

NON-SUBSTANTIVE CHANGE REQUEST
U.S. Department of Commerce
U.S. Census Bureau
Automated Export System (AES) Program
OMB Control No. 0607-0152

The U.S. Census Bureau issued a final rule, June 2, 2008, to amend the Foreign Trade Statistics Regulations in its entirety. The new regulations implement the provisions of the Foreign Relations Authorization Act, Public Law 107-228, and require mandatory filing of export information through the Automated Export System (AES) or through *AESDirect* for all shipments where a Shipper's Export Declaration (SED) was previously required. The rule became effective on July 2, 2008, and will be implemented on October 1, 2008. The AES is an electronic method for filing the paper SED information directly with the U.S. Customs and Border Protection and the Census Bureau. Therefore, as of October 1, 2008, the paper SED will become obsolete. All references to the paper SED will be eliminated because the AES will be the only filing option for reporting export information. The elimination of references to the SED in the Office of Management and Budget (OMB) Package will also result in a title change to the AES Program.

There are several benefits to requiring all export information to be filed electronically. Electronic filing strengthens the U.S. government's ability to prevent the export of certain items by unauthorized parties to unauthorized destinations and end users, because the AES aids in targeting and identifying suspicious shipments prior to export. Other benefits include the government's ability to significantly improve the quality, timeliness, and coverage of export statistics.

Mandatory AES will reduce the respondent burden by 52,567 burden hours. The reduction in burden hours is derived by subtracting the new estimate of respondent burden from the previous estimate of respondent burden. The following tables show the total annual responses, and the time required to complete the SED or the AES record. Table 1 is the previous estimate of respondent burden that was submitted with the original OMB Package. Table 2 is the new estimate of respondent burden with mandatory AES.

Table 1: Previous Estimate of Respondent Burden

SED/AES	Annual Responses	x	Hours per Response	=	Total Hours
SED	394,252		.18333		72,280
AES	14,913,223		.05		745,661
Total	15,307,475				817,941

Table 2: New Estimate of Respondent Burden

AES	Annual Responses	x	Hours per Response	=	Total Hours
AES	15,307,475		.05		765,374
Total	15,307,475				765,374

The estimate of approximately eleven minutes (.1833 hrs.) per document completion time for the paper SED is based on historical records. The estimate of approximately three minutes (.05 hours) per electronic AES submission is based on an examination of an electronic submission as compared with preparation of paper SEDs. We estimate that approximately one quarter to one third of the information reported on paper SEDs is repetitious and can be automatically inserted on electronic submissions. An example of such repetitious information is the name, address, and Employer Identification Number of the U.S. Principal Party in Interest. Also, many automated filing respondents extract preexisting information from their electronic databases eliminating the repeated lookup of information necessary for paper submissions.