

SUPPORTING STATEMENT

Application for Issuance or Replacement of Northern Mariana Card

(Form I-777)

OMB No. 1615-0042

A. Justification:

1. As provided for in 8 CFR 235.9, applicants may apply for a Northern Mariana identification card if they received United States citizenship pursuant to Public Law 94-241, Covenant to Establish a Commonwealth of the Northern Mariana Islands (CNMI).
2. An applicant may file Form I-777 for the CNMI identification card if he or she:
 - Was born before November 3, 1986, in the Northern Mariana Islands, was a citizen of the Trust Territory of the Pacific Islands (TTPI), and on that date was domiciled in the CNMI or the U.S. or any territory or possession of the U.S.;
 - Was a citizen of the dissolved TTPI on November 3, 1986, was domiciled continuously in the Northern Mariana Islands for the preceding 5 years; and unless under age, registered to vote in Northern Mariana Islands district legislature or municipal elections prior to January 1, 1975;
 - Was domiciled in the CNMI on November 3, 1986 and was not a citizen of the dissolved TTPI but has been domiciled continuously in the Northern Mariana Islands since prior to January 1, 1974; or
 - Is requesting replacement of a Northern Mariana identification card.

U.S. Citizenship and Immigration Services (UCIS) will use the information collected to verify the applicant's status and to determine his or her eligibility for the benefit.

3. The use of this form provides the most efficient means for collecting and processing the required data. Currently, USCIS does not have the automated capability in place to accept electronic submission of applications. Since the number of respondents for this information collection is so small, this form has not been designated for e-filing under the Business Transformation Project.
4. A review of the Forms Inventory Report revealed no duplication of effort, and there is no other similar information currently available that can be used for this purpose.
5. This collection does not have an impact on small businesses or other small entities.
6. If the information is not collected USCIS could not determine or verify an applicant's claim of eligibility for or replacement of a Northern Mariana identification card. Without this identification card, persons from the Northern Mariana Islands would not have proof of U.S. citizenship and would not qualify or become eligible to apply for or receive certain U.S. benefits and privileges.
7. The special circumstances contained in item 7 of the supporting statement are not applicable to this information collection.
8. On June 9, 2010, USCIS published 60-day notice in the Federal Register at 75 FR 32799. On August 26, 2010, USCIS published 30-day notice in the Federal Register at 75 FR 52539. USCIS received one comment on the 60-day notice for

this information collection. The following is a discussion of the comment and USCIS' response.

Comment: The commenter suggested that we rename the card either the "CNMI Card" or the "Northern Mariana Card."

Response: The Form I-777 is an application to replace a lost or mutilated card that was previously issued by USCIS to U.S. citizens whom obtained citizenship as a result of Public law 94-241. These cards were only issued in the two year period that ended on July 1, 1990. USCIS does not issue new identification cards for U.S. citizens who obtained citizenship from the passage of Public Law 94-241. There is currently no authority to issue a new card or a new form of identification to U.S. citizens from the CNMI and USCIS is only able to replace previously issued cards. Renaming the card would constitute a new form of identification which, as previously stated, USCIS has no authority to issue. USCIS continues to replace cards with the same designation as they were previously issued.

In addition, on November 17, 2009, OMB approved the Form I-777 for one year.

In the terms of clearance OMB requested that Form I-777 be updated in conjunction with regulations implementing changes to the CNMI categories.

USCIS has reviewed the form and instructions in accordance with OMB's terms of clearance. It was decided that no changes to the form or instructions are required as a result of the CNMI regulations.

9. USCIS does not provide payments or gifts to respondents in exchange for a benefit sought.
10. There is no assurance of confidentiality.

11. There are no questions of a sensitive nature.

12. **Annual Reporting Burden:**

a. Number of Respondents	100
b. Number of Responses per Respondent	1
c. Total Annual Response	100
d. Hours per Response	.50
e. Total Annual Reporting Burden Hours	50

Annual Reporting Burden

Total annual reporting burden hours is 50. This figure was derived by multiplying the number of respondents (100) x (1) frequency of response x (.50) 30 minutes per response.

13. There are no capital or start-up costs associated with this information collection. Any cost burdens to respondents as a result of this collection are identified in item

14. There is a fee charge of \$15 associated with this information collection.

14. **Annualized Cost Analysis:**

Printing Cost	\$ 20
Collecting and Processing	\$ 1,480
Total Cost to Program	\$ 1,500
Fee Charge	\$ 1,500
Total Cost to Government	\$ 0

Government Cost

The cost of the program to the Government is calculated by multiplying the estimated number of respondents (100) x (\$15) the fee charge (which includes the

suggested average hourly rate for clerical, officer, and managerial time with benefits). In addition, the cost includes estimated overhead cost for printing, stocking, distributing and processing of this form.

Public Cost

The estimated annual public cost is \$1,494. This is based on the number of respondents (100) x (.50) 30 minutes per response x \$29.89 (average hourly rate).

This estimated annual fee cost is \$1,500. This estimate is based on the number of respondents (100) x \$15 fee charged.

15. There has been no increase or decrease in the estimated annual burden hours previously reported for this information collection.
16. USCIS does not intend to employ the use of statistics or the publication thereof for this collection of information.
17. USCIS will display the expiration date for OMB approval of this information collection.
18. USCIS does not request an exception to the certification of this information collection.

B. Collection of Information Employing Statistical Methods.

Not applicable.

C. Certification and Signature.

PAPERWORK CERTIFICATION

In submitting this request for OMB approval, I certify that the requirements of the Privacy Act and OMB directives have been complied with including paperwork regulations, statistical standards or directives, and any other information policy directives promulgated under 5 CFR 1320.

Sunday Aigbe,

Date

Chief,

Regulatory Products Division,

U.S. Citizenship and Immigration Services,

Department of Homeland Security.