

Justification for Request for Non-Substantive Change to Information Services Forms - OMB Control No. 0625-0143

The Commercial Service (CS) is implementing an initiative to standardize its client in-take and registration system, streamline the forms used by clients to request export assistance and populate select forms with previously collected client data by March 2012. The CS is evaluating the collections in this package to prepare for both the organizational standardization and streamlining launch in March 2012 and the package renewal due by March 2012. Prior to finalizing and submitting the renewal package, the CS would like to implement minor changes to:

- Create a new “International Participation Agreement for Events” that is based upon the current Participation Agreement for Events.
 - The CS would use the “International Participation Agreement for Events” for international clients
 - The CS would continue to use the currently approved “Participation Agreement for Events” for domestic clients
- Change the name of the currently approved “Customized Services Form” to the “Client Information Form” and make minor revisions so that it will collect appropriate information from clients and serve as a major component of the CS’ standardization and streamlining initiative.
 - The Client Information Form is expected to replace or significantly streamline forms in this package (such as the “U.S. Commercial Service Company Questionnaire” which is used with the CS’ most requested matchmaking service) and in Internet Website forms 0625-0237 (such as the Preliminary Consultation Form).

The CS is proposing to make the following types of minor revisions to the forms:

- Addition of supplementary information and instructions
- Text revisions to improve clarity and appropriateness (such as revisions to make a form more appropriate for use by foreign firms)
- Translation of some English language forms into foreign languages
- Deletion of fields that are no longer needed
- Addition of limited new fields consistent with the intent of the approved form
- Moving the placement of questions to improve the organization and layout of a form

The CS would like to begin using the revised collections in mid-June to gain enough experience to finalize the renewal package by October 2011.

I. International Participation Agreement (PA) for Events Form

Overview

A Participation Agreement (PA) for Events is the vehicle by which individual firms agree to participate in ITA’s trade promotion programs, identify the products and/or services they intend to sell or promote, and record their required financial contribution to the Department of Commerce. The PA for Events asks clients to provide basic contact and company information so that CS staff have a basic understanding of the companies that will participate in specific trade promotion events and the ability to provide additional event information as appropriate. (A link for payment, 0625-0143, is associated with this collection and is used by clients to pay for the CS events they elect to participate in.)

The CS has been using the standard Participation Agreement (PA) for Events form for both domestic and foreign clients. The CS has found that minor changes to the PA for Events Form will make it easier to use and more applicable for foreign clients. Therefore the CS would like to use the currently approved Participation for Events Form for U.S. clients and an International Participation Agreement (PA) for Events for foreign clients. The minor changes are shown below.

Proposed Changes

Currently Approved Text	Proposed Changes	Explanation
State	Province	Text revision.
Zip Code*	Postal Code	Text revision. Field not mandatory.
Number of employees	*Number of employees	Mandatory field. Fee structure based on number of employees.
*Type of client	Type of client	Not mandatory.

Additionally, the CS plans to translate the International PA for Events Form into the following languages:

Arabic	French	Japanese	Spanish
Bulgarian	German	Korean	Thai
Chinese	Greek	Polish	Ukrainian
Croatian	Hebrew	Portuguese	Vietnamese
Czech	Hungarian	Romanian	Turkish
Dutch	Indonesian	Russian	
Finnish	Italian	Slovak	

Burden

There is no overall change in burden associated with the use of an International PA for Events form, as the number of foreign clients that use the International PA for Events form will be a subset of the 18,000 clients using the currently approved version. The time to complete forms will be 5 minutes and the total burden will remain at 999 hours.

II. Client Information Form

Overview

The Client Information Form solicits information about product/service details, expected outcomes and potential end users to enable CS staff to counsel clients, design export strategies and propose appropriate services.

The CS proposes to use the Client Information Form to follow-up with export-experienced firms that register on Export.gov and indicate permission to be contacted by a Federal Trade Promotion Agency. The Client Information Form will most often be completed by a CS Trade Specialist during discussions with the client, but in some instances portions may be completed electronically by the client.

The completed Client Information Form will be saved in the client's account and will be accessible to CS staff that is providing export assistance to the client. The form can therefore streamline or eliminate the need for some currently approved forms and reduce requests for duplicative client data. The data collected on the form will be updated as appropriate by either CS staff during client discussions or by the client.

Proposed Changes

Currently Approved Text	Proposed Changes	Explanation
Customized Services Form	Client Information Form (CIF)	Change form name
	<p>About this Form: Upon completion of this document, you are ready for a Trade Specialist to assist your company with its exporting needs.</p> <p>Your company will be registered as a U.S. and Foreign Commercial Service (CS) client. Your company's information will be entered into our CS database and this document will be attached to the organization record. The records will only be made available to CS and International Trade Administration staff that may subsequently assist you.</p> <p>About Commercial Service Assistance: The goal of CS assistance is to help you achieve export success. We expect you to report to CS any export sales and related agreements resulting from CS assistance.</p>	<p>Add explanatory text.</p>
Street Address, City, State, 9-Digit Zip Code, Fax, Company Web-site Address, Number of Employees, Total Sales, % of Sales from Exporting		Delete. Will be captured on Export.gov Client Registration Form 0625-0237.
	Company Information	New heading
	Number of years in business	New field.
Total Years Exporting	Number of years exporting	Text revision.

Does your firm have an international marketing plan? If no, does your company need assistance developing one?	Does your company have an international marketing plan?	Text revision.
Firms' objective to export (choose all that apply):	Company's objective(s) to exporting (choose all that apply):	Text revision.
Product Information/Readiness	Product Information	Text revision.
Product or service you wish to export:	What is the product or service you wish to export:	Text revision.
	Your industry NAIC Code:	New field.
	Is this product or service currently being sold in the U.S.?	New field.
Describe your product/service's benefits and unique features:	Describe your product/service's benefits and unique features (including IPR, ISO 9000 Certification):	Text revision
If not the manufacturer, does your firm have documented export rights to the product?	If not the manufacturer, does your firm have documented sales or distribution authorization for the product?	Text revision
Is the company's product sourced/produced entirely in the United States?		Delete. (Covered in supplemental document.)
If part of the product is sources/produced outside the United States, does U.S. content represent at least 51% of the value of the finished product?		
Is your company willing to modify its product to meet foreign standards (i.e. metric system, CE mark compliance with foreign government regulatory agencies, etc.)?		Delete. Not needed.
Can the company fill any new export orders from its present inventory?		Delete. Not needed.
If your company is working towards certification, in what year will this be completed?		Delete. Not needed.
Export Objective/Resources	Export Information	Text revision.
Does the product require any special technical support or after-sales service?	Does the product/service to be exported require any special technical support or after-sales service? If yes, please explain:	Text revision.

Does the product have patent/trademark/copyright registration in the United States?	Discuss intellectual property (IP). a. Have you registered IP (trademark, patent, design, or copyright) in the U.S.?	Text revision.
Will patent/trademark/copyright protection abroad be necessary for the product?	b. Have you inquired about IP requirements in foreign markets? If yes, please explain.	
What methods do you use to export in current markets:		Delete. Not needed.
If currently exporting, what are your company's international channels of distribution?	Which international distribution channels does your company currently use:	Text revision.
What promotional methods does your company use overseas:	Which international promotional methods does your company currently use:	Text revision.
How would you describe your firm's top management commitment to supporting export activities?		Delete. Not needed.
Does your firm have a domestic marketing plan?		Delete. Not needed.
What are the company's international sales objectives for the next 3 years (as percentage of total sales)?		Delete. Not needed.
What prompted your company to export?		Delete. Not needed.
Distribution Channels		Delete heading.
What domestic channels of distribution does your company employ?		Delete. Not needed.
Promotional Methods		Delete heading.
What promotional methods does your company use domestically?		Delete. Not needed.
	What is the outcome or result you expect to accomplish by working with the Commercial Service?	New field.
Additional information the Commercial Service should be aware of to fully understand your company and its requirements.	Please provide additional information the Commercial Service should be aware of to fully understand your company and its requirements.	Text revision.
What questions or export marketing issues would your company like to	Are there specific export issues that you would like to discuss? If so,	Text revision.

discuss with an International Trade Specialist? please describe.

Burden

There is no overall change in burden associated with the above revisions. The average time to complete the form will remain at 10 minutes and number of estimated annual respondents will stay at 3,120, therefore the burden will remain at 520 hours.

The annual cost burden has been adjusted for certain collections to correct errors.