

**Department of the Treasury
Bureau of Engraving and Printing
Request for Emergency Processing and Approval, Supporting Statement
Collection of Information At CSUN Conference on Disabilities**

Emergency Justification Request for Outreach Activities

The Department of the Treasury (“Treasury”), on behalf of itself and the Bureau of Engraving and Printing (“BEP”), respectfully requests emergency processing and approval for a collection of information to be taken during an outreach effort at the California State University Northridge (“CSUN”) Annual International Technology and Persons with Disabilities Conference, scheduled from February 27 – March 3, 2012. An Emergency Processing and Approval request is submitted because normal clearance procedures are reasonably likely to prevent or disrupt the collection of information.

Background

Some background about BEP, the currency design and production process, and meaningful access is helpful in explaining the basis for this request.

1. Overview of Currency Design and Production Process

The Secretary of the Treasury has the authority to engrave and print United States paper currency. *See* 31 U.S.C. secs. 5115(a)(2), 5114(a)(1). As such, the Secretary has authority to approve any new designs of United States paper currency, which is issued in the form of Federal Reserve Notes. *See id.* Engraving and printing United States paper currency is carried out within the Department of the Treasury, specifically by the Bureau of Engraving and Printing. *Id.*

Though the Secretary of the Treasury approves the final design of United States paper currency the process for developing that design involves a number of different agencies, including the following:

- The Federal Reserve Board of Governors (“FRB”), which purchases Federal Reserve notes from the BEP for distribution through the Federal Reserve System;
- The Currency Technology Office (“CTO”), based at the Federal Reserve Bank of Richmond, which focuses on the automation of physical currency handling, the high-speed processing environment, and financial and administrative support for System-level currency processing.
- The United States Secret Service (“USSS”), which safeguards the payment and financial systems of the United States by enforcing counterfeiting statutes to preserve the integrity of United States currency, coin and financial obligations.

These agencies participate in an Advanced Counterfeit Deterrence Steering Committee (“ACD”). The ACD was formed in 1982 to coordinate the counterfeit deterrence activities of the

various government agencies involved with United States currency. The steering committee is comprised of senior executives from the Treasury, BEP, the FRB, the CTO, and the USSS.

The agencies also participate in an Interagency Currency Design Group (“ICD”). The ICD was established by the ACD to provide guidance on design and other subjects related to new currency. The ICD includes members from BEP, FRB, the CTO, and the United States Secret Service.

BEP, which is tasked with developing the design of currency, presents design features for review and discussion by members of the ICD. After the ICD has arrived at agreement on a particular design feature, that feature is recommended for approval by the ACD. After further discussion, if the ACD approves a design feature, the feature is then presented to the Secretary of the Treasury, who determines whether to approve the new design.

2. Ordering Process

After a currency design is approved by the Secretary of the Treasury, it is included in the production order that FRB places with the BEP every year. The FRB’s order specifies how many notes of which denomination are to be produced, and to which of the 12 regional Federal Reserve Banks the notes are to be delivered.

Based on FRB’s order, BEP plans its production schedule and allocates resources as necessary between its printing facilities in Washington, DC and Ft. Worth, TX.

3. Efforts to Provide Meaningful Access to Currency for Blind and Visually Impaired Persons

A key aspect of the current United States paper currency design and production process is how to ensure that members of the blind and VI community have meaningful access to denominate U.S. paper currency.

Among earlier efforts to explore meaningful access was a BEP-sponsored study undertaken by the National Research Council in 1995. *See* National Research Council, 1995, *Currency Features for Visually Impaired People*. National Materials Advisory Board, NRC, Washington, DC: National Academy Press, ISBN 0-309-05194-0. This study recommended that any future implementation consider input from the blind and visually impaired (“VI”) community, economic impacts, and the potential for future technical developments that could occur. *See Final Report: Study to Address Options for Enabling the Blind and Visually Impaired Community to Denominate U.S. Currency (“ARINC Study”)* ARINC Engineering Services, LLC, Attachment (“Attach.”) 1, at 9.

4. American Counsel of the Blind Lawsuit

The efforts of BEP and Treasury to provide meaningful access were accelerated by a lawsuit brought by the American Council of the Blind (“ACB”). In May 2002, the ACB and two visually impaired individuals filed a complaint in the U.S. District Court for the District of

Columbia alleging that the currency of the United States violates the rights of the blind and visually impaired under the Rehabilitation Act because they could not denominate United States paper currency.

In October 2008, the District Court ruled that the Department of the Treasury must provide meaningful access to U.S. currency for blind and other visually impaired persons in the next currency redesign. *See American Council of the Blind v. Paulson* (“ACB v. Paulson”), 591 F. Supp. 2d 1 (D.D.C. 2008), Attach. 2. Specifically, the court ordered that the Secretary of the Treasury must

take such steps as may be required to provide meaningful access to United States currency for blind and other visually impaired persons, which steps shall be completed, in connection with each denomination of currency, not later than the date when a redesign of that denomination is next approved by the Secretary of the Treasury after the entry of this order and judgment.

*Id.*¹

5. *ARINC Study*

Following the court’s decision, BEP contracted with ARINC Engineering Services, LLC (“ARINC”) to conduct a study for purposes of evaluating options for enabling the blind and VI community to denominate U.S. paper currency. As part of the study, ARINC and its team:

- Gathered and analyzed data on the demographic, statistical, and other aspects of the blind and VI population of the U.S.
- Conducted focus group discussions and surveys to assess the needs of the U.S. blind and VI population with respect to identification of U.S. currency denominations.
- Researched currency from countries that have implemented accommodations to meet the needs of the blind and VI to independently denominate currency.
- Conducted one-on-one usability tests to determine how well available accessibility accommodations meet the needs of the blind and VI participants.
- Performed cost and benefit analyses of a group of accommodations (selected by the BEP). The benefit analyses considered the relative effectiveness of the selected accommodations in assisting various segments of the blind and VI

¹ The Order expressly “does not require the defendant to make any changes to the one dollar (\$1) note,” “does not apply to changing the Series year or the signatures of the Secretary of the Treasury or the Treasurer of the United States on each note,” nor does it require “changing the machine-readable features on the notes that are not visible to the naked eye.” *ACB v. Paulson*, Attach. 2, at 1-2. Further because at the time the “defendant is currently engaged in implementing a redesign of the \$100 note (“the NexGen \$100”), the defendant need not comply with [the Order] in connection with the NexGen \$100 note until the date when another redesign of such denomination is next approved by the Secretary of the Treasury after the redesign that is currently in progress.” *Id.*

population. The cost analyses included operational and technical impacts, and costs to government and industry organizations that manufacture, process, or handle U.S. currency.

- Adapted a decision model to facilitate comparison of currency-related accommodations for the blind and VI. The decision model criteria included provisions for a variety of considerations ranging from functionality of devices to how well the accommodation performs in key usability scenarios for an individual user.
- Customized and updated the decision model to include the cost and subjective aspects of the alternative accommodations.

ARINC Study, Attach. 1, at 1. The ARINC Study provided findings for a number of potential accommodations for blind and VI persons. They included:

- Color, contrast, and note design features focusing on improving note recognition by the VI population in an arm's length transaction scenario. *ARINC Study*, Attach. 1, at 3.
- Evaluating note size variation as a way to identify currency denominations (e.g., sizing one particular denomination differently from another particular denomination). *Id.* at 4.
- Evaluating tactile features, e.g., raised dots on each note, as a means of denominating different denominations. *Id.* at 4-5.
- Evaluating currency reader devices, e.g., hand-held devices that could be used to scan individual Federal Reserve notes and indicate the appropriate denomination. *Id.* at 5.

6. *Public Notice and Comment*

In May 2010, the Department of the Treasury and BEP issued a Notice of proposed agency action and request for public comments related to meaningful access efforts. *See* 75 Fed. Reg. 28,331 (May 20, 2010), Attach. 3, Tab 4. The Notice was issued to “inform the public of the features that BEP intends to propose to the Secretary of the Treasury to accommodate people who are blind and visually impaired in denominating U.S. currency, and to solicit public comment on the proposed accommodations.”

BEP's recommendations included:

- **Tactile Feature.** BEP proposed to develop and deploy a raised tactile feature that builds upon current tactile feature technologies. The tactile feature will be unique to each Federal Reserve note denomination that it may lawfully change, and will provide users with a means of identifying each denomination by way of touch.

- Large, High-Contrast Numerals. BEP proposed that consistent with its current practice, it would continue to add large, high-contrast numerals and different and distinct color schemes to each denomination that it is permitted by law to alter to further assist visually impaired citizens.
- Supplemental Currency Reader Program. BEP recommended a currency reader program as a supplemental measure to be taken to provide access to U.S. currency. This program would involve a process to loan and distribute currency readers to the blind and visually impaired at no cost to them. The program was intended by BEP to ameliorate difficulties stemming from the transition that will occur during the co-circulation of notes with and without a tactile feature and large, high contrast numerals, a transition which will persist for many years after the introduction of the tactile-enhanced note.

See id.

After considering the ARINC Study and public comments, BEP recommended that the Secretary of the Treasury approve the measures set forth above – tactile features, large, high-contrast numerals, and a supplemental currency reader program – to provide meaningful access to United States paper currency for the blind and VI community. On May 31, 2011, the Secretary of the Treasury approved the BEP’s recommendations. *See Action Memo, Attach. 4, at 2.*

7. *BEP Outreach*

In light of the Secretary’s approval, BEP has undertaken significant outreach efforts as part of its initiative to provide meaningful access to United States paper currency for the blind and VI community. Many of BEP’s outreach efforts involve communicating directly with national organizations whose constituencies have an interest in the redesign of United States paper currency to provide for meaningful access. This obviously involves the ACB and other organizations that aim to advocate for and support members of the blind and VI community. There are other national organizations, however, with which BEP coordinates. These are industry associations whose members deal with United States currency on a daily basis; associations such as armored car operators, and vending machine and cash machine manufacturers. Any change to United States paper currency will affect those member associations. The BEP, therefore, aims to keep all interested constituencies apprised of its efforts to provide meaningful access. Many of BEP’s outreach efforts take place at annual conventions and gatherings of these interested organizations. For example, in 2011, BEP representatives attended conferences hosted by the following organizations:

- The 11th Annual Josephine L. Taylor Leadership Institute Conference, Seattle, WA. The Josephine L. Taylor Leadership Institute, sponsored by the American Foundation for the Blind, aims to improve the quality of programs and services to blind and visually impaired children and adults.

- International Technology & Persons with Disabilities (CSUN) Conference. The CSUN Conference, which is held by the California State University, Northridge, provides a setting for researchers, practitioners, exhibitors, end users, speakers, and other participants to share knowledge and best practices in the field of assistive technology. The 2011 Conference drew more than 4,800 attendees.
- National Council of State Agencies for the Blind (NCSAB) Spring Conference. The NCSAB is a forum for state agencies to study, deliberate, and act on matters affecting rehabilitation and other services for individuals who are blind or visually impaired.
- National Automatic Merchandising Association (NAMA) conference. The NAMA is an industry association that serves the vending, coffee service, and foodservice management industries. Interested attendees had the opportunity to get information about BEP's efforts to redesign United States paper currency to provide for meaningful access.
- Independent Armored Car Operators Association (IACOA) Annual Conference. The IACOA includes privately owned armored car companies that participate in the Cash In Transit Industry. Armored car companies are among the constituencies that can be affected by redesigns of United States paper currency. IACOA Conference attendees, therefore, were able to obtain information about BEP's latest currency redesign efforts to provide for meaningful access.
- National Federation of the Blind (NFB) Summer Convention. The NFB is a 50,000 member organization with a mission to improve the lives of blind people through advocacy, education, research, technology, and developing programs to encourage independence and self-confidence.
- American Council of the Blind (ACB) Summer Convention. The ACB is a nationwide organization of blind, visually impaired, and sighted individuals who work toward independence, security, equality of opportunity, and improved quality of life for blind and VI individuals.
- Blinded Veteran Association (BVA) National Conference. The BVA, established by a Congressional charter in 1958, is an association for blind and visually impaired veterans that assists veterans and their families meet and address the challenges of blindness.

To date, BEP's outreach efforts have involved discussion of the progress BEP has made in planning for and designing United States paper currency to provide meaningful access. In many instances, BEP representatives have been able to demonstrate sample currency designs at the various conventions and conferences. The sample currency designs incorporate tactile features that BEP is considering for use in its next currency redesign. By allowing conference attendees, particularly blind and VI attendees, to feel the tactile features, BEP has been able to help members of this important constituency feel engaged in the process to provide meaningful access to United States paper currency.

Upcoming Information Collection at CSUN Conference

The 2012 CSUN Conference will be held between February 27 and March 3 in San Diego, CA. BEP would like to send representatives to the Conference in order to show sample tactile features to any interested Conference attendees.

During this round of outreach, BEP would like to obtain qualitative feedback from Conference attendees. BEP would like to provide different sample tactile features to interested Conference attendees, and obtain from the attendees their thoughts about and reactions to the tactile features. This type of feedback will allow BEP to consider the types of responses to a set of tactile features it is considering for incorporation into the redesigned currency.

The information to be gathered will not be used by BEP to arrive at one particular tactile feature to be used in the next currency redesign. The feedback sought at the CSUN Conference will be one of a number of outreach efforts BEP is planning for 2012. Other BEP feedback efforts will be captured in subsequent requests for generic clearance under the Paperwork Reduction Act.

The qualitative feedback received from CSUN Conference attendees will, however, be used to help BEP narrow down the range of designs and materials into a manageable set of final designs that can be tested against a representative sample of the blind and VI community.

Emergency clearance, therefore, is needed for a collection of information from approximately 65 interested blind and visually impaired attendees at the CSUN Conference. The clearance will allow BEP to set up a booth at the CSUN Conference, inform any interested Conference attendees about tactile features it is considering for inclusion in future currency designs, and obtain qualitative feedback from them about the effectiveness of some sample tactile features. The CSUN Conference will take place between February 27 and March 3, 2012 in San Diego, CA.

Department of the Treasury
Bureau of Engraving and Printing
Request for Emergency Processing and Approval, Supporting Statement
Collection of Information At CSUN Conference on Disabilities

A. JUSTIFICATION

(1) Circumstances Necessitating the Data Collection

A court order was issued in *American Council of the Blind v. Paulson*, 591 F. Supp. 2d 1 (D.D.C. 2008), requiring the Department of the Treasury to “provide meaningful access to United States currency for blind and other visually impaired persons, which steps shall be completed, in connection with each denomination of currency, not later than the date when a redesign of that denomination is next approved by the Secretary of the Treasury” *Id.* See Order, Attach. 2 at 1. The Department is also obligated to “file periodic status reports describing the steps taken to implement this Order and Judgment.” *Id.* Under terms of the Order, the Department must file status reports every six months until it has fully complied with the Order.

On May 31, 2011, the Secretary of the Treasury approved implementation of three accommodations; among them will be the addition of a tactile feature to Federal Reserve notes, to be “introduced in the next currency redesign”. See Action Memo, Attach. 4, at 2. This data collection will help the BEP in its efforts to develop an effective tactile feature for use in the next currency redesign. This, in turn, will help the Department of the Treasury satisfy the requirements of the Order.

(2) Use of Information

How will the information be collected?

BEP is seeking to engage in outreach with the blind and visually impaired community in order to share information about some tactile features it is considering for inclusion in its next U.S. paper currency redesign. Part of that outreach involves asking questions of blind and visually impaired persons about the effectiveness of sample tactile features. One way to reach certain members of the blind and visually impaired community is through attending conferences attended by blind and visually impaired persons. One such conference is the CSUN Conference, a national conference which features sessions for persons who are blind or visually impaired. The BEP intends to send personnel to this year’s CSUN Conference, scheduled to take place between February 27 and March 3, and set up an information booth in the exhibit hall at the Conference.

Any interested Conference attendees can come to BEP’s booth and learn about BEP’s efforts to develop tactile features for incorporation into future currency designs. BEP personnel will have available sample coupons with tactile features that interested persons may feel in order to better understand the types of features under consideration. The sample coupons have the same size and feel as U.S. paper currency, but are either printed with generic images or unprinted and include a clear, transparent, raised tactile feature.

The BEP will ask any blind and visually impaired visitors to its booth if they would like to respond to questions about the tactile features. If a blind and visually impaired visitor is interested in providing feedback, a BEP employee manning the booth will ask the visitor individual questions orally, and note the visitor's responses.

Information to Be Collected

A respondent will be presented with a series of sample coupons and asked to indicate whether they felt it was very easy, easy, or difficult to find and count tactile features. A copy of the script of outreach questions to be used by BEP at the CSUN Conference is included as Attachment 5. See Script for Outreach Questions at CSUN Conference on Disabilities ("CSUN Conference Script"), Attach. 5.

1. Perception of tactile features:
 - a. A participant will be presented with distinct sets of sample coupons. Each set of coupons will have a separate, unique, proprietary material applied on a portion of the coupon's surface creating a tactile feature that can be sensed by touch.
 - b. Each coupon has raised tactile symbols and raised tactile numerals applied on the surface of the coupon.
 - c. BEP personnel will first present the respondent a demonstration coupon to demonstrate the style and position of the raised tactile feature being presented. The respondent will then be given a set of samples, one at a time, and asked to locate and determine the number of raised tactile elements present on each sample. The respondent will then be asked to describe whether it was very easy, easy, or difficult to find and count the tactile elements, and explain what he or she believed to be good or bad about the sample. As indicated above, additional details about the sample coupons and outreach questions are available in the attached script. See CSUN Conference Script, Attach. 5.

By whom will the information collection be administered?

Information will be collected by one of the following BEP personnel attending the CSUN Conference:

Douglas Bernia
Position: Project Manager, BEP Office of Product Development
Phone: 202-874-2039

Sabra Pressman
Position: Program Manager, BEP Office of External Relations
Phone: 202-874-6608

(3) Use of Information Technology

This is a limited collection of information from an estimated 65 blind and visually impaired individuals. Automated, electronic, mechanical, or other technological collection techniques or other forms of information technology will not be used for purposes of collecting this information.

A BEP employee will ask each respondent questions as detailed above. The responses will be provided orally; the oral responses will be recorded on paper by the BEP employee.

(4) Efforts to Identify Duplication

No similar information already available can be used or modified for the purposes of this information collection. The questions are being asked about specific tactile features that are in the process of design and development. As such, there is no similar information available that will help the BEP assess the efficacy of the particular samples that it plans to test.

The BEP had researched to ascertain if any testing or information collections had been performed earlier, and which might be able to be used for its present purposes. Some acuity testing has been performed. Earlier acuity testing, however, cannot be used for the BEP's present purposes because the BEP will be asking for feedback about specific sample tactile features which are being considered for incorporation into U.S. currency. Previous tests involved samples and features different from those being contemplated for use in United States currency designs.

(5) Impact on Small Entities

The data collection is not anticipated to burden small entities.

(6) Consequences of Less Frequent Collection and Obstacles to Burden Reduction

Consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently.

The best chance BEP has of engaging in outreach and asking questions of blind and visually impaired persons is to meet with them directly at national conferences such as the CSUN Conference. These are initial collections aimed at communicating to the blind and visually impaired community that BEP is working to provide them meaningful access to currency. BEP's outreach efforts also provide a chance to ask questions about some of the variety of tactile features it is considering. This may help narrow down the range of features that BEP may consider for future testing. The feedback from CSUN Conference attendees, along with feedback that BEP will seek to obtain through other information collections (for which BEP will seek approval under the Paperwork Reduction Act) is crucial to the BEP's goal of providing meaningful access to U.S. paper currency for blind and visually impaired persons.

The inability of BEP to collect this information means that BEP will have less direct input from the community of individuals for whom tactile features are being developed, blind and visually impaired persons.

The CSUN Conference represents a one-time information collection. Future efforts to obtain information from blind and visually impaired visitors to national conferences will be addressed in generic clearance requests to be submitted by BEP through the Department of the Treasury.

(7) Circumstances Requiring Special Information Collection

There are no special circumstances involved in this information collection. The testing is not a statistical survey, nor does it require the use of a statistical data classification.

(8) Solicitation of Comments on Information Collection

The BEP is requesting that the Office of Management and Budget (“OMB”) review this information collection request under emergency clearance procedures. There is not sufficient time to seek public comment on this information collection.

The BEP, however, in 2010 solicited and accepted comments on the means by which blind and visually impaired persons could be provided meaningful access to United States currency. A copy of the Federal Reserve notice is attached. *See* 75 Fed. Reg. 28,331 (May 20, 2010), Attach. 3, Tab 4.

Further, BEP has published a 60-day Federal Register notice providing details of future information collection efforts that will be similar to this collection. *See* 77 Fed. Reg. 4,626 (Jan. 30, 2012), Attach. 6. That will help BEP consider feedback from the public with regard to its information collection activities at national conferences.

(9) Payment or Gift to Respondents, Other Than Remuneration of Contractors or Grantees

Respondents will not be receiving payments or gifts for their feedback.

(10) Assurance of Confidentiality

Participants will be informed:

1. Why the information is being collected;
2. How the information provided during the testing will be used;
3. The burden estimated by the BEP; (approximately 10 to 15 minutes per participant)
4. The nature of their response, which in this case will be voluntary;
5. The nature and extent of confidentiality, which in this case will be maintained by BEP as nonpublic information. Respondents will be informed, however, that the information provided will be subject to disclosure under the Freedom of Information Act.

6. Further, participants will be notified of BEP’s need to display or otherwise inform them of a currently valid OMB control number. To the extent that number is available as a result of the emergency approval, it will be provided.

More detail is available in the attached script. See CSUN Conference Script, Attach. 5, at 2. The BEP will not ask a participant for his or her name, address, phone number, social security number, or for any other information that may be personally identifiable.

(11) Justification of Sensitive Questions

The BEP will not be asking sensitive questions.

(12) Estimated Burden of Information Collection

Type of Intake	Estimated Number of Respondents	Estimated Number of Intakes per Respondent	Average Burden Hours per Intake	Estimated Total Annual Burden Hours Requested
In-Person Questions	65	1	10 - 15minutes	16.25 hours

The burden hours are calculated based upon the following:

BEP commissioned a comprehensive acuity study in late 2011 in which blind and visually impaired persons evaluated samples and answered questions about various tactile features BEP is considering for inclusion in future U.S. paper currency designs. Though that information collection was disapproved, BEP learned that the average time to obtain feedback from participants in the acuity study was approximately 60 minutes. BEP is using that information to estimate the time for responding to questions during the CSUN Conference.

As part of its outreach efforts, BEP sent employees to conferences in 2011 to share information about its efforts to ensure meaningful access to U.S. paper currency. The BEP had approximately 62 visitors to its booth at the 2011 CSUN Conference. Based on that total, BEP has estimated about 65 visitors at this year’s CSUN Conference.

(13) Estimated Total Annual Cost Burden to Respondents

There will be no annualized capital or start-up costs for the respondents to collect and submit this information.

(14) Estimated Cost to the Federal Government

The BEP anticipates incurring minimal cost in the collection of this information. Sample coupons were manufactured in conjunction with development activities associated with the overall project to develop and evaluate a variety of designs of raised tactile features. The actual cost associated with producing individual samples has not been captured. Even if BEP

employees are not allowed to collect information, they will be attending the CSUN Conference to provide information to visitors about meaningful access efforts. Thus, the time and expense undertaken by BEP to send its employees to the CSUN Conference is not attributable to this collection of information.

(15) Reasons for Change in Burden

Not applicable. This information collection is part of a new program.

(16) Plans for Tabulation, Statistical Analysis, and Publication

Publication and Tabulation

The BEP is not publishing results of this information collection. The results may be shared with BEP's stakeholders as part of the process of considering tactile features for incorporation into future currency designs. The information is meant to be interpreted only in light of a small pool of respondents estimated to be 65 in number.

The information will give BEP and its stakeholders basic ideas of the effectiveness of tactile features developed to date. The stakeholders who will work with the BEP in reviewing the information collection include: The Department of the Treasury, the Federal Reserve Board of Governors, the Currency Technology Office, the United States Secret Service, and the Central Bank Cash Machine Group ("CBCMG"), a consortium comprised of BEP, its stakeholders, other central banks throughout the world, and member of banknote equipment manufacturing industry; the CBCMG discuss issues pertaining to the handling and processing of U.S. paper currency and other currencies throughout the world.

Statistical Analysis

Complex analytical techniques will not be employed in this outreach effort. BEP may provide basic, descriptive statistics about the numbers and the nature of responses received from respondents (e.g., what percentage of respondents stated a preference for one particular tactile feature over another). No statistical analysis, however, will be utilized to extrapolate the results of this information collection to a broader population of blind and visually impaired persons.

(17) Reasons Why Displaying the OMB Expiration Date is Inappropriate

Not applicable. The expiration date for OMB approval will be displayed on any form utilized for the information collection.

(18) Exceptions to Certification Requirement of OMB Form 83-I

Not applicable. The BEP is not requesting any exceptions to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act Submissions".

