Supporting Statement A

Ferrous Metals Surveys

OMB Control Number 1028-0068

Terms of Clearance: None

General Instructions

A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question "Does this ICR contain surveys, censuses, or employ statistical methods?" is checked "Yes," then a Supporting Statement B must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The authorities for this collection are:

- National Materials and Minerals Policy, Research and Development Act of 1980 (Public Law 96-479)
- National Mining and Minerals Policy Act of 1970 (Public Law 91-631)
- Strategic and Critical Materials Stock Piling Act (50 U.S.C. 98 et seq.)

The U.S. Department of the Interior (DOI) has policy responsibility for the Nation's mineral resources and their derived industries. The National Mining and Minerals Policy Act of 1970 (Public Law 91-631), the National Materials and Minerals Policy, Research and Development Act of 1980 (Public Law 96-479) and the Defense Production Act make it incumbent upon the Secretary of the Interior to be informed about and to inform the Congress of important developments, including crises, in the minerals industries. Many of the responsibilities regarding mineral resources are assigned to the U.S. Geological Survey (USGS), where they are discharged through a staff that includes chemists, economists, engineers, geologists, mineral commodity specialists, and physicists.

Two fundamental activities—mining and agriculture—form the basis of the Nation's wealth because they furnish all the raw materials and most of the energy that are used in all other industries. Additionally, the mining industry supplies the fertilizers, pesticides, and soil conditioners that significantly enhance the performance of the agricultural sector. For those raw materials not produced domestically, supplies must be imported. This adversely affects the trade balance and, for some materials, puts U.S. industries at risk of supply disruptions because of global political developments. Imports may also compete with domestic production, thus jeopardizing U.S. jobs. Accordingly, the Government requires accurate, timely data on raw materials production and related industries to formulate policies that ensure national security and economic well-being. The USGS canvass forms are the fundamental means by which data on minerals, mining, and related materials production are obtained.

Ferrous metals are used ubiquitously and are significant and essential metals in most industries, including the construction, transportation, electronics, and chemical industries. In terms of the quantity used and the value, iron, and iron and steel scrap are the principal metals in the ferrous group. These metals and their ores are followed by approximately nine other elemental metals. These include nickel, cobalt, manganese, niobium (columbium), tantalum, molybdenum, tungsten, and silicon. These metals and the ores from which they are produced are widely used in virtually every sector of the U.S. economy, and almost all impart qualities that are not substitutable in their applications in the steel industry and many other industries downstream from the steel industry.

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. Be specific. If this collection is a form or a questionnaire, every question needs
to be justified.

The data obtained from this collection are used by Government agencies, Congressional offices, educational institutions, research organizations, financial institutions, consulting firms, industry, and the public. They provide the Government with essential consumption data for use in legislative decisions, research programs, economic studies, analyses, and land use and environmental impact studies. These data are also used to respond to nationwide and global requests for minerals information. With these canvass forms, the USGS collects and analyzes data on production, consumption, stocks, and value of ferrous metals—a number of which have traditionally been considered as strategic and critical.

Each company reports commodity data consistent with industry standards and as mutually agreed upon by the company and the USGS mineral commodity specialists. The USGS routinely uses this information to provide analyses and data for decision-making purposes to the Congress and various Presidential councils and commissions. The National Security Council, in particular, has frequently used USGS data in relation to materials mobilization studies and sustainability analyses.

Information gathered from this collection is used by the Secretary of the Interior in the annual report to the Congress on the state of domestic mining and mineral industries as required by the

National Materials and Minerals Policy, Research, and Development Act of 1980. Two of the basic provisions of the Act are "the availability of materials is essential for national security, economic well-being, and industrial production" and the "extraction, production, processing, use, recycling, and disposal of materials are closely linked with natural concerns for energy and the environment." The data also provide ways of identifying industry trends; making supply and demand analyses on varying time cycles; assembling meaningful conclusions concerning such important indicators as industry vitality; and formulating appropriate recommendations for the Government on such matters as stockpiling, tariffs, research and development, and production incentives. The availability, production, supply, and value of some of the minerals are highly variable and must be analyzed each month to furnish information and data for reports and indexes that are prepared more frequently than on an annual basis.

These canvasses cover production and consumption in all the ferrous metals industries. The data collected are analyzed and used by the USGS to issue, as promptly as possible, various publications that provide essential information while protecting trade secrets and privileged or proprietary commercial or financial information. These data form a substantial part of the USGS Automated Minerals Information System (AMIS) which the USGS uses in legislative programs, research programs, economic studies, analyses, and land use and environmental impact studies. These data are also used to respond to nationwide and global requests for minerals information.

Furthermore, the Strategic and Critical Materials Stock Piling Act (50 U.S.C. 98 et seq.) requires the Secretary to collect data on strategic and critical materials to assist in determining stockpile goals. The Secretary transferred the responsibility to the USGS after the U.S. Bureau of Mines was abolished in 1996.

Uses of the Information

The U.S. Department of Commerce (DOC) uses USGS data in studies of minerals mobilization, to recommend trade policy and to resolve disputes under the International Trade Administration, to assist in export development, to develop materials research, to develop annual data on the output of U.S. industries, and to develop worldwide mineral production and trade data.

The U.S. Department of State uses USGS data to support international commodity negotiations, to analyze relations with foreign mineral producers, to recommend tariffs and quotas, and to develop a worldwide mineral database.

The U.S. Agency for International Development uses USGS data to assist in determining which minerals are of interest to the United States for development in developing nations.

The Federal Trade Commission and the U.S. International Trade Commission (ITC) use USGS data in studies of antitrust activities, unfair trade practices, and false advertising or misrepresentation of mineral goods or commodities.

The U.S. Department of Defense (DOD) uses USGS data to determine research on materials and minerals within research laboratories of the Army, Navy, and the Air Force; sea lanes that must be protected; Defense Production Act Title III projects; National Defense Stockpile (NDS) goals and specifications; details of procurement, storage and disposal; and suppliers of mineral commodities.

The Federal Reserve Board uses USGS data to develop periodic (monthly, quarterly, and annual) indicators of industrial production and capacity and capacity utilization.

The National Science Foundation, the National Academy of Sciences, the National Academy of Engineering, and the National Research Council use USGS data to ensure maximum benefits from all mineral research.

The U.S. Department of Transportation, the Interstate Commerce Commission, and the U.S. Army Corps of Engineers use USGS data to determine national and State transportation requirements for the minerals industry.

In addition to the use of USGS data by the majority of Federal Government departments, reports and information are in demand by many types of organizations, including the following:

- Participating companies
- Industrial marketing groups
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- Financial institutions
- Export associations

Electric utilities

- International industry associations
- State governments
- Domestic trade associations
- Industrial and agricultural sectors
- The general public, especially academic, consulting, and legal organizations
- Minerals management companies

Sectors of the public that use the data collected by the USGS include, but are not limited to: concrete, construction, metals, ceramics, refractories, electric utilities, electronic engineering, chemical, coal, paper, rubber, plastics, and agricultural industries. The USGS customer base (recipients of these data) is well over 35,000 entities and increases considerably each year.

The Department of Energy, the Department of Homeland Security, the World Bank, the Federal Highway Administration, and most of our sister agencies within the DOI also rely on these data. The data collected are used to determine the economic health of the Nation, factored into the gross domestic product, and used in forecasts and trend projections in the building and construction industries, which are closely linked to the issue of rebuilding the infrastructure of the country. This information is not available from any other source.

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 and specifically how this collection meets GPEA requirements.

On-line electronic forms are available to registered users at the minerals information forms (MIFORMS) Web site (https://miforms.er.usgs.gov). Immediate on-line registration is available where new respondents and new users are granted immediate access. For security purposes, additional new registrants (two or more) for the same operation will not be allowed to access past submissions on-line unless they specifically request administrative privileges to retrieve such historical data.

Currently, 15% of the universe responds electronically this percentage is expected to increase over time. Paper forms will remain an option for submission because not all industry respondents are able or wish to transmit their data to the USGS by electronic means.

The electronic forms conversion effort continues to fulfill the Government Paperwork Elimination Act requirements by maintaining intelligent links between the electronic forms and the database.

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.

These data are not collected by any other Federal or State agency, trade association, or other public sources. The USGS continuously reviews data collection practices with other agencies, including the U.S. Department of Labor, DOC, and ITC, as well as industry associations such as the American Iron and Steel Institute, the Ferroalloys Association, the Institute of Scrap Recycling Industries, the International Tungsten Industry Association, and the Cobalt Development Institute.

For over 120 years, the Federal Government has consistently collected mineral information while trade associations have been created and abolished. Where data are available from other sources, these data are used. Alternate data sources are not available for the mineral commodities that are canvassed.

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

The canvass form is designed to minimize the burden to all respondents by only requesting essential data. The format is common to the reporting industry. When applicable, small businesses (10%) often respond with fewer data entries than the larger organizations.

6. Describe the consequence 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.

The USGS provides information necessary for sound Federal, State, and industry decision-making. If data are not made available as soon as possible or canvasses were conducted less frequently, the monitoring of stockpile materials for national defense would be impeded by the gap in statistics. The level of domestic and foreign productivity and economic fluctuation would be much less apparent or missed, and that data simply would not be timely enough to be reliable for decisions that affect minerals vulnerability, potential environmental impacts, current trends, and future needs. These decisions, in turn, have an effect on such aspects of our economy as taxes, royalty payments, tariffs, land use, environmental regulations, water use, and transportation.

Collection of monthly and annual data allows economic analysis that can capture variations that a longer time interval could not. Collection of these data on a biennial basis would not be practical because the industry respondents do not normally have the data in convenient format except on a monthly or annual basis. A 2-year canvass, for example, would require the respondents to alter their accounting procedures or manually add 2 years of data. This would increase their reporting burden. Also, multiyear data are less meaningful and less convenient for analysis by industry and Government agencies.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner:
 - * requiring respondents to report information to the agency more often than quarterly;
 - * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
 - requiring respondents to submit more than an original and two copies of any document;
 - * requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
 - * in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;
 - requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
 - * that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
 - * requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

The data collected by the monthly canvasses are absolutely necessary if the USGS is to meet current, reliable information demands of industry and Government mineral analysts who prepare monthly and bimonthly indexes and commodity reports to analyze the industry. Additionally, the data are necessary if the USGS is to meet the requirements of Public Law 91-631 for the minerals that have erratic supply,

demand, value, availability, or seasonal production patterns. Users of this information are able to track trends on a monthly basis because of the highly volatile market or seasonal production patterns for the materials covered by these canvasses. Collecting data on a monthly basis, rather than at less frequent intervals, such as quarterly, semiannually, or annually will allow trends to be detected earlier.

Under the terms of the USGS standard for handling proprietary canvass data included in the supplementary documents, companies can and usually do specify that the data they supply be shared only in aggregated form. These terms ensure that the USGS will continue to receive proprietary data in confidence.

The canvass forms are designed to ensure that respondents are not required to maintain or provide data in a format other than that in which the data are customarily maintained. The respondents are routinely asked to comment on the design of the form and to make recommendations that help maintain consistency with industry's methods of accounting.

Some commodity data are needed monthly because of the importance of these industries to the industrial economy, such as for the transportation, construction, and electronic sectors. DOD planners use these data to evaluate purchase and disposal plans for the NDS. The mining and metal products industries regularly use these data to evaluate production and consumption plans. Minerals policy planners need the most up-to-date information in making decisions concerning these industries.

If a company receives a monthly canvass, then it will not receive an annual canvass of the same type for those commodities. Most canvasses that are conducted annually are done so for two reasons: (1) because of the small size of the companies involved and (2) the desire to limit reporting burden. Although the number of small companies canvassed annually is large, the aggregate data collected is small, thus permitting monthly estimates based on the previous year's data without significant impact on the overall accuracy of monthly production or consumption. Another reason for instituting an annual reporting basis relates to the willingness or capability of a company to complete a monthly canvass. On a few occasions, exceptions have been made to allow a company to report annually on a temporary basis; this has been most common during poor economic times.

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 in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe 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.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On February 22, 2011, a 60-day Federal Register notice (76 FR 9810) was published announcing this information collection. Public comments were solicited for 60 days ending April 21, 2011. We did not receive any public comments in response to that notice.

The canvass forms are designed to collect only the required data, thus minimizing the individual response time, and to ensure that respondents are not required to maintain or provide data in a format other than that in which the data are customarily maintained. The respondents are regularly asked to comment on the design of the form and to make recommendations that help maintain consistency with industry's methods of accounting.

USGS mineral commodity specialists are routinely contacted by Federal and State agencies, Members of Congress, trade associations, the financial community, private companies, universities, and private citizens that request general and specific data and information.

When persons outside the USGS submit requests for information, the USGS mineral commodity specialists and statistical assistants respond in a timely manner. The USGS receives and responds to several thousand e-mail and telephone inquiries each month. During these discussions and interactions, views are exchanged on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, reporting format, data elements to be recorded, disclosed, or reported, burden estimates and other aspects of this Information Collection. These views help the USGS to improve its data and publications.

On the basis of such feedback, information-use patterns are established commodity by commodity. Once patterns are determined, canvass forms are revised to collect data and to meet the information needs. As information request patterns change, the data collected and reported are modified. Within the last 3-years of the Office of Management and Budget approval period for this collection, no direct changes were made to the collection instruments. The list below identifies industry contacts consulted on the burden estimates and other aspects of this Information Collection between February 2010 and March 2011.

Freeport McMoran Copper and Gold, Inc.

Barbara Pickett, Accounting Assistant

Phoenix, AZ

Date of contact: February 2010

Lafarge North America, Inc.

Chris DeMichael, Financial Analyst

Streetsboro, OH

Date of contact: March 2011

AK Steel

Gary Patrick, Senior Accountant

Middletown, OH

Date of contact: March 2011

Tronox, Inc.

Paula Stage-Squire, Manager of Accounting and

Materials Henderson, NV

Date of contact: March 2011

CMC Steel Alabama Alex Chaney, Cost Accountant Birmingham, AL

Date of contact: February 2011

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

No payments or gifts are made to respondents.

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

Public Law 96-479, Section 5(3) (f), ensures the confidentiality of all data reported by persons or firms engaged in any phase of mineral or mineral-material production or large-scale consumption.

To implement Section 5(3) (f), the USGS withholds all data reported as "Company Proprietary Data," and such data will be disclosed only in the aggregate so as not to reveal data from a single respondent. USGS policy states that absent specific company permission, aggregated data can be reported only if it represents three or more companies and if no one company accounts for more than 75% of the total or if no two companies account for more than 90% of the total. Proprietary data may only be disclosed to Congress or to Federal defense agencies upon official request for appropriate purposes. Except in response to requests by Congress or by Federal defense agencies, proprietary data will never be disclosed without the specific permission of the company as represented in the disclosure query. The disclosure statement and query are printed on each canvass form.

The USGS standard for handling proprietary canvass data further discusses protections for USGS proprietary data including penalties associated with violations.

The records for this collection will be maintained in the appropriate Privacy Act System of Records identified as Computer Registration System. (INTERIOR/USGS-20) published at 74 FR 23430 (May 19, 2009).

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.

This collection does not ask for information of a sensitive nature.

- 12. Provide estimates of the hour burden of the collection of information. The statement should:
 - * Indicate the number of respondents, frequency of response, annual hour burden, and an

explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

- * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
- * Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under "Annual Cost to Federal Government."

Variations can be expected in the reporting burden for completion of these forms because of the differences in operation size and accounting systems. The data sought are those routinely maintained in the course of business. For some companies with more than one plant, the submission takes the form of a consolidated report covering all company operations. This greatly reduces the reporting burden.

We estimate the total annual burden for this collection of information (includes the time for reviewing instructions, searching data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information) to be approximately 1,660 hours (Table 1 below). Approximately 990 respondents will report data either monthly or annually. These two respondent groups are mutually exclusive. For example, companies that report on a monthly basis are not asked to report the same data on an annual basis. For the 3,201 associated responses, average completion time ranges from 10 minutes to 1 hour per form.

Table 1. Consolidated estimates of annual burden

			PRIVATE SECTOR			
	Form No.	Frequency	Number of Respondents	Responses	Completion Time	Burden Hours
1	9-4044-A	Annually	12	12	30 min	6
2	9-4045-M	Monthly	10	120	10 min	20
3	9-4047-MA	Annually	87	87	30 min	44
3	9-4047-MA	Monthly	27	324	30 min	162
4	9-4048-A	Annually	49	49	30 min	25
5	9-4050-A	Annually	20	20	30 min	10
6	9-4064-M	Monthly	10	120	1 hour	120
7	9-4071-MA	Annually	10	10	45 min	8
/	9-4071-MA	Monthly	10	120	45 min	90
8	9-4076-A	Annually	10	10	1 hour	10
9	9-4077-A	Annually	13	13	10 min	2

10	9-4078-M	Monthly	14	168	10 min	28
11	9-4079-M	Monthly	10	120	30 min	60
12	9-4092-A	Annually	24	24	30 min	12
13	9-4093-M	Monthly	10	120	1 hour	120
14	9-4106-M	Monthly	10	120	30 min	60
15	9-4116-MA	Annually	416	416	30 min	208
13	9-4116-MA	Monthly	100	1,200	30 min	600
16	9-4120-A	Annually	137	137	30 min	69
17	9-4140-A	Annually	11	11	30 min	6
	TOTALS		990	3,201		1,660

We estimate the total dollar value of this collection to be \$66,566 (Table 2 below). We arrived at this figure by multiplying the combined estimated burden hours (1,660) by the current dollar value (including benefits) of burden hours (\$40.10). This wage figure is based on the Bureau of Labor Statistics (BLS) news release USDL-10-1687 for Employer Costs for Employee Compensation—September 2010 at http://www.bls.gov/news.release/archives/ecec_12082010.pdf, dated December 8, 2010.

Table 2: Estimated Dollar Value of Respondent Annual Burden Hours

Activity	Sector	Annual Number of Responses	Total Annual Burden Hours	Dollar Value of Burden Hours (Including Benefits)	Total Dollar Value of Annual Burden Hours
Completing canvass forms	Private	3,201	1,660	\$40.10	\$66,566

- 13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)
 - * The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
 - * If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or

- regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- * Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

There is no non-hour cost burden, recordkeeping nor any fees associated with collection of this information.

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 total annual cost to the Federal Government is \$706,050. This includes the operational expenses of \$208,450 (Table 3 below). Operational expenses include mailing, overhead, printing, processing, and non-Federal support.

Table 3. Annualized Operational Expenses and estimated costs

Operational Expenses	Estimated Cost
Printing of canvass forms	\$156
Mailing lists compilation and maintenance	\$1,353
Mailing operation	\$3,444
Editing, coding, tabulation	\$82,127
ADP processing	\$91,131
Electronic publication of results	\$7,232
Government Printing Office print costs for 2 Federal Register Notices	\$652
Electronic forms development and maintenance	\$22,355
Total	\$208,450

The total estimated cost to the Federal Government for processing and reviewing information received as a result of this collection is \$497,600 (Table 4 below). This includes Federal employee salaries and benefits. The table below shows Federal staff and grade levels performing various tasks associated with this information collection. We used the Office of Personnel Management Salary Table 2011-DCB (http://www.opm.gov/oca/11tables/pdf/dcb_h.pdf) to determine the hourly rate. We multiplied the hourly rate by 1.5 to account for benefits (as implied by the BLS news release USDL-10-10-0774).

Table 4. Federal Employee Salaries and Benefits

Position	Grade/ Step	Hourly Rate	Hourly Rate incl. benefits (1.5 x hourly pay rate)	Estimated time spent by Federal Employees (annualized hours)	Estimated Federal employee salary/benefit annualized costs
Commodity Specialist	GS-13/8	\$52.61	\$78.92	1,700	\$134,200
Statistical Assistants	GS-6/3	\$19.41	\$29.12	7,940	\$231,200
Computer Specialist	GS-13/8	\$52.61	\$78.92	570	\$45,000
Editors	GS-12/8	\$44.25	\$66.38	510	\$33,900
Minerals Records Administrator	GS-12/8	\$44.25	\$66.38	170	\$11,300
Management	GS-14/8	\$62.17	\$93.26	450	\$42,000
				TOTAL	\$497,600

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

We estimate that there will be 3,201 responses totaling 1,660 burden hours. This is a net increase of 222 responses and 46 burden hours from our previous request of 2,979 responses and 1,614 burden hours.

We are reporting an increase of 312 responses and 96 burden hours as a program change. This results from new requirements and the addition of four new forms:

- Form 9-4077-A (Molybdenum Ore and Concentrate) increase of 13 responses and 2 burden hours.
- Form 9-4078-M (Molybdenum Concentrates) increase of 168 responses and 28 burden hours.
- Form 9-4079-M (Molybdenum Concentrate Molybdenum Products) increase of 120 responses and 60 burden hours.
- Form 9-4140-A (Production, Shipments, and Stocks of Reclaimed Nickel) increase of 11 responses and 6 burden hours.

We are also reporting a decrease of 90 responses and 50 burden hours. This adjustment is based on our experience in administering this collection along with the types of respondent feedback, discussions, and interactions as described in our answer to item 8 above, we fine-tuned the number of respondents for these forms.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time

schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The AMIS mainframe system and off-the-shelf software packages such as spreadsheets are used to compile and tabulate the data and to prepare tables for publication. National, State, and regional tabulations are prepared and published annually at http://minerals.er.usgs.gov/minerals/ in table format from data collected by these canvasses. Preliminary estimates are prepared and published in the Mineral Commodity Summaries, which is the earliest Government publication to furnish estimates covering the previous year's nonfuel mineral industry. Data are also published in the monthly and annual issues of the Mineral Industry Surveys series and the Annual Reports from the Minerals Yearbook and other USGS publications.

Tables present various aspects of commodities, such as consumption and production of products together with industry stocks. Economic changes are incorporated and industry trends and activities are studied. Statistical data are processed and analyzed by the Data Collection and Coordination Section, which also establishes timing for all key steps in the work.

Tabulation and publication of data are governed by the USGS standard for handling proprietary canvass data. Data are available via the Internet and in print for select publications in the USGS minerals information series.

Monthly, quarterly, and semiannual tables are generally published within 50 workdays from the end of the reporting month. Annual data are generally published within 9 months from the end of the reporting year.

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.

We will display the OMB control number and expiration date on each form in this collection.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions to the certification statement.