2007 SUPPORTING STATEMENT

Lamb Promotion, Research and Information Order
OMB NO. 0581-0198

Terms of Clearance:

In accordance with 5 CFR 1320, this information collection is approved for three years. However, with the next submission the agency should ensure that this collection abides by relevant electronic government initiatives, including the use of electronic signatures. In addition, all forms associated with this collection should be submitted to www.forms.gov no later than March 2005.

All forms are currently available by PDF through the AMS Web site. They are electronically available and fillable only. An authentic signature is still required. Forms are generally received by fax or through the mail.

Web sites where forms are available online:

- LS-78: http://www.ams.usda.gov/lsg/mpb/lamb/LS-78fill.pdf
- LS-81: http://www.ams.usda.gov/lsg/mpb/lamb/LS-81fill.pdf
- LS-82: http://www.ams.usda.gov/lsg/mpb/lamb/LS-82fill.pdf
- LS-84: http://www.ams.usda.gov/lsg/mpb/lamb/LS-84fill.pdf
- AD-755: http://www.ocio.usda.gov/fors/doc/AD-755.pdf

A. Justification.

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

Congress has delegated to the Department of Agriculture (USDA) the responsibility for implementing and overseeing national commodity research and promotion programs. While most of these programs are established under specific freestanding legislation, the authority for the Lamb Promotion, Research, and Information Order (Order) (7 CFR Part 1280) is established under the Commodity Promotion, Research, and Information Act of 1996 (7 U.S.C. 7411 et. seq.).

These programs carry out projects relating to research, consumer information, advertising, producer information, market development, and product research with the goal of maintaining and expanding their existing markets and uses and strengthening their position in the marketplace. The funding for such programs is industry specific, usually through deductions from sales by producers, processors, and others in the industry as appropriate.

The legislation that provides the authority for collecting and expending funds also mandates that the Secretary of Agriculture (Secretary) appoint a board to administer the program and approve the board's budgets, plans, and projects. The latter responsibility has been delegated to the Agricultural Marketing Service (AMS).

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 collection requirements in this revision request are essential to carry out the intent of the Act. Under the Order, first handlers and exporters are required to collect assessments from producers and submit the required reports and remit assessments to the Board. Persons who are market agencies are required to collect an assessment and pass the collected assessments on to the subsequent purchaser. It is required to submit records of their transactions involving lamb purchases and the required assessment collection to the Board. While the Order imposes certain recordkeeping requirements on persons subject to the Order, information required under the Order can be compiled from records currently maintained. There is also a requirement that producers, feeders, seedstock producers, market agencies, first handlers, and exporters maintain records, for 2 years beyond the year of their fiscal applicability, sufficient to verify reports and requests for refunds submitted under the Order. These records are currently maintained as part of normal business practices and thus the requirement would not impose significant additional burden.

The following is a listing of forms currently used by the agency to administer the Order:

(1) Certification of Non-Producer Status Form (LS-78). If necessary, this form is used by market agencies which include commission merchants, brokers, or livestock markets in the business of receiving lambs for sale or commission to certify that certain transactions are exempt from assessments. The program requires that any market agent will complete the form when lambs are resold not later than 10 days from the date on which the market agency acquired ownership. Each agency seeking non-producer status shall provide the agency remitting the assessment a Statement to Certification of Non-records, for 2 years beyond the year of their fiscal applicability, sufficient to verify reports and requests for refunds submitted under the Order.

(2) Lamb Promotion, Research, and Information Board Monthly Remittance

Report (LS-81). This form is used by first handlers and exporters who are responsible for collecting and remitting assessments to the Lamb Promotion, Research, and Information Board (Board). This form is completed and submitted to the Board on a monthly basis unless otherwise provided for under regulations prescribed by the Secretary.

(3) Application for Certification of Organization (LS-82). This form is used by national, State, or regional lamb associations or organizations who wish to be certified as eligible to nominate lamb producers, seedstock producers, feeders, and first handlers to serve as members of the Board. This form is voluntary and may be requested by organizations at any time.

(4) Statement of Certification (Lamb Promotion, Research, and Information Order) (LS-83). This form is used to (1) officially identify the name of each certified lamb producer, feeder, or first handler organization that is eligible to nominate producers, feeders, seedstock producers, and/or first handlers to the Board, and (2) issue an official certification number to be used by each certified organization when submitting nominations for appointment to the Board. The form is signed by the Deputy Administrator or designee of AMS' Livestock and Seed Program.

(5) Nomination for Appointment to the Lamb Promotion, Research, and Information Board (LS-84). This form is used by certified nominating organizations. Each organization submits nominees of lamb producers, feeders, seedstock producers, and/or first handlers in the order of preference to the Secretary for appointment. This form is used on an annual basis by certified organizations when submitting nominees for appointment to the Board.

(6) Background Questionnaire for Nominees (AD-755) –form is to be completed and submitted by persons nominated to serve on the Board. The form is used to conduct applicant background clearances and determine qualifications and suitability for appointment by the Secretary to the Board.

Burden for form AD-755, "Advisory Committee Membership Background Information" is approved under OMB No. 0505-0001.

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.

Upon approval these forms will be used to submit information directly to the American Lamb Board (Board), which administers the order. The Board is not part of a Federal agency, but is a commodity industry board that operates under Federal authority and oversight. Though 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, the availability and submission of forms electronically is at the Board's discretion.

The forms completed by the public are available on the USDA Web site at the following addresses:

LS-78: http://www.ams.usda.gov/lsg/mpb/lamb/LS-78fill.pdf
LS-81: http://www.ams.usda.gov/lsg/mpb/lamb/LS-81fill.pdf
LS-82: http://www.ams.usda.gov/lsg/mpb/lamb/LS-82fill.pdf
LS-84: http://www.ams.usda.gov/lsg/mpb/lamb/LS-84fill.pdf
AD-755: http://www.ocio.usda.gov/fors/doc/AD-755.pdf

Although available online, forms may not be submitted electronically. Currently, forms are transmitted by fax machine and postal delivery.

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.

The required information for these forms is not available from any other source because it relates specifically to individual lamb producers, feeders, seedstock producers, first handlers, and exporters. The primary sources of data would be records, delivery receipts, and sales records. There is no practical method for collecting the information without the use of forms. Reporting requirements have been reduced to the minimum in order to effectively carry out the requirements of the Order. No similar information is available to be used or modified.

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

Information collection requirements have been reduced to the minimum requirements of the Order. These forms require only a minimal amount of information that can be supplied without data processing equipment or outside technical expertise. The primary sources of data that are used to complete these forms are routinely used in all business transactions. Thus, the information collection and reporting burden are relatively small and requiring the same reporting requirements for all producers, feeders, seedstock producers, first handlers, and exporters would not significantly disadvantage any small entity.

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.

Collecting information monthly generally coincides with the normal business practices of most of the national commodity research and promotion programs. This allows the boards to obtain the necessary information needed for assessment collection so that the boards can maintain a consistent level of funding to effectively carry out research and promotion activities.

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;**

  Most respondents already maintain monthly records as part of normal business practices and requiring them to report information monthly would cause no significant additional burden.

- **REQUIRING RESPONDENTS TO PREPARE A WRITTEN RESPONSE TO A COLLECTION OF INFORMATION IN FEWER THAN 30 DAYS AFTER RECEIPT OF IT;**

  In order for the Board to receive timely remittance of assessments collected, the Order requires those persons collecting assessments to remit the Monthly Remittance Report and the assessments to the Board by the 15th of the month following the month in which live lamb were purchased for slaughter, exported, or processed and sold as processed products when there is no sale to a slaughter. These records are currently a part of normal business practice and therefore impose no additional burden.

- **REQUIRING RESPONDENTS TO SUBMIT MORE THAN AN ORIGINAL AND TWO COPIES OF ANY DOCUMENT;**

  It is not anticipated that there are any special circumstances that would require 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;

It is not anticipated that respondents would need to retain records for more than 3 years, as the Order requires respondents to retain records for 2 years beyond the fiscal year of their applicability, a part of normal business practice.

- **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;**

There are no such special circumstances. The Agency will not be using any statistical surveys that are 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;**

There are no such special circumstances. The Agency will not be using 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**

There are no such special circumstances. The Order supports a pledge of confidentiality.

- **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 such special circumstances. Respondents are not required to submit proprietary trade secret or other confidential information.

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 Agency published the notice of information collection and request for comment, in the *Federal Register* on May 1, 2007, Vol. 72, No. 83. The 60-day comment period ended on July 2, 2004. The Agency has received one comment, which did not address the burden hours of this 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.

Industry representatives have been consulted on the use of these forms. The data elements included on these forms is consistent with other elements approved under a previous submission for the national research, promotion, and consumer information programs. The use of these forms has been discussed with Peter Orwick, Executive Director, American Sheep Industry Association, 303-771-3565; Nikki Kosesan, Administrative Assistant, National Lamb Feeders Association, 503-364-5462; Rosemary Mucklow, Director Emeritus, National Meat Association, 510-763-1533.

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.

There are no obstacles to consulting with industry members who must submit information to this Board. Industry members are consulted on an ongoing basis on the information collection requirements.

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

No payments or gifts are provided to respondents.

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

To assist the Board and the Secretary in the collection of proper information, the Order provides that producers, seedstock producers, feeders, market agencies, first handlers, and exporters make available for inspection by the Secretary and the Board such books and records prescribed by the Order. The Order provides that all information obtained from those books and records or from reports filed under the Order shall be kept confidential by those having access to the information. In addition, the Order provides for fines, imprisonment, and removal from office for employees of USDA or the Board convicted of violating the confidentiality provision of the Order.

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.

The only questions that some may consider of a sensitive nature are found on the Background Information Form (AD-755) that nominees to the Board must complete. These questions are asked to ascertain their qualifications to serve on the Board and are provided to the Secretary for use in the selection process. Otherwise, questions of a sensitive nature are not included on any other form.

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.

- 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-I.

Estimates of the burden of collection of information have been summarized on the attached AMS Form 71.

The additional burden for the Background Questionnaire (AD-755) for nominees is covered under OMB No. 0505-0001. Collection of this information is estimated to average .5 hours per response. Estimated number of respondents is 16 (16 x .5 = 8 hours annually).

- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

There are a wide variety of respondents involved in providing information to the Board. These people represent a broad range of expertise and responsibilities. In order to provide an estimated annual cost, these respondents are all estimated to be paid $22.21 per hour, a sum deemed reasonable should they be compensated for their time. The total estimated annual cost for producers, feeders, seedstock producers, first handlers, exporters, and market agencies by the estimated 3,953 respondents would be $179,156.52. This total has been estimated by multiplying 8,066.48 (total burden hours requested) by $22.21. Estimates of burden collection have been summarized on AMS Form 71. Background Questionnaire total cost is $260 initially and $80 thereafter.

Data computation of the hourly wage was obtained from the U.S. Department of Labor Statistic's publication, "National Compensation Survey: Occupational Wages in the United States; June 2005, published August 2006 (Bulletin 2581). This publication can also be found at the following website: *http://www.bls.gov/ncs/ocs/sp/ncbl0832.pdf*. The average hourly salary for a white-collar occupation in the private industry was used.

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 funds to cover the expenses of the Board are obtained through assessments on lamb producers, feeders, seedstock producers, first handlers, and exporters. All administrative costs incurred by the Federal Government will be reimbursed by the Board.

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

There is a decrease of – 17,051.50 hours from the previous submission. Since the last information collection, there has been a decrease in the number of respondents for Form LS-81. Additionally, form LS-85 has become obsolete because the period in which producers, feeders, first handlers, and seedstock could request refunds has expired.

Reg #	Reason	Previous Burden	New Burden	Difference	Type
7 CFR 1280.217, .218, .219, .220	Decrease in respondents Form LS-81	7,032.00	6,852.00	180.00	Adj.
7 CFR 1280.214, .215, .216	Form LS-85 obsolete	16,871.50	0.00	16,871.50	Adj.
			TOTAL	**-17.051.50**	

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.

The information and data collected on these forms is not for publication or statistical use. The collection of information does not employ statistical methods.

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 Agency is seeking approval to not display the OMB expiration date on the forms associated with this information collection.

The Board will attempt to order forms in quantities large enough to get a price break. If the expiration date for OMB approval is printed on the forms, it would be costly to the Board to destroy inventories of forms displaying an obsolete date or burdensome and time consuming for the Board to manually alter an obsolete date.

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

The Agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection does not employ statistical methods.