

Justification for Change
National Research, Promotion and Consumer Information Programs
OMB No. 0581-0093
December 2009

This Justification for Change requests **merging** form number **FV-258-1** – National Peanut Board, First Handler’s Report **and** form **PEA-DPP** – National Peanut Board, First Handler Report, Direct Peanut Purchases, Purchases Not Under Marketing Assistance Loans, **into** a single form (**PEA-FHR**). The single form would be PEA-FHR – National Peanut Board, First Handler Report, and this form would be for all peanut purchases – both peanut purchases under the marketing assistance loan (MAL) program and those that are not under the MAL program.

The revised form (PEA-FHR) looks very similar to form PEA-DPP – National Peanut Board for peanut purchases not under the MAL program (which is already approved), with some additional FSA information that was collected from the already approved form FV-258-1.

The information at the top and bottom of the PEA-FHR form will remain the same as the merged forms. The chart below shows the comparison of the forms from the new form (PEA-FHR) and the merged forms (FV-258-1 and PEA-DPP):

PEA-FHR (New Form)	FV-258-1 (Current First Handler Report)	PEA-DPP (Current First Handler Report for Peanuts not under Loan)
Crop Year	N/A	Crop Year
Producer Name Address – City - Zip	Part C – Indicate Company Name	Name & Address of Producer
State	Part C – FSA “ST”	State/County
FSA State ID	Part C – FSA “ST”	N/A
FSA County ID	Part C – FSA “CT”	N/A
FSA Farm #	Part C – FSA Farm ID #	N/A
Farm Name	Part C – Indicate Company Name	N/A
Purchase Price	Market Activity	Purchase Price
Purchase Date	Part C – Reporting Month	Purchase Date
# Tons Purchased	Loan Activity	Quantity (Tons)
Price Per Ton	Total Value Segment	Price Per Ton
Assessments	Total R&P Deduction	Assessments

(N/A = Not applicable)

Essentially, form PEA-FHR will merge the two already approved forms PEA-DPP and FV-258-1 into one consolidated form PEA-FHR.

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The reason for the changes to the Peanut Board's (Board) first handler report is to streamline the collection process of peanut assessments remitted by first handlers. In addition, the Board is looking at working with the industry to give peanut first handlers the option to submit assessments electronically. By having form PEA-FHR look more like a spreadsheet, the Board is hoping that it will make the collection process more efficient.

By merging two forms into one form, the burden hours for "Designated Handler Reports" for Peanuts will be reduced by 288 hours. Currently approved is the following:
FV-258-1 with 57 respondents x 12 responses = 684 x 0.75 hours per response = 513 hrs.
PEA-DPP with 25 respondents x 6 responses = 150 x 0.50 hours per response = 75 hrs.
A grand total of 588 burden hours. The newly merged form PEA-FHR will be as follows: 50 respondents (due to mergers) x 12 responses = 600 x 0.50 hours per response = 300 burden hours. (588 – 300 = 288 less burden hours).

This information collection was approved by OMB on 3/13/08. The Agency is requesting approval of non-substantive changes, which does not require rulemaking.