

**SUPPORTING STATEMENT
U.S. Department of Commerce
International Trade Administration
Trade Fair Certification Program Application
OMB CONTROL NO. 0625-0130**

A. JUSTIFICATION

This is to request an extension/revision of the Office of Management and Budget approval.

1. Explain the circumstances that make the collection of information necessary.

The U.S. Department of Commerce's Trade Fair Certification (TFC) Program provides the Department's endorsement and support for private-sector recruited and organized foreign trade fairs. Certifying a trade fair means Commerce endorses a qualified trade fair as a proven opportunity to promote exports. Certification also provides endorsement of the U.S. fair organizer or agent as a reliable firm capable of effectively organizing and managing a U.S. pavilion or trade fair. The Program emphases are on obtaining greater numerical participation by U.S. new-to-export (NTE) and new-to-market (NTM) firms in the Certified Trade Fairs and increasing the percentage of NTE and NTM firms. The TFC Program has supported more than 1,100 trade fairs since 1988. Thousands of U.S. firms and scores of fair organizers have participated in this Program and approximately 110 trade fairs are currently certified annually.

The requested revision will add three questions and price increase information:

16. Is the overall show audited by an official or professional trade show authority or an accredited media audit organization? (For instance, in the U.S., this would be an audit firm recognized by the Exhibition and Event Industry Audit Commission.). If yes, please indicate which one(s) or include a copy of the last report.

JUSTIFICATION – Many events are audited Exhibition Industry Associations, such as the Global Association of the Exhibition Industry. The bottom line is that the applicant responds either YES or NO. This adds negligible time to filling out the application.

24. Indicate what Intellectual Property Rights (IPR) protection and/or IPR policies and procedures are available from the show owner/organizer for exhibitors at the show.

JUSTIFICATION – This question was added to the application in a response to the concerns of many U.S. industry associations that many exhibitions were not addressing the very sensitive issue of IPR infringement. Almost all exhibitions now have and IPR policy which they include as an attachment to the application.

25. Provide a copy of the rules/regulations for U.S. exhibitors and a copy of the show owner/organizer rules/regulations for all exhibitors. If you are both the U.S. pavilion organizer and the show owner/organizer, one set of rules/regulations for all exhibitors is sufficient.

JUSTIFICATION – Pavilions are either organized by the actual show organizer in which one set of rules are sufficient. When the pavilion is organized by a consolidator who purchases a block of exhibit space from the show, the consolidator usually issues their own set of rules and regulations which should be in compliance with the rules of the show organizer. Consolidators must be in compliance with show owner rules.

26. Acknowledge that if certification is granted, applicant will contribute \$2,000 (NON- REFUNDABLE) to the Department to cover general expenses by the Department on behalf of this application review and specific support services in the field on behalf of this project. (Cost was \$1,750)

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

The information will be collected by the Manager of the Trade Fair Certification Program by submission of a completed application (Form ITA-4100P) for each event an organizer wishes to have considered for certification. The respondent is required to type the information requested (questions and responses) on company letterhead and mail to ITA. The information will be used to evaluate and select viable applicants for organizing and managing a U.S. pavilion at a trade fair. The appropriate ITA units make a recommendation to accept or deny the application.

The information collected will not be disseminated to the public.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

ITA's Office of the Chief Information Officer (OCIO) has determined that it is capable of making the form available electronically and will do so once the form is approved. Electronic submission of the form is not acceptable because a signed application is required.

4. Describe efforts to identify duplication.

This type of information is not available from other sources. It is unique to each trade fair.

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

The amount of information requested has been reduced to the minimum necessary to evaluate viable applications. Qualified respondents should have the required experience and abilities needed to fulfill the requests in the notice. Information reporting requirements are not difficult for a bona fide applicant to complete. All organizers, large or small, develop this information for each show, whether or not they apply for certification.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

Without this information, it would not be possible for ITA to determine if the trade fair would warrant endorsement and support of the DOC under the terms of the TFC Program.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

The collection will be conducted in a manner consistent with the Paperwork Reduction Act guidelines.

8. Provide a copy of the PRA Federal Register notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the 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.

There were no comments received from the public in response to the August 30, 2011, Federal Register Notice (Volume 76, pg. 53882).

Based upon ITA's experience in working with the private sector in its Trade Fair Certification Program, ITA has been able to obtain ongoing private sector input with regard to this collection of information. The application has been discussed at trade fair organizer conferences and no

problems associated with the application were identified by the conference attendees or in feedback from applicants.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

Not applicable.

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

The information collected will remain business confidential and will be used only by ITA staff in assessing the applicants' abilities, experience and needs. As a general agency policy, proprietary company information is kept confidential within the strictures of all applicable law. Respondents are advised that except to the extent required by law, no information of proprietary nature reported on form ITA-4100P will be disclosed without the prior written consent of the relevant firm.

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.

No questions of a sensitive nature are asked.

12. Provide an estimate in hours of the burden of the collection of information.

ITA expects to receive approximately 120 applications annually. It is estimated that a respondent will spend three hours, no additional burden for the new questions, to complete the Application for Status, for a total of **360 hours**.

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in #12 above).

The estimated annual cost burden to respondents is \$2,160 for courier delivery.

$$\text{\$18} \times 120 = \text{\$2,160}$$

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

To determine costs, a salary of \$40 per hour was used. It is estimated that it will take three hours to review and decide upon each application. The cost to the Federal Government is estimated as follows:

Review and process applications: 3 reviewers (1 hour from each ITA reviewing unit: U.S. and Foreign Commercial Service overseas post, Global Trade Programs and Manufacturing and Services)

$$120 \text{ applications} \times 3 \text{ hours} \times \$40/\text{hr.} = \$ 14,400$$

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

Not applicable.

16. For collections whose results will be published, outline the plans for tabulation and publication.

Not applicable.

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

Not applicable.

18. Explain each exception to the certification statement.

Not applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection of information does not employ statistical methodologies.

LEGAL AUTHORITY: Public Law 15 U.S.C. 171 et seq.