

Consultation Process: Responses to Standard Questions

Questions:

1. The ICR (Information Collection Request) is intended to require that respondents provide certain data so that the Agency can utilize them. Based on the instructions, is it clear to respondents what they are required to do and how to submit such data? If not, what suggestions do you have to clarify the instructions?
2. Do respondents understand what they are required to submit or maintain in their records? Is the reporting form clear, logical, and easy to complete?
3. The Government Paperwork Elimination Act requires agencies make available to the public electronic reporting alternatives to paper-based submissions by 2003, unless there is a strong reason for not doing so. If the Agency were able to ensure the security of CBI that might be transmitted over the Internet and the reporting form could be completed electronically, would you be interested in submitting it electronically?

Current electronic reporting alternatives include the use of “web forms”/XML based submissions via the Agency’s internet site and magnetic media-based submissions (i.e., on diskette, CD-ROM, etc.) Are you interested in using, or are they currently utilizing, electronic reporting/record-keeping options?

4. Where a reporting requirement includes a signature requirement, consider whether a secure electronic signature method (such as Private Key Infrastructure) should be *required* if submitting electronically; whether a less secure method (such as the use of PINs and passwords) would be more appropriate; or, whether a signed cover sheet may be sufficient for the Agency’s purposes when data is submitted on disk.
5. If you prefer one method to another, does your choice balance burdens and costs against electronic data and signature security integrity?
6. If an electronic reporting option is not offered because of CBI-related concerns, would you be more inclined to submit CBI on diskette than on paper? What benefits would you realize? (Burden reduction? Greater efficiency in compiling the information?).
7. The labor rates included in the Agency’s estimated burden hours and costs are a U.S. average that includes costs for overhead and benefits. These estimates include only burden hours and costs associated with the paperwork involved with this ICR (i.e., the Agency does not include estimated burden hours and costs for usual and customary business practices such as R&D, marketing, etc.). Are the estimated burden hours and labor rates accurate?
8. Are there other costs that should be accounted for that may have been missed, such as capital/start-up/M&O expenditures? If so, please provide an explanation of how you arrived at your estimate of burden and cost if substantially different than EPA’s estimate.