Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number 1028-0070 Consolidated Consumers' Report Expiration Date: November 30, 2007—USGS Form 9-4117-MA Terms of Clearance: None

Specific Instructions

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The U.S. Department of the Interior (DOI) has policy responsibility for the Nation's mineral resources and their derived industries. The National Mining and Minerals Policy Act of 1970 (Public Law 91-631) and the National Materials and Minerals Policy, Research and Development Act of 1980 (Public Law 96-479) make it incumbent upon the Secretary of the Interior to be informed about and to inform the Congress of important developments, including crises, in the minerals industries. DOI responsibilities regarding mineral resources are discharged through a staff of scientists, including geologists, chemists, and physicists; engineers; economists; and mineral commodity specialists. Many of the responsibilities are assigned to the U.S. Geological Survey (USGS).

Two fundamental activities—mining and agriculture—form the basis of the Nation's wealth because they furnish all the raw materials and most of the energy that are used in all other industries. Additionally, the mining industry supplies the fertilizers, pesticides, and soil conditioners that significantly enhance the performance of the agricultural sector. For those raw materials not produced domestically, supplies must be imported. This adversely affects the trade balance and, for some materials, puts U.S. industries at risk of supply disruptions because of international political developments. Imports may also compete with domestic production, thus jeopardizing U.S. jobs. Accordingly, the Government requires accurate, timely data on raw materials production and related industries to formulate policies that ensure national security and economic well-being. The USGS canvass forms are the fundamental means by which data on minerals, mining, and related materials production are obtained.

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. [Be specific. If this collection is a form or a questionnaire, every question needs to be justified.]

The data obtained from this canvass are used by Government agencies, educational institutions, research organizations, consulting firms, industry, and the public. They provide the Government with essential consumption data for use in legislative decisions, research programs, economic studies, analyses, land use, and environmental impact studies. These data also provide ways of identifying consumption trends, making demand analyses on varying time cycles, assembling meaningful findings, such as economic vitality; and drawing conclusions. The consumption of these minerals are highly volatile and must be analyzed each month to furnish information and data for reports and indexes that are prepared more frequently than on a yearly basis.

These data are also used to respond to nationwide and international requests for minerals information. With this canvass form, the USGS collects and analyzes data on consumption and stocks of materials—a number of which have traditionally been considered as strategic and critical. Each company reports commodity data consistent with industry standards and as mutually agreed upon by the company and the USGS commodity specialists. Based on these submissions, the USGS routinely supplies information, analyses, and data for decision-making purposes to the Congress and various presidential councils and commissions. The National Security Council, in particular, has frequently used USGS data in relation to materials mobilization studies and specific presidential projects, such as sustainability analyses.

Information gathered from this canvass is used by the Secretary of the DOI in the annual report to the Congress on the state of domestic mining and mineral industries as required by the National Materials and Minerals Policy, Research and Development Act of 1980.

The data collected are analyzed and used by the USGS to issue, as promptly as possible, various publications that provide essential information while protecting trade secrets and privileged or proprietary commercial or financial information. These data form a substantial part of the USGS's Automated Minerals Information System (AMIS).

Furthermore, the Strategic and Critical Materials Stock Piling Act (50 U.S.C. 98 et seq.) requires the Secretary to collect data on strategic and critical materials to assist in determining stockpile goals. The Secretary assigned this responsibility for data collection to the U.S. Bureau of Mines (USBM) and transferred the responsibility to the USGS after the USBM was abolished.

The U.S. Department of Commerce uses USGS data in studies of minerals mobilization, to recommend trade policy and to resolve disputes under the International Trade Administration, to assist in export development, to develop materials research, and to develop worldwide mineral production and trade data.

The U.S. Department of State (DOS) uses USGS data to support international commodity negotiations, to analyze relations with foreign mineral producers, and to recommend tariffs and quotas and as a worldwide mineral database.

The U.S. Agency for International Development uses USGS data to assist in determining which minerals are of interest to the United States for development in developing nations.

The Federal Trade Commission (FTC) and the U.S. International Trade Commission (ITC) use USGS data in studies of antitrust activities, dumping, and false advertising or misrepresentation of mineral goods or commodities.

The U.S. Department of Defense (DOD) uses USGS data to determine research on materials and minerals within research laboratories of the Army, Navy, and the Air Force; sea lanes that must be protected; Defense Production Act Title III projects; National Defense Stockpile (NDS) goals and specifications; details of procurement, storage and disposal; and suppliers of mineral commodities.

The National Science Foundation, the National Academy of Sciences, the National Academy of Engineering, and the National Research Council use USGS data to ensure maximum benefits from all mineral research.

The U.S. Department of Transportation, the Interstate Commerce Commission, and the U.S. Army Corps of Engineers use USGS data to determine national and State transportation requirements for the minerals industry.

In addition to the use of USGS data by the majority of Federal Government departments, reports and information are in demand by many types of organizations, including the following:

- Participating companies
- Electric utilities
- Export associations
- State governments
- Industrial marketing groups
- Financial institutions
- International industry associations
- Domestic trade associations
- Industrial and agricultural sectors
- The general public, especially academic, consulting, and legal organizations.
- 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 [and specifically how this collection meets GPEA requirements.].

On-line electronic forms are currently available to authenticated users asked to respond who provide a valid user id and password. In addition to producing an electronic version of the paper form, the conversion process encompassed mappings of fields to the mainframe Automated Minerals Information System (AMIS) database. Cross-checks on data were automated,

replacing manual processes. The electronic forms conversion effort exceeds the Government Paperwork Elimination Act (GPEA) requirements by establishing intelligent links between the input on the electronic form and the database rather than simply transforming the physical form to an electronic version of the same.

Immediate on-line registration is available where new respondents and new users are granted immediate access. Periodic reminders contain instructions on how to register for the Web option. For security purposes, users who register on-line cannot access past submissions unless they specifically request the ability to retrieve historical data.

The supplementary documents contain printouts of the on-line screens where registration information is gathered for operations and users. The screens presented are not specific to each of the seven information collections administered by the USGS's Minerals Information Team.

Paper forms will remain an option for submission of responses because not all industry respondents are able to or wish to transmit their data to the USGS by electronic means. 20 percent of the universe is expected to respond electronically.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

If data are available from other Federal or State agencies, trade associations, or other public sources, then USGS canvasses are not conducted. The USGS continuously reviews data collection practices with other agencies, including the DOC and the U.S. Department of Labor (DOL), and the ITC, as well as with industry associations such as the American Iron and Steel Institute, the Ferroalloys Association, the Institute of Scrap Recycling Industries, the International Tungsten Industry Association, the International Chromium Development Institute, the Bismuth Institute, the International Copper Study Group, and the International Lead and Zinc Study Group. Where data are available from other sources, these data are used. Alternate data sources are not available for the commodities that are canvassed.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

These canvass forms are designed to minimize the burden to all respondents. The supplementary documents show estimated respondent and response counts and percentages for small businesses or other small entities, business or other for-profit institutions, and State, local or tribal government. The mix of small and large business is determined by selecting a cross-section of respondents.

Because only essential data are requested and in a format common to the reporting industry, the burden is kept to the minimum for large and small businesses. When applicable, small businesses often respond with fewer data entries than the larger organizations.

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.

The USGS provides information necessary for sound Federal, State, and industry decisionmaking. If data are not made available as soon as possible after collection or if canvasses are conducted less frequently, then monitoring of stockpile materials for national defense would be impeded by the gaps in statistics. The level of domestic and foreign productivity and economic fluctuation would be much less apparent or missed, and that data simply would not be timely enough to be reliable for decisions that affect minerals vulnerability, potential environmental impacts, current trends, and future needs. These decisions, in turn, have an effect on such things as taxes, royalty payments, tariffs, land use, environmental regulations, water use, and transportation.

Collection of monthly and annual data allows economic analysis that can capture variations—a longer time interval could not. Collection of these data on a biennial basis would not be practical because the industry respondents do not normally have the data in convenient format except on a monthly, quarterly, or annual basis. A 2-year canvass, for example, would require the respondents to alter their spreadsheets or manually add 2 years of data. This would increase their reporting burden. Also, multiyear data are less meaningful and less convenient for analysis by industry and Government agencies.

Sectors of the public that use the data collected by the USGS include, but are not limited to, the concrete, construction, metals, ceramics, refractories, electric utilities, electronic engineering, chemical, coal, paper, rubber, plastics and agricultural industries. The USGS customer base (recipients of these data) is well over 35,000 and increases considerably each year.

The DOC, the National Institute of Standards and Technology, the DOD, the DOS, the World Bank, the Federal Reserve Board, the ITC, the FTC, the Federal Highway Administration, and most of our sister agencies within the DOI are only some of the agencies that rely on these data. The data collected are used to determine the economic health of the Nation, factored into the gross domestic product, and used in forecasts and trends in the building and construction industries, which are closely linked to the issue of rebuilding the infrastructure of the country.

Our customers include banks, brokerage houses, other financial institutions, mineral management companies, independent consultants, and many others who need this information to

be able to make informed business decisions. This information is not available from any other source.

- 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;
 - * 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 three 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 statute 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.

Users of the published data based on these canvasses may track trends on a monthly basis because of the highly volatile market or seasonal production patterns for the materials covered by this canvass. Trends may be detected earlier if the data are available monthly rather than at less frequent intervals, such as quarterly, semiannually, or annually. The data collected by the monthly canvasses are absolutely necessary if the USGS is to meet current, reliable information demands of industry and Government mineral analysts who prepare monthly and bimonthly indexes and commodity reports to meet the market analysis of the industry. Additionally, the data are necessary if the USGS is to meet the requirements of Public Law 631 for the minerals that have erratic supply, demand, value, availability, or seasonal production patterns.

Under the terms of the USGS standard for handling proprietary canvass data included in the supplementary documents, companies can and usually do specify that the data they supply be shared only in aggregated form. These terms ensure that the USGS will continue to receive proprietary data in confidence.

The canvass form is designed to ensure that respondents are not required to maintain or provide data in a format other than that in which the data are customarily maintained. The respondents are routinely asked to comment on the design of the form and to make recommendations that help maintain consistency with industry's methods of accounting.

Some commodity data are needed monthly because of the importance of these industries to the industrial economy, such as for the transportation, construction, and electronic sectors. DOD planners use these data to evaluate purchase and disposal plans for the NDS. The mining and metal products industries regularly use these data to evaluate production and consumption plans. Minerals policy planners need the most up-to-date information in making decisions concerning these industries.

If a company receives a monthly canvass, then it does not receive an annual canvass of the same type for these commodities. Most canvasses that are conducted annually are done so for two reasons. Generally, an annual canvass is conducted because of the small size of the companies involved and the desire to limit their reporting burden. Although the number of small companies canvassed annually is large, the aggregate data collected from them is small, thus permitting monthly estimates based on the previous year's data without significant impact on the overall accuracy of monthly production or consumption. Another reason for instituting an annual reporting basis relates to the willingness or capability of a company to complete a monthly canvass. On a few occasions, exceptions have been made to allow a company to report annually on a temporary basis; this has been most common during poor economic times.

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 in response to the PRA statement associated with the collection over the past three years] and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

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. [Please list the names, titles, addresses, and phone numbers of persons contacted.]

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.

The notice was published in the Federal Register (72 FR 30821) on June 4, 2007. No public comments were received in response to the notice.

Mineral commodity specialists contact and are routinely contacted by Federal and State agencies, members of Congress, trade associations, the financial community, private companies,

universities, and private citizens that request general and specific data and information.

Typically, persons outside the USGS submit and the USGS mineral commodity specialists and statistical assistants respond in a timely manner to several thousand e-mail and telephone inquiries each month. By such discussions and interactions, views are exchanged on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, reporting format, data elements to be recorded, disclosed, or reported, burden estimates and other aspects of this Information Collection. Although no significant changes to the collection instrument were made within the last 3-year OMB approval period for this Collection, these views help the USGS to continuously improve its data and publications.

Examples of industry contacts between 2004 and 2007 that identify persons who were consulted on the burden estimates and other aspects of this Information Collection include the following:

- Diane Truman, Accounting Assistant, Sandusky International, Inc. Sandusky, OH Phone: 419-626-5340 ext. 251, dtruman@sanduskyintl.com, Date of contact: August 14, 2007 Although the canvass form is fairly quick and easy to complete, balancing data can take time. Frequency of reporting and ease of understanding are not issues.
- Michael Holdeman, Cost Accountant, K.B. Alloys, Inc. Robards, KY Phone: 610-693-1111, costaccounting@kballoys.com, Date of contact: August 14, 2007 Although the respective meanings of "gross weight" and "contained weight" are not clear, the canvass form was otherwise quick and easy to complete.

On the basis of such feedback, information-use patterns are established commodity by commodity. Once patterns are determined, canvass forms are revised to collect data and to meet the information needs. As information request patterns change, the data collected and reported are modified.

The canvass instrument has been modified to include definitions of "gross weight" and "contained weight."

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payments or gifts are made to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Public Law 96-479, Section 5(3) (f), ensures the confidentiality of all data reported by persons or firms engaged in any phase of mineral or mineral-material production or large-scale consumption. The disclosure of data shall be in aggregated form so as not to reveal data from a single person or firm.

To implement Section 5(3) (f), the USGS withholds all data reported as "Company Proprietary Data," and data are disclosed only in the aggregate. Additionally, tests are performed on aggregated data to ensure confidentiality. USGS policy states that absent specific company permission, aggregated data can be reported only if it represents three or more companies and if no one company accounts for more than 75% of the total or if no two companies account for more than 90% of the total. Proprietary data may only be disclosed to Congress or to Federal defense agencies upon official request for appropriate purposes and, in some instances, to a State government under a cooperative agreement (Memorandum of Understanding). Except in response to requests by Congress or by Federal defense agencies, proprietary data will never be disclosed without the specific permission of the company as represented in the disclosure query. The disclosure statement and query are printed on the canvass form. The following addition has now been made to the disclosure statement:

Unless objection is made in writing to the USGS, the information furnished in this report may be disclosed to the respondent's State Geological Survey (or similar State Agency) if the State has appropriate safeguards to prevent disclosing company proprietary data.

The USGS standard for handling proprietary canvass data further discusses protections for USGS proprietary data including penalties associated with violations.

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.

Sensitive data are not sought.

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 differences 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.
- * 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.

Variations can be expected in the reporting burden for completion of this form because of the differences in operation size and accounting systems. The data sought are those routinely maintained in the course of business. For some companies with more than one plant, the submission takes the form of a consolidated report covering all company operations. This greatly reduces the reporting burden.

Public reporting burden for this collection of information includes the time for reviewing instructions, searching data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Approximately 397 respondents report details of their consumption monthly and annually. These two respondent groups are mutually exclusive. Companies that report on a monthly basis are not asked to report annual data. For the 2,278 associated responses, completion time averages 45 minutes per form. Requested are 1,709 total annual hours burden for reporting and recordkeeping. See the table below.

The annualized cost to respondents for the hour burden for this collection of information is estimated to be \$51,270 on the basis of an average labor cost of \$30 per hour and 1,709 total annual hours requested. Hourly cost was estimated by averaging typical compensation rates for the variety of positions that respondents hold who complete this canvass.

The respondents are primarily in the management, business, and financial and the office and administrative support occupational groups, with the latter group accounting for approximately 70% of the burden hours. The employer costs per hour for these occupational groups from Table 2 of the BLS press release *Employer Costs for Employee Compensation—June 2007* are \$51 and \$22, respectively. The weighted average of employer costs per hour for these two occupational groups is approximately \$30.

Frequency	No. of Respondents	No. of Responses	Annual Burden Hours	\$ Value of Burden Hours
Monthly	171	2,052	1,539	46,170

Annual Hour Burden Breakdown—Form 9-4117-MA—Hour Burden: 45 minutes

Annually	226	226	170	5,100
Total Reporting	397	2,278	1,709	51,270

- 13. Provide an estimate of the total annual [non-hour] 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 [including filing fees paid]. 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 keep records for the government, or (4) as part of customary and usual business or private practices.

This supporting statement covers a voluntary canvass form pertaining to a set of industries that are widely diverse in size and mode of operation. The cost and time required to make a detailed canvass-by-canvass estimate for this section would be very high, and, in light of the following factors, would not be worthwhile. A negligible non-hour cost burden exists. We have not identified any non-hour cost burdens.

a) These are long-established canvasses. Because the requested data are normally maintained in the course of routine operations, no respondents are believed to have purchased equipment or services specifically to answer this canvass.

- b) The data requested are of the sort kept by companies for their own purposes; the USGS does not ask for data that would not normally be at hand. Providing selected data to the USGS is incidental to business operations.
- c) Only the largest companies might need to purchase office equipment or hire services specifically for the purpose of answering Federal Government questionnaires. In those cases, the demand for data records needed by the USGS would be dwarfed by the volume of records needed by other Government agencies; for example, the U.S. Environmental Protection Agency, the Internal Revenue Service, and the DOL.
- 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, operational 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.

Annualized cost to the Federal Government is estimated at \$165,503 based on costs for the following expenses which include actual salaries, benefits, and overhead of Federal employees:

- Printing of canvass forms
- Mailing lists compilation and maintenance
- Mailing operation
- Editing, coding, tabulation
- ADP processing
- Electronic publication of results

Consolidated Consumers' Report—Weighted Average Hourly Cost—Federal Employees

Position	Average Grade	Hourly rate including benefits (1.3 x hourly rate)	* Percent of time spent on collection	Weighted average (\$/hr)
Commodity Specialist	GS-13 Step 8	\$61.20	30	\$18
Statistical Assistant	GS-6 Step 3	22.58	35	8
Computer Specialist	GS-13 Step 8	61.20	5	3
Editor	GS-12 Step 8	51.47	20	10
Micrographic Specialist	GS-12 Step 8	51.47	5	3

Management	GS-14 Step 8	72.32	5	4
Weighted Average (\$/hr)				\$46

* Data collection, processing, and publication

15. Explain the reasons for any program changes or adjustments.

Not applicable. No program changes or adjustments are reported.

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 AMIS mainframe program and off-the-shelf software packages are used to compile and tabulate the data and to prepare tables for publication.

National, State, and regional tabulations are prepared and published annually at_<u>http://minerals.er.usgs.gov/minerals/</u> in table format from data collected by these canvasses. Preliminary estimates are prepared and published in the Mineral Commodity Summaries, which is the earliest Government publication to furnish estimates covering the previous year's nonfuel mineral industry. Data are also published in the monthly and annual issues of the Mineral Industry Surveys series and the Annual Reports from the Minerals Yearbook and other USGS publications.

Tables present various aspects of commodities, such as consumption and production of products together with industry stocks. Economic changes are incorporated and industry trends and activities are studied. Statistical data are processed and analyzed by the Data Collection and Coordination Section, which also establishes timing for all key steps in the work.

Tabulation and publication of data are governed by the USGS standard for handling proprietary canvass data. Data are available via the Internet and in print for select publications in the USGS minerals information series.

Monthly, quarterly, and semiannual tables are generally published within 50 workdays from the end of the reporting month. Annual data are generally published within 9 months from the end of the reporting year. This publication schedule maintains a very high percentage of responses.

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.

We will display the OMB control number and expiration date.

18. Explain each exception to the certification statement, "Certification for Paperwork Reduction Act Submissions."

There are no exceptions to the certification statement.