

**Supporting Statement A for
Paperwork Reduction Act Submission**

OMB Control Number 1018-0093

**Federal Fish and Wildlife Permit Applications and Reports—
Management Authority
50 CFR 12, 13, 14, 15, 16, 17, 18, 21, 23**

**FWS Forms 3-200-19--200-37, 3-200-39--3-200-53, 3-200-58, 3-200-61,
3-200-64--3-200-66, 3-200-69, 3-200-70, 3-200-73, and 3-200-76**

Note: This Information Collection Request (ICR) includes applications and reports currently approved under other OMB control numbers. If OMB approves this ICR, we will submit a request to discontinue OMB Control Numbers 1018-0130 and 1018-0134.

Terms of Clearance: None.

1. Explain the circumstances that make the collection of information necessary.

We collect information on application forms and in reports (in form and nonform format) to determine if applicants for permits meet the requirements mandated by:

- Bald and Golden Eagle Protection Act.
- Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).
- Endangered Species Act.
- Lacey Act (Injurious Wildlife).
- Marine Mammal Protection Act.
- Migratory Bird Treaty Act.
- Wild Bird Conservation Act.

Service regulations implementing these statutes and the CITES treaty are in Chapter I, Subchapter B of Title 50, Code of Federal Regulations. These regulations stipulate general and specific requirements that when met allow us to issue permits to authorize activities that are otherwise prohibited.

2. Indicate how, by whom, how frequently, and for what purpose the information is to be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, explain how the collection complies with all applicable Information Quality Guidelines.

All Service permit applications are in the 3-200 series of forms, each tailored to a specific activity based on the requirements for specific types of permits. We collect standard identifier information for all permits, such as the name of the applicant and the applicant's address, telephone and fax numbers, social security or tax identification number, and e-mail address. Standardization of general information common to the application forms will make the filing of applications easier for the public as well as expedite our review of applications.

The information that we collect on applications and reports is the minimum necessary for us to determine if the applicant meets/continues to meet issuance requirements for the particular activity. Respondents submit application forms periodically as needed; submission of reports is generally on an annual basis. We examined applications in this collection, focusing on questions frequently misinterpreted or not addressed by applicants. We have made clarifications to many of our applications to make it easier for the applicant to know what information we need.

In addition to the forms and reports previously approved for this collection, we have:

- Incorporated FWS Form 3-200-61 (American Ginseng Report) and nonform information collections for Approval of CITES Exports, Furbearer Reports, American Alligator Reports, Plant Rescue Center Application for Participation, and Plant Rescue Center Report of Receipt and Condition of Specimens. These information collections are currently approved under OMB Control No. 1018-0130, which expires August 31, 2009.
- Included FWS Forms 3-200-69 (Eagle/Import/Transport of Bald and Golden Eagle for Scientific or Exhibition Purposes (CITES)) and 3-200-70 (Export/Re-Import/Transport of Bald and Golden Eagle for Indian Religious Purposes (CITES)). These information collections are currently approved under OMB Control Number 1018-0022, which expires July 31, 2007.
- Included FWS Form 3-200-76 (Export of Caviar or Meat of Paddlefish or Sturgeon Removed from the Wild (CITES) currently approved under OMB Control Number 1018-0134, which expires March 31, 2010.

Note: We have not revised the information collected or the burden associated with the above applications and reports from that previously approved.

- Developed three new report forms (3-200-30a, 3-200-39a, and 3-200-40a) and one nonform report to simplify the reporting process for permittees. The information that we collect for reports is not a new requirement and was previously requested as a condition of the applicable permit. In our previous request, we included the burden for these reports with that requested for the specific application. The report forms provide the permittee with a suggested format for submitting the reporting requirement associated with activities authorized by their permit/authorization. These forms also provide potential applicants with an idea of what will be required if they receive the authorization requested.

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].

Forms in this collection will be available to applicants in a fillable format on our forms and permits websites, by mail, or by fax. Applicants may complete the fillable application online, but must send the application form with an original signature and the applicable processing fee by mail. Applicants may send supporting information by e-mail or fax, if we already have their application and they are able to reference an application number.

At this time, we do not have a system for electronic submission of permit application forms

or reports; however, we are actively developing the system and are pilot testing two Service application forms that have current OMB approval.

4. Describe efforts to identify duplication.

The information that we collect is unique to the applicant and is not available from any other source. Other than the general identifying information standard for each application, collection of duplicate information is minimal.

We have established "master permit files" and "programmatic files" for certain types of permits. This procedure allows applicants who frequently apply for these permits (e.g., CITES export permits) to submit most of the required information only once, instead of each time that they apply. Under this system, the applicant only needs to submit information specific to the immediate activities. We continue to identify areas where establishment of "master files" and "programmatic files" would meet our goals of reducing burden, while ensuring that the applicant's activities meet the permit/authorization issuance criteria.

We developed an electronic permit issuance and tracking system that greatly improves retrieval of file information, further reducing duplicate information requests for use in renewals, extensions, and repeat applications. Ongoing development of our permit issuance and tracking system will ensure that no duplication arises among Service offices.

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

This collection will not have a significant impact on small entities. Small businesses or small entities must provide the same information required of individual applicants. We collect only the minimum information necessary to establish eligibility and to assess the effect of the permit program.

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.

If we do not collect the information or if we collected the information less frequently, we could not implement many wildlife protection programs that are mandated by law. Further, we could not issue applicants a permit, certificate, or authorization letter, since the collected information is either required on the permit, certificate, or authorization itself or is needed to make the necessary biological and legal findings under applicable statutes and treaties. In certain cases where programmatic, biological, and/or legal findings can be made as a result of an initial application, we can use a less burdensome process for subsequent requests, as long as the information provided to make the original findings remains the same.

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 secrets, 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.

No special circumstances exist that require us to collect the information in a manner inconsistent with OMB guidelines.

8. Provide 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 (or in response to a PRA statement) and describe actions taken by the agency in response to these comments.

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.]

On February 22, 2007, we published in the Federal Register (72 FR 8002) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on April 23, 2007. We received one comment. The comment did not address issues surrounding the proposed collection of information or the cost and hour burden estimates, but instead objected to other aspects of our program, such as level of issuance of permits, interpretation of laws, clarity of Federal Register notices related to other processes and procedures, and the accuracy of the level of the application fees. We have not made any changes to this collection as a result of the comment.

We contacted the following groups that consistently use our forms and solicited comments on the information collection.

Steve Olson Director of Government Affairs Association of Zoos and Aquariums solson@aza.org	Ellen Paul Executive Director The Ornithological Council ellen.paul@verizon.net
Carla Cicero Museum Specialist Museum of Vertebrate Zoology ccicero@berkeley.edu	Dave Self President Elect Florida Nurserymen & Growers Association dave@wyldwestannuals.com

Rick Parsons Director of Wildlife Conservation Safari Club International 4800 West Gates Pass Road, Tucson, Arizona 85745-9490	Marshall Meyers Government Affairs Pet Industry Joint Advisory Council mmeyers@pijac.org
Susan Clubb, Conservation and Research Committee/ Cooperative Breeding Programs American Federation of Aviculture susanclubb@aol.com	Eric Klaphake Legislative Committee Association of Reptilian and Amphibian Veterinarians dreklaphake@att.net
Regulatory Affairs Professionals Society (RAPS) 11300 Rockville Pike, Suite 1000, Rockville, MD 20852 raps@raps.org	

Necessity of Collection. All agreed that the collections were necessary, except in the following circumstances:

- FWS Form 3-200-49. One commenter asked why there needs to be a conservation relationship delineated in the Wild Bird Conservation Act Cooperative Breeding Program application.

Response: This conservation relationship is part of the issuance criteria and this question must remain part of the application.

- FWS Form 3-200-41. One commenter asked if the requested inventory needs to include Endangered Species Act listed species/specimens that are not eligible for the Captive-bred Wildlife Registration (CBW).

Response: We agree it is not necessary that the inventory for this application include those species/specimens not able to be covered under the CBW, and we have indicated this on the application form. However, if the applicant's experience does not include activities with the specific species he/she is requesting to add to a CBW, he/she may need to provide this inventory data to substantiate experience with similar species.

Burden Estimates. All agreed that our estimates were accurate except in the following circumstances:

- FWS Form 3-200-24. One commenter indicated that the time burden estimate might be a little low for novice applicants. This commenter went on to state that the time burden estimates on application forms 3-200-49 and 3-200-65 were underestimates.
- FWS Forms 3-200-27 and 3-200-29. Another commenter indicated that updates to the burden time were needed on application forms 3-200-27 and 3-200-29. This commenter went on to state that it would be useful to see all of the reporting burdens expressed consistently (e.g., not 120 minutes on one application and 2 hours on the next).

Response: We believe that the approximate time burdens for each application (including those emphasized in these comments) accurately reflect the estimated time for the average applicant to complete the application in question. For

consistency, we have standardized the time units. For applications, completion times of 70 minutes or less are expressed in minutes and completion times over 70 minutes are expressed in hours and minutes, as appropriate.

Ways to Enhance the Quality, Utility, and Clarify of Information. Three commenters made suggestions regarding the application form formats:

- FWS Form 3-200-48. One commenter indicated that the Service wildlife ports where the import declaration for their bird(s) can occur are limited to those close to U.S. Department of Agriculture bird quarantine stations; therefore, the list of Service wildlife ports should contain a note to that effect.

Response: All application forms that contain the wildlife declaration question have a standardized list of ports for Service wildlife declaration. The port of declaration is chosen by the applicant from this standardized list, in consideration of all factors (to include other Federal agency requirements) influencing the logistics of their specific situation.

- FWS Form 3-200-24. One commenter stated that the IATA website link is not useful for answering the question.

Response: We have removed this link and have standardized the question to assist the applicant in responding.

- Consistency. A commenter indicated several areas where consistency in common questions across applications would improve the quality of information. For certain common questions, the commenter provided insights into areas where clarification may be needed. The questions where consistency is warranted are: request for transport information; request for CITES Appendix I import permit information; request for current location information; and request for location of parental stock information. The questions where clarification is warranted are: request for transport information and requests that can be answered with supporting documentation. Specifically, the commenter indicated that it would be helpful if there were more detail on the transport regulations and their associated guidelines, to include web links where appropriate. Clarification would be useful on the types of documentation that can be submitted to identify the specimen(s), the specimen's(s) origin(s), or species holdings of an institution. This commenter also indicated that on application forms 3-200-25, 3-200-27, 3-200-29, 3-200-31, 3-200-37, and 3-200-41, language and enclosures/web links could be updated so certain questions are clearer and/or would provide the information appropriate to address the permit issuance criteria. Finally, this commenter emphasized that the direction for the principal officer to sign in blue ink should be in bold type, as this instruction is easily missed.

Response: We have attempted to standardize common questions across applications wherever feasible. With regard to the specific instances where clarification or language and enclosure/web links updates are needed, we have taken these into account and have added clarifications and updates where warranted and feasible.

Ways to Minimize Burden. All agreed that the burden was within acceptable limits except in the following circumstances:

- FWS Form 3-200-49. One commenter indicated that we should not require all of the original program information to be repeated in cases of reissuance/amendment. This same commenter also indicated applicants should be able to utilize electronic signatures rather than a traditional hard copy signature.
- Use of Databases. One commenter emphasized the ability for their members to be able to use their member-wide database records to answer certain questions, the implication being it would be helpful in reducing the burden of information submission on the applicant's end.

Response: We revised FWS Form 3-200-49 to indicate when applicants do not need to repeat certain information. At this time, we do not have a system for electronic submission of permit application forms or report forms; however, we are actively developing the system and hope to have a system soon that will accept electronic signatures. Regarding referencing a specific membership's record type as a type of supporting documentation that can be submitted for certain questions, we will accept this specific membership's record type as supporting documentation where appropriate to augment answers to specific questions. However, applicants should not use this documentation in lieu of answering a specific question. The applicant should consider which application questions the mentioned records would serve to augment. We can provide guidance on appropriate supporting documentation to all applicants regardless of their membership affiliation.

In addition to this specific public outreach, we also attend meetings of groups where a significant portion of the membership submits applications. At these meetings, we provide guidance on submitting applications and receive general feedback on the forms. We attempt to incorporate the general comments in our application forms where appropriate.

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

We do not provide payments 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.

We do not provide any assurance of confidentiality. The information collected is subject to the requirements of the Privacy Act and the Freedom of Information Act as explained in the notices portion of all applications.

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.

We do not ask questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information.

We estimate that there will be approximately 8,155 respondents annually for the applications and reports included in this ICR. We anticipate receiving approximately 12,097 responses annually, totaling 8,950 annual burden hours. The completion times vary substantially depending on the activity. At an average rate of \$35 per hour for salary and benefits, we estimate the dollar value of the annual burden hours for this collection to be \$313,250. See Attachment A for a breakout of burden hours and costs for each information collection.

13. Provide an estimate of the total annual [non-hour] cost burden to respondents or record keepers resulting from the collection of information.

We estimate the nonhour cost burden to respondents for this information collection to be \$941,270. These costs are primarily for application processing fees, which range from \$0 to \$300. There are no processing fees for reports. However, we have estimated the nonhour cost burden for the American Ginseng Report (FWS Form 3-200-61) to be \$3,000 for travel and printing costs. Federal, tribal, State, and local government agencies and those acting in their behalf are exempt from processing fees. See Attachment A for a breakout of nonhour burden costs for each information collection.

14. Provide estimates of annualized costs to the Federal Government.

The annual cost to the Federal Government for this information collection is approximately \$1,894,731. These costs are primarily for staff time to review and process applications and reports. We estimate an average of \$50 per hour for salary and benefits. Review/processing time varies from 15 minutes to 30 hours depending on the activity. See Attachment A for a breakout for each information collection.

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

We are estimating 12,097 responses, totaling 8,950 annual burden hours for this collection. This is an increase of 2,790 responses and 2,204 annual burden hours from our previous request. Part of this increase is a result of incorporating information collections contained in 1018-0022, 1018-0130, and 1018-0134 (652 responses and 1,907 burden hours) in this collection. The remaining increase is a result of adjustments to our estimates, based on experience over the past 3 years. The reduction in nonhour burden costs of \$14,730 from our previous request is because our previous request erroneously included application processing fees for exempt entities.

16. For collections of information whose results will be published, outline plans for tabulation and publication.

There are no plans for publication of the results of these information collections.

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 identified in Item 19,
"Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.**

There are no exceptions to the certification statement.

**CONSOLIDATED BURDEN TABLE
OMB 1018-0093**

Activity	Number of annual respondents	Number of annual responses	Average completion time per response (minutes)	Total annual burden hours	Total dollar value of burden hours (\$35/hr)	Average nonhour burden cost per response**	Total nonhour burden cost to applicants	Average time (hrs) per response for Govt review	Cost to Government (\$50/hr)
3-200-19 - application	1031	1083	20	361	\$12,635	100	\$108,300	3.5	\$189,525
3-200-20 - application	15	21	60	21	\$735	100	\$2,100	7.5	\$7,875
3-200-21 - application	134	201	45	151	\$5,285	100	\$20,100	7.5	\$75,375
3-200-21 - associated report	100	135	15	34	\$1,190	0	\$0	0.25	\$1,688
3-200-22 - application	70	95	20	32	\$1,120	100	\$9,500	4.5	\$21,375
3-200-23 - application	127	241	45	181	\$6,335	75	\$17,250	5	\$60,250
3-200-24 - application	170	485	45	364	\$12,740	100	\$41,500	6	\$145,500
3-200-25 - application	46	64	60	64	\$2,240	100	\$6,400	5	\$16,000
3-200-26 - application	618	865	20	288	\$10,080	100	\$86,500	1.5	\$64,875
3-200-27 - application	68	113	45	85	\$2,975	100	\$9,700	5	\$28,250
3-200-28 - application	57	95	30	48	\$1,680	87.5	\$8,313	1.75	\$8,313
3-200-29 - application*	108	270	70	316	\$11,060	125	\$25,625	1.83	\$24,705
3-200-30 - application	73	81	60	81	\$2,835	100	\$8,100	7	\$28,350
3-200-30a - report	64	69	30	35	\$1,225	0	\$0	0.50	\$1,725
3-200-31 - application	3	3	120	6	\$210	100	\$200	6.5	\$975
3-200-32 - application	105	614	60	614	\$21,490	125	\$58,000	3	\$92,100
3-200-33 - application	20	303	120	606	\$21,210	200	\$60,600	7	\$106,050
3-200-34 - application	41	107	20	36	\$1,260	125	\$13,375	4.5	\$24,075
3-200-35 - application	3	3	60	3	\$105	100	\$200	6.5	\$975

* Total burden hours adjusted to reflect totals entered by ROCIS because of rounding.

** Nonhour burden cost per response is application fee

***Nonhour burden cost is for travel/printing expenses

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3-200-36 - application	3	3	60	3	\$105	100	\$200	7.5	\$1,125
3-200-37 - application	110	165	120	330	\$11,550	100	\$15,900	20	\$165,000
3-200-39 - application	7	7	60	7	\$245	100	\$300	4	\$1,400
3-200-39a - report & recordkeeping	7	7	30	4	\$140	0	\$0	0.50	\$175
3-200-40 - application	2	2	60	2	\$70	100	\$100	4	\$400
3-200-40a* - report	2	2	30	2	\$70	0	\$0	0.25	\$25
3-200-41 - application	87	87	120	174	\$6,090	200	\$13,000	6	\$26,100
3-200-41a - report	83	83	30	42	\$1,470	0	\$0	0.50	\$2,075
3-200-42 - application	20	21	60	21	\$735	62.5	\$1,063	3	\$3,150
3-200-43 - application	16	19	140	44	\$1,540	131.25	\$1,969	30	\$28,500
3-200-44 - application	1	1	30	1	\$35	150	\$150	3.5	\$175
3-200-44a* - report	1	1	60	1	\$35	0	\$0	1.00	\$50
3-200-45 - application	77	77	30	39	\$1,365	100	\$7,700	3.5	\$13,475
3-200-46 - application	335	369	30	185	\$6,475	50	\$18,450	4	\$73,800
3-200-47 - application	7	16	120	32	\$1,120	100	\$800	6.5	\$5,200
3-200-48 - application	3	4	60	4	\$140	100	\$300	4	\$800
3-200-49 - application	3	4	180	12	\$420	200	\$600	8	\$1,600
3-200-50 - application	2	2	600	20	\$700	0	\$0	7	\$700
3-200-51 - application	2	2	480	16	\$560	250	\$500	8	\$800

* Total burden hours adjusted to reflect totals entered by ROCIS because of rounding.

** Nonhour burden cost per response is application fee

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**CONSOLIDATED BURDEN TABLE
OMB 1018-0093**

Activity	Number of annual respondents	Number of annual responses	Average completion time per response (minutes)	Total annual burden hours	Total dollar value of burden hours (\$35/hr)	Average nonhour burden cost per response**	Total nonhour burden cost to applicants	Average time (hrs) per response for Govt review	Cost to Government (\$50/hr)
3-200-52 - application	145	198	15	50	\$1,750	100	\$15,000	2.5	\$24,750
3-200-53 - application	4	4	120	8	\$280	100	\$300	6.5	\$1,300
3-200-58 - application	50	50	60	50	\$1,750	0	\$0	3	\$7,500
3-200-61 ***- report	25	25	2610	1088	\$38,080	120	\$3,000	2	\$2,500
3-200-64 - application	115	137	30	69	\$2,415	75	\$10,275	3	\$20,550
3-200-65 - application	2	2	2400	80	\$2,800	100	\$200	5	\$500
3-200-66* - application	50	50	30	26	\$910	50	\$1,900	1	\$2,500
3-200-69* - application	3	3	30	3	\$105	75	\$150	1	\$150
3-200-70 - application	16	16	30	8	\$280	0	\$0	1	\$800
3-200-73* - application	3975	5565	30	2784	\$97,440	75	\$355,650	2	\$556,500
3-200-76 - application	12	120	180	360	\$12,600	150	\$18,000	8	\$48,000
Approval of CITES Export	2	2	720	24	\$840	0	\$0	4	\$400
Furbearer Report	52	52	60	52	\$1,820	0	\$0	1	\$2,600
Alligator Report	10	10	60	10	\$350	0	\$0	1	\$500
PRC - Application	3	3	60	3	\$105	0	\$0	1	\$150
PRC - Report	70	140	30	70	\$2,450	0	\$0	0.5	\$3,500
Totals	8155	12097		8950	\$313,250		\$941,270		\$1,894,731

* Total burden hours adjusted to reflect totals entered by ROCIS because of rounding.

** Nonhour burden cost per response is application fee

***Nonhour burden cost is for travel/printing expenses