

**SUPPORTING STATEMENT**  
**U.S. Department of Commerce**  
**International Trade Administration**  
**International Client Export Services Life-Cycle Customized Forms**  
**OOMB CONTROL NO. 0625-0237**

**A. JUSTIFICATION**

**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.

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 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. The CS therefore requests approval to continue this collection.

The CS requests approval to create an all inclusive and flexible client life-cycle information collection package. The proposed 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. 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.

CS should have the flexibility to create forms from the above approved categories and their questions. Client benefits include customizing questions, 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 and expansion goals.

CS can further reduce client burden through forms' flexibility and technology. CS seeks increased forms flexibility to ensure that CS asks and captures only the specific information needed for a particular event, thereby continuing to reduce client burdens as CS utilizes pre-populated information for clients who have previously registered with CS. As CS moves forward, we understand the importance and need for strategic planning and integration of future technology and initiatives that relate to CS programs and metrics with the types of information collected from clients to conduct those programs.

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 promotional activities.

**2. 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.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 international and domestic 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-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. 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.**

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.

**4. Describe efforts to identify duplication.**

There is no duplication of information collection requirements. The information collected by the documents in this package 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 information collected on these documents is not available elsewhere in government.

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. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.**

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 adopting these forms to use with modifications for international buyers.

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

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 will be severely hindered. These documents enable clients to request and obtain export-related services. These documents 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. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.**

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

**8. 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. 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.**

No comments have been received.

**9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.**

Respondents will not receive payments or gifts.

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

Confidentiality is provided to the extent allowed by law.

**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.**

Total estimated annual burden hours = 12,500

#### Estimated International Number of Respondents and Burden Hours

CS International Client Life-cycle Forms (examples)	Estimated time to complete	Estimated number of respondents	Estimated total burden hours
Company	10.7 minutes	5,000	892

Questionnaire Form			
US Supplier Search Forms	10.7 minutes	5,000	892
Client Registration	10.7 minutes	4,500	802
Preliminary consultation	10.7 minutes	2,000	357
Local event	10.7 minutes	2,000	357
ShowTime	10.7 minutes	2,000	357
Reporting International Success	10.8 minutes	9,000	1620
Industry Focused Program	10.7 minutes	2,000	357
Business Service Providers	10.7 minutes	2,000	357
Participation Agreements	10.7 minutes	5,000	891
Multifaceted Forms TBD	10.7 minutes	31,500	5,618
<b>Totals</b>		<b>70,000</b>	<b>12,500</b>

See attached questions to be used for creating these forms.

**13. 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 #12 above).**

No cost to respondents.

**14. Provide estimates of annualized cost to the Federal government.**

Government employees will spend approximately 10 minutes reviewing each completed document except for Export.gov registrations because these are received and acted on by a computer program.

Estimated annual government employee hours to review completed documents = 11,667 hrs. (government employees are not required to review Export.gov registrations as a computer program automatically takes care of this.)

Annualized cost to the Federal Govt.: 11,667 hr. X \$25/hr. = \$ 291,675.

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

**Program changes:** Based upon client feedback, the CS is increasing the number of export-related services that it provides, therefore the CS is requesting approval of this international clients life-cycle forms. CS is requesting approvals of multifaceted forms that are flexible to create and deliver effective and efficient services to international and domestic buyers as they seek to import U.S. goods and services. **16. For collections whose results will be published, outline the plans for tabulation and publication.**

Results will not be published.

**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.**

Does not apply.

**18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I.**

Does not apply.