

SUPPORTING STATEMENT
U.S. Department of Commerce
International Trade Administration
Market Research to Broaden and Deepen U.S. Exporter Base
OMB CONTROL NO. 0625-0264

A. Justification

This request is to extend the approval of this information collection.

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

Expanding U.S. exports is a national priority essential to improving U.S. trade performance. The Department of Commerce (DOC) International Trade Administration (ITA) U.S. Commercial Service (CS) serves as the key U.S. government agency responsible for promoting exports of goods and services from the United States, particularly by small and medium-sized enterprises, and assisting U.S. exporters in their dealings with foreign governments.

Section 4721 of 15 United States Code contains several provisions that direct the CS to, “identify United States businesses with the potential to export goods and services and provide such businesses with advice and information on establishing export businesses.” As such, the long-term performance goal of the CS is to, “broaden and deepen the U.S. exporter base.”

CS uses the following four surveys to conduct market research on prospective and existing U.S. exporters:

1. **Commercial Service Brand Analysis and Strategy Survey** (Form ITA–4158): To meet the program performance goal of broadening and deepening the U.S. exporter base, the CS must increase awareness of our organization and the services we provide to U.S. companies. Currently, there is limited research available about CS awareness and brand position. This survey was designed to measure four new performance metrics (awareness, consideration, transaction and loyalty) related to broadening and deepening the U.S. exporter base.
2. **Market Segmentation Survey of Moderate U.S. Exporters – Manufacturers** (Form ITA–4159): To meet the program performance goal of broadening and deepening the U.S. exporter base, the CS must continue to gain market knowledge and generate statistically valid characterizations about the needs of exporting companies, especially small and medium-sized enterprises. This survey was designed to identify different segments of U.S. manufacturers so that the organization can measure our ability to broaden and deepen the exporter base of each unique segment.
3. **Market Segmentation Survey of U.S. Exporters – Service Providers** (Form ITA–4160): To meet the program performance goal of broadening and deepening the U.S. exporter base, the CS must continue to gain market knowledge and generate statistically

valid characterizations about the needs of exporting companies. This survey was designed to identify different segments of U.S. service providers so that the organization can measure our ability to broaden and deepen the exporter base of each unique segment.

4. **Market Evaluation Survey of Non-Exporting Companies** (Form ITA-4161): To meet the program performance goal of broadening and deepening the U.S. exporter base, the CS must continue to gain market knowledge and generate statistically valid characterizations about the needs of non-exporting companies. This survey was designed to uncover the needs of U.S. companies that are not currently exporting so that the CS can measure the organization's ability to turn non-exporters into exporters.

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.

The surveys will be conducted electronically with an e-mail sent containing a web-enabled survey link (ITA-4158) on an annual basis; and by telephone using a skip pattern (ITA-4159, ITA-4160, ITA-4161) on an ad-hoc basis.

Information from these surveys will be used to:

- Provide information needed to determine how the CS can broaden and deepen the U.S. exporter base.
- Provide performance metrics to determine how well the CS is meeting its mandate of broadening and deepening the U.S. exporter base.

Clients benefit because the information will be used to improve and better target services provided to the public. Without this information, the CS is unable to measure program performance and systematically determine the needs and benefits desired of U.S. companies and how best to meet these needs in order to broaden and deepen the U.S. exporter base.

Information collected will not be disseminated to the public or used to support information that will 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.

All survey responses will be collected using web survey technology or telephone skip pattern technology.

4. Describe efforts to identify duplication.

The Commercial Service contacted multiple government agencies and private sector companies to determine if the information was currently being collected. Research reviewed includes the Report Card on Trade II by ITA and Dr. Jennifer Bremer of the Kenan Institute; National Export Strategy; 2006 ITA Customer Satisfaction Survey; Census Bureau's *Profile of Exporting Companies*; SBA's *Small Business Guide*; ITA's *Small and Medium-Sized Exporting Companies: A Statistical Handbook 2003*; and CS customer satisfaction surveys. Consultations were also conducted with DOC/NIST's Manufacturing Extension Partnership, Ex-Im, Census, TPCC, and MAS. The Commercial Service also reviewed all information collections currently approved by OMB and found that no similar information is available.

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

Every effort has been made to streamline the surveys to reduce the burden on the respondents. Consideration was given to the length and the wording of all questions. Survey questions were beta tested using five respondents from the target demographic groups identified for each survey to ensure that the questions are properly worded and the survey is an appropriate length.

Furthermore, survey questions are opinion-oriented, and there is no need for clients to maintain additional records, or incur extra expense to develop data not readily available.

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

If the collection is not conducted, the CS will be unable to accomplish its program performance goals and measure its effectiveness and impact on broadening and deepening the U.S. exporter base.

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

There are no special circumstances that require the collection to be conducted in a manner inconsistent with OMB 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 record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A Federal Register notice soliciting public comments was published on Friday, January 13, 2012, (Volume 77, Number 9, page 2031). No public comments were received.

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

No payments or gifts are provided to the respondents.

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

The government will protect confidential/proprietary information on business operations and trade secrets possessed by any company or participant to the full extent of the law. Such information will be withheld from disclosure pursuant to the following statutes:

- a. Trade Secrets Act - 18 U.S.C. § 1905);
- b. Freedom of Information Act (FOIA) - 5 U.S.C. § 552(b); and
- c. Economic Espionage Act – 18 U.S.C. § 1832

An assurance of confidentiality will be provided to all survey respondents (see attached surveys).

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.

The information collected does not include questions of a sensitive nature.

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

A breakdown of estimated burden hours for each survey is as follows:

- Form ITA-4158
 - Estimated Respondents: 400
 - Estimated Time per Response: 15 minutes
 - Estimated Total Annual Burden Hours: 100
 - Estimated Total Annual Cost to Public: \$0

- Form ITA-4159
 - Estimated Respondents: 1600
 - Estimated Time per Response: 30 minutes
 - Estimated Total Annual Burden Hours: 800
 - Estimated Total Annual Cost to Public: \$0

- Form ITA-4160
 - Estimated Respondents: 1600
 - Estimated Time per Response: 30 minutes
 - Estimated Total Annual Burden Hours: 800
 - Estimated Total Annual Cost to Public: \$0

- Form ITA-4161
 - Estimated Respondents: 400
 - Estimated Time per Response: 15 minutes
 - Estimated Total Annual Burden Hours: 100
 - Estimated Total Annual Cost to Public: \$0

ESTIMATED ANNUAL TOTALS:

RESPONDENTS/RESPONSES = 4,000
BURDEN HOURS = 1,800
COST = \$0

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

There is no annual cost burden to the respondents or record-keepers resulting from the collection of information beyond the value of the burden hours listed in #12 above.

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

The following estimates are based on staff hours/cost to process surveys:

\$10,000 for ITA-4158
 \$50,000 for ITA-4159
 \$75,000 for ITA-4160
 \$10,000 for ITA-4161

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

Not applicable.

16. For collections of information 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.

The expiration date will be displayed on the email survey Form ITA-4158, however, the expiration date will not be displayed on the telephone surveys. The telephone survey interviewer will provide the standard PRA information.

18. Explain each exception to the certification statement.

No exception to the certification statement is requested.