

**Ex-Im SUPPORTING STATEMENT FOR THE ANNUAL
COMPETITIVENESS REPORT SURVEY OF EXPORTERS AND
BANKERS**

EIB No. 00-02

OMB No. 3048-0004

The Export-Import Bank of the United States (Ex-Im Bank) requests OMB's approval of the Annual Competitiveness Report Survey of Exporters and Bankers (hereinafter "Survey"). The Survey will provide Ex-Im Bank with information from private sector users that is necessary to evaluate the competitiveness of Ex-Im Bank's export programs vis-à-vis those offered by the export credit agencies (ECAs) of other major industrialized countries. Ex-Im Bank is requesting a three-year extension of the Survey.

A. JUSTIFICATION

- 1) The purpose of the proposed Survey is to fulfill a statutory mandate (the Export-Import Bank Act of 1945, as amended, 12 U.S.C. 635) that directs Ex-Im Bank to report annually to the U.S. Congress any action taken toward providing export credit programs that are competitive with those offered by official foreign export credit agencies. The Act further stipulates that the annual report on competitiveness should include the results of a survey of U.S. exporters and commercial lending institutions to determine whether their export financing is competitive with that of their foreign counterparts.
- 2) Ex-Im Bank is requesting that the proposed Survey (EIB No. 00-02) be administered to approximately 60 respondents. The list of potential respondents will be exporters and lenders that applied for Ex-Im Bank's medium- and long-term programs during the calendar year. The information is used to report, as stated above, on the competitiveness of Ex-Im Bank's programs and policies.
- 3) The 60 potential respondents will be invited to participate in the Survey via email. The Survey will be administered on the Bank's website, which will reduce postage costs to Survey respondents and the use of paper by Ex-Im Bank.
- 4) The revised Survey is similar to previous years' surveys, as it asks lenders and exporters to evaluate the competitiveness of Ex-Im Bank's programs vis-à-vis foreign ECAs. However, it has been modified to elicit answers that will provide a better analysis of Ex-Im Bank's competitiveness and so that the survey may be answered on-line.
- 5) This Survey does not impact small business or other small entities.

- 6) The Survey is conducted annually, as required by Ex-Im Bank's Congressional mandate. An annual Survey provides a broad enough time horizon to ensure quality responses. Less frequent surveying (e.g., biennially) would greatly diminish the value of the Survey, because: (1) respondents would react strongly to their most recent experience instead of weighing the entire time period; (2) market conditions change rapidly, and Ex-Im Bank needs to identify emerging market imperfections and respond to them in a timely manner; and (3) the policies of Ex-Im Bank and its foreign competitors are frequently adjusted, and a less frequent survey would not capture reactions to individual programmatic changes.
- 7) The Survey will not collect information in any of the specified manners.
- 8) A notification of the Survey revision was published in the Federal Register on *October 10, 2006 (Volume 71, Number 195, Page 59506)*. No comments were received. In addition, Ex-Im Bank provided the draft of the survey for comment to several USG agencies with an interest in Ex-Im Bank activity. These agencies included the U.S. Department of State, Commerce and Treasury; the office of the U.S. Trade Representative, and the Office of Management and Budget. The survey was accepted as drafted by all of the aforementioned agencies.
- 9) No payments or gifts have been or will be provided to respondents.
- 10) Persons submitting information to Ex-Im Bank are asked to identify any information that they wish Ex-Im Bank to treat as confidential. Before complying with any requests for disclosure of information containing confidential commercial information or trade secrets, Ex-Im Bank provides adequate notice to the submitters so they may protect themselves from disclosure. However, the final determination to disclose will be made by Ex-Im Bank in accordance with the Freedom of Information Act, the Privacy Act or any other legislation that Ex-Im Bank deems relevant. The results of the Survey will be reported to the U.S. Congress in aggregate form without identifying the respondents or matching them to their specific responses.
- 11) Not applicable to this Survey.
- 12) Based on information obtained by informal discussions with bankers and exporters, the estimated time required per respondent is one hour per response. If 200 respondents complete and return the Survey, the total reporting burden would be 200 hours. There should be no marginal cost to respondents for filling out this form; this is reflected by the fact that OMB's current inventory for burden costs for this Survey is \$0. Based on data collected over the last several years, the average collection burden to the Federal Government is estimated at one hour per response. If 60 respondents reply, the total collection burden to the Federal Government will be 60 hours. Typically, fewer than 60 survey recipients respond; thus, these are maximum estimates.
- 13) The total annual cost burden to respondents will be \$0. No start-up costs are expected, as respondents will not need equipment beyond computers with internet access and email to recall their experience with Ex-Im Bank over the preceding year.

- 14) As with respondents, the total annual cost burden to the Federal Government will be \$0. No marginal cost is required for the Federal Government to analyze the Survey results.
- 15) There are no changes or adjustments reported in items 13 and 14 of the OMB Form 83-I. The only difference in what has previously been reported for item 13 is that the Survey will now be administered via Ex-Im Bank's website.
- 16) Ex-Im Bank's Policy and Planning Division will be responsible for the distribution, collection and analysis of the Survey responses. An aggregation of the results and an analysis will appear in the Annual Competitiveness Report to the U.S. Congress as required by the Act. The time schedule for the collection of information will be approximately three weeks, and the time schedule for report completion and publication will be three months.
- 17) Ex-Im Bank is not seeking this approval.
- 18) There are no exceptions for Item 19, "Certification for Paperwork Reduction Act Submissions."