

**SUPPORTING STATEMENT
U.S. DEPARTMENT OF COMMERCE
INTERNATIONAL TRADE ADMINISTRATION
APPLICATION FOR THE PRESIDENT'S "E"
AND "E STAR" AWARDS FOR EXPORT EXPANSION
OMB CONTROL NO. 0625-0065**

A. JUSTIFICATION

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

Expanding the United States (U.S.) exports is a national priority and essential to improving U.S. trade performance. The Department of Commerce (DOC), International Trade Administration (ITA), U.S. Commercial Service (CS) serves as the key U.S. government agency responsible for promoting exports of goods and services from the United States and assisting U.S. exporters in their dealings with foreign governments.

The "E" Award Program was established by Executive Order 10978 on December 5, 1961, to afford suitable recognition to persons, firms, or organizations that contribute significantly in the effort to increase U.S. exports and to encourage U.S. companies to sell their products and services internationally. The Executive Order authorized the Secretary of Commerce, in cooperation with the Secretary of the Interior, the Secretary of Agriculture, the Administrator of the Small Business Administration, and the heads of other Government departments and agencies, to establish procedures for the nomination and the granting of awards.

A second Presidential award, the "E Star" Award, was authorized by the Secretary of Commerce on August 4, 1969, to afford continuing recognition of noteworthy export promotion efforts.

The application form, ITA-725P, is the vehicle designed to determine eligibility for the "E" Award and the "E Star" Award within established criteria. In addition to the application form and written justification, respondents can submit supporting materials that show their qualification for the respective awards, although supporting materials are not required. Examples of supporting materials can include: translated company and product literature; promotional materials; client impact statements; or anything the company or organization deems relevant to its qualification for the respective award.

The "E" and "E Star" Awards are the highest honors that our nation bestows upon American exporters and organizations that contribute to exporting. These awards recognize firms and organizations for their competitive achievements in world markets, as well as the benefits of their success to the U.S. economy. The purpose for collecting all of the information mentioned above is to determine the applicant's eligibility to receive a Presidential award.

The respondents benefit from the collection of this information because it affords them with recognition of their exporting success from the U.S. government. Respondents can use this recognition to further market themselves and thereby increase business and reputation.

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

Once the company or organization submits the “E” or “E Star” Award application to its local Commercial Service (CS) office, the application is reviewed and endorsed by the CS office director and forwarded to the Commercial Service within the International Trade Administration of the U.S. Department of Commerce. Upon receipt, the “E” Award program officer forwards the applicant’s name and address to the following federal agencies for clearance:

- DOC/Bureau of Industry and Security
- Department of Labor
- Department of Justice (anti-trust division and criminal division)
- Federal Trade Commission
- Internal Revenue Service
- Securities Exchange Commission (if applicable)

These clearances are essential to assure that the applicant is conforming to government regulation and policy.

The CS requests via email (with the exception of the IRS which requests a fax) that the agencies check whether they have any adverse information concerning the applicants during the past four years and whether, in their opinion, the conferring of the Presidential Awards would in any way cause concerns to the United States government. The agencies provide the CS with a response via email, with the exception of the IRS which sends a response via regular mail, stating whether they have found any adverse information on the company.

At the same time, the application is evaluated by the “E” Award program officer for presentation before the “E” Award committee. The “E” Award committee is comprised of members from the Department of Commerce International Trade Administration U.S. Commercial Service (which chairs the committee); Department of State; Department of Labor; Small Business Administration; Export-Import Bank; and the Department of Transportation Maritime Administration. Each member of the President’s “E” Award committee reviews the application and supplemental materials prior to scheduled committee meetings, at which time the content, analysis and merits of each application are discussed.

Applications are reviewed once or twice per year, but each application is only used for information one time.

The collected information will not be disseminated.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.**

Applications can be downloaded from the Commercial Service's Marketing and Communications Office website at www.buyusa.doc.gov/marketing. The application can be sent via email to the "E" Award program officer. The application can then be distributed from the program officer to "E" Award committee members. Respondents can also choose to submit a hard copy of the application and supporting materials in addition to the electronic version, but this is not required.

- 4. Describe efforts to identify duplication.**

Each applicant is eligible for only one "E" Award and one "E Star" Award. Because of the uniqueness of the award, much of the information requested is pertinent only to the pursuit of an "E" or "E Star" Award and must address the applicant's own credentials for the award. An applicant is submitting proprietary information specifically compiled for this purpose.

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

The applicant must use the same standard criteria regardless of size.

- 6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

If this information is not collected and the applications and supporting materials are not provided, the Department of Commerce would be unable to determine an applicant's eligibility for the President's "E" and "E Star" Awards. The cessation of this program would take away the U.S. government's ability to recognize U.S. exporters for their achievements and contributions to the U.S. economy.

- 7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.**

No special circumstances are required. The information will be collected consistent with guidelines in 5 CFR 1320.5.

8. **Provide information of the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the 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.**

A Federal Register Notice requesting public comment was published on December 10, 2007 (Volume 72, Number 236, pg. 69652). No comments were generated from this notice.

The President's "E" Award committee is consulted at least once a year to determine the clarity of the application's instructions as well as the criteria for receiving the "E" and "E Star" awards.

9. **Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.**

There are no payments or gifts to enumerate respondents.

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

Item 9 of ITA-725P, Export Statistics, are marked "Business Confidential." In addition, the entire application except Items 1, 2, and 3 (organization information, contact information, and signature of organization president/CEO) have been ruled proprietary, Freedom of Information Act Exemption B.4.

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.**

No questions of a sensitive nature are asked.

12. **Provide an estimate in hours of the burden of the collection of information.**

It is estimated that 10 applications will be submitted per year. A random sampling of respondents revealed an estimate of 20 hours developing and preparing an application.

Estimated Number of Respondents: 10.

Estimated Time Per Response: 20 hours.

Estimated Total Annual Burden Hours: 200.
[10 x 20 hours]

Estimated Total Annual Costs: \$7,000.
[average private sector wage of \$35 per hour x 200 hours]

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in #12 above).

None.

14. Provide estimates of annualized cost to the Federal government.

The total estimated cost to the government is **\$11,200** for salary, printing and award materials as is broken down as follows:

Salary - \$8,000
Printing and Framing - \$1,000
Award Materials (flags and pins) - \$2,200

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB 83-I.

Not Applicable.

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

The results of this information collection will not be published. It does not employ any statistical methodologies.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

There will not be any changes to this form in the foreseeable future. It would be a waste of money to have an expiration date on the form and request an exemption from the date requirement for the following reasons:

- Forms with expired authorization dates would have to be disposed of, even though the only change would be the expiration date.
- In order to avoid excessive costs from the disposal of forms, program officials would have to try to fine-tune anticipated stock requirements, meaning small printing orders at higher unit cost.

18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I.

Not Applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

The collection does not employ statistical methods.

TERMS OF CLEARANCE: The agency should consider electronic submission options for this collection, understanding that original or faxed signatures are required to obtain information from the Internal Revenue Service about candidate businesses.

RESPONSE TO OMB NOTICE OF ACTION DATED 12/21/2004

The Commercial Service is researching electronic submission in the very near future (to be completed in three months) but due to a shortage in staff resources the transition to electronic submission was not completed before the expiration of this information collection request.'