

EXPORT-IMPORT BANK OF THE UNITED STATES

Agency Information Collection Activities Submission for OMB Review

PART 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 purpose of the survey is to fulfill the statutory mandate (Export-Import Bank Act of 1945, as amended, 12 U.S.C. 635) which directs Ex-Im Bank to report annually to the U.S. Congress any action taken toward providing export credit programs that are competitive with those offered by official foreign export credit agencies. The Act further stipulates that the annual report on competitiveness should include the results of a survey of U.S. exporters and U.S. commercial lending institutions which provide export credit to determine their experience in meeting financial competition from other countries whose exporters compete with U.S. exporters.¹

- 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.

The expansion of the survey is a direct result of requests made by Ex-Im Bank's Advisory Committee. This committee strongly urged staff to broaden the scope, specificity, and survey pool with the guidance of a professional survey consultant. As a result, the number of questions increased. For example, short-term questions were added (questions 10-46 for lenders, brokers, and exporters). At the behest of the committee, staff also included questions on non-standard financing and denied and deterred deals (questions 203-228) to better assess Ex-Im's performance in light of a changing international finance landscape.

¹ <http://www.exim.gov/about/charter/section8.cfm>

Ex-Im Bank Charter: Section 8

Sec. 8(a). The Export-Import Bank of the United States shall transmit to the Congress annually a complete and detailed report of its operations. Such report shall be as of the close of business on the last day of each fiscal year

Sec. 8A. Annual Competitiveness Report.

(a) In General.- Not later than June 30 of each year, the Bank shall submit to the appropriate congressional committees a report that includes the following:

(1) Actions of Bank in Providing Financing on a Competitive Basis, and to Minimize Competition in Government-Supported Export Financing.- A description of the actions of the Bank in complying with the second and third sentences of section 2(b)(1)(A). In this part of the report, the Bank shall include a survey of all other major export-financing facilities available from other governments and government-related agencies through which foreign exporters compete with United States exporters (including through use of market windows (as defined pursuant to section 10(h)(7))) and, to the extent such information is available to the Bank, indicate in specific terms the ways in which the Bank's rates, terms, and other conditions compare with those offered from such other governments directly or indirectly. With respect to the preceding sentence, the Bank shall use all available information to estimate the annual amount of export financing available from each such government and government-related agency. In this part of the report, the Bank shall include a survey of a representative number of United States exporters and United States commercial lending institutions which provide export credit on the experience of the exporters and institutions in meeting financial competition from other countries whose exporters compete with United States exporters.

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A significant issue with the previous survey was that it did not draw distinctions for grades among the five different major medium- and long-term program areas: long-term (LT) aircraft, LT project finance, LT other, medium-term (MT) aircraft, MT other. Given that these programs are highly diverse, staff decided the new survey should be more tailored to each participant's experience in order to allow for differences in grades among program areas. The solution was reorganizing a portion of the MLT survey into segments for each of the five program areas that participants will answer if they experience in a program area (questions 50-147). These answers will be more informative than the previous years' responses. Additionally, the previous survey did not provide an outlet for comparing Ex-Im Bank's performance against any other specific export credit agencies. To remedy this issue, a number of optional questions listing specific ECAs for comparison have been inserted throughout the survey. Below is a table depicting the number of questions for each section of the survey.

Category	# Q's
All respondents	19
Brokers	15
Lenders	16
Exporters	17
LT Aircraft	16
LT Project Finance	19
LT Other	16
MT Aircraft	15
MT Other	15
Foreign Currency Guarantees	8
Co-financing	6
Environment	10
Foreign Content	9
Local Costs	4
MARAD/PR-17	7
Economic Impact	3
Non-standard Financing	15

There are 19 questions asked of all respondents. There are 15 questions that are asked of Brokers. There are 16 questions that are asked of Lenders. There are 17 questions that are asked of all Exporters. If an Exporter or Lender responds that they had one or more medium- or long-term transaction, they are directed to the program sections. The program sections consist of the following: long-term aircraft (16 questions), long-term project finance (19 questions), long-term other (16 questions), medium-term aircraft (15 questions), and medium-term other (15 questions). Approximately 80% of the medium- and long-term Exporters and Lenders will only answer one of the five program sections. After completing the program section(s), medium- and long-term exporters and lenders are asked 62 questions that are divided into the following eight sections: Foreign Currency Guarantees (8 questions), Co-financing (6 questions), Environment (10 questions), Foreign Content (9 questions), Local Costs (4 questions), MARAD/PR-17 (7 questions), Economic Impact (3 questions), and Non-standard Financing (15 questions). Each of

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these sections has a screener question; therefore respondents with no experience in a given section will only have to answer the first yes/no question in that section. Approximately 80% of the lender and exporter respondents will only have experience in three of these sections. A Broker will only ever be asked a maximum of 34 questions. An Exporter or Lender could be asked a maximum of 179 or 178 questions, respectively; however, a typical Exporter or Lender will be asked a maximum of 73 questions. The questionnaire makes heavy use of skip patterns, so while a respondent may enter a section, parts of that section may be skipped depending on the respondent's experience. It is extremely unlikely that any respondent will see all of the questions for which they qualify. A flow chart depicting question/section flow is attached.

After the survey was loaded into the survey software (see below), extensive testing was performed by Ex-Im Bank subject matter experts and outside survey experts. As a result of this testing, it was determined that the questionnaire was too burdensome and exceeded the initial estimate of 90 minutes. The questionnaire was revised to exclude a number of questions as well as to make many required questions optional. A summary of the changes is provided for your reference at the end of this document. These changes were again tested by the subject matter and survey experts who now confirm the 90 minute respondent burden.

A revised Word document that serves as a mockup of the web survey is attached. Each page of the Word document represents a screen of the web survey.

The data collection will be handled by Ex-Im Bank. The software selected as the survey tool is Checkbox. Below is a link to the testing environment, so that the survey implementation may be reviewed.

<http://us.eximbank.checkboxonline.com/Survey.aspx?s=a735f1f482d9404ea4206a68ecd549f8&u=5104fefe-2423-4d07-91e8-56f81e3735e6&forceNew=true&test=true>

- 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 submissions 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.

Participants will complete the survey online via a commercial survey software vendor's website.² This technology will be utilized in order to efficiently guide the participants through the survey and to effectively organize the responses.

- 4) Describe effort 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.

The survey will require participants to login with individually supplied credentials, therefore avoiding duplication in respondents and responses. In addition, the survey specifically requests that the

² Checkbox (www.checkbox.com) has been selected as the software vendor.

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participants respond with information only on the prior business year and therefore, it is necessary for Ex-Im Bank to distribute the survey on an annual basis.

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

The survey will not impact small businesses or small entities with any greater burden than for larger entities, and the burden is minimal.

- 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.

Ex-Im Bank, as mandated by Congress, is required to utilize the results of an annual survey to determine its experience in meeting financial competition from other countries whose exporters compete with U.S. exporters.

- 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 or reliable results that can be generalized to the universe of study;
 - requiring the use of 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.

This collection is consistent with guidelines in 5 CRF 1320.6

- 8) If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice 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.

The 60 Day Federal Register citation is Federal Register Volume 77, Number 143 (July 25, 2012).

The 30 Day Federal Register citation is Federal Register Volume 77, Number 193 (October 4,

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2012).

No comments were received.

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

Participants will not be provided any payments or gifts.

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

Ex-Im Bank and its officers and employees are subject to the Trade Secrets Act, 18 USC Sec 1905, which requires Ex-Im Bank to protect confidential business and commercial information from disclosure, as well as, 12 CFR 404.1, which provides that, except as required by law, Ex-Im Bank will not disclose information provided in confidence without the submitter's consent.

A copy of the invitation message is attached. The introductory page of the online survey has been revised to include more instructions for survey participants.

- 11) Provide additional justification for any question 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.

The survey does not include any questions of a sensitive nature.

- 12) Provide estimates of the hour burden of the collection of information. The statement should include:

- the number of respondents;
- the frequency of response;
- annual hour burden; and
- an explanation of how the burden was estimated.

Annual Number of Respondents:	150
Estimated Time per Respondent:	1.5 hours (90 minutes)
Government Annual Burden Hours:	137.5
Frequency of Reporting or Use:	Yearly

- 13) Provide an estimate for the total annual cost burden to respondents or records keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in items 12 and 14).

There is no cost burden expected to be incurred by participants.

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14) Provide estimates of annualized costs to the Federal government. Also provide a description of the method used to estimate costs, which should include quantification of hours, operational expenses, and any other expense that would not have been incurred without this collection of information.

Reviewing time per hour:	55 minutes
Responses per year:	150
Reviewing time per year:	137.5 hours (8,250 minutes)
Average wages per hour:	\$30.25
Average cost per year (time * wages):	\$4,159.38
Benefits & Overhead:	28%
Total Cost to Government:	\$5,324.01

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

The increase in burden is due to Export Import Bank increasing the number of respondents, survey scope (i.e. addition of short term program questions), and time to complete the survey and perform survey review.

16) For collection 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 results will be summarized and published in the 2012 Export-Import Bank Annual Competitiveness Report to Congress which will be published on June 30, 2013. Ex-Im Bank anticipates that the survey will be finalized for distribution to participants by January 2013. The survey will be available online for four weeks, during which time electronic and phone nonresponse follow up will occur.

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.

Not applicable

18) Explain each exception to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-1.

Not applicable

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