Supporting Statement
U.S. Department of Commerce
Bureau of Economic Analysis
Annual Survey of Foreign Ocean Carriers'
Expenses in the United States (Form BE-29)
OMB Control Number 0608-0012

A. JUSTIFICATION

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

1. <u>Explain the circumstances that make the collection of information necessary.</u>

The Bureau of Economic Analysis (BEA) is responsible for the compilation of the U. S. International Transactions Accounts (ITAs), which it publishes quarterly in news releases, on its web site, and in its monthly journal, the <u>Survey of Current Business</u>. These accounts provide a comprehensive and detailed view of economic transactions between the United States and other countries. In addition, they provide input into other U.S. economic measures and accounts, contributing particularly to the National Income and Product Accounts. The ITAs are used extensively by both government and private organizations for national and international economic policy support and for analytical purposes.

The information collection, BE-29, <u>Annual Survey of Foreign Ocean Carriers' Expenses in the United States</u>, is necessary to develop the "transportation" portion of the ITAs. Without this information, an integral component of the ITAs would be omitted.

The BE-29 is a mandatory survey, conducted under the authority of the International Investment and Trade in Services Survey Act (P.L. 94-472, 22 U.S.C. 3101 through 3108), hereinafter "the Act." The survey requests that U.S. agents of foreign ocean carriers operating in the United States report the carriers' expenses in U.S. ports and shipping weight of cargo handled. BEA collects the information on an annual basis from U.S. agents that handle 40 or more port calls in the reporting period by foreign ocean vessels, and covered expenses for all foreign ocean vessels handled by the U.S. agent were $250,000 or more. A report is not required if the total number of port calls by foreign ocean vessels handled by the U.S. agent in the reporting period is fewer than 40, or total annual covered expenses for all foreign ocean vessels handled by the U.S. agent are below $250,000.

2. <u>Indicate how, by whom, and for what purpose the information is to be used.</u>

BEA uses the data from the BE-29 survey to prepare the "transportation" portion of the U.S. ITAs. BEA estimates the expenditures of foreign-operated ocean carriers in U.S. ports based on the expenses reported by U.S. agents of foreign carriers on the BE-29 survey. In addition to being used to develop the ITAs, these data provide input into other U.S. economic measures and accounts, contributing particularly to the National Income and Product Accounts. Finally, information from the survey is used by international organizations, such as the International Monetary Fund, various private organizations, and other government agencies.

3. <u>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</u>.

All respondents have the option of filing the BE-9 survey using *eFile*, BEA's electronic filing system located on BEA's website (www.bea.gov). The *eFile* system makes use of fillable Adobe PDF forms that can be downloaded, completed, saved, and submitted securely to BEA .

Approximately 23 percent of respondents file reports using BEA's *eFile* system.

4. <u>Describe efforts to identify duplication</u>.

No other Government agency collects comprehensive annual data on foreign ocean carriers' expenses in the United States.

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

This information collection excludes most small U.S. agents of foreign ocean carriers from mandatory reporting. A BE-29 report is not required if the total number of port calls by foreign ocean vessels handled in the reporting period by the U.S. agent is fewer than 40, or total annual covered expenses for all foreign ocean vessels handled by the U.S. agent are below $250,000. In addition to providing this size-based exemption, BEA has attempted to keep reporter burden to a minimum by asking only essential questions for which answers are available from existing books and records.

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

If the annual survey of foreign ocean carriers' expenses in the United States were not conducted or were conducted less frequently, the quality of the ITAs would be compromised.

Statistics on exports and imports of transportation services are published by BEA as part of the ITAs, which are compiled quarterly, in quarterly news releases, on its web site, and in its monthly journal, the <u>Survey of Current Business</u>. In addition, summary statistics are released monthly, approximately 45 days after the end of each month, in the joint BEA-Census Bureau news release on trade in goods and services. Therefore, the accuracy of the estimates would be seriously impaired if the collection were conducted less frequently. In addition, the objectives stated in Question 2 above could not be accomplished if the collection were conducted less frequently.

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

Not Applicable.

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.

This submission follows a public request for comments in the *Federal Register* (pages 16178-16179 of the April 9, 2009 issue). BEA received no comments in response to that notice.

BEA maintains a continuing dialogue with respondents and with data users, including its own internal users through the Bureau's Source Data Improvement and Evaluation Program, to ensure that, as far as possible, the required data serve their intended purposes and are available from existing records, that the instructions are clear, and that unreasonable burdens are not imposed.

In reaching decisions on questions to include in any survey, BEA considers the Government's need for the data, the burden imposed on respondents, the likely quality of the responses (e.g., whether the data are readily available from respondents' books), and BEA's experience in designing surveys and collecting data.

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

No payments or gifts to the respondents are made.

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

BEA provides respondents with assurance that it will keep the reported data confidential. The following statement is taken directly from the reporting instructions for the survey.
"**Confidentiality –** The Act provides that your report is CONFIDENTIAL and may be used only for analytical or statistical purposes. Without your prior written permission, the information filed in your report CANNOT be presented in a manner that allows it to be individually identified.

Your report CANNOT be used for purposes of taxation, investigation, or regulation. Copies retained in your files are immune from legal process."

Sec.5(c) of the Act (22 U.S.C. 3104) provides that the information collected may be used only for analytical and statistical purposes and access to the information shall be available only to officials and employees (including consultants and contractors and their employees) of agencies designated by the President to perform functions under the Act. The President may authorize the exchange of the information between agencies or officials designated to perform functions under the Act, but only for analytical and statistical purposes. No official or employee (including consultants and contractors and their employees) shall publish or make available any information collected under the Act in such a manner that the person to whom the information relates can be specifically identified. Reports and copies of reports prepared pursuant to the Act are confidential, and their submission or disclosure shall not be compelled by any such person without the prior written permission of the person filing the report and the customer of such person, where the information supplied is identifiable as being derived from the records of such customer.

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 estimates of the hour burden of the collection of information.

The annual survey is expected to result in the filing of approximately 110 reports per year, approximately 80 filed by respondents that would report mandatory data on the survey and 30 respondents that would not report data. The respondent burden for this collection of information is estimated to vary between one hour and four hours per response, with an average respondent burden of three hours. This estimate covers the amount of time for respondents to review the instructions, search existing data sources, gather and maintain the required data, and complete and review the information collection. Thus, the total annual respondent burden for this survey is estimated at 330 hours as shown in the RISC/OIRA Consolidated Information System (ROCIS).

110 responses x 3 hours = 330 burden hours

The actual burden will vary from respondent to respondent, depending upon the number and amounts of their transactions and the ease of assembling the data. The estimated annual cost to respondents is $13,200 based on the estimated reporting burden of 330 hours and the estimated hourly cost of $40.

13. <u>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 Question 12 above)</u>.

Other than respondent labor cost associated with the estimated burden hours, the total additional annual cost burden to respondents is expected to be negligible. Total capital and start-up costs are insignificant because new technology or capital equipment would not be needed by respondents in order to prepare their responses to the survey. As a consequence, the total cost of operating and maintaining the technology and capital equipment will also be insignificant. Purchases of services to complete the information collection are also expected to be insignificant.

14. <u>Provide estimates of annualized cost to the Federal government</u>.

The estimated annual cost to the Federal Government is $40,000. The estimate includes salaries, overhead, computer processing, printing, and mailing.

15. <u>Explain the reasons for any program changes or adjustments</u>.

This request is for an extension of a currently approved collection. The change in the estimate of burden, from 624 hours to 330 hours, is a decrease of 294 hours. This change is shown as an adjustment and is attributable to a lowering of the estimated average burden hours from 4 hours per response to 3 hours per response. The reduction in estimated average burden reflects an improved burden-hour estimation methodology that, unlike the method previously used, differentiates between the burden on respondents that file complete reports and those that file only claims for exemption (recognizing that the burden is much smaller for the latter than the former).

Also an adjustment decrease is due to the number of firms expected to file reports has been reduced from 156 to 110; burden hours reduced by 138.

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

The data from this survey will be used to estimate international transportation services transactions by major world region and selected countries for the U.S. ITAs on a quarterly basis. These estimates will be published in BEA's monthly journal, the *Survey of Current Business,* and on BEA's web site (www.bea.gov). The data will also be used to provide the basis for the reflection of transportation transactions in monthly estimates of international services transactions, which are included in a joint BEA-Census Bureau news release on U.S. trade in goods and services.

Quarterly statistics developed from the survey results are released four times a year as part of the U.S. international transactions accounts approximately 75 days after the close of each quarter. Annual summations of the quarterly statistics are released approximately six months after the end of the year. An analysis of the quarterly statistics appears in the *Survey of Current Business* approximately 105 days after the end of each quarter. Detailed annual estimates are included in an article on U.S. international services published each year, usually in the October issue of the *Survey of Current Business*. The *Survey of Current Business* is available on BEA's web site as well as in hard copy.

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.

The OMB expiration date will be displayed on the forms.

18. Explain each exception to the certification statement.

Not Applicable.