

**SUPPORTING STATEMENT**  
**Request to Microfilm Records**  
**OMB Control No. 3095-0017**

1. **Circumstances Making the Collection of Information Necessary.** Companies and other organizations that wish to microfilm archival holdings in the National Archives of the United States and Presidential libraries with privately-owned equipment must request permission from NARA. The contents of the request are specified in 36 CFR 1254.92. The purpose of the information collection is to allow NARA to determine whether the proposed microfilming project meets the criteria in 36 CFR 1254.94, to ensure the project will not cause damage to the records being filmed, and to schedule the use of the limited space available for private microfilming. Public access to the archival holdings in the National Archives and Presidential libraries is enhanced by the availability of private micropublication of series of significant documents. Without this information collection, NARA would not be able to allow private microfilming of the records.
2. **Purpose and Use of the Information.** The information collection is used by NARA to evaluate the reference use and condition of the records proposed for filming, the equipment to be used, and filming procedures to ensure that records are appropriate for filming (e.g., records are not classified or otherwise restricted and that they have not been filmed previously) and that the records will not be damaged during filming.
3. **Use of Information Technology and Burden Reduction.** No use of improved information technology is planned given the small number of respondents and the nature of the information requested.
4. **Efforts to Identify Duplication and Use of Similar Information.** No duplication exists. No similar information is already available.
5. **Impact on Small Businesses or Other Small Entities.** NARA has attempted to minimize the burden on small businesses by requiring the minimum information necessary to evaluate the request.
6. **Consequences of Collecting the Information Less Frequently.** The information collection cannot be conducted less frequently than once per new microfilming project. Without the information specified in the information collection requirement, NARA could not permit private microfilming of archival records.
7. **Special Circumstances Relating to the Guidelines of 5 CFR 1320.5.** The collection will be conducted in a manner consistent with the guidelines in 5 CFR Part 1320.
8. **Comments in Response to the Federal Register Notice and Efforts to Consult Outside Agency.** NARA published a *Federal Register* notice announcing the agency's intent to request extension of OMB approval of the information collection on May 4, 2009 (74 FR 20504 and 20505). No comments were received.

9. **Explanation of Any Payment or Gift to Respondents.** No payment or gift is provided to respondents.
10. **Assurance of Confidentiality Provided to Respondents.** No assurance of confidentiality is provided; however, NARA would not release the information outside the agency except as required by the Freedom of Information Act.

11. **Justification for Sensitive Questions.** No questions of a sensitive nature are asked.
12. **Estimates of Hour Burden Including Annualized Hourly Costs.** We estimate a maximum of 2 respondents per year. Each response is estimated to take an average of 10 hours. A respondent submitting a request for the first time would need to gather detailed information on the equipment to be used and to draft a description of the microfilming procedures to be followed. Respondents submitting requests to microfilm similar series of records, such as State Department diplomatic posts, would need less time to prepare requests because the equipment and filming procedures would change very little from one project to the next.

The frequency of response depends on the number of microfilm projects proposed by the respondent. In the past three years, respondents have submitted only one request per year; in earlier years, an active micropublisher submitted as many as 5 requests in one year.

13. **Estimate of Other Total Annual Cost Burden to Respondents or Recordkeepers.** The annualized cost to respondents is estimated at \$200 per respondent per year to assemble data concerning the equipment and microfilming procedures, to estimate production time, and to draft the request to microfilm records. An average salary rate of \$20 per hour was used. There are no capital costs or other start-up costs. The operating costs are 2 hours to prepare and send microfilm to NARA for inspection.
14. **Annualized Cost to the Federal Government.** The annualized cost to the Government is \$552 based on 2 requests per year. The Government cost is 12 hours of staff time to log requests, review the records requested for filming, evaluate equipment and filming procedures, and evaluate conservation needs for the documents before filming. The work is performed by GS-11 archivists and conservators.
15. **Explanation for Program Changes or Adjustments.** There is no change in burden.
16. **Plans for Tabulation and Publication and Project Time Schedule.** The information collection is not used for statistical publications.
17. **Reason(s) Display of OMB Expiration Date is Inappropriate.** The OMB approval number is displayed in the regulation.
18. **Exceptions to Certification for Paperwork Reduction Act Submissions.** There are no exceptions to the certification statement.