

**SUPPORTING STATEMENT  
U.S. Department of Commerce  
International Trade Administration  
International Buyer Program Application  
International Buyer Program Exhibitor Data  
OMB CONTROL NO. 0625-0151**

**A. JUSTIFICATION**

**This is to request an extension of the Office of Management and Budget approval for the International Buyer Program Application and the International Buyer Program Exhibitor Data.**

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

The U.S. Department of Commerce (DOC), International Trade Administration's (ITA) U.S. and Foreign Commercial Service (US&FCS) conducts the International Buyer Program (IBP) to help bring international buyers together with U.S. firms by promoting U.S. trade shows in industries with high export potential. The IBP emphasizes cooperation between the DOC and trade show organizers to benefit U.S. firms exhibiting at selected events and provides practical, hands-on assistance, such as export counseling and market analysis, to U.S. companies interested in exporting. The assistance provided to show organizers includes worldwide overseas promotion of selected shows to potential international buyers, end-users, representatives and distributors. The worldwide promotion is executed through US&FCS offices in more than 80 countries that are among America's most important trading partners. The number of shows selected to the program has increased from 24 in 1999 to a planned 45 in 2012. The following criteria are used to select these shows:

- **Intellectual Property Rights Protection:** The trade show organizer includes in the terms and conditions of its exhibitor contracts, provisions for the protection of intellectual property rights (IPR); has procedures in place at the trade show to address IPR infringement, which, at a minimum, provides information to help U.S. exhibitors procure legal representation during the trade show; and agrees to assist DOC in reaching and educating U.S. exhibitors on the Strategy Targeting Organized Piracy (STOP!), IPR protection measures available during the show, and the means to protect IPR in overseas markets, as well as in the United States.
- **Export Potential:** The products and services being promoted at the trade show are from U.S. industries that have high export potential, as determined by DOC sources (e.g., best prospects lists and U.S. export statistics).
- **International Interests:** The trade show meets the needs of a significant number of overseas markets covered by the US&FCS and corresponds to marketing

opportunities as identified by the posts in their Country Commercial Guides (e.g., best prospects lists).

- **Scope of the Show:** The trade show offers a broad spectrum of U.S.-made products and/or services for the subject industry. Trade shows with a majority of U.S. firms will be given preference.
- **Stature of the Show:** The trade show is clearly recognized by the industry it covers as a leading event for the promotion of that industry's products and services, both domestically and internationally, and as a showplace for the latest technology or services in that industry.
- **Exhibitor Interest:** There is a demonstrated interest on the part of U.S. exhibitors in receiving international business visitors during the trade show. A significant number of these exhibitors should be new-to-export or seeking to expand sales into additional international markets.
- **Overseas Marketing:** There has been a demonstrated effort made to market prior shows overseas. In addition, the applicant should describe in detail the international marketing program to be conducted for the event, explaining how efforts should increase individual and group international attendance.
- **Logistics:** The trade show site, facilities, transportation services and availability of accommodations conform to the expected norms of an international-class trade show.
- **Cooperation:** The applicant demonstrates a willingness to cooperate with the US&FCS to fulfill the program's goal and to adhere to target dates set out in the Memorandum of Agreement and the event timetable, both of which are available from the program office. Past experience in the IBP is taken into account in evaluating current applications to the program.

### **Description of Forms**

Form ITA-4102P, IBP Application contains questions that are general in nature and deal with how many U.S. exhibitors will be exhibiting and the percentage of net paid exhibitor space U.S. companies will be taking vis-à-vis non-U.S. exhibitors. Other questions deal with the experience of the show organizers and their ability to meet the special conditions of the IBP. These conditions and how to apply are published yearly in the *Federal Register*.

The IBP does not propose any major modifications to Form ITA-4102P. The only necessary modifications are to change the year of participation each year and update the application deadlines.

Form ITA-4014P, IBP Exhibitor Data is provided to U.S. exhibitors participating in IBP-selected trade shows to determine their interest in meeting foreign visitors and to determine the overseas business interests of the exhibitors. This form is usually mailed by the show organizer seven months prior to the show and is accompanied by a letter to the exhibitor explaining the request for the information. Due to the growing show organizer practice of registering exhibitors online, IBP has adjusted its Memorandum of Agreement to permit the collection of the information requested by Form ITA-4014P using this method.

In line with one of ITA's main objectives, the IBP seeks to identify small- and medium-sized companies seeking to enter the export market or to expand into new export markets. Many of these companies do not have the knowledge and skill resources to begin exporting. Through the questions asked on Form ITA-4014P, a company's export profile is identified as well as its international marketing objectives. ITA, through its domestic U.S. Export Assistance Center network, offers free export counseling to those firms that seek it, as well as to companies expanding into new overseas markets.

### **Proposed Changes**

The IBP proposes the following changes to Form ITA-4014P (new version in ROCIS):

- ~~1.~~ Under Question 3, IBP proposes that in addition to asking the Company's name and address, an additional question requesting the size of company (number of employees) included. The benefit of asking about the size of the U.S. companies will assist show organizers and the IBP in identifying small-to-medium sized companies at a tradeshow.
- ~~2.~~ Under Question 5, IBP proposes that in addition to asking for the company's telephone and fax number, that the question also requests the company's e-mail address and website. The inclusion of e-mail addresses and websites will update the form reflect current business practices regarding global communication practices.
- ~~3.~~ IBP proposes adding a new question at Question 9. Question 9 requests the name and contact for the official in charge of the company's financing. Requesting the company official in charge of financing will benefit U.S. companies by helping us provide financing options available through government entities such as EXIM bank for export transactions to the appropriate contact at the firm.-

With the inclusion of a new Question 9, the current question which inquires about the product lines a U.S. company is interested in exporting will become Question 10.

- ~~4.~~ IBP proposes moving Question 13 (under the current Form ITA-4014P), which inquires whether or not the company would like export counseling to Question 11 (under the new Form ITA-4014P). This move is being requested because the IBP feels that asking whether or not a U.S. company is interested in exporting should come at the beginning of the series of exporting questions, and not at the end.

The IBP also proposes expanding the question to also include what level or type of export counseling is needed. The IBP recommends that the expansion of Question 11 is necessary to determine the appropriate level of services required by the U.S. companies exhibiting at an IBP-supported tradeshow before, during and after the event.

~~5.~~—By moving Question 13 (under the current Form ITA-4014P) to Question 11, Questions 10-12 (under the current Form ITA-4014P) will be renumbered to Questions 11-13.

~~6.~~—Question 14 added – Check box ‘Yes/No’ request - ‘Would you like a free subscription to Commercial News USA (CNUSA)?’

These changes are not expected to add burden to this collection because the information is readily known by the respondent.

The proposed modifications to Form ITA-4014P are necessary to improve customer service and facilitate export transactions between foreign buyers and U.S. exhibitors at an IBP tradeshow. They will help create an Export Directory that will give foreign buyers all the necessary information they need when making purchasing decisions before, during and after an IBP-supported tradeshow. The modifications will also assist the U.S. Commercial Service better identify which U.S. companies are best prospects to sell their goods and/or services overseas and identify the type of export counseling required by the U.S. exhibitors to increase their export sales to overseas markets.

The International Buyer Program cannot be carried out or evaluated unless the information outlined in Forms ITA-4102P and ITA-4014P can be obtained from the show organizers and the U.S. exhibitors. Legal authority is 15 U.S.C. et. seq. and 15 U.S.C. 171 et. seq.

**Terms of Clearance:** DOC/ITA is transitioning from a fiscal year program schedule to a calendar year program schedule. ITA is asked to provide information in their next ICR about any effects this had on the program.

It has been determined that this schedule change was a positive affect for the program. It is believed, the impact from the public perspective is that it is much easier to apply and understand the process and information needed using the calendar year. Trade shows that would apply plan their shows on a calendar year basis and therefore, it makes it easier for them.

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

Form ITA-4102P, the information requested is very general in nature and gives a “show profile” of the trade event. Application forms usually come from private show organizers and industry

trade associations. A notice is placed in *Federal Register* to allow the call for applications to get the broadest possible exposure. Additional promotion is accomplished through notices in the trade press, association publications and websites, and through direct electronic mail notices to lists of show organizers. These notices not only contain a verbatim copy of ITA-4102P, but also list promotional actions to be undertaken by the International Buyer Program on the show organizer's behalf.

Applications from show organizers are then ranked according to criteria listed in the *Federal Register* with selections announced approximately 45 days after the deadline for applications. For Calendar Year 2011, IBP received 67 applications and selected 42 shows.

The application period falls two years before the actual trade shows. For example, the calendar year 2012 IBP application period opens in the fall of 2010.

Our Commercial Officers select events appropriate to their country markets and promote the events with the objective of increasing the number of foreign buyers attending the event. A number of Embassies work in tandem with a travel agency overseas that provides a travel package to attract foreign buyers to the trade event in the U.S.

Together with the travel agent, our Commercial Officers often do extensive in-country marketing which would include placing ads in trade journals, general mailings, and making calls to foreign trade association executives.

Form ITA-4014P, the information requested is used to create an Export Interest Directory. Approximately 60 days before the trade event, the Export Interest Directory is sent to overseas posts. This directory shows potential foreign buyers those U.S. exhibitors interested in exporting. Specifically, the directory contains a contact name, booth number, product description, and type of business relationship the U.S. exhibitor is seeking overseas and certification that the products and/or services offered for export have fifty percent U.S. content.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.**

The forms are available and downloadable on the ITA website. The collection of information is done by mail, fax and e-mail for the convenience of the applicant.

**4. Describe efforts to identify duplication.**

There is no duplication of existing requirements. The information in the application is not available elsewhere in the government.

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

The amount of information requested has been reduced to the minimum necessary to evaluate viable applications. The information collected is required by US&FCS in the proper performance of its functions, and no undue burden is placed on the public in furnishing the requested information.

**6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

If this information is not collected IBP would be unable to determine the U.S. exhibitor's interest in exporting, and an applicant's eligibility. This would be a detriment to U.S. trade.

**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.**

The notice soliciting comments from the public was announced in the *Federal Register* on July 8, 2010 (page 39206).

IBP staff regularly consults with U.S. exhibitors and show organizers to provide guidance and identify areas where operational improvements could be made. There are no unresolved substantive or material issues stemming from these consultations.

Both forms ITA-4014P and ITA-4102P have been used by the IBP to collect data for at least five years, and has been well received by our clients and the U.S. exhibitors who exhibit at and IBP domestic trade show. They have been an integral part of collecting data for the IBP.

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

ITA makes no payments or gifts to applicants.

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

There are no assurances of confidentiality.

**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 requested.

**12. Provide an estimate in hours of the burden of the collection of information.**

	<u>Estimated No. of Annual Respondents</u>	<u>Annual Burden Hours</u>
ITA-4102P	130 Applicants x 3 hrs per response =	390 hours
ITA-4014P	2,400 Respondents x 10 minutes per response =	400 hours

**TOTAL RESPONSES = 2,530      TOTAL ESTIMATED HOURS = 790**

**13. 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>Form Number</u>	<u>Time to Complete</u>	<u>IBP Applicants</u>	<u>Total Hours</u>	<u>Average Cost</u>	<u>Applicant Burden</u>
ITA-4102P	3 Hours	130	390	\$25.00	<b>\$3,250</b>

  

<u>Form Number</u>	<u>Time to Complete</u>	<u>Exhibitor Responses</u>	<u>Total Shows</u>	<u>Total Hours</u>	<u>Average Cost</u>	<u>Exhibitor Burden</u>
ITA-4014P	10 Minutes	2,400	45	400	\$0.00	\$0.00

Burden cost includes postage, paper, mailing materials (FedEx), ink, copy toner, and other materials needed to print and mail the application to the IBP.

**14. Provide estimates of annualized cost to the Federal government.**

<u>Form Number</u>	<u>Time to Process</u>	<u>IBP Applicants</u>	<u>Total Hours</u>	<u>Average Salary</u>	<u>Government Burden</u>
ITA-4102P	1 Hour	130	130	\$25/hr	<b>\$ 3,250</b>
ITA-4014P	N/A				

\* Form ITA-4014P, because U.S. exhibitors submit this form to the exhibitors there are no burden hours to the U.S. Government. Even though Form ITA-4014P is submitted to the show organizers, it is necessary for content of the Exporter Interest Directory to be consistent among the U.S. trade shows supported by the IBP program.

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

The adjustment decreases correct an error of the number of respondents/responses in the previous submission. An adjustment increase adding respondent cost burden.

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

Form ITA-4102P, not applicable. The results of the information collected are not published.

Form ITA-4014P, the results of the information collected and published in an Export Interest Directory used solely for promotional and matchmaking purposes at IBP domestic tradeshows. The respondents are aware that their information will be published in the Export Interest Directory by the show organizers. Form ITA-4014P is optional, if the respondent does not want their information published, the respondent is not required to submit the form.

**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 number and expiration date will be displayed on the forms.

**18. Explain each exception to the certification statement.**

Not Applicable.



**B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS**

Not Applicable.