SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION 3048-0017
FORM EIB 92-29

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain information specified in Section A below. If an item is not applicable, provide a brief explanation. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The Export Import Bank of the United States, pursuant to the Export Import Bank Act of 1945, as amended (12 USC 635, et.seq.), facilitates the finance of the export of U.S. goods and services. The "Report of Premiums Payable for Exporters Only" form will be used by exporters to report and pay premiums on insured shipments to various foreign buyers.

2. Indicate how, by whom and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received form the current collection.

This form will be completed by U.S. exporters to report transactions under the terms of the policy and to certify that premiums have been correctly computed and remitted.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submissions of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The majority of these forms are received electronically with associated payment of premiums transmitted electronically or by checks forwarded by exporters to a lockbox managed for Ex-Im Bank by a financial institution**. Technology is providing considerable burden reduction to both external users/exporters and moreso to internal staff at Ex-Im Bank. Since introducing web-based, online shipment reporting and premium payment, progressively larger numbers of exporters are making use of this efficiency tool. A secondary benefit to external and internal users is that viewing filed reports is very convenient through the online system.**

Ex-Im Bank continues upgrading the reporting module to increase usability and utilization. At the present time, slightly over 70% of the total submissions of these forms are being submitted electronically. Incremental usability advances support projections of greater adoption of electronic reporting towards 80% or higher over the next two years. There remains a minority group of exporters who prefer paper submissions.

4. Describe effort to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

All applications are independent of each other; therefore there is no duplication since each shipment report form corresponds to a unique transactions. In circumstances where information may already be on file at Ex-Im Bank the the online system notifies users of the potential duplicate.

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

Individual transactions that an exporter may have with the same foreign borrower can be sub-totaled and entered as a single line item for the specific month provided the length of payment term is identical. Thus, the otherwise heavy detail and administrative burden can be reduced using sub-totals.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

In unique cases, Ex-Im Bank has accommodated some exporters with reporting quarterly to reduce heavy administrative burdens usually for cases where the exporter has an extraordinary number of customers (exceeding 50-100 or more).

7. Explain any special circumstances that would cause an information collection to be conducted in a manner"
*requiring respondents to report information to the agency more often than quarterly;
*requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
*requiring respondents to submit more than an original and two copies of any

document;
*in connection with a statistical survey, that is not designed to produce valid or reliable results that can be generalized to the universe of study;
*requiring the use of statistical data classification that has not been reviewed and approved by OMB;
*that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
*requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

This collection is consistent with guidelines in 5 CRF 1320.6.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.

No comments were received.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Not applicable.

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

Ex-Im Bank and its officers and employees are subject to the Trade Secrets Act, 19 USC Sec 1905, which requires Ex-Im Bank to protect confidential business and commercial information from disclosure., as well as, 12 CRF 404.1, which provides that, except as required by law, Ex-Im Bank will not disclose information provided in confidence without the submitter's consent.

11. Provide additional justification for any question of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered provides. This justification should include the reasons why the agency considered the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

Not applicable.

12. Provide estimates of the hour burden of the collection of information. The statement should include

*the number of respondents;	1,850
*the frequency of response;	Monthly
*annual hour burden; and	16,650 (22,200 total submission x ¾ hr.)

*an explanation of how the burden was estimated.

Total annual hour burden for the entire portfolio is estimated at 16,650 hours represented by an average submission time of 45 minutes on 12 monthly reports from approximately 1,850 policyholders.

13. Provide an estimate for the total annual cost burden to respondents or records keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in items 12 and 14).

Not applicable

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

Reviewing time per hour:	
Responses per year	22,200 (1,850/per mo. x 12/mo.)
Reviewing time per year	
Average Wages per hour	$35
Average cost per year	
(time * wages)	8,880 x $35 = $310,800 *
Benefits and overhead	100%
Total Government Cost	$310,800

*** 6,660 shipment reports entered manually by Ex-Im Bank from hardcopy filiers (30% of 22,200 estimated total annual shipment reports); add 10% of 22,200 reports (2,200) which require adjustments (credits, refunds, correction of submission error detail) for 8,880 total. The total government t cost also includes monthly reconciliations towards closing monthly reports.**

15. For collection of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will bee used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

This request is for an extension of the expiry date.

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

Not applicable

B. Collection of Information Employing Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results.

Statistical methods are not used in this information collection.