

**Supporting Statement for Paperwork Reduction Act Submissions: Part A**  
**OMB Control Number 1028-0070**

**Consolidated Consumers' Report (1 form: 9-4117-MA)**

Terms of Clearance: None

A. Justification

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

***The authorities for this collection are:***

*National Materials and Minerals Policy, Research and Development Act of 1980 (Public Law 96-479)*  
*National Mining and Minerals Policy Act of 1970 (Public Law 91-631)*  
*Strategic and Critical Materials Stock Piling Act (50 U.S.C. 98 et seq.)*

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The U.S. Department of the Interior (DOI) has policy responsibility for the Nation's mineral resources and their derived industries. The National Mining and Minerals Policy Act of 1970 (Public Law 91-631) and the National Materials and Minerals Policy, Research and Development Act of 1980 (Public Law 96-479) make it incumbent upon the Secretary of the Interior to be informed about and to inform the Congress of important developments, including crises, in the minerals industries. Many of the responsibilities regarding mineral resources are assigned to the U.S. Geological Survey (USGS), where they are discharged through a staff that includes chemists, economists, engineers, geologists, mineral commodity specialists, and physicists.

Two fundamental activities—mining and agriculture—form the basis of the Nation's wealth because they furnish all the raw materials and most of the energy that are used in all other industries. Additionally, the mining industry supplies the fertilizers, pesticides, and soil conditioners that significantly enhance the performance of the agricultural sector. For those raw materials not produced domestically, supplies must be imported. This adversely affects the trade balance and, for some materials, puts U.S. industries at risk of supply disruptions because of international political developments. Imports may also compete with domestic production, thus jeopardizing U.S. jobs. Accordingly, the Government requires accurate, timely data on raw materials production and related industries to formulate policies that ensure national security and economic well-being. The USGS canvass forms are the fundamental means by which data on minerals, mining, and related materials

production are obtained.

**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. [Be specific. If this collection is a form or a questionnaire, every question needs to be justified.]**

The data obtained from this collection are used by Government agencies, Congressional offices, educational institutions, research organizations, financial institutions, consulting firms, industry, and the public. These data also provide ways of identifying consumption trends, making demand analyses on varying time cycles, assembling meaningful findings, such as economic vitality, and drawing conclusions. The consumption of these minerals is highly volatile and must be analyzed each month to furnish information and data for reports and indices that are prepared more frequently than on an annual basis.

With this information collection, the USGS collects and analyzes data on consumption and stocks of materials—a number of which have traditionally been considered as strategic and critical. Each company reports commodity data consistent with industry standards and as mutually agreed upon by the company and the USGS mineral commodity specialists.

Information gathered from this collection is used by the Secretary of the Interior in the annual report to the Congress on the state of domestic mining and mineral industries as required by the National Materials and Minerals Policy, Research, and Development Act of 1980. The USGS routinely uses this information to provide analyses and data for decision-making purposes to the Congress and various Presidential councils and commissions. The National Security Council, in particular, has frequently used USGS data in relation to materials mobilization studies and sustainability analyses.

The data collected are analyzed and used by the USGS to issue, as promptly as possible, various publications that provide essential information while protecting trade secrets and privileged or proprietary commercial or financial information. These data form a substantial part of the USGS Automated Minerals Information System (AMIS) which the USGS uses in legislative programs, research programs, economic studies, analyses, land use, and environmental impact studies. These data are also used to respond to nationwide and international requests for minerals information.

Furthermore, the Strategic and Critical Materials Stock Piling Act (50 U.S.C. 98 et seq.) requires the Secretary to collect data on strategic and critical materials to assist in determining stockpile goals. The Secretary assigned this responsibility for data collection to the U.S. Bureau of Mines (USBM) and transferred the responsibility to the USGS after the USBM was abolished in 1996.

### **Uses of the Information**

The U.S. Department of Commerce (DOC) uses USGS data in studies of minerals mobilization, to recommend trade policy and to resolve disputes under the International Trade Administration, to assist in export development, to develop materials research, to develop annual data on the output of U.S. industries, and to develop worldwide mineral production and trade data.

The U.S. Department of State (DOS) uses USGS data to support international commodity negotiations, to analyze relations with foreign mineral producers, to recommend tariffs and quotas, and to develop a worldwide mineral database.

The U.S. Agency for International Development uses USGS data to assist in determining which minerals are of interest to the United States for development in developing nations.

The Federal Trade Commission (FTC) and the U.S. International Trade Commission (ITC) use USGS data in studies of antitrust activities, unfair trade practices, and false advertising or misrepresentation of mineral goods or commodities.

The U.S. Department of Defense (DOD) uses USGS data to determine research on materials and minerals within research laboratories of the Army, Navy, and the Air Force; sea lanes that must be protected; Defense Production Act Title III projects; National Defense Stockpile (NDS) goals and specifications; details of procurement, storage and disposal; and suppliers of mineral commodities.

The National Science Foundation, the National Academy of Sciences, the National Academy of Engineering, and the National Research Council use USGS data to ensure maximum benefits from all mineral research.

The U.S. Department of Transportation, the Interstate Commerce Commission, and the U.S. Army Corps of Engineers use USGS data to determine national and State transportation requirements for the minerals industry.

In addition to the use of USGS data by the majority of Federal Government departments, reports and information are in demand by many types of organizations, including the following:

- Participating companies
- Electric utilities
- Export associations
- State governments
- Industrial marketing groups
- Financial institutions
- International industry associations
- Domestic trade associations
- Industrial and agricultural sectors
- The general public, especially academic, consulting, and legal organizations
- Minerals management companies

Sectors of the public that use the data collected by the USGS include, but are not limited to: concrete, construction, metals, ceramics, refractories, electric utilities, electronic engineering, chemical, coal, paper, rubber, plastics, and agricultural industries. The USGS customer base (recipients of these data) is well over 35,000 entities and increases considerably each year.

The Department of Energy, the Department of Homeland Security, the World Bank, the Federal Reserve Board, the Federal Highway Administration, and most of our sister agencies within the DOI also rely on these data. The data collected are used to determine the economic health of the Nation, factored into the gross domestic product, and used in forecasts and trend projections in the building and construction industries, which are closely linked to the issue of rebuilding the infrastructure of the country. This information is not available from any other source.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden [and specifically how this collection meets GPEA requirements].**

On-line electronic forms are available to registered users at the minerals information forms (MIFORMS) Web site (<https://miforms.er.usgs.gov>). Immediate on-line registration is available where new respondents and new users are granted immediate access. For security purposes, additional users will not be allowed to access past submissions on-line unless they specifically request administrative privileges to retrieve such historical data.

Currently, 10% of the universe responds electronically this percentage is expected to increase over time. Paper forms will remain an option for submission of responses because not all industry respondents are able or wish to transmit their data to the USGS by electronic means.

The electronic forms conversion effort continues to fulfill the Government Paperwork Elimination Act requirements by maintaining intelligent links between the electronic forms and the database.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

These data are not collected by any other Federal or State agency, trade association, or other public sources. The USGS continuously reviews data collection practices with other agencies, including the DOC and the U.S. Department of Labor, and the ITC, as well as with industry associations such as the American Iron and Steel Institute, the Institute of Scrap Recycling Industries, the International Tungsten Industry Association, the International Chromium Development Institute, the International Copper Study Group, and the International Lead and Zinc Study Group.

For over 120 years, the Federal Government has consistently collected mineral information while trade associations have been created and abolished. Where data are available from other sources, these data are used. Alternate data sources are not available for the mineral commodities that are canvassed.

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

The canvass form is designed to minimize the burden to all respondents of which about 10% are small businesses. Only essential data are requested in a format common to the reporting industry. When applicable, small businesses often respond with fewer data entries than the larger organizations.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

The USGS provides information necessary for sound Federal, State, and industry decision-making. If data are not made available as soon as possible or canvasses were conducted less frequently, the monitoring of stockpile materials for national defense would be impeded by the gap in statistics. The level of domestic and foreign productivity and economic fluctuation would be much less apparent or missed, and that data simply would not be timely enough to be reliable for decisions that affect minerals vulnerability, potential environmental impacts, current trends, and future needs. These decisions, in turn, have an effect on such aspects of our economy as taxes, royalty payments, tariffs, land use, environmental regulations, water use, and transportation.

Collection of monthly and annual data allows economic analysis that can capture variations that a longer time interval could not. Collection of these data on a biennial basis would not be practical because the industry respondents do not normally have the data in convenient format except on a monthly, quarterly, semiannual, or annual basis. A 2-year canvass, for example, would require the respondents to alter their accounting procedures or manually add 2 years of data. This would increase their reporting burden. Also, multiyear data are less meaningful and less convenient for analysis by industry and Government agencies.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner: (i) requiring respondents to report more often than quarterly, (ii) requiring respondents prepare written responses in fewer than 30 days after receipt, (iii) requiring respondents to submit more than an original and two copies of any document, (iv) retain records for more than 3 years; (v) in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study; (vi) the use of a statistical data classification that has not been reviewed and approved by OMB; (vii) that includes a pledge of confidentiality not supported by authority established in statute or regulation; requiring respondents to submit proprietary trade secrets or other confidential information.**

Users of the published data based on this canvass may track trends on a monthly basis because of the highly volatile market or seasonal production patterns for the materials covered by this canvass. Trends may be detected earlier if the data are available monthly rather than at less frequent intervals, such as quarterly, semiannually, or annually. The data collected by the monthly canvass are absolutely necessary if the USGS is to meet current, reliable information demands of industry and Government mineral analysts who prepare monthly and bimonthly indices and commodity reports to analyze the industry. Additionally, the data are necessary if the USGS is to meet the requirements of Public Law 91-631 for the minerals that have erratic supply, demand, value, availability, or seasonal production patterns.

Under the terms of the USGS standard for handling proprietary canvass data included in the supplementary documents, companies can and usually do specify that the data they supply be shared only in aggregated form. These terms ensure that the USGS will continue to receive proprietary data in confidence.

The canvass form is designed to ensure that respondents are not required to maintain or provide data in a format other than that in which the data are customarily maintained. The respondents are routinely asked to comment on the design of the form and to make recommendations that help maintain consistency with industry's methods of accounting.

Some commodity data are needed monthly because of the importance of these industries to the industrial economy, such as for the transportation, construction, and electronic sectors. DOD planners use these data to evaluate purchase and disposal plans for the NDS. The mining and metal products industries regularly use these data to evaluate production and consumption plans. Minerals policy planners need the most up-to-date information in making decisions concerning these industries.

If a company receives a monthly canvass, then it does not receive an annual canvass of the same type for these commodities. Most canvasses that are conducted annually are done so for two reasons. Generally, an annual canvass is conducted because of the small size of the companies involved and the desire to limit their reporting burden. Although the number of small companies canvassed annually is large, the aggregate data collected from them is small, thus permitting monthly estimates based on the previous year's data without significant impact on the overall accuracy of monthly production or consumption. Another reason for instituting an annual reporting basis relates to the willingness or capability of a company to complete a monthly canvass. On a few occasions, exceptions have been made to allow a company to report annually on a temporary basis; this has been most common during poor economic times.

**8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice [and in response to the PRA statement associated with the collection over the past three years] and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

**Describe 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. [Please list the names, titles, addresses, and phone numbers of persons contacted.]**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

On October 19, 2010, a 60-day Federal Register notice (75 FR 64349) was published announcing this information collection. Public comments were solicited for 60 days ending December 18, 2010. We did not receive any public comments in response to that notice.

The canvass form is designed to collect only the required data, thus minimizing the individual response time, and to ensure that respondents are not required to maintain or provide data in a format other than that in which the data are customarily maintained. The respondents are regularly asked to comment on the design of the form and to make recommendations that help maintain consistency with industry's methods of accounting.

USGS mineral commodity specialists are routinely contacted by Federal and State agencies, Members of Congress, trade associations, the financial community, private companies, universities, and private citizens that request general and specific data and information.

When persons outside the USGS submit requests for information, the USGS mineral commodity specialists and statistical assistants respond in a timely manner. The USGS receives and responds to several thousand e-mail and telephone inquiries each month. During these discussions and interactions, views are exchanged on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, reporting format, data elements to be recorded, disclosed, or reported, burden estimates and other aspects of this Information Collection. These views help the USGS to improve its data and publications.

On the basis of such feedback, information-use patterns are established commodity by commodity. Once patterns are determined, canvass forms are revised to collect data and to meet the information needs. As information request patterns change, the data collected and reported are modified. Within the last 3-year Office of Management and Budget approval period for this Collection, no direct changes to the collection instrument were made. The list below identifies industry contacts consulted on the burden estimates and other aspects of this Information Collection on October 7, 2010:

(Monthly)  
Timet North American Operation  
Doug McCoy, VIM Manager  
Vallejo, CA

(Monthly)  
Haynes International  
Peggy Mickelson, Cost Accountant  
Kokomo, IN

(Monthly)  
A K Steel Corporation  
Charlotte Kamann, Cost Accountant  
Mansfield, OH

(Annual)  
Electralloy  
Brian Jenkins, Production Control Manager  
Oil City, PA

(Annual)  
Atlas Foundry & Machine Company  
Lisa Schitoskey, Accounting Manager  
Tacoma, WA

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

No payments or gifts are made to respondents.

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

Public Law 96-479, Section 5(3) (f), ensures the confidentiality of all data reported by persons or firms engaged in any phase of mineral or mineral-material production or large-scale consumption.

To implement Section 5(3) (f), the USGS withholds all data reported as “Company Proprietary Data,” and such data will be disclosed only in the aggregate so as not to reveal data from a single respondent. USGS policy states that absent specific company permission, aggregated data can be reported only if it represents three or more companies and if no one company accounts for more than 75% of the total or if no two companies account for more than 90% of the total. Proprietary data may only be disclosed to Congress or to Federal defense agencies upon official request for appropriate purposes. Except in response to requests by Congress or by Federal defense agencies, proprietary data will never be disclosed without the specific permission of the company as represented in the disclosure query. The disclosure statement and query are printed on each canvass form.

The USGS standard for handling proprietary canvass data further discusses protections for USGS proprietary data including penalties associated with violations.

The records for this collection will be maintained in the appropriate Privacy Act System of Records identified as Computer Registration System. (INTERIOR/USGS-20) published at 74 FR 23430 (May 19, 2009).

**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. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

This collection does not ask for information of a sensitive nature.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

**\* Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance.**



**Generally, estimates should not include burden hours for customary and usual business practices.**

**\* If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**

**\* Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

Variations can be expected in the reporting burden for completion of these forms because of the differences in operation size and accounting systems. The data sought are those routinely maintained in the course of business. For some companies with more than one plant, the submission takes the form of a consolidated report covering all company operations. This greatly reduces the reporting burden.

We estimate the total annual burden for this collection of information (includes the time for reviewing instructions, searching data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information) to be approximately 1,371 hours (Table 1). Approximately 343 respondents will report data either monthly or annually. These two respondent groups are mutually exclusive. For example, companies that report on a monthly basis are not asked to report the same data on an annual basis. For the 1,828 associated responses, the average completion time is 45 minutes for USGS Form 9-4117-MA.

**Table 1. Consolidated estimates of annual burden**

		PRIVATE SECTOR			
Form No.	Frequency	Number of Respondents	Responses	Completion Time	Burden Hours
9-4117-MA	Monthly	135	1,620	45 min	1,215
9-4117-MA	Annually	208	208	45 min	156
TOTALS		343	1,828		1,371

The estimated dollar value of the burden hours for this collection takes into account the nature of our respondents. We estimate the total dollar value of this collection to be \$35,989 (Table 2). We arrived at this figure by multiplying the estimated burden hours 1,371 by \$26.25 (for the private sector). This wage figure included benefits and is based on the Bureau of Labor Statistics (BLS) news release USDL-10-1687 for Employer Costs for Employee Compensation—September 2010 at [http://www.bls.gov/news.release/archives/ecec\\_12082010.pdf](http://www.bls.gov/news.release/archives/ecec_12082010.pdf), dated December 8, 2010.

**Table 2: Estimated Dollar Value of Respondent Annual Burden Hours**

Activity	Sector	Annual Number of Responses	Total Annual Burden Hours	Dollar Value of Burden Hours (Including Benefits)	Total Dollar Value of Annual Burden Hours
Completing canvass forms	Private	1,828	1,371	\$26.25	\$35,989

**13. Provide an estimate of the total annual [non-hour] cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).**

There is no non-hour cost burden, recordkeeping nor any fees associated with collection of this information.

**14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

The total annual cost to the Federal Government is \$641,888. This includes the operational expenses (\$179,788) and cost to the Federal Government for salaries and benefits for administering this information collection (\$462,000). Operational expenses include mailing, overhead, printing, processing, and non-Federal support staff (Table 3).

**Table 3. Annualized Operational Expenses and estimated costs**

Operational Expenses	Estimated Cost
Printing of canvass forms	\$89
Mailing lists compilation and maintenance	\$773
Mailing operation	\$1,967
Editing, coding, tabulation	\$85,989
ADP processing	\$72,236
Electronic publication of results	\$362
Government Printing Office print costs for 2 Federal Register Notices	\$652
Electronic forms development and maintenance	\$17,720
<b>Total</b>	<b>\$179,788</b>

The total estimated cost to the Federal Government for processing and reviewing information received as a result of this collection is \$462,000 (Table 4). This includes Federal employee salaries and benefits. The table below shows Federal staff and grade levels performing various tasks associated with this information collection. We used the Office of Personnel Management Salary Table 2010-DCB

([http://www.opm.gov/flsa/oca/10tables/pdf/dcb\\_h.pdf](http://www.opm.gov/flsa/oca/10tables/pdf/dcb_h.pdf)) to determine the hourly rate. We multiplied the hourly rate by 1.5 to account for benefits (as implied by the BLS news release USDL-10-10-0774).

**Table 4. Federal Employee Salaries and Benefits**

Position	Grade/ Step	Hourly Rate	Hourly Rate incl. benefits (1.5 x hourly pay rate)	Estimated time spent by Federal Employees (annualized hours)	Estimated Federal employee salary/benefit annualized costs
Commodity Specialist	GS-13/8	\$52.61	\$78.92	2,880	\$227,200
Statistical Assistants	GS-6/3	\$19.41	\$29.12	4,280	\$124,700
Computer Specialist	GS-13/8	\$52.61	\$78.92	430	\$33,800
Editors	GS-12/8	\$44.25	\$66.38	430	\$28,400
Minerals Records Administrator	GS-12/8	\$44.25	\$66.38	120	\$8,000
Management	GS-14/8	\$62.17	\$93.26	430	\$39,900
<b>TOTAL</b>					<b>\$462,000</b>

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

We estimate that there will be 1,828 responses totaling 1,371 burden hours. This is a net decrease of 450 responses and 338 burden hours from our previous request of 2,278 responses and 1,709 burden hours.

The difference represents an adjustment where we fine-tuned the number of respondents based on our experience in administering this collection along with the types of respondent feedback, discussions, and interactions as described in our answer to item 8 above.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

The AMIS mainframe system and off-the-shelf software packages are used to compile and tabulate the data and to prepare tables for publication. National, State, and regional tabulations are prepared and published annually at <http://minerals.er.usgs.gov/minerals/> in table format from data collected by this canvass. Preliminary estimates are prepared and published in the Mineral Commodity Summaries, which is the earliest Government publication to furnish estimates covering the previous year's nonfuel mineral industry. Data are also published in the monthly and annual issues of the Mineral Industry Surveys series and the Annual Reports from the Minerals Yearbook and other USGS

publications.

Tables present various aspects of commodities, such as consumption and production of products together with industry stocks. Economic changes are incorporated and industry trends and activities are studied. Statistical data are processed and analyzed by the Data Collection and Coordination Section, which also establishes timing for all key steps in the work.

Tabulation and publication of data are governed by the USGS standard for handling proprietary canvass data. Data are available via the Internet and in print for select publications in the USGS minerals information series.

Monthly, quarterly, and semiannual tables are generally published within 50 workdays from the end of the reporting month. Annual data are generally published within 9 months from the end of the reporting year.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

We will display the OMB control number and expiration date on the single form in this collection.

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

There are no exceptions to the certification statement.