

# Supporting Statement e-Allegations Submission

OMB Control Number: 1651-0131

## 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.**

In the interest of detecting trade violations to customs laws, Customs and Border Protection (CBP) established the e-Allegations website to provide a means for concerned members of the trade community to confidentially report violations to CBP. The e-Allegations site allows the public to submit pertinent information that assists CBP in its decision whether or not to pursue the alleged violations by initiating an investigation and how to best proceed in the event that an investigation is warranted. The information collected includes the name, phone number, and email address of the member of the trade community reporting the alleged violation. It also includes a description of the alleged violation and the name and address of the potential violater.

This collection of this information is authorized by the Tariff Act of 1930, as amended (title 19, United States Code, section 1202 et seq.), the Homeland Security Act of 2002 (title 6, United States Code), and the Security and Accountability for Every Port Act of 2006 ["SAFE Port Act"] (Public Law 109-347, October 13, 2006). The e-Allegations website is accessible at <https://apps.cbp.gov/eallegations/>.

**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.**

The information collected will be used by select CBP officials for the sole purpose of pursuing trade violations.

The information is being collected to assist CBP with its mission of protecting the revenue through trade compliance and enforcement. The information will also assist CBP with its other areas of responsibility, such as intellectual property rights enforcement and import safety issues. This system helps CBP address actual violations of law.

**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.**

Information regarding potential trade violations will be electronically submitted via the e-Allegations website at <https://apps.cbp.gov/eallegations/>.

**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.**

This information is not duplicated in any other place or any other form.

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

This information collection does not have a significant impact on a substantial number of small businesses or entities.

**6. Describe consequences 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 consequence of not allowing this collection is that many trade violations will not be caught by law-enforcement officials. In many cases, not catching these violations will result in economic injury to the United States or in a threat to public health and safety.

**7. Explain any special circumstances that would cause an information collection to be conducted.**

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

**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 describe actions taken by the agency in response to these comments.**

Two Federal Register Notices were published soliciting public comment on this collection of information including a 60-day notice published on December 14, 2010, Volume 75, Page 77892 on which no comments were received, and a 30-day notice that was published on February 15, 2011, Volume 76, Page 8767 on which no comments have been received.

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

There is no offer of a monetary or material value for this information collection.

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

The information collected is maintained in CBP's Treasury Enforcement Communications System (TECS, System of Records Noticed, 66 FR 53029).

**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 information collection does not involve questions of a personal or sensitive nature.

**12. Provide estimates of the hour burden of the collection of information.**

INFORMATION COLLECTION	TOTAL ANNUAL BURDEN HOURS	NO. OF RESPONDENTS	NO. OF RESPONSES PER RESPONDENT	TOTAL RESPONSES	TIME PER RESPONSE
eAllegations	400	1,600	1	1,600	15 minutes (.25 hours)

#### **Public Cost**

The estimated cost to the respondents is \$8,000. This is based on the estimated burden hours (400) multiplied (x) the average hourly rate (\$20.00) = \$8,000.

**13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.**

There are no record keeping, capital, start-up or maintenance costs associated with this information collection.

**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.**

The estimated annual cost to the Federal Government in handling, processing, and recording the information collected with regard to this collection is **\$204,600**.

This is based on the number of responses (1,600) multiplied (x) the time spent per response (3 hours) = 4,800 hours multiplied (x) by the average hourly rate of \$42 = **\$201,600**.

There is an estimated **\$3,000** in recurring costs for administrative support and external hosting of the website.

Total cost to the Government is **\$204,600** which is calculated by: \$201,600 + \$3,000 = **\$204,600**.

**15. Explain the reasons for any program changes or adjustments reported in Items 12 or 13 of this Statement.**

The burden was increased from 25 hours to 400 hours because the 25 hours was estimated prior to the commencement of the program, and the 400 hours represents actual numbers since the website has been in operation. There has been no change to the information being collected.

**16. For collection 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.**

This information collection will not be published.

**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.**

CBP will display the expiration date for OMB approval of this information collection.

**18. Explain each exception to the certification statement identified in Item**

**19. "Certification for Paperwork Reduction Act Submissions".**

CBP does not request an exception to the certification of this information collection.

**19. Collection of Information Employing Statistical Methods**

No statistical methods were employed.