SUPPORTING STATEMENT U.S. DEPARTMENT OF COMMERCE INTERNATIONAL TRADE ADMINISTRATION U.S. GOVERNMENT TRADE EVENT INFORMATION REQUEST OMB CONTROL NO. 0625-0238

A. JUSTIFICATION

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

Expanding U.S. exports is a national priority essential to improving U.S. trade performance. The International Trade Administration's (ITA) Advocacy Center marshals federal resources to assist U.S. firms competing for foreign government procurements worldwide. The Advocacy Center works closely with the Trade Promotion Coordination Committee (TPCC), with a core of 7 agencies: Department of Commerce (DOC), Export-Import Bank, Overseas Private Investment Corporation (OPIC), U.S. Trade and Development Agency (USTDA), Small Business Administration (SBA), Department of State, and Department of Agriculture (USDA). TPCC is chaired by the Secretary of Commerce and includes 20 federal agencies involved in export promotion.

The purpose of the U.S. Government Trade Event Information Request is to collect the necessary information to make an evaluation as to whether a firm qualifies for senior-level U.S. government (USG) support, in the form of attendance at an event including witnessing the signing of a commercial agreement (e.g., most often a contract). Senior-level USG officials witnessing contract signings are generally undertaken at the request of U.S. companies to highlight commercial milestones pertaining to projects/procurements overseas. Each request will be for a different project/procurement that would result in significant U.S. exports and U.S. job creation was the American company awarded the transaction.

This request is to extend the Office of Management and Budget approval of the information collection.

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-4136P, U.S. Government Trade Event Information Request, is sent to any firm that requests senior-level USG witnessing of a commercial milestone, e.g., an announcement, contract, or business agreement signing, at a public event designed to highlight a company's commercial success in an overseas project or procurement competition. The Advocacy Center, appropriate ITA officials, and U.S. Commercial Service worldwide that provide support to U.S. firms, will request firm(s) seeking USG support, in the form of attendance at an event including

witnessing the signing, to complete the U.S. Government Trade Event Information Request Form and submit to the Advocacy Center for review and approval. This information is needed to ensure that the subject milestone to be witnessed is either a legally binding contract or a commercially significant announcement, which includes highlighted U.S. export content. Furthermore, the information contained on the form helps the U.S. Department of Commerce (USDOC) staff determine if USG association with the event or activity is in the best interest of the USG. The information collected permits staff to review details of the milestone to be witnessed, and to make an evaluation on: (a) whether the contract or announcement is actually ready for final signature or public disclosure; (b) whether additional USG advocacy may be required prior to the event in question; (c) whether the level of U.S. company participation and foreign government official participation, if appropriate, is at a level high enough to recommend senior-level USG participation; and (d) what states U.S. export content associated with the contract/announcement would be sourced from.

3. <u>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.</u>

Information will be collected by paper format and electronically. This form can be sent to clients as an e-mail attachment and the completed form can be returned via e-mail. The form is not available online, but the Advocacy Center will post a downloadable version on its website when this renewal goes into effect.

4. Describe efforts to identify duplication.

The collected information is unavailable elsewhere and is unique to each response.

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

There will be a minimal burden placed on small businesses. The amount of information requested is the minimum necessary to evaluate a specific company's request for senior-level USG witnessing of a commercial milestone at an international trade event.

6. <u>Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.</u>

If this information were not collected, staff could not make the appropriate evaluation prior to USG involvement, and therefore make the determination whether it is in the best interest of the USG.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

None.

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 requesting public comments was published on May 5, 2010, in the Federal Register [Volume 75, Number 86, pg. 24569]. No comments were received.

The Trade Event Information Request Form was developed and revised by the Advocacy Center in conjunction with the USG Advocacy network and selected U.S. firms. The form incorporates input from ITA organizational units, with sister USDOC agencies (e.g., the Bureau or Industry and Security), with the Advocacy Network (e.g., the TPCC agencies), and with selected U.S. firms and trade associations. There are no unresolved substantive or material issues stemming from these consultations.

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

ITA provides no payments or gifts to applicants.

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

The U.S. firms are informed, as stated on the form, that the information is for internal USG use only and that it will be considered *business confidential*; and some of the information collected may be subject to disclosure under the Freedom of Information 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.

No questions of a sensitive nature are asked of respondents.

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

Based on the number of senior-level USG trips overseas and the status of major projects in the respective countries, ITA estimates that approximately 10 firms in key industry sectors will submit a request for USG official witnessing event annually.

Total estimated respondent burden:

Form No.	<u>Time to Complete</u>	No. Respondents	No. Responses	<u>Total Hours</u>
30 minutes	10	10	5 hours	5

The estimated average private sector salary for persons completing the U.S. Government Trade Event Information Request Form is \$50/hour = total estimated labor cost is \$250.

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).

Not Applicable.

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

1 hour each request x 10 = 10 hours x \$50 (hourly salary) =

Total cost to the Federal government: \$500.

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

Since the previous request to authorize this form, ITA-4136P, fewer responses were received. It is estimated that 10 responses (down from 20) will be received. The adjustment decrease in number of respondents/responses is 10.

In the previous submission the incorrect response time of 1hour was used instead of 30 minutes. This resulted in an adjustment decrease in burden hours of 15.

16. <u>For collections whose results will be published, outline the plans for tabulation and publication</u>.

Not Applicable.

17. If seeking approva	ıl to not display the	expiration date f	for OMB approval of the
information collection,	<u>, explain the reason</u>	<u>ıs why display wo</u>	<u>uld be inappropriate</u> .

The OMB number and expiration date will be displayed on the form.

18. Explain each exception to the certification statement.

Not Applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Not Applicable.