

DEPARTMENT OF THE TREASURY  
ALCOHOL AND TOBACCO TAX AND TRADE BUREAU

Supporting Statement - Information Collection Request

OMB Control Number 1513-0111

TTB F 5013.2 COLAs Online Access Request

A. JUSTIFICATION

1. What are the circumstances that make this collection of information necessary and what legal or administrative requirements necessitate the collection? Also include the following: Align the information collection to Treasury's Strategic Goals, Line of Business/Sub-function, and IT Investment, if one is used.

Participants in an electronic filing system will use this form. TTB has designed an electronic filing program which requires a password to be granted access to the system. Although electronic filing of TTB F 5100.31, Application for and Certification/Exemption for Label/Bottle Approval (Certificate of Label Approval (COLA)), is voluntary, participants must submit certain information about themselves to meet Treasury and TTB computer security requirements. The information required to issue passwords involves collecting Privacy Act information. The information submitted by the applicants will be used to associate them with a particular TTB issued permit and to verify their identity prior to distributing the passwords. The law at 27 U.S.C. 205(e) and implementing regulations at 27 CFR Parts 4, 5, and 7 mandate the labeling of alcohol beverages (wine, distilled spirits, and malt beverages) to provide consumers with adequate information as to the identity and quality of the product and prevent consumer deception. This information collection is required by statute 27 U.S.C. 205(e) and implementing regulations at:

4.40	5.51	7.30
4.50	5.55	7.31
4.51		7.40
		7.41
		7.42

This information collection is aligned with:

Treasury Strategic Goal: US & World Economies Perform at Full Performance Potential.

Line of Business/Sub-function: Law Enforcement/Substance Control.

IT Investment: Regulatory Major Application Systems.

2. How, by whom and for what purpose is this information used?

The information on this form will be used by TTB to authenticate end users of the system to electronically file COLAs. The system will authenticate end users by comparing information submitted on the form to records held in multiple, independently sourced databases, such as consumer credit, postal address, and credit card databases. By checking multiple sources,

often with an overlapping scope of coverage, the verification engine will facilitate the authentication process and reduce the possibility of fraud. After verifying the applicant user is who he or she claims to be, a password will be issued to allow the user to access the COLAs Online system. TTB will also use this form to ensure that the information submitted by the user (company name, address, permit number, etc.) matches what is contained in our databases. This will ensure accuracy in reporting data from electronically filed transactions.

3. To what extent does this collection of information involve the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology? What consideration is given to use information technology to reduce burden?

This form is available on our website and COLAs Online. TTB uses this form to permit filing of COLAs through the use of information technology. Fifty-eight percent of these forms are submitted electronically.

4. What efforts are used to identify duplication? Why can't any similar Information already available be used or modified for use for the purposes described in Item 2 above?

TTB F 5013.2 collects information that is pertinent to each user and applicable to his/her specific request for access to the COLAs Online system. As far as we can determine, similar information is not available elsewhere.

5. If this collection of information impacts small businesses or other small entities, what methods are used to minimize burden?

All entities, regardless of size, are required to complete this application to gain access to the COLAs Online system. However, we have minimized the burden on small businesses by: (1) collecting only such information as is necessary to identify and verify the person gaining access; and (2) providing that the use of COLAs Online is voluntary.

6. What consequences to Federal program or policy activities and what, if any, technical or legal obstacles to reducing burden will occur if this collection is not conducted or is conducted less frequently?

If the information on this form is not submitted, the users will not be granted a user ID and password and cannot participate in the electronic filing system.

7. Are there any special circumstances associated with this information collection that would require it to be conducted in a manner inconsistent with OMB guidelines?

There are no special circumstances associated with this collection.

8. What effort was made to notify the general public about this collection of information? Summarize the public comments that were received and describe the action taken by the agency in response to those comments.

A 60-day notice was published in the Federal Register (76 FR 81016) on Tuesday, December 27, 2011. The notice solicited comments from the general public. TTB received no comments in response to this notice.

9. What decision was made to provide any payment or gift to respondents, other than reenumeration of contractors or grantees?

No payment or gift is associated with this collection.

10. What assurance of confidentiality was provided to respondents and what was the basis for the assurance in statute, regulations, or agency policy?

No specific assurance of confidentiality is provided on this form; however, the confidentiality of the information collected on this form is protected by the Privacy Act.

11. What justification is there for questions of a sensitive nature?

The date of birth and mother's maiden name are requested to verify the identity of individuals requesting passwords. This information will be compared to records in other databases to authenticate the users.

12. What is the estimated hour burden of this collection of information?

The respondent will only need to complete this form once to receive a password to access the COLAs Online system. It is estimated that 1,366 respondents will file the form in a 12-month period. Each form should take an average of 18 minutes per applicant to complete; for a total of 410 burden hours. Fifty-eight percent are filed electronically.

Electronic:  $792 \times 1 = 792 \times 18 = 14,261/60 = 238$

Paper:  $574 \times 1 = 574 \times 18 = 10,332/60 = 172$

Total Burden Hours:  $238 + 172 = 410$

13. What is the estimated total annual cost burden to respondents or recordkeepers resulting from this collection of information (excluding the value of the burden hours in Question 12 above)?

No cost is associated with this collection.

14. What is the annualized cost to the Federal Government?

The annual Federal Government cost is estimated at:

Processing, data entry	110,000
Clerical Cost	60,000
Printing	1,000
Distribution	<u>500</u>
TOTAL	171,500

15. What is the reason for any program changes or adjustments reported?

There are no program changes or adjustments associated with this collection.

16. Outline plans for tabulation and publication for collections of information whose results will be published.

We will not publish the results of this collection.

17. If seeking approval to not display the expiration date for OMB approval of this information collection, what are the reasons that the display would be inappropriate?

We will display the expiration date of OMB approval for this collection.

18. What are the exceptions to the certification statement?

- (c) See item 5 above
- (f) This is not a recordkeeping requirement
- (i) No statistics are involved

B. Collections of Information Employing Statistical Methods.

This collection does not employ statistical methods.