

**SUPPORTING STATEMENT**  
**U.S. Department of Commerce**  
**International Trade Administration**  
**Market Research to Broaden and Deepen U.S. Exporter Base**  
**OMB CONTROL NO. 0625-XXXX**

**SECTION A. Justification**

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

Expanding U.S. exports is a national priority 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, particularly by small and medium-sized enterprises, and assisting U.S. exporters in their dealings with foreign governments.

Section 4721 of 15 United States Code contains several provisions that direct the CS to, “identify United States businesses with the potential to export goods and services and provide such businesses with advice and information on establishing export businesses.” As such, the long-term performance goal of the CS is to, “broaden and deepen the U.S. exporter base.”

Furthermore, the CS is mandated by the Government Performance and Results Act of 1993 to improve program performance and achieve better results for American citizens. Based on this mandate, the CS developed new metrics driven by the 2008 Program Assessment Rating Tool (PART). The new metrics allow the CS to measure organizational effectiveness at broadening and deepening the U.S. exporter base and to capture, quantify and communicate this impact in macroeconomic terms that are more meaningful to stakeholders, Congress and U.S. taxpayers.

In order to collect information that establishes the baseline metrics for some of these new performance measures and provides data points for determining how to meet program performance goals, the CS requests approval to conduct market research on prospective and existing U.S. exporters using the following four surveys:

- 1. Commercial Service Brand Analysis and Strategy Survey (Form ITA - 8710):**  
To meet the performance goal of broadening and deepening the U.S. exporter base, the CS must increase awareness of our organization and the services we provide to U.S. companies. Currently, there is no research available about CS awareness and brand position. This survey was designed to measure four new performance metrics (awareness, consideration, transaction and loyalty) related to broadening and deepening the U.S. exporter base.
- 2. Market Segmentation Survey of Moderate U.S. Exporters – Manufacturers (Form ITA – 8711):** The CS has coordinated with the Manufacturing Extension Partnership, the U.S. Census Bureau, and the Export-Import Bank to conduct research to better understand and profile the behaviors, attitudes and characteristics of U.S. manufacturers

with regard to selling internationally and using U.S. government export assistance. This survey was designed to provide senior management and trade professionals with actionable market intelligence to tailor the organization's service mix and optimize resource allocation, enabling the CS to broaden and deepen the U.S. exporter base.

- 3. Market Segmentation Survey of U.S. Exporters – Service Providers (Form ITA – 8712):** Services industries account for 55 percent of economic activity in the United States (U.S. Census Bureau). As such, the CS must conduct research to better understand and profile the behaviors, attitudes and characteristics of U.S. service providers with regard to selling internationally and using U.S. government export assistance. This survey was designed to provide senior management and trade professionals with actionable market intelligence to tailor the organization's service mix and optimize resource allocation, enabling the CS to broaden and deepen the U.S. service provider exporter base.
- 4. Market Evaluation Survey of Non-Exporting Companies (Form ITA- 8713):** This survey was designed to uncover the needs of non-exporting companies to enable the CS to measure the organization's ability to turn non-exporters into exporters, supporting our performance goal of broadening and deepening the U.S. exporter base. The CS also has a renewed focus on new-to-export companies as a result of the new performance metrics developed in response to the PART. To find new-to-export companies and to turn them into exporters, the CS must better understand and profile the behaviors, attitudes and characteristics of U.S. companies that are not currently exporting.

**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.**

The surveys will be conducted by telephone. . Form ITA-8710 will be conducted on an annual basis. Forms ITA-8711, 8712 and 8713 will be conducted one time only. All surveys will be conducted by government contractors. Survey ITA-8710 will be conducted by The Research Associates and ITA-8711, 8712 and 8713 will be conducted by Pacific Consulting Group.

Information from these surveys will be used to:

- Provide actionable market intelligence to tailor the CS's service mix and optimize resource allocation, enabling the CS increase the number of U.S. companies exporting.
- Provide baselines for performance metrics to determine how well the CS is meeting its mandate of broadening and deepening the U.S. exporter base and to adjust its strategies accordingly.

U.S. citizens benefit from this information collection because the data will be used to create better, more targeted services for the public. The CS needs this information to measure program performance and to set baselines for the new metrics created in response to the PART. The

information also allows the CS to systematically determine the needs and benefits desired of U.S. companies and how best to meet these needs in order to effectively and efficiently meet its goal of increasing the U.S. exporter base.

Information collected will not be disseminated to the public or used to support information that will be disseminated to the public.

**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.**

All telephone survey responses will be collected using skip pattern technology.

**4. Describe efforts to identify duplication.**

The Commercial Service contacted multiple government agencies and private sector companies to determine if the information was currently being collected. Research reviewed includes the Report Card on Trade II by ITA and Dr. Jennifer Bremer of the Kenan Institute; National Export Strategy; 2006 ITA Customer Satisfaction Survey; Census Bureau's *Profile of Exporting Companies*; SBA's *Small Business Guide*; ITA's *Small and Medium-Sized Exporting Companies: A Statistical Handbook 2003*; and CS customer satisfaction surveys. Consultations were also conducted with MEP, Ex-Im, Census, TPCC, and MAS. The Commercial Service also reviewed all information collections currently approved by OMB and found that no similar information is available.

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

Every effort has been made to streamline the surveys to reduce the burden on the respondents. Consideration was given to the length and the wording of all questions. Survey questions were beta tested using five respondents from the target demographic groups identified for each survey to ensure that the questions are properly worded and the survey is an appropriate length.

Furthermore, survey questions are opinion-oriented, and there is no need for clients to maintain additional records, or incur extra expense to develop data not readily available.

As the surveys will be conducted via phone, there is no travel time associated with the information collection.

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

If the collection is not conducted, the CS will be unable to measure program performance and cannot set baselines for the new metrics created in response to the PART. More importantly, the CS will not be able to systematically determine the needs and benefits desired of U.S. companies and how best to meet these needs. In short, the CS cannot effectively and efficiently meet its mandate to broaden and deepen the U.S. exporter base.

If survey ITA-8710 is conducted less frequently than on an annual basis, the CS will not be able to assess its program performance each year and make adjustments accordingly. Measurement and analysis on a yearly basis allows the CS to optimize resource allocation by focusing on the program areas that provide the greatest return on investment – areas that would be designated by the yearly data collection and analysis.

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

There are no special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

**8. Provide a copy 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 record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

A *Federal Register* Notice soliciting public comment was published on March 31, 2008. No comments were received.

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

No payments or gifts are provided to the respondents.

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

The government will protect confidential/proprietary information on business operations and trade secrets possessed by any company or participant to the full extent of the law. Such information will be withheld from disclosure pursuant to the following statutes:

- a. Trade Secrets Act - 18 U.S.C. § 1905  
([http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=browse\\_usc&docid=Cite:+18USC1905](http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=browse_usc&docid=Cite:+18USC1905)).
- b. Freedom of Information Act (FOIA) - 5 U.S.C. § 552(b)  
([http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=browse\\_usc&docid=Cite:+5USC552](http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=browse_usc&docid=Cite:+5USC552)).
- c. Economic Espionage Act – 18 U.S.C. § 1832  
([http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=browse\\_usc&docid=Cite:+18USC1832](http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=browse_usc&docid=Cite:+18USC1832)).

An assurance of confidentiality will be provided to all survey respondents (see attached surveys). The decision was made not to send a pre-notification letter explaining the confidentiality because the lists purchased will not contain company address information. Furthermore, even if there was an address, there is no guarantee that the person who receives the pre-notification is the person who will be answering the survey. The screening process will determine this.

More specifically on confidentiality:

The information collected will be confidential, specifically to the Department of Commerce. Assuring survey respondents that their answers will be confidential helps relieve their fears that the information will be misused and helps achieve a higher response rate. By necessity, Pacific Consulting Group (PCG) and The Research Associates and their data collection subcontractors will have to know how each respondent answered. However, PCG and TRA will provide the Department of Commerce with aggregate data only.

If the Department of Commerce wants the survey database at the project's end, PCG and TRA will delete any variables that identify the individual company or respondent (e.g., name, phone, address, email, etc.) before providing it. Both PCG and TRA, and their subcontractors, adhere to the American Association of Public Opinion Research's (AAPOR) Code of Professional Ethics and Conduct and would never use this type of information for anything beyond what is needed for the project.

**Data Retention and Storage**

PCG and TRA keep the full survey information – including sampling universe, survey samples, and survey data – for one year following completion of the project. At that point, it is purged from their network and files. This allows them to answer any questions that might arise or

conduct any additional analysis after the project ends. However, it can be purged at any time at an earlier or later date at the request of the Department of Commerce.

### **Security**

Regarding data security, PCG and TRA will protect the data as they do any personally-identifiable information for other federal clients including, Medicare, IRS, Department of Education, VBA, etc. Their data storage systems comply with federal regulations and are well-protected both physically and electronically, both in the main office and the restricted-access, secure Analysis Suite.

### **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.**

Not applicable. The information collected does not include questions of a sensitive nature.

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

The burden hours for the collection of information are estimated at 1,767 based on approximately 4,000 respondents taking 15-30 minutes to respond, depending on the survey. A breakdown of burden hours for each survey is as follows:

- Form ITA-8710
  - Estimated Respondents: 400
  - Estimated Time per Response: 15 minutes
  - Estimated Total Annual Burden Hours: 100
  - Estimated Total Annual Cost to Public: \$0
  
- Form ITA-8711
  - Estimated Respondents: 1,600
  - Estimated Time per Response: 30 minutes
  - Estimated Total Annual Burden Hours: 800
  - Estimated Total Annual Cost to Public: \$0
  
- Form ITA-8712
  - Estimated Respondents: 1,600
  - Estimated Time per Response: 30 minutes
  - Estimated Total Annual Burden Hours: 800
  - Estimated Total Annual Cost to Public: \$0
  
- Form ITA-8713
  - Estimated Respondents: 400
  - Estimated Time per Response: 15 minutes
  - Estimated Total Annual Burden Hours: 100

Estimated Total Annual Cost to Public: \$0

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

Not Applicable

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

The following is based on staff hours/cost to process the surveys –

\$10,000 for ITA-8710  
\$50,000 for ITA-8711  
\$75,000 for ITA-8712  
\$10,000 for ITA-8713

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

This is a new collection of information thus no program changes or adjustments.

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

Not applicable. The information collected will not be published for statistical use.

**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.**

Not applicable.

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

No exception to the certification statement is requested.