

JUSTIFICATION

1513-0038

TTB F 5100.16 APPLICATION FOR TRANSFER OF SPIRITS AND/OR DENATURED SPIRITS IN BOND

TTB is requesting approval to amend the above-mentioned form based on administrative burden. We had several issues working with the current form-

- We discovered that due to unclear instructions and fields on the transfer form, some plants were making transfers that were impermissible under the TTB regulations.
- Only transfers from Distilled Spirits Plants or Alcohol Fuel Plants to Distilled Spirits Plants are permitted using TTB F 5100.16. The previous form did not make it clear which types of transfers were permitted.
- Because the prior version of the form did not request complete information about permit types and company names, each transfer necessitated lengthy research procedures by TTB. TTB receives numerous transfer applications on an ongoing basis.

So, we are recommending that the following changes be made to make it easier for industry members (IM) to complete the form correctly, and for us to process it.

Here are some of the things that changed:

- Better defined the structure of the Serial Number in item 1,
- Prompting the user for the correct Plant Registry or Permit Number,
- Better identified sections for the 2 participating plants – consolidated all the shipping IM's info and all the receiving IMs information separately,
- Added section for IM to identify the type of operations authorized by their permits,
- Changed the flow of some of the fields to a more logical order,
- Added the notice that it is the responsibility of both plants to make sure they are making a valid transfer/receipt of spirits in bond, and
- Updated the instructions.

For these reasons we are requesting approval of these changes to this form. We do not believe that these changes will change the burden hours.