

Supporting Statement for Paperwork Reduction Act Submissions EIB 11-04 Co-Financing with Foreign Export Credit Agency

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain information specified in Section A below. If an item is not applicable, provide a brief explanation. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

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 Export Import Bank of the United States (Ex-Im Bank) pursuant to the Export Import Bank Act of 1945, as amended (12 USC 635, et seq), facilitates the finance of export of U.S. goods and services. By neutralizing the effect of export credit insurance and guarantees offered by foreign governments and by absorbing credit risks that the private sector will not accept, Ex-Im Bank enables U.S. exporters to complete fairly in foreign markets on the basis of price and product. This collection of information is necessary, pursuant to 12 USC Sec. 635 (a) (1), to determine eligibility of the applicant for Ex-Im Bank assistance.

This form will enable Ex-Im Bank to identify the specific details of the proposed co-financing transaction between a U.S. Exporter, Ex-Im Bank, and a Foreign Export Credit Agency (ECA). These details are necessary for approving this unique transaction structure and coordinating the Bank's support with that of the ECA to ultimately complete the transaction.

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.

This collection will gather information necessary to make a determination of eligibility of a transaction for Ex-Im Bank assistance coordinating support with a foreign Export Credit Agency.

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 submissions 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.

These forms can be completed electronically and printed for submission.

4. Describe effort 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.

All applications are independent of each other; therefore this is no duplication since each application corresponds to a unique financing transaction.

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

The ability to complete the form electronic submission reduces the paperwork burden on small businesses and processing time for Ex-Im Bank.

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.

Not applicable.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner”
 - *requiring respondents to report information to the agency more often than quarterly;
 - *requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
 - *requiring respondents to submit more than an original and two copies of any document;
 - *in connection with a statistical survey, that is not designed to produce valid or reliable results that can be generalized to the universe of study;
 - *requiring the use of statistical data classification that has not been reviewed and approved by OMB;
 - *that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
 - *requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information’s confidentiality to the extent permitted by law.

This collection is consistent with 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 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.

No comments were received

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

Not applicable.

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

Ex-Im Bank and its officers and employees are subject to the Trade Secrets Act, 19 USC Sec 1905, which requires Ex-Im Bank to protect confidential business and commercial information from disclosure., as well as, 12 CFR 404.1, which provides that, except as required by law, Ex-Im Bank will not disclose information provided in confidence without the submitter's consent.

11. Provide additional justification for any question of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered provides. This justification should include the reasons why the agency considered 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.

Not applicable.

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

* number of respondents: 60;

* frequency of response: Occasion

*annual hour burden: 15 hours;

*an explanation of how the burden was estimated:

from time to time staff complete a "sample" application form for use in system testing, training, etc. The time it takes for staff to fill out the application form is about 15 minutes. For burden calculation purposes, we assumed that it would take on average 15 minutes for respondents to complete the application.

13. Provide an estimate for the total annual cost burden to respondents or records keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in items 12 and 14).

Not applicable

14. Provide estimates of annualized costs to the Federal government.

Reviewing time per hour:	15 minutes
Responses per year:	60
Reviewing time per year:	15 hours
Average Wages per hour:	\$30.25
Average cost per year: (time * wages)	\$453.75
Benefits and overhead:	28%
Total Government Cost:	\$580.80

Explain the reasons for any program changes or adjusted reported in items 13 or 14 of OMB from 83-1.

Ex-Im Bank is requesting an emergency approval for form EIB 11-04, Application for Co-Financing with Foreign Export Credit Agency because the Bank has been using this form for several years without OMB approval. The co-financing option program has recently become popular and is an absolutely essential offering for Ex-Im Bank customers.

Ex-Im Bank developed the referenced form in order to be able to identify the specific details of the proposed co-financing transaction between a U.S. exporter, Ex-Im Bank, and a foreign export credit agency; the information collected includes vital facts such as the amount of U.S.-made content in the export, the amount of financing requested from Ex-Im Bank, and the proposed financing amount from the foreign export credit agency. These details are necessary for approving this unique transaction structure and coordinating our support with that of the foreign export credit agency to ultimately complete the transaction and support U.S. exports – and U.S. jobs.

Lack of an emergency approval of this form would prevent the collection of the necessary information and make it impossible to process transactions of this type. This would significantly disrupt Ex-Im Bank's ability to fulfill its mission to support U.S. exports and maintain U.S. jobs, as many co-financing transactions are in support of very large U.S. exports that sustain many U.S. jobs. As an example, having just successfully delivered the first Boeing 787 Dreamliner airplane to a foreign customer, Boeing hopes to export more 787 airplanes to Ex-Im Bank customers. Very high demand for the new airplane will enable Boeing to maintain its production line and support numerous U.S. workers as more 787s are built. However, the 787 cannot be fully financed without the co-financing structure offered by Ex-Im Bank. Without the ability to identify the details of the required co-financing structure, Ex-Im Bank will not be able to fully support these types of large-scale export transactions. This will likely result in reduced U.S. exports and fewer U.S. jobs supported by export transactions, which is counter to Ex-Im Bank's mission and purpose.

Accordingly, Ex-Im Bank deems emergency approval of EIB 11-04 entirely necessary for the continuation of vital Bank transactions.

15. 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.

Not applicable

B. Collection of Information Employing Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on OMB Form 83-1 is checked, "Yes" the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

Statistical methods are not used in this information collection.