SUPPORTING STATEMENT U.S. Department of Commerce International Trade Administration Trade Fair Certification Program Application OMB CONTROL NO. 0625-0130

A. JUSTIFICATION

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

This supporting statement is to request renewal of OMB Control No. 0625-0130.

The U.S. Department of Commerce's Trade Fair Certification (TFC) Program provides the Department's endorsement and support for private-sector recruited and organized foreign trade fairs. Certifying a trade fair means Commerce endorses a qualified trade fair as a proven opportunity to promote exports. Certification also provides endorsement of the U.S. fair organizer or agent as a reliable firm capable of effectively organizing and managing a U.S. pavilion or trade fair. The Program emphases are on obtaining greater numerical participation by U.S. new-to-export (NTE) and new-to-market (NTM) firms in the Certified Trade Fairs and increasing the percentage of NTE and NTM firms. The TFC Program has supported more than 1,100 trade fairs since 1988. Thousands of U.S. firms and scores of fair organizers have participated in this Program and approximately 110 trade fairs are currently certified annually.

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.

The information will be collected by the Manager of the Trade Fair Certification Program by submission of a completed application (Form ITA-4100P) for each event an organizer wishes to have considered for certification. The information will be used to evaluate and select viable applicants for organizing and managing a U.S. pavilion at a trade fair. The appropriate ITA units make a recommendation to accept or deny the application.

The information collected will not be disseminated to the public.

3. <u>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.</u>

ITA's Office of the Chief Information Officer (OCIO) has determined that it is capable of making the form available electronically and will do so once the form is approved. Electronic submission of the form is not acceptable because a signed application is required.

4. Describe efforts to identify duplication.

This type of information is not available from other sources.

5. <u>If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.</u>

The amount of information requested has been reduced to the minimum necessary to evaluate viable applications. Qualified respondents already should have the required experience and abilities needed to fulfill the requests in the notice. Information reporting requirements are not difficult for a bona fide applicant to complete. All organizers, large or small, develop this information for each show, whether or not they apply for certification.

6. <u>Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.</u>

Without this information, collected on Form ITA-4100P, it would not be possible for ITA to determine if the trade fair in would warrant endorsement and support of the DOC under terms of the TFC Program.

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

The collection will be conducted in a manner consistent with the Paperwork Reduction Act 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 recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

There were no comments received from the public in response to the May 30, 2008, Federal Register announcement (Volume 73, pg. 31058).

Based upon ITA's experience in working with the private sector in its Trade Fair Certification Program, ITA has been able to obtain ongoing private sector input with regard to this collection of information. The application has been discussed at trade fair organizer conferences and no problems associated with the application were identified by the conference attendees or in feedback from applicants.

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

ITA makes no payments or gifts to applicants.

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

The information collected will remain business confidential and will be used only by ITA staff in assessing the applicants' abilities, experience and needs. As a general agency policy, proprietary company information is kept confidential within the strictures of all applicable law. Respondents are advised that except to the extent required by law, no information of proprietary nature reported on form ITA-4100P will be disclosed without the prior written consent of the relevant firm.

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.

ITA expects to receive approximately 120 applications annually. It is estimated that a respondent will spend three hours completing the Application for Status, or a total of 360 hours for all respondents.

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).

The estimated annual cost burden to respondents is \$2,160 for courier delivery.

$$$18 \times 120 = $2,160$$

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

To determine costs, a salary of \$40 per hour was used. It is estimated that it will take three hours to review and decide upon each application. The cost to the Federal Government is estimated as follows:

Review and process applications: 3 reviewers (1 hour from each ITA reviewing unit: U.S. and Foreign Commercial Service overseas post, Global Trade Programs and Manufacturing and Services)

120 applications x 3 hours x \$40/hr. = \$14,400

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

Adjustment was made of estimated time to complete the application from 10 hours to 3 hours because review of the application revealed that the 10 hour estimate was excessive.

The increase in number of responses is due to the program growing in popularity because of the benefits derived by the fair organizers, which caused an increase in the number of applications submitted to the Program.

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

Not applicable.

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.
Not applicable.
B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS
This collection of information does not employ statistical methodologies.

LEGAL AUTHORITY: Public Law 15 U.S.C. 171 et seq.