

Supporting Statement
Application for Identification Card
1651-0008

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.**

Part 112.41 of the CBP Regulations (19 CFR, Part 112) provides CBP authority for establishing a system whereby licensed Cartmen or Lightermen, and each employee whose duties require receiving, transporting, or otherwise handling imported merchandise which has not been released from CBP custody are identified by submitting CBP Form 3078, Application for Identification Card. 19 CFR 112.42 provides that an application for an identification card shall be filed personally by the applicant with the Port Director on Form 3078.

- 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 from the current collection .**

The Identification Card is used to gain access to CBP Security areas. The employers verify the applications and forward them to CBP. Failure to collect the information would result in employees not being admitted to CBP areas. Before an identification card is issued, a background investigation is conducted by a CBP investigator. All information on the form is relevant to, and required for, investigation of the applicant.

- 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 submission 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 Form 3078 is available through the CBP web site and can be filled in on line using The Adobe Acrobat PDF format. 19 CFR 112.42 requires that this form be submitted personally to the Port Director by the applicant, so electronic submission of this form would not be practical.

- 4. Describe efforts 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.**

This information is not duplicated in any other place or any other form.

- 5. If the collection of information impacts small businesses or other small entities (Item 5 of the OMB Form 83-I), describe any methods used to minimize burden.**

This information collection does not have an impact on small businesses or other small entities.

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

If this information was not collected, CBP would have no way of identifying those authorized to enter CBP security areas to handle merchandise in CBP Custody.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

This information is collected in a manner consistent with the guidelines of 5 CFR 1320.5(d)(2).

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), 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. Specifically address comments received on cost and hour burden.**

Public comments were solicited through two Federal Register notices published on April 9, 2009 (Volume 74, Page 16229) and on July 7, 2009 (Volume 74, Page 32176). No comments were received.

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

There is no offer of a monetary or material value for this information collection.

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

There are no assurances of confidentiality provided to the respondents of this information collection.

- 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. This justification should include the reasons why the agency considers 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.**

There are no questions of a sensitive nature.

- 12. Provide estimates of the hour burden of the collection of information.**

New:

INFORMATION COLLECTION	TOTAL ANNUAL BURDEN HOURS	NO. OF RESPONDENTS	NO. OF RESPONSES PER RESPONDENT	TOTAL RESPONSES	TIME PER RESPONSE
Form 3078	42,450	150,000	1	150,000	17 minutes (.283 hours)

Old:

INFORMATION COLLECTION	TOTAL ANNUAL BURDEN HOURS	NO. OF RESPONDENTS	NO. OF RESPONSES PER RESPONDENT	TOTAL RESPONSES	TIME PER RESPONSE
Form 3078	9,962	30,700	1.5	46,050	17 minutes (.283 hours)

Public Cost

New:

The estimated cost to the respondents is \$1,188,600. This is based on the estimated burden hours (42,450) multiplied (x) hourly rate (\$28.00).

Old:

The estimated cost to the respondents is \$144,449. This is based on the estimated burden hours (9,962) multiplied (x) hourly rate (\$14.50).

- 13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.**

There are no record keeping, capital, start-up or maintenance costs associated with

this information collection.

- 14. Provide estimates of annualized cost to the Federal Government. Also provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.**

New:

The estimated annual cost to the Federal Government associated with the review of these responses is **\$5,250,000**. This is based on the number of responses (150,000) that must be reviewed (x) the time to review and process each response (1 hour) = 150,000 hours (x) the average hourly rate (\$35.00)= \$5,250,000.

Old:

The estimated annual cost to the Federal Government associated with the review of these responses is \$600,000. This is based on an estimated 20,000 hours expended at an average hourly rate of \$30.00.

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

The burden hours were increased due to better estimates by CBP regarding the number of respondents filing this form. Also, CBP had previously reported that respondents filed 1.5 responses annually, but it should have been 1 response annually. This was corrected in this ICR.

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

This information collection will not be published for statistical purposes.

- 17. If seeking approval to not display the expiration date, explain the reasons that displaying the expiration date would be inappropriate.**

CBP will display the expiration date for OMB approval of this information collection.

- 18. "Certification for Paperwork Reduction Act Submissions."**

CBP does not request an exception to the certification of this information collection.

B. Collection of Information Employing Statistical Methods

No statistical methods were employed.

17. We will put an expiration date on this form when we receive a Notice of Action from OMB with the new date.
 18. CBP does not request an exception to the certification of this information collection.
- B. No statistical methods were employed.**