

SUPPORTING STATEMENT
U.S. Department of Commerce
International Trade Administration
Export Information Services Order Forms
OMB CONTROL NO. 0625-0143

A. JUSTIFICATION

This is an information collection request to extend the Office of Management and Budget approval.

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

The Commercial Service (CS) offers a variety of services to enable clients to begin exporting or to expand existing exporting efforts. Clients may learn about our services from business related entities such as the National Association of Manufacturers, Federal Express, State Economic Development offices, the Internet or word-of-mouth. The CS provides a standard set of services to assist clients with identifying potential overseas partners, establishing meeting programs with appropriate overseas business contacts, and providing due diligence reports on potential overseas business partners. The CS also provides other export-related services considered to be of a “customized nature” because they do not fit into the standard set of CS export services, but are driven by unique business needs of individual clients.

The CS works closely with clients to educate them about the exporting process and help prepare them for exporting. When a client is ready to begin the exporting process our field staff provide counseling to assist in the development of an exporting strategy and provide fee-based, export-related services. The type of export-related service that is proposed to a client depends upon a client’s business goals and where they are in the export process. Some clients may be at the beginning of the export process and require assistance with identifying potential distributors, whereas other clients may be ready to sign a contract with a potential distributor and require due diligence assistance.

Before the CS can provide export-related services to clients, such as assistance with identifying potential partners or providing due diligence, specific information is required to determine the client’s business objectives and needs. For example, before we can provide a service to identify potential business partners we need to know whether the client would like a potential partner to have specific technical qualifications, coverage in a specific market, English language ability or warehousing requirements. This information collection is designed to elicit such data so that appropriate services can be proposed and conducted to most effectively meet the client’s exporting goals. The following forms are proposed for use by CS:

- **Company Questionnaire Form:** This form was previously approved and used for our Gold Key Service (GKS) and we request approval to use the form to collect information from our International Partner Search (IPS) clients as well. This means adding a check box on the form. The GKS and IPS services are similar with respect to the type of information required from our clients. The IPS service identifies appropriate potential

partners for clients, whereas the GKS service identifies appropriate potential partners and arranges meetings between the U.S. client and the potential foreign partners. The form asks clients about the requirements and criteria that for potential partners must meet, including: type of business contact the client is seeking, technical qualifications, servicing abilities, language ability, company size, market coverage, and investment capacity.

- **International Company Profile (ICP) Form:** This form is used in conjunction with our due diligence service. CS would like to make minor changes to the previously approved form. Based on client feedback, modifications were made to the layout of the form and added some instructional information to make it easier to understand and complete. These changes do not affect the burden hours. This form requests information about the U.S. company that is ordering the service, the U.S. company that is the end client and the foreign company to be investigated.
- **Customized Services Form:** This is a new form that will take the place of the discontinued Customized Market Research Form. This form would be used when a standard CS service such as GKS, ICP and IPS do not adequately meet a client's needs. Therefore, this form would be used for a wide variety of customized services, including Customized Market Research. The form includes a wide variety of questions to assist CS with identifying a client's unique business needs and objectives to enable us to propose an appropriate, effective and comprehensive export assistance program. CS would like the flexibility to make slight modifications to the Customized Service Form based upon new clients' needs that may arise within the next three years and for which CS cannot identify at this time. As economic and business conditions vary, clients' needs may change and we need the flexibility to be able to slightly modify the Customized Services Form to allow us to immediately obtain the information needed to assess the needs of the client and provide the most effective and appropriate export-related services.
- **U.S. Supplier Search Form:** The CS requests approval to add a form for a U.S. Supplier Search Form which will be completed by a U.S. firm in response to a request from an importer interested in sourcing U.S. goods and services and/or interested in establishing a business relationship with a U.S. firm. The form solicits information regarding details about the U.S. product to be exported.

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.

CS Trade Specialists in domestic Export Assistance Centers and Commercial Specialists at overseas Posts use these forms to provide services to clients. These forms are used whenever a client requests a CS service. The information provides Trade and Commercial Specialists with the client's background data, special requests and service requirements. The information is used

to tailor standardized services to client needs and to enable the CS to provide customized services as needed. The forms are used internally and are not 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.

The CS implemented an on-line ordering and payment system in January 2008, and CS staff use this system to send the service order forms to clients. Clients complete the form electronically and send it to CS staff via electronic means. The vast majority of CS clients complete the form electronically, but a hard copy form may be used in limited circumstances such as with clients who may not have access to the Internet.

4. Describe efforts to identify duplication.

There is no duplication of information within the DOC or another government entity. This form collects unique client information that is required by the CS to efficiently and effectively provide the very specific and tailored services support our clients' exporting goals.

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

The CS has conducted user acceptance testing methods with a select group of U.S. companies to ensure that this form is simple and easy to use. The use of a computerized on-line ordering and payment system also was designed to minimize the burden for all clients, including small businesses. Based on client feedback the CS has streamlined the ICP Form to make it easier to understand and complete.

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 or is conducted less frequently, the quality of service that we provide to private sector clients will drastically decrease and CS will be severely hindered in meeting their customers' satisfaction OMB PART metric. OMB audits the CS and requires that we exceed a specific customer satisfaction score. Without the use of the forms in this collection, the CS would be unable to effectively meet the needs of our clients, inhibiting our ability to provide appropriate and customized services to U.S. businesses seeking access to the international marketplace, helping them enter new markets, increase market share and compete effectively worldwide. CS would be hindered in meeting the ITA vision of fostering economic growth and prosperity through global trade.

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

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

A Federal Register Notice was published on August 11, 2008 (Vol. 73, Number 155, page 45684) soliciting public comment. No comments were received.

CS staff regularly consults with their clients regarding the substance and format of this form. There are no unresolved substantive or material issues stemming from these consultation efforts. If the CS receives feedback from clients indicating that the form could be streamlined or improved, the CS will make the necessary changes and request OMB approval accordingly.

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

Not applicable.

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

All responses to this collection of information will be provided confidentiality to the extent allowed by law. This assurance is printed at the bottom of each form.

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 9,035 requests for information will be submitted annually and will take approximately 10 minutes to complete. The total burden hours will be 1,505.

CS Service Order Form	Estimated time to complete	Estimated number of respondents	Estimated total burden hours
Company Questionnaire Form (used for IPS and GKS services)	10 minutes	3,250	541
International Company Profile Request Form	10 minutes	2,600	433
Customized Services form	10 minutes	3,120	520
U.S. Supplier Search Form	10 minutes	65	11
TOTAL		9,035	1,505

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).

There is no cost to complete the form. If, after completing the order forms, clients decided to purchase Commercial Service services, the estimated annual cost of purchasing the services is \$8,625,000.

Estimated itemized costs:

Form Name	Estimated number of services purchased annually	Estimated number of services x Average cost per service
Company Questionnaire (used with (IPS and GKS)	IPS = 500 GKS = 2,000	IPS: 500 x \$975 = \$487,500 GKS: 2,000 x \$1,500 = \$3,000,000
US Supplier Search Form	50	50 x \$750 = \$37,500
Internat'l Company Profile	2,000	2,000 x \$750 = \$1,500,000
Customized Services Form	2,400	2,400 x \$1,500 = \$3,600,000
Total		\$8,625,000

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

It will take CS staff approximately 10 minutes to review each form and the total burden hours to review 10,000 forms will be 1,667 hours.

$$1,667 \text{ hours} \times \$25/\text{hour staff time} = \$41,675.$$

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

	Requested	Program change due to agency discretion	Change due to adjustment in agency estimate	Previously approved
Annual No. of Responses	9,035	5,915	2,145	975
Annual Burden Hours	1,505	986	197	323
Annual Cost Burden	\$8.6 million to purchase export assistance services, \$0 to complete the forms,			0

Changes due to agency estimates:

- CS previously estimated that clients would require 20 minutes to complete the forms, but as a result of client feedback we have since learned that the majority of clients complete the forms in approximately 10 minutes. The burden hour estimate is revised accordingly.
- The annual number of responses has increased overall due to an increase in the number of clients that are served by the CS. We are mandated by Congress to provide export assistance to U.S. firms and mandated by OMB to establish cost recovery goals associated with the services we provide to U.S. firms. Therefore, to achieve our OMB cost recovery goals CS must continue to increase the number of clients that we serve and the number of services that we provide and this serves to increase the number of respondents completing our Service Order forms.

Changes due to program changes:

- The Customized Market Research (CMR) form will be eliminated and replaced with the Customized Services Form which will include CMR.
- CS has initiated a new Customized Services Program which will utilize the Customized Services Form. This increases the burden hours and the number of respondents.
- CS would like to continue using the Company Questionnaire for our GKS service and expand the use to the IPS service. This change affects the total burden hours and the total respondents.
- CS has initiated a new U.S. Supplier Search Service which will increase the number of respondents and increase the burden hours.

The annual cost burden for respondents has increased by \$8.6 million because the fees-for-service was not included in the previous submission. There is no cost associated with completing a services order form.

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

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. et seq and 15 U.S.C. 171 et seq