

**Supporting Statement
Importer ID Input Record
1651-0064**

A. Justification:

- 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.**

The collection of the information on the Importer ID Input Record (CBP Form 5106) is the basis for identifying entities who wish to import merchandise in to the United States, act as consignee on an importation when not the importer of record, or otherwise do business with CBP that would involve the payment of duties, taxes, fees or other monies or the refund of same. Each person, business firm, Government agency, or other organization that intends to file an import entry must file CBP Form 5106 with the first formal entry or request for services that will result in the issuance of a bill or a refund check upon adjustment of a cash collection. This form must also be filed by or on behalf of the ultimate consignee at the first importation in which the party acting as ultimate consignee is so named.

CBP Form 5106 is authorized by 19 USC 1484 and provided for by 19 CFR 24.5. It is accessible at: http://forms.cbp.gov/pdf/CBP_Form_5106.pdf

- 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.**

CBP Form 5106 is used to establish records for bond coverage, release and entry of merchandise, liquidation and issuance of bills and refunds. The proposed changes are intended to help CBP ensure that filing entities are engaged in legitimate import practices and to help CBP work with companies to resolve outstanding financial obligations.

- 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.**

This information can be transmitted electronically via the Automated Broker Interface system. Approximately 95 percent of Importer ID Input Records are transmitted electronically.

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

This information is not duplicated elsewhere.

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

This information collection does not have a significant impact on small businesses.

- 6. Describe consequences 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.**

If the information was collected less frequently, CBP would not be able to enforce regulatory requirements.

- 7. Explain any special circumstances**

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(c)(2).

- 8. 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.**

Public comments were solicited through two Federal Register notices dated June 22, 2012 (Volume 77, Page 37696) on which no comments were received, and on September 10, 2012 (Volume 77, Page 55487) on which one comment was received.

A letter, dated October 10, 2012, was received from Michael Caskin, Director of Business Development, Dun and Bradstreet Government Solutions. This letter is a solicitation for employment by Dun and Bradstreet who proposes to collect and maintain the Importer ID Input Record information for CBP. It is not a public comment on this collection of information or on CBP Form 5106.

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

There is no offer of a monetary or material value for this information collection.

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

There is no assurance of confidentiality provided to respondents. A PIA for the Automated Commercial System (ACS) dated December 2, 2008, and a SORN for ACS/ACE, dated December 19, 2008 (Vol. 73, Page 77759) will be included in this ICR.

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. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a personal or sensitive nature.

11. Provide estimates of the hour burden of the collection of information.

INFORMATION COLLECTION	TOTAL ANNUAL BURDEN HOURS	NO. OF RESPONDENTS	NO. OF RESPONSES PER RESPONDENT	TOTAL RESPONSES	TIME PER RESPONSE
Importer's Import Record (Form 5106)	75,000	300,000	1	300,000	15 minutes (.25 hours)

Public Cost

The estimated cost to the respondents is \$1,500,000. This is based on the estimated burden hours (75,000) multiplied (x) hourly rate (\$20.00).

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

There are no recordkeeping, capitalization or start-up costs associated with this collection.

14. Provide estimates of annualized cost to the Federal Government. Also provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment

overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The estimated cost associated with collecting the information is \$3,150,000. This is based on an estimated time to process each response (15 minutes) multiplied (x) by the total annual responses (300,000) = 75,000 hours, multiplied (x) by the average hourly rate of \$42.00 = \$3,150,000.

15. Explain the reasons for any program changes or adjustments reported in Items 12 or 13 of this Statement.

The burden hours were increased from 100 hours to 75,000 due to revised estimates by CBP of the number of respondents filing Form 5106. The change in the estimated burden is also due to CBP revising the estimate for the time to complete Form 5106 from 6 minutes to 15 minutes. There are no changes to CBP Form 5106 or to the information collected, however CBP has plans to make revisions to this form in the next year.

16. For collection of information whose results will be published, outline plans for tabulation, and publication.

This information collection will not be published for statistical purposes.

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.

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

18. Explain each exception to the certification statement.

CBP does not request an exception to the certification of this information collection.

B. Collection of Information Employing Statistical Methods

No statistical methods were employed.