

# INFORMATION COLLECTION SUPPORTING STATEMENT

## EXTENSION OF A CURRENTLY APPROVED COLLECTION

### TSA CUSTOMER COMMENT CARD

- 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. (Annotate the CFR parts/sections affected).***

TSA first sought approval for its Customer Comment Card in 2005. The urgency of initiating a customer comment card was highlighted when TSA changed its screening procedures in September 2004. The circumstances surrounding the bombing of two Russian passenger aircraft led to the addition of limited torso pat-down screening. Feedback received through the Contact Center, and informally through the airports, was a critical input in revisions to this procedure in December 2004. However, TSA Headquarters staff and TSA airport staff realized that the lack of a comment card made it difficult to ascertain fully the scope and breadth of the feedback, thereby depriving TSA of a critical source of information. Because screening procedures will invariably change again in the future, TSA needs to be able to collect comprehensive feedback in a timely manner and respond appropriately.

TSA's goal is to adopt an analytical, collaborative framework to ensure that customer impact is considered when considering changes to operations and policies on customers; this impact can include the treatment of and communication with the customer during direct screening operations. The TSA Customer Comment Card is an important tool in facilitating this goal.

- 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.***

TSA will collect comments on the TSA Customer Comment Card from passenger respondents at airports. Respondents may deposit the comment card in drop-boxes at the airport via TSA supervisors or managers, or by mailing the card to TSA. TSA will use the data collected from the card to prepare Performance Measurement Improvement System (PMIS) reports. TSA personnel at airports are required to prepare daily PMIS reports that include data concerning customer complaints and compliments. PMIS reports are submitted to Headquarters for use in developing measures required by the Government Performance and Results Act (GPRA), which requires all Federal agencies to define performance goals, and measure agency and program performance in the achievement of these goals, and for measuring customer satisfaction. This card will enhance the accuracy of the data being reported and will place the TSA Customer Service Manager at each airport in a better position to quickly respond to citizens' concerns about TSA operations.

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 submission 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. [Effective 03/22/01, your response must SPECIFICALLY reference the Government Paperwork Elimination Act (GPEA), which addresses electronic filing and recordkeeping, and what you are doing to adhere to it. You must explain how you will provide a fully electronic reporting option by October 2003, or an explanation of why this is not practicable.]***

There are no current plans for the electronic submission of the actual comment card. TSA does allow passengers to comment about service and policy via the TSA.gov web site.. TSA's intent is to make the feedback process accessible to all passengers, including those who do not have access to the Internet.

4. ***Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose(s) described in Item 2 above.***

This information collection will not be a duplication of any existing collections.

5. ***If the collection of information has a significant impact on a substantial number of small businesses or other small entities (Item 5 of the Paperwork Reduction Act submission form), describe the methods used to minimize burden.***

The collection will not have an impact on small businesses or other small entities.

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.***

Without this collection, TSA will not have a mechanism for the expeditious daily collection of customer feedback. Such an instrument is needed to facilitate addressing and resolving these concerns as quickly as possible. Inevitably, new security threats will arise that will influence the screening process in the future. If TSA does not implement a collection that is available on a daily basis, it will not be able to quickly and efficiently gauge public reaction to the changes and respond appropriately, including conducting public education activity.

7. ***Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5(d)(2).***

The collection will be conducted in a manner consistent with the general information collection guidelines.

- 8. Describe efforts to consult 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. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d) 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. Specifically address comments received on cost and hour burden.**

TSA published a 60-Day renewal notice in the Federal Register on September 21, 2011 (76 FR 58532), and a 30-Day renewal notice on January 26, 2012 [77 FR 4054]. TSA received no comments for either notice.

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

The respondents will not be paid for their voluntary participation in the feedback activity.

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

Based on the nature of the collection, the respondents cannot be guaranteed confidentiality. If the agency is to appropriately follow up on the concerns, certain personal information is needed. If the agency does follow up on concerns and personal information is used for that purpose, the information would likely fall under the appropriate system of records notice, thereby affording Privacy Act protection in addition to any protections available under the Freedom of Information Act. The appropriate system of records notice would depend on the nature of follow up conducted by TSA.

- 11. Provide additional justification for any questions of sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.**

No questions that could be considered sensitive are included in this collection.

- 12. Provide estimates of hour burden of the collection of information.**

The number of respondents annually for the entire program is estimated to be 150,000. TSA estimates that it would take approximately five minutes to complete the card; therefore, the total annual hour burden requested is estimated to be 12,500.

<b>Average Annual Respondents</b>	<b>Average Annual Responses per</b>	<b>Hour Burden per response</b>	<b>Total Annual Hour Burden</b>
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	Year		
150,000	1	5 minutes	12,500
<b>Total</b>	<b>150,000</b>		<b>12,500</b>

**13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.**

For most respondents the total annual cost burden is \$0. For respondents who chose to mail in the comment card to TSA instead of using the drop-boxes available at airports, the cost would be the price of a postage stamp. Thus, the cost if all respondents chose to mail the comment card would be \$67,500 ( $\$.45 \times 150,000$ ). This cost is likely overstated as TSA assumes most respondents will provide the card to TSA at airports.

**14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, and other expenses that would not have been incurred without this collection of information.**

The estimated annual cost to the Federal Government will be \$25,000 for card printing. These figures were derived by estimating that approximately 500,000 passengers that pass through the checkpoints will take a card from the display stands at those airports who participate in the program. With an estimated printing cost of \$.05 per card, the total annual printing expenses will be \$25,000.

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.**

There are no changes in the number of respondents or burden hour. Also, there are no changes to the information being collected.

**16. For collections 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.**

TSA will not publish this information.

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

The expiration date of the OMB approval is displayed on the card.

**18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.**

TSA is not seeking any exceptions to the certification statement.