

**1 Supporting Statement A for
Paperwork Reduction Act Submission**

OMB Control Number 1018-0007

**Annual Certification of Hunting and Sport Fishing Licenses Issued
FWS Forms 3-154a and 3-154b
50 CFR 80.10**

Terms of Clearance. None.

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

The Federal Aid in Wildlife Restoration Act (16 U.S.C. 669 et seq.) and the Federal Aid in Sport Fish Restoration Act (16 U.S.C. 777 et seq. except 777e-1) provide Federal assistance to the States, territories (Commonwealths of Puerto Rico and the Northern Mariana Islands, and the territories of Guam, the U.S. Virgin Islands, and American Samoa), and the District of Columbia for management and restoration of fish and wildlife. These Acts and regulations at 50 CFR 80.10 require that States, territories, and the District of Columbia annually certify hunting and sport fishing license sales. We (Fish and Wildlife Service, Service) use this information to apportion and distribute funds under the formula provided in each Act.

2. Indicate how, by whom, how frequently, and for what purpose the information is to be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, explain how the collection complies with all applicable Information Quality Guidelines.

States, territories, and the District of Columbia (grantees) complete FWS Form 3-154b to indicate the total hunting and fishing licenses issued and the dollar amounts involved. This summary includes all paid and nonpaid licenses, tags, stamps, and permits issued for hunting (both firearm and bow) and for sport or recreational fishing. Grantees then take the data from FWS Form 3-154b, eliminate all duplicates, and use FWS Form 3-154a to certify the number of paid hunting and fishing license holders. Failure to submit these certifications may result in grant funds being partially or totally withheld pending receipt of the certifications. We made only minor revisions to the forms.

Our Division of Federal Assistance uses this information to apportion and distribute funds to grantees. During Fiscal Year 2009, we apportioned \$336,474,545 under the Wildlife Restoration Program and \$404,449,843 under the Sport Fish Restoration Program.

States, nonprofit organizations, and commercial entities use the information to track statistics and identify economic and participatory trends and anomalies. The information is available to the public on the Wildlife and Sport Fish Restoration Program Internet site at <http://wsfrprograms.fws.gov/>.

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 [and specifically how this collection meets GPEA requirements].

FWS Forms 3-154a and 3-154b are available online at <http://www.fws.gov/forms/> in a fillable format. Respondents can complete the forms online, and then mail or email the forms to us. They can also submit electronically through iFAIMS the Federal Aid Information Management System Internet site. These forms are fillable, fileable and signable. We receive approximately 50 percent of the responses electronically.

4. Describe efforts to identify duplication.

There are no other forms that collect similar information.

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

We collect the data from States, territories, and the District of Columbia. This information collection does not impact small entities.

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.

We collect the information annually. If we were to collect it less frequently, we would not be able to provide the funds to the States and territories on an annual basis. If we did not collect the information, we would not be able to apportion any funds to States and territories in accordance with the Acts.

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;
- * requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- * in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- * requiring the use of a 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.

There are no special circumstances that require us to collect this information in a manner inconsistent with OMB guidelines.

8. Provide 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 (or in response to a PRA statement) and describe actions taken by the agency in response to these comments.

Describe 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. [Please list the names, titles, addresses, and phone numbers of persons contacted.]

On August 20, 2009, we published in the Federal Register (74 FR 42091) a notice requesting public comment on this information collection. The comment period ended on October 19, 2009. We did not receive any comments.

In addition to the Federal Register notice, we contacted the following persons and asked for comments on this information collection.

Jean Higgins State of New Mexico Jean.Higgins@state.nm.us	Eric Sink State of Michigan sinke@michigan.gov
Cecilia Edgar State of North Carolina cecilia.edgar@ncwildlife.org	Randy Curtis State of New Hampshire Randy.Curtis@wildlife.nh.gov
Adam Brooks State of Montana abrooks@mt.gov	Larry Boyle State of Alaska larry.boyle@alaska.gov
Tony Straw State of Nevada Tstraw@dfg.ca.gov	

All of those contacted believed that the information is necessary and serves a practical purpose, although two commenters questioned the value of information collected on FWS Form 3-154b. We explained that this information is necessary to analyze the licenses report net of duplicates.

The respondents did not feel that the forms are burdensome. Each provided a different response regarding the time it takes to complete the forms. The times ranged from a low of 4 hours to a high of 20 hours, depending significantly on whether or not the grantee has an automated system for issuing licenses. We believe our burden estimates in item 12 represent a reasonable average.

One person suggested that we change the title of the reporting from “Year Ending” to “License Year Ending.” The proposed forms include that change.

Some respondents asked for clarification of the rules for counting licenses. This is not associated with the forms, and we will address this issue through the rulemaking process.

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

We do not provide any gifts or payments to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for

the assurance in statute, regulation, or agency policy.

There is no assurance of confidentiality. Once submitted, this form becomes public information and is not protected under the Privacy Act.

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.

We do not ask questions of a sensitive nature.

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

We estimate that 56 respondents will provide 112 responses totaling 1,792 burden hours annually. As stated in item 8, completion times vary greatly; however, we believe our estimates represent a reasonable average.

The total dollar value of the annual burden hours is \$88,758. We based the hourly wage rate on BLS news release USDL 09-1098, September 10, 2009. We used the management, professional and related category from Table 4 for State and local government workers which states an hourly rate of \$33.02. To calculate benefits, we multiplied the hourly rate by 1.5. The hourly rate including benefits is \$49.53.

ACTIVITY	COMPLETION TIME PER RESPONSE	TOTAL ANNUAL RESPONSES	ANNUAL BURDEN	\$ VALUE OF ANNUAL BURDEN HOURS*
FWS Form 3-154a	12 hours	56	672 hours	\$33,284
FWS Form 3-154b	20 hours	56	1,120 hours	55,474
TOTALS		112	1,792 hours	\$88,758

*rounded.

13. Provide an estimate of the total annual [nonhour] cost burden to respondents or recordkeepers resulting from the collection of information.

There is no nonhour cost burden to respondents.

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

We estimate that the total annual cost to Federal Government for processing these forms is \$1,983.

According to the Office of Personnel Management Salary Table 2009-DCB (http://www.opm.gov/oca/09tables/html/dcb_h.asp), the hourly rate for a GS-13, step 5, is \$47.21. We multiplied the hourly rate by 1.5 to account for benefits in accordance with BLS news release USDL 09-1098, September 10, 2009, resulting in a total hourly cost factor of \$70.82 (rounded). We will receive 112 responses annually, each of which takes approximately 15 minutes to process, totaling 28 hours annually.

Action	Position and Grade	Hourly Rate	Hourly Rate including Benefits	Total Annual Hours	Annual Cost*
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Review and process forms	Accountant GS 13/5	47.21	70.82	28	1,983
Total					\$ 1,983

*rounded.

15. Explain the reasons for any program changes or adjustments.

There are no program changes or adjustments.

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

The information collected is for grant administration purposes and we do not formally publish the results. However, we do make the license data available on the Wildlife and Sport Fish Restoration Program Web site for use by the States and others.

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

We will display the OMB control number and expiration date.

18. Certification.

There are no exceptions to the certification statement.