

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION
EXPORT-IMPORT BANK OF THE UNITED STATES
CONTENT REPORT ON PRODUCTS & SERVICES IN EX-IM BANK
TRANSACTIONS, EIB 01-02
ANNUAL AGGREGATE FOREIGN CONTENT CAUSE REPORT, EIB 01-02-A**

A. Justification

1. Ex-Im Bank's statutory mandate is to create jobs in the U.S. by providing finance support for the sales of U.S. goods and services to foreign buyers (12 USC 635). In limited cases, the Bank also allows for financing of goods and services of foreign origin. To ensure the Bank is fully supporting its mission, such foreign content support must be carefully monitored. Pursuant to policy changes designed to create less of a burden on our exporters, Ex-Im is now documenting the amount of "foreign content" in transactions through up-front reporting and back-end verification, rather than requiring certifications of content with each shipment of goods as was previously required (as an annex to legal documentation not covered by the Paperwork Reduction Act). The Content Report on Products & Services in Ex-Im Bank Transactions (EIB 01-02), and the Annual Aggregate Foreign Content Cause Report (EIB 01-02-A) are used to facilitate this documentation.
2. Ex-Im Bank provides financing for the sale of U.S. goods and services to foreign buyers, and, in limited cases, allows for financing of goods and services of foreign origin. The Content Report, submitted by exporters prior to their initial shipment, provides information to Ex-Im Bank to ensure that its policies regarding "foreign content" are in compliance with its statutory mandate to support U.S. jobs.
3. The forms are on Ex-Im Bank's website in fillable PDF format. Ex-Im Bank is currently planning for electronic submission of these documents.
4. Not applicable. Information was formerly reported through independent legal documentation.
5. This collection does not have a significant impact on a substantial number of small entities. The up-front reporting and back-end verification lessened the burden on small businesses, which previously reported foreign content with each shipment.
6. If collection of this information is not conducted, Ex-Im Bank may be unable to effectively monitor the implementation of its policies, and thus diminish its ability to comply with its statutory mandate to ensure creation of U.S. jobs.
7. Ex-Im Bank has promulgated regulations, at 12 CFR Parts 404 and 405, to ensure confidentiality of sensitive business and financial information. The collection is otherwise consistent with guidelines in 5 CFR Part 1320.6.

8. A notice was published in the Federal Register, Volume 72, No. 177, Page 52372 on September 13, 2007.

9. No payment or gifts will be provided to respondents.

10. Ex-Im Bank and its officers and employees are subject to the Trade Secrets Act, 18 USC 1905, which requires Ex-Im Bank to protect confidential information from disclosure. In addition the Bank has promulgated regulations, at 12 CFR Parts 404 and 405, to ensure confidentiality of sensitive business and financial information.

11. Not applicable. No sensitive information requested.

12. Number of respondents	600
Frequency of response	no more than 2/yr. (one "Content Report" and one "Cause Report")
Annual hour burden	1,200

13. Not Applicable

14. Estimated annualized cost to the Federal Government.

Reviewing time/hrs.	1
Responses/yr.	1200
Review time per yr.	1200
Avg. Wages/hr.	<u>x \$35</u>
Avg. Wages/yr.	\$42,000
Benefits and overhead	100%
Total Government Cost	\$84,000

15. Not applicable. There is no change in burden.

16. Not application. The information collected will not be published.

17. Not applicable. We are not seeking permission not to display the expiration date.

18. No exceptions.

B. Collections of Information Employing Statistical Methods

Statistical methods are not used in this information collection.