

SUPPORTING STATEMENT
Application for Replacement of Northern Mariana Card

(Form I-777)

OMB No. 1615-0042

A. Justification:

1. Under 8 CFR 235.9, applicants may apply for a Northern Mariana identification card if they received U.S. citizenship pursuant to Public Law 94-241, Covenant to Establish a Commonwealth of the Northern Mariana Islands (CNMI).

2. An applicant may file Form I-777 to replace a CNMI identification card. During the 2-year period that ended July 1, 1990, USCIS issued original Northern Marianna Identification Cards to individuals who acquired U.S. citizenship through Public Law 94-241. These cards remain valid as evidence of U.S. citizenship. Although USCIS no longer issues these cards, a citizen to whom a card was previously issued may use this application to request replacement of a card that was lost, stolen, or damaged. USCIS will use the information collected to verify the applicant's status and to determine his or her eligibility for the benefit.

3. The use of this form provides the most efficient means for collecting and processing the required data. This form resides on the USCIS Web site and can be completed electronically. However, this form cannot be e-filed.

4. A review of the Forms Inventory Report revealed no duplication of effort, and there is no other similar information currently available that can be used for this purpose.
5. This collection does not have an impact on small businesses or other small entities.
6. If the information is not collected USCIS could not determine or verify an applicant's claim of eligibility for a replacement of a Northern Mariana identification card. Without this identification card, individuals from the Northern Mariana Islands would not have proof of U.S. citizenship and would not qualify or become eligible to apply for or receive certain U.S. benefits and privileges.
7. The special circumstances contained in item 7 of the supporting statement are not applicable to this information collection.
8. On May 18, 2011 USCIS published a 60-day notice in connection with this information collection in the Federal Register at 76 FR 28800. USCIS did not receive any comments in connection with this notice. On August 1, 2011 USCIS published a 30-day notice in the Federal Register at 76 FR 45845. USCIS has not received any comments in connection with this notice to the date.

9. USCIS does not provide payments or gifts to respondents in exchange for a benefit sought.

10. There is no assurance of confidentiality. The system of records notice associated with this information collection is the U.S. Citizenship and Immigration Services Benefits Information System, which was published in the Federal Register on September 29, 2008, at 73 FR 56596. The privacy impact assessment associated with this information collection is USCIS Benefits Processing of Applicants other than Petitions for Naturalization, Refugee Status, and Asylum.

11. There are no questions of a sensitive nature.

12. Annual Reporting Burden:
 - a. Number of Respondents 100
 - b. Number of Responses per Respondent 1
 - c. Total Annual Response 100
 - d. Hours per Response .50
 - e. Total Annual Reporting Burden Hours 50

Annual Reporting Burden

Total annual reporting burden hours are 50. This figure was derived by multiplying the number of respondents 100 x (1) frequency of response x .50 hours (30 minutes) per response.

The estimated annual public burden cost is \$1,537. This is based on the number of respondents 100 x (1) number of responses x .50 hours (30 minutes) per response x \$30.74 (average hourly rate).

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

For informational purposes, USCIS offers that there is an estimated annual fee cost is \$1,500. This estimate is based on the number of respondents 100 x \$15 fee charged.

14. Annualized Cost Analysis:

Printing Cost	\$ 20
Collecting and Processing	\$ 2,000
Total Cost to Government	\$ 2,020

Government Cost

The estimated annual cost to the Government is calculated by multiplying the estimated number of respondents 100 x (1) number of responses x .50 hours (30 minutes) per response x \$40 (Suggested average hourly rate for clerical, officer, and supervisory time with benefits). In addition, the cost includes estimated overhead cost for printing, stocking, distributing and processing of this form.

15. There has been no increase or decrease in the estimated annual burden hours previously reported for this information collection. There are no changes to the information being collected.
16. USCIS does not intend to employ the use of statistics or the publication thereof for this collection of information.
17. USCIS will display the expiration date in the information collection as required under OMB regulations.
18. USCIS does not request an exception to the certification of this information collection.

B. Collection of Information Employing Statistical Methods.

Not applicable.

C. Certification and Signature.

PAPERWORK CERTIFICATION

In submitting this request for OMB approval, I certify that the requirements of the Privacy Act and OMB directives have been complied with including paperwork regulations, statistical standards or directives, and any other information policy directives promulgated under 5 CFR 1320.

Sunday Aigbe,

Date

Chief,

Regulatory Products Division,

Office of the Executive Secretariat,

U.S. Citizenship and Immigration Services,

Department of Homeland Security.