SUPPORTING STATEMENT
U.S. Department of Commerce
International Trade Administration
Domestic and International Client Export Services and Customized Forms
OMB CONTROL NO. 0625-0143

A. JUSTIFICATION

This is a request to revise a currently approved information collection. The revision will streamline the process CS uses when providing services to its export clients by merging all its service-based information collections. This will also eliminate seven information collections. The title will change from "Export Information Services Order Forms" to "Domestic and International Client Export Services and Customized Forms."

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

The International Trade Administration's (ITA) U.S. Commercial Service (CS) is mandated by Congress to broaden and deepen the U.S. exporter base. The CS accomplishes this by providing counseling, programs and services to help U.S. organizations export and conduct business in overseas markets. This information collection package enables the CS to provide appropriate export services to U.S. exporters and international buyers.

The Commercial Service (CS) offers a variety of services to enable clients to begin exporting/importing or to expand existing exporting/importing efforts. Clients may learn about our services from business related entities such as the National Association of Manufacturers, Federal Express, State Economic Development offices, the internet or word of mouth. The CS provides a standard set of services to assist clients with identifying potential overseas partners, establishing meeting programs with appropriate overseas business contacts and providing due diligence reports on potential overseas business partners. The CS also provides other export-related services considered to be of a "customized nature" because they do not fit into the standard set of CS export services, but are driven by unique business needs of individual clients.

The dissemination of international market information and potential business opportunities for U.S. exporters are critical components of the Commercial Service's export assistance programs and services. U.S. companies conveniently access and indicate their interest in these services by completing the appropriate forms via ITA and CS U.S. Export Assistance Center websites.

The CS works closely with clients to educate them about the exporting/importing process and to help prepare them for exporting/importing. When a client is ready to begin the exporting/ importing process our field staff provide counseling to assist in the development of an exporting strategy. We provide fee-based, export-related services designed to help a clients export/importt. The type of export-related service that is proposed to a client depends upon a client's business goals and where they are in the export/import process. Some clients are at the beginning of the export process and require assistance with identifying potential distributors, whereas other clients may be ready to sign a contract with a potential distributor and require due diligence assistance.

Before the CS can provide export-related services to clients, such as assistance with identifying potential partners or providing due diligence, specific information is required to determine the client's business objectives and needs. For example, before we can provide a service to identify potential business partners we need to know whether the client would like a potential partner to have specific technical qualifications, coverage in a specific market, English or foreign language ability or warehousing requirements. This information collection is designed to elicit such data so that appropriate services can be proposed and conducted to most effectively meet the client's exporting goals. Without these forms the CS is unable to provide services when requested by clients.

The forms ask U.S. exporters standard questions about their company details, export experience, information about the products or services they wish to export and exporting goals. A few questions are tailored to a specific program type and will vary slightly with each program. (More details about specific forms and uses are provided in Question 2.) CS staff use this information to gain an understanding of client's needs and objectives so that they can provide appropriate and effective export assistance tailored to an exporter's particular requirements.

As a result, the CS requests approval to revise this information collection by creating an all inclusive and flexible client intake process and merging it with the following information collections: OMB Control Numbers: 0625-0065, 0625-0130, 0625-0151, 0625-0215, 0625-0220, 0625-0228, 0625-0237, and 0625-0238. These collections include all client intake, events/activities and export success forms. The set of questions used to generate the customized forms have been approved under the aforementioned information collections. Upon OMB approval, these information collections will be discontinued.

The proposed sub-categories of questions are: contact information, organization information, organization type, agreements and confirmations, objectives, products and services, exporting experience, marketing, events and activities, trade fair/show, certified trade missions, trade missions, advocacy, environment, and education. These will come under three main categories: Contact, Organization, and Events and Activities information. The CS asks only those questions that provide the required information to assist CS in fulfilling a client's objective for a requested service and/or event/activity.

An example of how this collection of information can occur for a domestic client:

<u>Step 1. Client calls U.S. Export Assistance Center</u>:

Trade Specialist (TS) obtains contact information such as:

Name of organization
Address of organization
Contact information
Telephone

Fax
Website

<u>Step 2. TS arranges meeting with client for in-depth counseling session to collect additional information such as</u>:

Exporting experience
Number and name of countries currently exporting to
Number of employees
Is product/service manufactured in U.S.
Product/service description
Years in business
Describe any trade barriers your organization has overcome*

<u>Step 3. TS seeks assistance in finding potential partners (matchmaking. TS request additional information such as</u>:

Organization’s objective
Type of contacts organization is seeking
Document client’s expected and agreed to result
Any specific companies you want CS to or not to contact
Identify competitors (U.S. and non-U.S.)
Name and title of foreign government decision makers*
How will project be financed*

Examples of clients’ registration and agreement actions after receiving CS services:

<u>Step 4. Client registers on-line for industry specific webinar and CS collects information such as</u>:

Basic contact information
Type of company
Method of payment

<u>Step 5. Client signs partnership agreement (export success). CS seeks the following information, such as</u>:

Name of buyer
Product/service sold
Total dollar value of sale

*These questions would be pulled from different question segments (E-awards, advocacy, matchmaking and events and activities).

An example of how this collection of information can occur for an international client:

<u>Step 1. Client calls U.S. Embassy</u>:

Locally Engaged Staff (LES) obtains contact information such as:

- Name of organization
- Address of organization
- Contact information
- Telephone
- Fax
- Website

<u>Step 2. LES arranges meeting with client for in-depth counseling session to collect additional information such as</u>:

- Importing experience
- Number and name of countries currently importing from
- Number of employees
- Product/service looking to import
- Years in business

<u>Step 3. LES seeks assistance in finding potential partners (matchmaking. LES request additional information such as</u>:

- Organization’s objective
- Type of contacts organization is seeking
- Document client’s expected and agreed to result
- Any specific companies you want CS to or not to contact
- Identify competitors (U.S. and non-U.S.)
- Name and title of international government decision makers*
- How will project be financed*

Examples of clients’ registration and agreement actions after receiving CS services:

<u>Step 4. Client registers on-line for industry specific webinar and CS collects information such as</u>:

- Basic contact information
- Type of company
- Method of payment

<u>Step 5. Client signs partnership agreement (import success). CS seeks the following information, such as</u>:

Name of buyer
Product/service sold
Total dollar value of sale

*These questions would be pulled from different question segments (Advocacy, matchmaking and events and activities).

The above are examples of requested information from the list of questions that may be used and are currently approved. The CS will use the pre-approved domestic information requests (IC List in ROCIS/listed as 'New') to generate customized client information that will reduce client burden and increase the CS' ability to expand services to a broader client base. Flexible forms allow for a customer-oriented approach by requiring clients to fill out only the information that addresses their specific needs and objectives. In addition, the CS will be able to provide tailored export assistance that can quickly adapt to changing business situations and environments. The collected information will be used by CS staff in counseling and assisting domestic clients and in fulfilling U.S. firms' request for export assistance services and programs.

The flexibility to create forms from the above categories/subcategories/questions will assist CS provide their clients with benefits including customizing information requests, forms, and services to address their specific needs and objectives. Without this flexibility, CS is impeded from collecting pertinent client information in an effective and efficient manner. Therefore, with increased forms creation flexibility, and the ability to immediately ascertain key information, U.S. organizations are productively positioned to achieve their exporting/importing and expansion goals.

Additionally, the most important positive impact is the ability to quickly change and ask pertinent questions to assist clients with their exporting needs regarding matchmaking services, organization promotions, trade missions, market research and other trade

2. <u>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, then explain how the collection complies with all applicable Information Quality Guidelines</u>.

CS Trade Specialists in domestic Export Assistance Centers and Commercial Specialists at overseas Posts use the information to customize forms relative to the services required by each client. These forms are used whenever a client requests a CS service. The information provides the specialists with the client's background data, special requests and service requirements. The forms are used internally and are not disseminated to the public.

Additionally, U.S. companies that are interested in obtaining export assistance or participating in a CS export-related program will provide the CS with information about:

- The export-related programs and services that they wish to participate in
- Company background such as product/service to be exported, industry, company size (fees, where applicable, are determined according to company size in accordance with OMB cost recovery requirements) export experience, company contact information, client name and contact information
- Exporting goals and objectives such as markets of interest, industries, potential end-users
- Commercial Service relationships such as the U.S. Export Assistance Center(s) previously contacted and CS staff with whom the client may have previously worked

The collected information will be used by CS staff in counseling and assisting domestic and international clients, and in fulfilling U.S. firms' requests for export assistance services and programs.

The collection is voluntary and the frequency will be on-going and will depend upon the demand U.S. companies have for CS services and programs. These forms are used by firms to indicate their interest in participating in a service or program; therefore, if a firm is not interested in obtaining a CS service or participating in an export/import-related program, there is no need for the firm to complete a form. Companies access these forms via ITA and CS websites and they may submit them via the Internet.

3. <u>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</u>.

Currently, clients may register for events and export.gov online. Additionally, online pay for credit cards is also available. The vast majority of CS clients complete the forms electronically, but hard copies of some forms may be used in limited circumstances, such as with clients who may not have Internet access.

The CS is focused on registering its clients through export.gov and designed to capture basic client contact information. Moreover, as the client expands its exporting/importing needs, additional information will be collected and stored in a database in order to reduce client burden. With the new website the functionality for pre-populating forms becomes available and with the approval of this information collection, CS will be able to begin the process design and ability to pre-populate forms once a client has registered on export.gov. The export.gov project was delayed but has made tremendous progress and plans to release the new website in January 2013. However, this feature is also contingent on funding. The client will now only have to answer the relevant questions at hand with the ability to update as needed. By capturing the client information and storing it in export.gov, the CS will be able to access pre-populated client information without having them to re-enter it. This will reduce both the client's and CS's burden, and allow for more customized and efficient services.

4. <u>Describe efforts to identify duplication</u>.

There is no duplication of information within the DOC or another government entity. The information collected represents unique client information that is required by the CS to efficiently and effectively provide services to U.S. exporters and international buyers so to document the effectiveness of our services in creating export successes.

The CS maintains a central Client Tracking System (CTS) that is accessible to domestic and internationally-based CS staff. Client information is stored in the CTS and CS staff can check to see whether we have the necessary information about a client's exporting needs and goals thereby eliminating duplication of information and ensuring that we do not ask clients to provide information that we already have.

5. <u>If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden</u>.

This information collection involves small businesses. The CS will consolidate existing currently approved questions to create an all-inclusive and flexible package to ensure that clients only provide the information needed and reduce client burden by utilizing pre-populated data. With increased forms creation flexibility and the ability to immediately ascertain key information, CS can effectively aid U.S. organizations to achieve their exporting/importing and expansion goals. The minimal information will be collected to provide the best export/import services no matter the size of the organization.

Moreover, the majority of these forms have been in use by the Commercial Service for 3 years and during this time we have not received any negative feedback from either clients or client-facing staff regarding the use of these forms. Therefore, CS's international staff is also adopting these forms to use with modifications for international buyers.

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

If the collection is not conducted or is conducted less frequently, the quality of service that CS provide to private sector clients may drastically decrease and we may be hindered in meeting our customer's specific needs and requirements. Also, CS is moving away from products to solutions and this shift in service delivery requires very specific and detailed information. This detailed client information allows CS to deliver more effective and efficient services based on client specific requirements.

Also, if approval is not granted for use of these documents, the CS ability to conduct its congressional mandate of broadening and deepening the export base may not be met.

These documents enable clients to request and obtain export-related services. Also, provide the CS with details about clients' products/services to enable the CS to provide clients with the assistance they require to successfully export their goods/services to international buyers.

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

This collection will be conducted in a manner consistent with OMB guidelines.

8. <u>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</u>. <u>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 recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported</u>.

A Federal Register Notice soliciting public comment was published on June 28, 2012
(Vol. 77, No. 125, page 38582).

Two comments were received regarding the notice and the comments concerned the formats of the forms and the ability to easily edit them, currently the form used is in pdf. CS discussed the format of the new form and the commenter will test for ease of use. The second comment was about is CS's focus on U.S. content when requesting assistance and CS provided the commenter with information regarding the reason for this focus.

CS staff regularly consults with their clients regarding the substance and format of this form. There are no unresolved substantive or material issues stemming from these consultation efforts. If the CS receives feedback from clients indicating that the form could be streamlined or improved, the CS will make the necessary changes and request OMB approval accordingly.

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

Not applicable. Respondents will not receive payments or gifts.

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

All responses to this collection of information will be provided confidentiality to the extent allowed by law. This assurance will be printed at the bottom of each form.

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.

No questions of a sensitive nature are asked.

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

It is estimated that 47,318 domestic and 47,318 international clients will request services at least twice (94,636+94.636) for a total of **189,272** responses. The average time to complete a request is 5 for Contact information to 15 minutes for Organization and Events/Activities information (15 minutes is used for this request). The total burden hours will be 47.3,234.

Examples of CS Client Export Services Forms

Reporting International Success
Company Questionnaire Form
International Company Profile Request Form
Preliminary consultation
Local event
ShowTime
Market Express Bulletin
Industry Focused Program
Featured US Exporters
Business Service Provider
Advocacy Questionnaire
Trade Fair Application
International Buyer Program Applicants
IBP Exhibitor Responses
Certified Trade Mission Form
Client Registration
E-Awards
Participation Agreements
Customized Forms TBD

For example: A Participation Agreement pulls questions from the following categories – Contact and Organization. The form would include the following:

Organization Name;
Address;
City;
State;

Postal code;
Country;
Type of client;
Primary contact; and
51% US content

The above are examples of what may be used and are currently approved. The CS will use the pre-approved domestic and international questions to generate customized client forms that will reduce client burden and increase the CS' ability to expand services to a broader client base. Flexible forms allow for a customer-oriented approach by requiring clients to fill out only the questions that address their specific needs and objectives. In addition, the CS will be able to provide tailored export assistance that can quickly adapt to changing business situations and environments. The collected information will be used by CS staff in counseling and assisting domestic clients and in fulfilling U.S. firms' request for export assistance services and programs.

For example, once a client provides their basic client information form, the client will have access to basic market research, export training, and expansion information when the client is ready to expand their exporting needs through other CS services. Additionally, as the client works with other CS posts, all client information will be available to the post staff by capturing the client's preliminary consultation form which includes pre-populated contact information based on previously submitted information. Previously, clients would have had to resubmit their information for each additional CS service. As a result, this is an increase in burden for both the client and CS staff. Over previous years, client demand for CS services has increased significantly as CS set aggressive export success performance measures and resulted in reaching out to a significantly larger number of clients, particularly New-to-Export and New-to-Market.

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

There is no cost to complete the form. If, after completing the order forms, clients can purchase CS services

14. <u>Provide estimates of annualized cost to the Federal government</u>.

Domestic and International

It will take CS staff approximately 10 minutes to review each response and the total burden hours to review 189,272 responses will total 31,545 hours.

31,545 hours X $25/hour staff time = **$788,625**

15. <u>Explain the reasons for any program changes or adjustments reported</u>.

Program changes:

The combining the information collections resulted in an increase of the estimated number of respondents/ responses and burden hours..

Program adjustment:

Adjustment decreases are due to the removal of the information collections which results in – -27,035 respondents/responses; -2,505 burden hours; -$1,537,500 cost burden.

16. For collections 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.

Not applicable.

18. Explain each exception to the certification statement.

Not applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection of information does not employ statistical methodologies.

LEGAL AUTHORITY: PUBLIC LAW 15 U.S.C. et seq and 15 U.S.C. 171 et seq