

Justification
Request for Internet Services
Request for Password Request code (PRC) and PIN/Password Establishment

1. Circumstances of information collection - The Government Paperwork Elimination Act (GPEA) required Federal agencies to provide its customers the option to submit information or to transact business with agencies electronically, when practical, as a substitute for paper. The Railroad Retirement Board (RRB) has a Personal Identification Number (PIN)/Password system that provides RRB customers with the ability to request a Password Request Code (PRC) and subsequently, to establish an individual PIN/Password, the initial steps in providing the option of conducting transactions with the RRB on a routine basis through the Internet, as required by the GPEA. The RRB's authority to collect the information is provided by Section 7(b)(6) of the Railroad Retirement Act.
2. Purposes of collecting/consequences of not collecting the information – The Personal Identification Number (PIN)/Password system provides applicants and annuitants with the ability to conduct business with the RRB electronically. A portion of the system allows the RRB to collect and use information needed to establish a PRC with the RRB. Once a PRC is established, the RRB collects information from the user to establish a unique PIN/Password that allows access to RRB Internet-based Railroad Retirement Act and Railroad Unemployment Insurance Act applications and claims (Internet-based applications and claims are still largely under development). The information collected is used exclusively to verify the identity of the requestor.

The following screens are used to collect the necessary information:

- *Request for Password Request Code (railroad employee)
- *Request for Password Request Code (foreign version)
- Establish PIN/Password (Establish Internet Account)

***Depending on the response to the question, “where does the employee live” the employee either receives a U.S version or foreign version. Both options are included in the Request a Password Request Code (current) and Request a Password Request Code (proposed) exhibits. *The only difference between the two Password Request Code versions is the railroad employee version (U.S) asks for city, state and zip code. The foreign version asks for province, country, postal code.**

To receive a PRC, the RRB requests that the following information be provided in all cases; the railroad employee's name Social Security Number, date of birth and mailing address. After submission of the required data, the PIN/Password system validates the information received against existing RRB electronic records to authenticate the identity of the individual. Once the information has been validated, the system randomly assigns a PRC. The PRC is mailed to the last known address of RRB record via RRB Form Letter GL-60, Important Information About Your RRB Internet Services Account, and allows a user to

establish a PIN and password online. Once the PIN/Password is established, the user has access to RRB Internet-based applications.

The RRB proposes a non-burden impacting formatting and editorial change to the PIN/PASSWORD screens.

- The language for the current PIN/Password Services screen (screen 2 for both the Request for Password Request Code and Establish PIN/Password) has been retitled from PPW Services Acknowledgement to PPW Certification Statement. The language (unchanged) has also been reformatted. Since the transaction will not process without an OK being clicked on, the cancel option has been deleted.

3. Planned use of technology or technical/legal impediments to further burden reduction – This information collection allows RRB customers to request a Password Request Code (PRC) and subsequently establish an individual PIN/Password; the initial steps in providing the option of conducting transactions with the RRB on a routine basis through the Internet.
4. Efforts to identify duplication and other improvements – This information collection does not duplicate any other information collection.
5. Small business respondents – N.A.
6. Consequences of less frequent collections – None. Completion is voluntary.
7. Special circumstances – None
8. Public comments/consultations outside the agency – In accordance with 5 CFR 1320.8(d), comments were invited from the public regarding the information collection. The notice to the public was published on page 13828 and 13829 of the March 23, 2007 Federal Register. No requests for further information or comments were received.
9. Payments or gifts to respondents – None
10. Confidentiality – Privacy Act System of Records, RRB-51, Railroad Retirement Board's PIN/Password Master File System.
11. Sensitive questions – There are no questions of a sensitive nature.
12. Estimate of respondent burden

Current Burden

	Annual Responses	Time (min)	Burden (Hrs)
PRC	11,760	5.0	980
Pin/Password	11,760	1.5	294

Total	23,520		1,274
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Proposed Burden

	Annual Responses	Time (min)	Burden (Hrs)
PRC	14,040	5.0	1,170
Pin/Password	14,040	1.5	351
Total	28,080		1,521

Burden Change

	Responses	Hours
Total	4,560	+247
Adjustment	4,560	+247

13. Estimate of annual cost burden to respondents or recordkeepers – N.A.
14. Estimate of cost to Federal Government. N.A.
15. Explanation for changes in burden – The proposed burden is calculated based on actual usage of the PIN/Password system. We have shown the **increase** of 4,560 annual responses and 247 burden hours as an adjustment.
16. Time schedule for data collections and publications – The results of this collection will not be published.
17. Request not to display OMB expiration date – The Password Request code associated with reprogramming the screens will be seldom revised. Given the costs associated with reprogramming the screens in order to keep the appropriate OMB expiration date in place, the RRB requests authorization to **not** display the expiration date on the screens.
18. Exceptions to the certification statement – None