item 12).

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

We do not provide any gifts or payments to respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

There is no assurance of confidentiality. Once submitted, this form becomes public information and is not protected under the Privacy Act.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.**

None of the information collected on FWS Forms 3-154a and 3-154b is sensitive.

**12. Provide estimates of the hour burden of the collection of information.**

| ACTIVITY                    | COMPLETION TIME PER RESPONSE | TOTAL ANNUAL RESPONSES | ANNUAL BURDEN | \$ VALUE OF ANNUAL BURDEN HOURS |
|-----------------------------|------------------------------|------------------------|---------------|---------------------------------|
| Certification (Form 3-154a) | 12 hours                     | 56                     | 672 hours     | \$16,800                        |
| Summary (Form 3-154b)       | 20 hours                     | 56                     | 1,120 hours   | \$28,000                        |
| TOTALS                      |                              | 112                    | 1,792 hours   | \$44,800                        |

The hour burden associated with the information collection varies with each respondent and depends significantly on whether or not the State/territory has an automated process for issuing hunting and fishing licenses. During our outreach, we received burden estimates for FWS Form 3-154a ranging from 8 to 16 hours (for an average of 12 hours). Burden estimates for FWS

Form 3-154 ranged from 16 to 24 hours (average of 20 hours). Therefore, we have increased our estimates of burden for the completion of these forms accordingly. We increased the wage rate from \$20 to \$25 because we believe this is more realistic. The total dollar value of the annual burden hours is \$44,800.

**13. Provide an estimate of the total annual [nonhour] cost burden to respondents or recordkeepers resulting from the collection of information.**

There is no nonhour cost burden to respondents; there are no filing fees.

**14. Provide estimates of annualized costs to the Federal Government.**

We estimate that the total annual cost to Federal Government for processing these forms is \$784.00. We base this estimate on an average salary/benefits rate of \$28.00 for persons likely to review and process these forms. We will receive 112 responses annually, each of which takes approximately 15 minutes to process.

**15. Explain the reasons for any program changes or adjustments.**

We are requesting an increase of 1,736 burden hours (from 56 to 1,792 hours). Based on our outreach, we adjusted our estimates of burden for each form. We previously estimated that it would take 1/2 hour to complete each form. We have increased the burden estimate to 12 hours for FWS Form 3-154a and to 20 hours for FWS Form 3-154b.

**16. For collections of information whose results will be published, outline plans for tabulation and publication.**

The information collected is for grant administration purposes and we do not formally publish the results. However, we do make the license data available on the Federal Assistance website for use by the States and others.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

We will display the OMB control number and expiration date on FWS Forms 3-154a and 3-154b.

**18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.**

There are no exceptions to the certification statement.