

EXPORT-IMPORT BANK OF THE UNITED STATES

Agency Information Collection Activities Submission for OMB Review

PART A. 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.

The purpose of the survey is to fulfill the statutory mandate (Export-Import Bank Act of 1945, as amended, 12 U.S.C. 635) which directs Ex-Im Bank to report annually to the U.S. Congress any action taken toward providing export credit programs that are competitive with those offered by official foreign export credit agencies. The Act further stipulates that the annual report on competitiveness should include the results of a survey of U.S. exporters and U.S. commercial lending institutions which provide export credit to determine their experience in meeting financial competition from other countries whose exporters compete with U.S. exporters.¹

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.

Ex-Im Bank plans to invite approximately 125 U.S. exporters and commercial lending institutions that have used Ex-Im Bank's medium and long term programs over the previous year with an electronic invitation to participate in the online survey. The

¹ <http://www.exim.gov/about/charter/section8.cfm>

Ex-Im Bank Charter: Section 8

Sec. 8(a). The Export-Import Bank of the United States shall transmit to the Congress annually a complete and detailed report of its operations. Such report shall be as of the close of business on the last day of each fiscal year

Sec. 8A. Annual Competitiveness Report.

(a) In General.- Not later than June 30 of each year, the Bank shall submit to the appropriate congressional committees a report that includes the following:

(1) Actions of Bank in Providing Financing on a Competitive Basis, and to Minimize Competition in Government-Supported Export Financing.- A description of the actions of the Bank in complying with the second and third sentences of section 2(b)(1)(A). In this part of the report, the Bank shall include a survey of all other major export-financing facilities available from other governments and government-related agencies through which foreign exporters compete with United States exporters (including through use of market windows (as defined pursuant to section 10(h)(7))) and, to the extent such information is available to the Bank, indicate in specific terms the ways in which the Bank's rates, terms, and other conditions compare with those offered from such other governments directly or indirectly. With respect to the preceding sentence, the Bank shall use all available information to estimate the annual amount of export financing available from each such government and government-related agency. In this part of the report, the Bank shall include a survey of a representative number of United States exporters and United States commercial lending institutions which provide export credit on the experience of the exporters and institutions in meeting financial competition from other countries whose exporters compete with United States exporters.

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proposed survey, modified from the previous survey to account for new policies and programs, will ask participants to evaluate the competitiveness of Ex-Im Bank's programs and how the programs compare to those of foreign credit agencies. Ex-Im Bank will use the responses to develop an analysis of the Bank's competitiveness.

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 submissions 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.

Participants will complete the survey online via Ex-Im's website. This technology will be utilized in order to efficiently guide the participants through the survey and to effectively organize the responses.

4) Describe effort 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.

The survey will require participants to create a user registration that will be connected to the participant's email address, therefore identifying duplication in responders and responses will not be a concern. In addition, the survey specifically requests that the participants respond with information only on the prior business year and therefore, it is necessary for Ex-Im to distribute the survey on an annual basis.

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

The survey will not impact small businesses or small entities with any greater burden than for larger entities, and the burden is minimal.

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.

Ex-Im Bank, as mandated by Congress, is required to utilize the results of an annual survey to determine its experience in meeting financial competition from other countries whose exporters compete with U.S. exporters.

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;
- *in connection with a statistical survey, that is not designed to produce valid or reliable

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results that can be generalized to the universe of study;

*requiring the use of 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 circumstances which would require participants to report information to the agency more often than once annually.

8) If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice 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.

Ex-Im received a comment from the general public regarding the time Ex-Im noted that will be required of respondents to complete the form. Ex-Im originally estimated that the completion would require approximately ".05 hour." Ex-Im has corrected this statement and responded to the commenter (via email) that: "It should have stated that it would take .25 hours (15 minutes) which Ex-Im understands to be the approximate time which was needed by previous year's respondents to review and respond to the survey."

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

Participants will not be provided any payments or gifts.

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

Participants will be given the following statement about confidentiality: "The information that you provide is reported in such a way that it does not reveal the identity of respondents."

11) Provide additional justification for any question of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered provides. This justification should include the reasons why the agency considered 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.

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The survey does not include any questions of a sensitive nature.

12) Provide estimates of the hour burden of the collection of information. The statement should include:

- *the number of respondents;
- *the frequency of response;
- *annual hour burden; and
- *an explanation of how the burden was estimated.

Annual Number of Respondents: 125
Estimated Time per Respondent: 0.25 hours (15 minutes)
Government Annual Burden Hours: 6.25
Frequency of Reporting or Use: Yearly

13) Provide an estimate for the total annual cost burden to respondents or records keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in items 12 and 14).

There is no cost burden expected to be incurred by participants.

14) The following are the estimates of annualized costs to the Federal government:

Reviewing time per hour: .05 (5 minutes)
Responses per year: 125
Reviewing time per year: $125 \times .10 = 6.25$ hours
Average Wages per hour: \$50.00
Average cost per year (time * wages): \$312.50
Benefits & Overhead: 20% \$62.50
Total Cost to Government: \$375.00

15) Explain the reasons for any program changes or adjusted reported in items 13 or 14 of OMB from 83-1.

There are no changes to the expected time or cost burden of participants or the federal government.

16) For collection of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The results will be summarized and published in the 2009 Export-Import Bank Annual Competitiveness Report to Congress which will be published on June 30, 2010. Ex-Im

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Bank anticipates that the survey will be finalized for distribution to participants by February 2010. The survey will be available online until the end of April 2010.

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

Ex-Im Bank understands that approval of this form will expire 3 years from the date of OMB approval (expected expiration date: Feb 2013)

18) Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-1.

Ex-Im Bank has not identified any exceptions to the “Certification for Paperwork Reduction Act Submissions” of OMB Form 83-1.

PART B- Collection of Information Involving Statistical Methods

Ex-Im Bank will NOT be employing statistical methods to analyze the survey responses.

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