

## 2007 SUPPORTING STATEMENT

### Cotton Classification and Market News Service OMB NO. 0581-0009

#### A. Justification.

1. **EXPLAIN THE CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY. IDENTIFY ANY LEGAL OR ADMINISTRATIVE REQUIREMENTS THAT NECESSITATE THE COLLECTION.**

The Cotton Statistics and Estimates Act, 7 USC 471-476, authorizes and directs the Secretary of Agriculture, to:

- a. Collect and publish annually, statistics or estimates concerning the grades and staple length of stocks of cotton, known as the carryover, on hand on the 1st of August of each year in warehouses and other establishments of every character in the continental U.S.; and following such publication each year, to publish at intervals, in his/her discretion, his/her estimate of the grades and staple length of cotton of the then current crop (7 USC 471).
- b. Collect, authenticate, publish, and distribute by radio, mail, or otherwise, timely information of the market supply, demand, location, and market prices for cotton (7 USC 473B).

2. **INDICATE HOW, BY WHOM, AND FOR WHAT PURPOSE THE INFORMATION IS TO BE USED. EXCEPT FOR A NEW COLLECTION, INDICATE THE ACTUAL USE THE AGENCY HAS MADE OF THE INFORMATION RECEIVED FROM THE CURRENT COLLECTION.**

The information required under 7 USC 471-476 is gathered on the following forms and will be used by the cotton industry and/or the USDA as outlined below:

- a) **Cotton on Hand in Mills (CN-110)**: This form is filled out by textile mills that process raw cotton to provide the number of bales of cotton and the quality of that cotton stored at the mill on August 1 each year. The quality of cotton in the carryover stocks along with the size or volume of the carryover is information that is needed and used by all

segments of the cotton industry. Growers use this information in making decisions relative to marketing their present crop and planning for the next one; cotton merchants use the information in marketing decisions; and the mills that provide the data also use the combined data in planning their future purchase to cover their needs. Importers of U.S. cotton use the data in making their plans for purchases of U.S. cotton. In addition, other USDA agencies (Economic Research Service, Foreign Agricultural Services, and Farm Service Agency) use the information on carryover stocks for calculating accurate projections and estimates used in policy decisions.

- b) **Cotton Sampling Inspection Report –Part 3 Market News (CN-59)**: this form is filled out by USDA, AMS Cotton Program employees who collect information verbally, in conjunction with other field work. Cotton Program personnel record cotton market news information obtained from ginners regarding disposition of current ginnings, qualities of cotton sold by farmers and prices received, and prices paid farmers for cottonseed. This information is used in market news reports to supplement and broaden market information received from other sources.

**Cotton Landed Mill Prices (collected Verbally)**: USDA, AMS, Cotton Program employees contact cotton mill buyers and merchants selling cotton to domestic cotton mills to ascertain the prices paid for specific qualities of cotton, delivered to mills in North Carolina and South Carolina. This data is used in cotton market news reports and provides interested parties with general price level for cotton delivered to the mills. Landed mill prices are solicited verbally by the Cotton Program market reporters without the completion of a Cotton Program form.

**Cotton Market Canvass (Collected Verbally)**: USDA, AMS Cotton Program employees contact cotton merchants, brokers, cotton ginners, warehouse operators, county extension agents, and other knowledgeable persons to collect information on supply and demand, prices, quality, stocks, offerings, inquiries, sales (domestic and foreign), textile mill activity, crop development, and harvesting progress to be used in cotton market news reports. Data for the market news reports is solicited verbally by the Cotton

Program market reporters without the completion of a Cotton Program form.

Cotton market news reports are used primarily by anyone who buys or sells cotton; this includes producers, merchants, commodity exchanges, cooperatives, and textile mills. Cotton Program price reports are also used by other government agencies and to establish value, on any given date, of cotton involved in insurance of legal claims. Prices paid for cotton vary widely and are determined by a complex interaction of such factors as quality, area of growth, location and costs of storage, transportation costs, and the type of manufactured products in demand and supply. All of these factors are subject to constant shifts as the market adjusts to changing economic factors.

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.**

The forms in this information collection are part of the AMS Integrated eGovernment Report. AMS is committed to complying with the E-Government Act, which requires Government agencies in general to provide the public the option of submitting information or transacting business electronically to the maximum extent possible.

We are constantly exploring means of reducing the reporting burden. There is no technical or legal obstacle (of which we are aware) to reducing the burden. The bulk of the information is collected verbally. Some merchandisers provide information by electronic methods (Email). Also, Cotton Program verbally collects market information while conducting Sampling Inspections and records it on the Cotton Sampling Inspection Report (CN-59). Since this form is completed internally we have filed a justification for exemption not to provide it on the internet for public submission.

**4. DESCRIBE EFFORTS TO IDENTIFY DUPLICATION. SHOW SPECIFICALLY WHY ANY SIMILAR INFORMATION ALREADY AVAILABLE CANNOT BE USED OR MODIFIED FOR USE FOR THE PURPOSE(S) DESCRIBED IN ITEM 2 ABOVE.**

There is no other Federal entity collecting this (or similar) information from cotton gins, mills, warehouses, etc.

**5. IF THE COLLECTION OF INFORMATION IMPACTS SMALL BUSINESSES OR OTHER SMALL ENTITIES (ITEM 5 OF THE OMB FORM 83-1), DESCRIBE THE METHODS USED TO MINIMIZE BURDEN.**

Information collected is only the minimal amount needed to meet the needs for preparation of timely and accurate publications.

**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.**

Since the cotton market is highly volatile and prices usually fluctuate daily, it would be impossible for the USDA to fulfill its responsibility to publish accurate and timely information of market conditions.

Elimination of the preceding information collections would not permit the Cotton Program to carry out the mandates delineated in the Cotton

Statistics and Estimates Act. In addition, it would be impossible for the USDA to carry out its responsibility to publish timely and accurate market news reports and the annual report (and subsequent interval reports) concerning the grades and staple length of stocks of cotton. This would leave the cotton industry without any centralized and organized entity for compiling and publishing data relevant to planning, forecasting, marketing, etc.

**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;**

Since prices may fluctuate daily, information is collected daily.

- **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 3 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 STATUE 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 SECRET, 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. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR1320.6

- 8. IF APPLICABLE, PROVIDE A COPY AND IDENTIFY 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 AND DESCRIBE ACTIONS TAKEN BY THE AGENCY IN RESPONSE TO THESE COMMENTS. SPECIFICALLY ADDRESS COMMENTS RECEIVED ON COST AND HOUR BURDEN.**

The notice of information collection and request for comments was published in the Federal Register on April 4, 2007, Vol. 72 No. 64, page 16325-16326. The Agency received one comment, and no response was sent because the comment did not address the burden hours of the information collection.

**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.**

**CONSULTATION WITH REPRESENTATIVES OF THOSE FROM WHOM INFORMATION IS TO BE OBTAINED OR THOSE WHO MUST COMPILE RECORDS SHOULD OCCUR AT LEAST ONCE EVERY 3 YEARS -- EVEN IF THE COLLECTION OF INFORMATION ACTIVITY IS THE SAME AS IN PRIOR PERIODS. THERE MAY BE CIRCUMSTANCES THAT MAY PRECLUDE CONSULTATION IN A SPECIFIC SITUATION. THESE CIRCUMSTANCES SHOULD BE EXPLAINED.**

Since Market News information is collected from a variety of sources outside the agency, frequent consultations are conducted to ensure satisfaction with procedures and practices. Below are industry representatives:

Jordon Lea  
Eastern Trading  
(864) 233-0613

Claude Aker  
Cal-Cot  
(661) 395-5961

Gene Fry  
Parkdale Mills  
(704) 825-7993

**9. EXPLAIN ANY DECISION TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS, OTHER THAN REMUNERATION OF CONTRACTORS OR GRANTEES.**

We make no payment or gifts to respondents.

**10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS AND THE BASIS FOR THE ASSURANCE IN STATUTE, REGULATION, OR AGENCY POLICY.**

Confidentiality of information furnished by individual establishments is assured by 7 USC 472, and is well established with the respondents. There has never been a breach of this confidentiality.

**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. THIS JUSTIFICATION SHOULD INCLUDE THE REASONS WHY THE AGENCY CONSIDERS THE QUESTIONS NECESSARY, THE SPECIFIC USES TO BE MADE OF THE INFORMATION, THE EXPLANATION TO BE GIVEN TO PERSONS FROM WHOM THE INFORMATION IS REQUESTED, AND ANY STEPS TO BE TAKEN TO OBTAIN THEIR CONSENT.**

Questions of a sensitive nature are not found in this information collection.

**12. PROVIDE ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION. THE STATEMENT SHOULD:**

- **INDICATE THE NUMBER OF RESPONDENTS, FREQUENCY OF RESPONSE, ANNUAL HOUR BURDEN, AND AN EXPLANATION OF HOW THE BURDEN WAS ESTIMATED. UNLESS DIRECTED TO DO SO, AGENCIES SHOULD NOT CONDUCT SPECIAL SURVEYS TO OBTAIN INFORMATION ON WHICH TO BASE HOUR BURDEN ESTIMATES. CONSULTATION WITH A SAMPLE (FEWER THAN 10) OF POTENTIAL RESPONDENTS IS DESIRABLE. IF THE HOUR BURDEN ON RESPONDENTS IS EXPECTED TO VARY WIDELY BECAUSE OF DIFFERENCE IN ACTIVITY, SIZE, OR COMPLEXITY, SHOW THE RANGE OF ESTIMATED HOUR BURDEN, AND EXPLAIN THE REASONS FOR THE VARIANCE. GENERALLY, ESTIMATES SHOULD NOT INCLUDE BURDEN HOURS FOR CUSTOMARY AND USUAL BUSINESS PRACTICES.**

The total number of respondents is 1,066 and responses range from 12 to 841. Frequency of response ranges from 1 time per year to 27 times per year. Frequency of response varies by the type of information being collected. Since the cotton market is highly volatile and prices usually fluctuate daily, respondents that supply information on prices and market conditions are contacted about once every two weeks, resulting in a higher number of responses per respondent. The Landed Mill Prices do not change often; as a result this information is collected less frequently. Information collected on the Cotton Sampling Inspection Report- Part 3 Market News, CN-59, is collected each time Cotton Program employees make sampling inspections as gin. The Cotton on Hand at Mills, CN-110, is for an annual report. The hour burden per respondent ranges from .017 to .5 hours per response. The annual hour burden was calculated by average actual response time since most of the information is collected verbally. The annual response time was estimated using the average time to enter the data on the sheet from a computer print-out readily available to most respondents. Respondents may, at their option simply provide a computer print out and many do. The print-out is a report generally done as a routine business practice.

- **IF THIS REQUEST FOR APPROVAL COVERS MORE THAN ONE**



**FORM, PROVIDE SEPARATE HOUR BURDEN ESTIMATES FOR EACH FORM AND AGGREGATE THE HOUR BURDENS IN ITEM 13 OF OMB FORM 83.1.**

Estimate of the burden of the collection of information has been summarized on the AMS-71, enclosed.

- **PROVIDE ESTIMATES OF ANNUALIZED COST TO RESPONDENTS FOR THE HOUR BURDENS FOR COLLECTIONS OF INFORMATION, IDENTIFYING AND USING APPROPRIATE WAGE RATE CATEGORIES. THE COST OF CONTRACTING OUT OR PAYING OUTSIDE PARTIES FOR INFORMATION COLLECTION ACTIVITIES SHOULD NOT BE INCLUDED HERE. INSTEAD, THIS COST SHOULD BE INCLUDED IN ITEM 14.**

Estimated annualized cost to respondents involves primarily only the amount of time involved in the collection since the data is current and, by nature of the respondents position in cotton merchandising, the information is either given from memory or is readily at hand.

Estimated respondent cost per year is: \$18,855.20

Estimated as follows:

Annual Salary =	\$53,000
Salary per week (52 wks) =	\$1019.23 per week
Salary per hour (40 hrs) =	\$25.48 per hour
740 hours per year =	\$18,855.20

The salary information was obtained from the Department of Labor, Bureau of Labor Statistics Web site:

<http://www.bls.gov/oes/current/oes131021.htm#ind>

- 13. PROVIDE AN ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS OR RECORDKEEPERS RESULTING FROM THE COLLECTION OF INFORMATION. (DO NOT INCLUDE THE COST OF ANY HOUR BURDEN SHOWN IN ITEMS 12 AND 14).**
- **THE COST ESTIMATE SHOULD BE SPLIT INTO TWO COMPONENTS: (a) A TOTAL CAPITAL AND START-UP COST COMPONENT (ANNUALIZED OVER ITS EXPECTED USEFUL LIFE); AND (b) A TOTAL OPERATION AND MAINTENANCE AND**

**PURCHASE OF SERVICES COMPONENT. THE ESTIMATES SHOULD TAKE INTO ACCOUNT COSTS ASSOCIATED WITH GENERATING, MAINTAINING, AND DISCLOSING OR PROVIDING THE INFORMATION. INCLUDE DESCRIPTIONS OF METHODS USED TO ESTIMATE MAJOR COST FACTORS INCLUDING SYSTEM AND TECHNOLOGY ACQUISITION, EXPECTED USEFUL LIFE OF CAPITAL EQUIPMENT, THE DISCOUNT RATE(S), AND THE TIME PERIOD OVER WHICH COSTS WILL BE INCURRED. CAPITAL AND START-UP COSTS INCLUDE, AMONG OTHER ITEMS, PREPARATIONS FOR COLLECTING INFORMATION SUCH AS PURCHASING COMPUTERS AND SOFTWARE; MONITORING, SAMPLING, DRILLING AND TESTING EQUIPMENT; AND RECORD STORAGE FACILITIES.**

- **IF COST ESTIMATES ARE EXPECTED TO VARY WIDELY, AGENCIES SHOULD PRESENT RANGES OF COST BURDENS AND EXPLAIN THE REASONS FOR THE VARIANCE. THE COST OF PURCHASING OR CONTRACTING OUT INFORMATION COLLECTION SERVICES SHOULD BE A PART OF THIS COST BURDEN ESTIMATE. IN DEVELOPING COST BURDEN ESTIMATES, AGENCIES MAY CONSULT WITH A SAMPLE OF RESPONDENTS (FEWER THAN 10), UTILIZE THE 60-DAY PRE-OMB SUBMISSION PUBLIC COMMENT PROCESS AND USE EXISTING ECONOMIC OR REGULATORY IMPACT ANALYSIS ASSOCIATED WITH THE RULEMAKING CONTAINING THE INFORMATION COLLECTION, AS APPROPRIATE.**
  
- **GENERALLY, ESTIMATES SHOULD NOT INCLUDE PURCHASES OF EQUIPMENT OR SERVICES, OR PORTIONS THEREOF, MADE: (1) PRIOR TO OCTOBER 1, 1995, (2) TO ACHIEVE REGULATORY COMPLIANCE WITH REQUIREMENTS NOT ASSOCIATED WITH THE INFORMATION COLLECTION, (3) FOR REASONS OTHER THAN TO PROVIDE INFORMATION OR KEEPING RECORDS FOR THE GOVERNMENT, OR (4) AS PART OF CUSTOMARY AND USUAL BUSINESS OR PRIVATE PRACTICES.**

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

**14. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL**

**GOVERNMENT. ALSO, PROVIDE A DESCRIPTION OF THE METHOD USED TO ESTIMATE COST, WHICH SHOULD INCLUDE QUANTIFICATION OF HOURS, OPERATION EXPENSES (SUCH AS EQUIPMENT, OVERHEAD, PRINTING, AND SUPPORT STAFF), AND ANY OTHER EXPENSE THAT WOULD NOT HAVE BEEN INCURRED WITHOUT THIS COLLECTION OF INFORMATION. AGENCIES ALSO MAY AGGREGATE COST ESTIMATES FROM ITEMS 12, 13, AND 14 IN A SINGLE TABLE.**

The estimated annual cost to the Federal government, which includes salaries, benefits, travel, rent, communication, supplies, equipment, etc. to administer this regulation is \$2,021,000. The cost was developed by estimating the number of hours that the Agency employees will spend providing oversight and assistance for the collection, verification, computation, assembly, tabulation, checking and disseminating market news collected.

**Estimated Annual Cost to Federal Government for FY 2007:**

Salaries and benefits for 20 GS-5 through GS-14 employees	\$1,508,700
Travel	\$49,600
Rent Communications & Utilities	\$383,900
Transportation of things and printing	\$1,300
Contractual Services	\$59,100
Supplies and materials	\$11,500
Equipment	\$6,900
<b>Total</b>	<b>\$2,021,000</b>

**15. EXPLAIN THE REASON FOR ANY PROGRAM CHANGES OR ADJUSTMENTS REPORTED IN ITEMS 13 OR 14 OF THE OMB FORM 83-1.**

From the previous submission, there is an overall increase of +445.59 burden hours due to an increase in respondents (due to expanded contacts lists of cotton gins, crop consultants, and Agricultural Extension Specialists), responses and the re-evaluation of hours per response for two items.

<u>REG. NO.</u>	<u>PREVIOUS</u>	<u>NEW</u>	<u>REASON</u> <u>BURDEN</u> <u>CHANGE</u>	<u>TYPE OF</u> <u>BURDEN</u> <u>DIFFERENCE</u>
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28.904	Decrease in		2.47	
			1.44	-
			1.03	
			A	
7 USC 473B	respondents			
28.904	Increase in		555.20	
			968.71	+
			413.51	
			A	
7USC 473B	responses, respondents & re-evaluations of response burden			
28.904	Increase in		150	
			183.11	
			+ 33.11	
				A
7 USC 473B	responses and respondents,	<b>Total +</b>	445.59	

PC = Program Change  
A = Adjustment

**16. FOR COLLECTIONS OF INFORMATION WHOSE RESULTS WILL BE PUBLISHED, OUTLINE PLANS FOR TABULATION, AND PUBLICATION. ADDRESS ANY COMPLEX ANALYTICAL TECHNIQUES THAT WILL BE USED. PROVIDE THE TIME SCHEDULE FOR THE ENTIRE PROJECT, INCLUDING BEGINNING AND ENDING DATES OF THE COLLECTION OF INFORMATION, COMPLETION OF REPORT, PUBLICATION DATES, AND OTHER ACTIONS.**

28.904 Cotton Landed Mill Prices  
7 USC 473B (Collected verbally)

This information is collected weekly from respondents who volunteer to provide it. Data is compiled by Growth area, averaged and adjusted for changes in the NY futures market. Published each Friday.

7 USC 71 Cotton On Hand at Mills, Form CN-110

Collected from 16 randomly selected mills from list of mills provided by the Farm Service Agency. Data is compiled and raised to Department of Commerce "carryover" data. Published each October for carryover stocks at mill as of August 1.

28.904 Cotton Market Canvass  
7 USC 473B (Collected verbally)

Collected on a daily basis from volunteer individuals and firms involved in buying and selling of cotton. Number of respondents varies from day to day and week to week depending on marketing activity. Prices collected are compiled, compared with previously published cotton quotations, adjusted if necessary and published. Daily report that is compiled and summarized on a monthly and annual basis.

28.904 Cotton Sampling Inspection Report, Form CN-  
59  
7 USC 473B (Part 3 Market News)  
(Collected verbally)

Program personnel contact ginners in the course of their work related to cotton grading. They obtain general market information including cottonseed prices. Prices are averaged and published weekly.

**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.**

The Cotton Program orders forms well in advance, so forms are mailed to respondents in a timely manner. The Cotton Program attempts to order forms in quantities large enough to get a price break. If the Cotton Program needs to order more forms prior to an OMB submission for extension of approval, there is no guarantee that OMB will use a requested expiration date. There is also some confusion to respondents thinking their annual applications are good for the length of time noted in the expiration date rather than expiring at the end of their application period. Therefore, the Cotton Program is seeking approval to not display the OMB expiration date on the forms associated with this information collection.

**18. EXPLAIN EACH EXCEPTION TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19, "CERTIFICATION FOR PAPERWORK REDUCTION ACT SUBMISSIONS," OF OMB FORM 83-1.**

"The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-1."

**B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS**

The information collection does not employ statistical methods.