Justification for Non-substantive Change OMB Control No. 0694-0137

The Bureau of Industry and Security (BIS) exercises export controls on Trans-Alaska Pipeline Shipments (TAPS) of crude oil by tanker ship under the Short Supply provisions of the Export Administration Act. Collection authority OMB Control No. 0694-0027 "Short Supply - Petroleum (crude oil)" covers both (1) supporting documentation for TAPS export licenses and (2) documentation and recordkeeping requirements for exports under license exception TAPS.

BIS believes that supporting documentation for all export licenses, including TAPS licenses, is already adequately covered by OMB Control No. 0694-0088 "Simple Network Application Process and Multipurpose Application Form."

OMB approved a new collection authority OMB Control No. 0694-0137 "Licensing Exceptions and Exclusions." BIS believes that the existing burden for tanker shipments of crude oil under license exception TAPS should be transferred into OMB Control No. 0694-0137 by creating a new IC entitled "TAPS Reporting and Recordkeeping." The estimated burden consists of 10 hours to complete and file 55 shippers export declarations and 28 hours to record 55 deep water ballast exchanges.

After the TAPS licensing exception component of **38 hours and 55 responses** is merged with OMB Control No. 0694-0137, BIS will discontinue OMB Control No. 0694-0027.