

**SUPPORTING STATEMENT  
FOR INFORMATION COLLECTION SUBMISSION  
9000-0145, USE OF DATA UNIVERSAL NUMBERING SYSTEM (DUNS) AS  
PRIMARY CONTRACTOR IDENTIFICATION**

**A. Justification**

1. **Administrative requirements.** The Data Universal Numbering System (DUNS) number is the nine-digit identification number assigned by Dun and Bradstreet Information Services to an establishment. The Government uses the DUNS number to identify contractors in reporting to the Federal Procurement Data System (FPDS). The FPDS provides a comprehensive mechanism for assembling, organizing, and presenting contract placement data for the Federal Government. Federal agencies report data on all contracts in excess of \$3,000 to the Federal Procurement Data Center that collects, processes, and disseminates official statistical data on Federal contracting. Contracting officers insert the Federal Acquisition Regulations (FAR) provision 52.204-6, Data Universal Numbering System (DUNS) Number in solicitations they expect will result in contracts in excess of \$3,000. This provision requires offerors to submit their DUNS number with their offer. If the offeror does not have a DUNS number, the provision provides instructions on obtaining one.

2. **Uses of information.** Information is used to categorize data related to Federal contracts.

3. **Consideration of information technology.** We use improved information technology to the maximum extent practicable. Where both the Government agency and contractors are capable of electronic interchange, the contractors may submit this information collection requirement electronically.

4. **Efforts to identify duplication.** This requirement is issued under the Federal Acquisition Regulation (FAR) which has been developed to standardize Federal procurement practices and eliminate unnecessary duplication.

5. **If the collection of information impacts small businesses or other entities, describe methods used to minimize burden.** The burden applied to small businesses is the minimum consistent with applicable laws, Executive orders, regulations, and prudent business practices.

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

**frequently.** Collection of information on a basis other than solicitation-by-solicitation is not practical.

**7. Special circumstances for collection.** Collection of information is consistent with guidelines in 5 CFR 1320.6

**8. Efforts to consult with persons outside the agency.** A notice was published in the *Federal Register* at 77 FR 56212, on September 12, 2012. Three respondents submitted comments.

**Comment:** Three respondents commented that they supported the continued use of the Data Universal Numbering System as the primary contractor identification.

**Response:** The comments are noted.

**Comment:** One respondent commented that the extension of the information collection would violate the fundamental purposes of the Paperwork Reduction Act because of the burden it puts on the entity submitting the information and the agency collecting the information.

**Response:** In accordance with the Paperwork Required Act (PRA), agencies can request an OMB approval of an existing information collection. The PRA requires that agencies use the Federal Register notice and comment process, to extend the OMB's approval, at least every three years. This extension, to a previously approved information collection, pertains to FAR Subpart 4.6, Contract Reporting. The contracting officer must identify and report a DUNS number (Contractor Identification Number) for the successful offeror on a contract action in the Federal Procurement Data System (FPDS). The DUNS number reported must identify the successful offer's name and address as stated in the offer and resultant contract. Not granting this extension would consequently eliminate the Government's ability to use the DUNS number to report information on federal contract awards.

**Comment:** One respondent commented that the Agency did not accurately estimate the public burden an extension of the information collection requirement would create.

**Response:** The DUNS number is a widely used number for identifying companies conducting business in the private sector. The estimated average of 1.5 minutes to comply with providing the DUNS number appears reasonable for this collection, however; based on a reassessment, an adjustment has been made to increase the average estimate to 10 minutes. The number of estimated respondents remains at 38,679. The number of unique large and

small business contractors who received new awards or orders of \$3K or more in the Federal Procurement Data System database for Fiscal Year (FY) 2011 is 193,397. It is estimated that twenty percent (or 38,679) of the contractors would have been required to submit their DUNS number under FAR provision 52.204-6 on an average of three solicitations in FY11. The majority of contractors will not be required to submit their DUNS under FAR provision 52.204-6. This is due to the fact that FAR Clause 52.204-7, Central Contractor Registration (CCR), is required to be inserted in the majority of solicitations and contracts except as provided in 4.1102(a). FAR Clause 52.204-7 requires vendors to provide their DUNS number in CCR.

**Comment:** One respondent commented that the collective burden of compliance with the information collection requirement greatly exceeds the Agencies estimate and outweighs any potential utility of the extension.

**Response:** The Paperwork Reduction Act (PRA) was designed to improve the quality and use of Federal information to strengthen decision-making, accountability, and openness in government and society. Central to this process is the solicitation of comments from the public. This process incorporates an enumerated specification of targeted information and provides interested parties a meaningful opportunity for comment on the relevant compliance cost. This process has led to decreases in the overall collective burden of compliance for the information collection requirement in regards to the public. Based on OMB estimates, in FY 2010, the public spent 8.8 billion hours responding to information collections. This was a decrease of one billion hours, or ten percent from the previous fiscal year. In effect, the collective burden of compliance for the public is going down as the Government publishes rules that make the process less complex, more transparent, and reduces the cost of federal regulations to both the Contractor community and Government.

**Comment:** One respondent commented that the Government's response to the Paperwork Reduction Act waiver for Far Case 2007-006 is instructive on the total burden for respondents.

**Response:** Serious consideration is given, during the open comment period, to all comments received and adjustments are made to the paperwork burden estimate based on reasonable considerations provided by the public. This is evidenced, as the respondent notes, in FAR Case 2007-006 where an adjustment was made from the total preparation hours from three to 60. This

change was made considering particularly the hours that would be required for review within the company, prior to release to the Government.

The burden is prepared taking into consideration the necessary criteria in OMB guidance for estimating the paperwork burden put on the entity submitting the information. For example, consideration is given to an entity reviewing instructions; using technology to collect, process, and disclose information; adjusting existing practices to comply with requirements; searching data sources; completing and reviewing the response; and transmitting or disclosing information. The estimated burden hours for a collection are based on an average between the hours that a simple disclosure by a very small business might require and the much higher numbers that might be required for a very complex disclosure by a major corporation. Also, the estimated burden hours should only include projected hours for those actions which a company would not undertake in the normal course of business. Careful consideration went into assessing the estimated burden hours for this collection, however, at any point, members of the public may submit comments for further consideration, and are encouraged to provide data to support their request for an adjustment.

**9. Explanation of any decision to provide any payment or gift to respondents, other than remuneration of contractors or guarantees.** Not applicable.

**10. Describe assurance of confidentiality provided to respondents.** This information will be disclosed only to the extent consistent with prudent business practices and current regulatory and statutory requirements.

**11. Additional justification for questions of a sensitive nature.** No sensitive questions are involved.

**12.& 13. Estimated total annual public hour and cost burden.** The estimated time for offerors to enter the DUNS number is approximately 1 minute.

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a. Estimated Annual Hour Burden

Number of Respondents to FAR 52.204-6 . . . . . 38679  
 Number of submissions per respondent. . . . . 3  
 Total annual responses. . . . . 116,037  
 Estimated time per response . . . . . X .1666 hours  
 Response burden hours . . . . . 19,332

It is estimated that 15 percent of the 38,679 offerors or 5,802 offerors will be required to request a new DUNS number to submit under FAR provision 52.204-6. The historical estimate of approximately five minutes is used for the time to receive the DUNS number.

Number of new DUNS numbers requested. . . . . 5,802  
 Time needed to request a DUNS number. . . . . X .0833 hours  
 Total hours to receive DUNS number . . . . . 483

	Submission of DUNS under 52.204-6	New DUNS requested	
Number of Respondents	38,679	5,802	n/a
Number of submissions per respondent	3	1	n/a
Total annual responses	116,037	5,802	116,037
Preparation time per response	.02 hrs	.08333hrs	n/a
Total Response burden hours	2,321	483	2804
Avg. Preparation time per response	n/a	n/a	.02416=2804/116,037

Summary of Estimated Annual Burden:

Respondents: 38,679.  
Responses Per Respondent: 3.  
Annual Responses: 116,037.  
Hours Per Response: .02416.  
Total Burden Hours: 19,815.

b. Estimated Annual Cost

Total Burden Hours . . . . .19,815  
Cost per Hour . . . . .X \$49.07  
Cost to respondents . . . . . \$ 972,322

14. **Estimated cost to the Government.** Time required for Governmentwide review of the requirement is approximately 1 minute per response.

Total annual responses..... 116,037  
Review time per responses..... X .02  
Total burden hours..... 2,321  
Average cost per hour wage(\$28.04/hr + 100% OH) X \$56.08  
Total Government cost..... \$130,162

15. **Explain reasons for program changes or adjustments reported in Item 13 or 14.** This submission requests an extension of OMB approval of an information collection requirement in the FAR. The public and Government burden has changed due to the majority of vendors reporting this information into the Central Contractor Registration per FAR 52.204-7.

16. **Outline plans for published results of information collections.** Results will not be tabulated or published.

17. **Approval not to display expiration date.** Not applicable.

18. **Explanation of exception to certification statement.** Not applicable.

**B. Collections of Information Employing Statistical Methods.**