Justification for Non-substantive Change

The Business and Industry Service has received OMB approval of the China Policy rule. This rule makes a number of changes to import certificate requirements. The dollar limit for import certificates was raised from \$5,000 to \$50,000 so that the total number of responses would remain about the same at approximately 2,222. Although the number of responses will be about the same, the number of companies (respondents) will decrease. It is estimated that more large-sized companies will submit more responses thus an insignificant change in responses. This was discovered by a qualitative review of IC data for calendar year 2006. Based on this review, the number of companies will be about half the number of responses, or 1,111. The reduction in number of companies is requested to provide a more reasonable estimate of the number of companies believed to be impacted.