

**1 Supporting Statement A for
Paperwork Reduction Act Submission**

OMB Control Number 1018-0012

**Declaration for Importation or Exportation of Fish or Wildlife and
Fee Waiver Certification
50 CFR 14.61–14.64 and 14.94(k)(4)**

Note: Currently, information that we collect for the Fee Waiver Certification is approved under OMB Control No. 1018-0152, which expires April 30, 2013. We are including the Fee Waiver Certification in this Information Collection Request. If OMB approves this request, we will discontinue OMB Control No. 1018-0152.

Terms of Clearance: None.

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

FWS Form 3-177 (Declaration for Importation or Exportation of Fish or Wildlife)

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The Endangered Species Act (16 U.S.C. 1531 et seq.) (ESA) makes it unlawful to import or export fish, wildlife, or plants without filing a declaration or report deemed necessary for enforcing the Act or upholding the Convention on International Trade in Endangered Species (CITES) (see 16 U.S.C. 1538(e)). The regulations at 50 CFR 14.61 and 14.63 provide the requirements for the declaration of imported or exported fish or wildlife using FWS Forms 3-177 and 3-177a (Continuation Sheet). The exceptions to those requirements are in sections 14.62 and 14.64.

Fee Waiver Certification

The Endangered Species Act (16 U.S.C. 1538(d)(1)) makes it unlawful for any person to engage in business as an importer or exporter of certain fish or wildlife without first having obtained permission from the Secretary. 16 U.S.C. 1540(f) authorizes the U.S. Fish and Wildlife Service (we, Service) to charge and retain reasonable fees for processing applications and for performing reasonable inspections of importation, exportation, and transportation of wildlife. The regulations at 50 CFR 14.91 provide the requirements for obtaining an import/export license prior to engaging in business as an importer or exporter of certain fish or wildlife and the regulations at 50 CFR 14.94(k) provide the exemptions for user fees that would otherwise be assessed to importers or exporters of certain fish or wildlife.

In 2009, we implemented a new user fee system intended to recover the costs of the compliance portion of the wildlife inspection program. Since that time, we have been made aware that we may have placed an undue economic burden on businesses that exclusively trade in small volumes of low-value, non-Federally protected wildlife parts and products. To address this issue, we implemented a program that exempts certain businesses from the designated port base inspection fees as an interim measure while we reassess the current user fee system. In order to participate in our user fee exemption program for low-risk importations and exportations, importers or exporters must certify electronically that they meet the criteria for inclusion in the program.

2. Indicate how, by whom, how frequently, and for what purpose the information is to be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, explain how the collection complies with all applicable Information Quality Guidelines.

FWS Form 3-177

FWS Forms 3-177/3-177a are the declaration forms that individuals, businesses, or State and local government agencies must file with us prior to importing into or exporting from the United States any fish, wildlife, or wildlife products. The information that we collect on FWS Forms 3-177/3-177a is unique to each wildlife shipment and:

- Assists us during the inspection process when confirming the contents of the shipment.
- Enables us to enforce any regulations that pertain to the fish, wildlife, or wildlife products contained in the shipment.
- Enables us to maintain records of the importation and exportation of these commodities.

As one of our treaty obligations under CITES, we send to the CITES Secretariat in Geneva, Switzerland, an annual report on the number and types of imports and exports of fish, wildlife, and wildlife products. We use information from FWS Form 3-177 to compile this report.

We also use the information as an enforcement tool and management aid to monitor the international wildlife market and detect trends and changes in the commercial trade of fish, wildlife, and wildlife products. Our Division of Scientific Authority and Division of Management Authority use this information to assess the need for additional protection for native species. In addition, nongovernment organizations, including the commercial wildlife community, request information from us that we obtain from these forms.

Since our 2009 request to OMB to renew this collection of information, we have updated the instructions for the completion of FWS Form 3-177, most notably by updating the links included in those instructions. These updates to the instructions will not increase the burden associated with the submission of the form.

We collect the following information on FWS Forms 3-177/3-177a:

Block 1 - The date of the import or export of the wildlife shipment is important for monitoring wildlife shipments. This date often differs from the date filed with U.S. Customs and Border Protection (CBP).

Block 2 - Regulations at 50 CFR 14.91 require that businesses and individuals obtain an import/export license prior to engaging in business as an importer or exporter of fish, wildlife or wildlife products. The license number allows us to determine (1) if this shipment complies with this requirement and (2) if this information is consistent with information provided in Block 5.

Block 3 - Identification of the wildlife shipment as an import or an export is necessary so we can (1) determine what documentation may be required to authorize the importation or exportation and (2) compile statistical data on fish, wildlife or wildlife products that are imported and exported.

Block 4 -The port of entry or export is important to us for long-term planning purposes. This information will assist us in tracking the volume of wildlife shipments by port and in setting priorities for establishing future ports where fish, wildlife or wildlife products can be imported or exported.

Block 5 - The purpose code identifies the intended purpose of the wildlife shipment.

Block 6 - The Custom Document Number(s) provides the CBP document number and connects FWS Forms 3-177/3-177a with corresponding CBP documents.

Blocks 7 - 12 provide specific information describing the wildlife shipment including how the wildlife shipment is being imported or exported and where it is available for inspection. Information includes the name and type of carrier, the carrier's identifying "way bill" or "bill of lading" number for the shipment, the location where the wildlife shipment is available for inspection, the number of cartons or containers of the wildlife shipment, and any distinguishing markings on those cartons or containers indicating that they contain fish, wildlife or wildlife products. The term "Bonded" means that the location of the shipment is under CBP control. This information helps to ensure that we can inspect the wildlife shipment without excessive delays to the importer or exporter.

Block 13 - We need the name, address, telephone number, e-mail address, and any identifier number of the U.S. importer or exporter so that we can identify and communicate with the individual or business on any matters regarding the wildlife shipment. The identifier number in Block 13b, if applicable, may be issued by CBP or a commercial source of business information, such as Dun and Bradstreet (Duns number).

Block 14 - We ask for the name, foreign address, telephone number, e-mail address, country code, and any identifier number of the foreign importer or exporter so that we can determine the origin or destination of the wildlife shipment and the validity of any required import or export permits submitted at the time clearance of the wildlife shipment is requested. Foreign government permits are intended for specific shipments and specific importers and exporters and cannot be transferred. Block 14b requires the two-letter International Organization for Standardization (ISO) country code of the foreign importer or exporter, and Block 14c, the identifier number, if applicable.

Block 15 - We need the business name, telephone and fax number, e-mail address, identifier number and contact person for the customs broker, shipping agent, or freight forwarder so that we can identify and communicate with the representative of the individual or business on any matters regarding the wildlife shipment. Block 15b requires the identifier number, if applicable, and Block 15c, the contact name.

Blocks 16, 19a, and 20 - The species of wildlife included in the shipment, listed by common name (Block 16a) and scientific name (Block 16b), the quantity of that species in the shipment (Block 19a), and the natural country of origin of that species in the shipment (Block 20) allow us to establish the legality of a wildlife shipment by determining compliance with Federal, State and foreign laws. This information also allows us to monitor trade in species listed in the appendices to CITES and to compile summary data for use in annual reports, management planning, and evaluation in various divisions of the Service and the National Marine Fisheries Service, and to fulfill treaty obligations under CITES.

Block 17 - The foreign (Block 17a) and United States (Block 17b) CITES permit numbers document compliance with Federal, State and foreign laws governing imports and exports of

wildlife shipments and connect FWS Form 3-177 with corresponding foreign and U.S. CITES permits.

Block 18 - The description code (Block 18a) identifies the imported or exported commodity as a live animal or a product. The source code (Block 18b) describes that commodity as to whether it is from the wild, captive-bred, or from another source. This information is necessary to establish the legality of a wildlife shipment by comparing the commodities present with any accompanying documentation. The description code also assists us in establishing inspection priorities by declaring that a given shipment contains a live or perishable commodity.

Block 19b - The declared value of the imported or exported commodities allows us to monitor and report values of wildlife shipments being imported and exported and to ensure compliance with CBP duty rates.

Block 21- Each species of live wildlife in the shipment must be identified as venomous or nonvenomous. This information will assist our wildlife inspectors in the preparation for and inspection of the wildlife shipment.

Block 22 - The signature of the person certifying the information provided on FWS Form 3-177, and the date of that certification, are needed to establish legal responsibility for the wildlife shipment in the event of subsequent litigation resulting from the wildlife shipment.

Fee waiver certification

Businesses that require an import/export license under 50 CFR 14.93 may be exempt from the designated port base inspection fee as set forth in 50 CFR 14.94(k)(4)(i). To participate in this program, the U.S. importer or exporter must continue to pay the overtime fees, the nondesignated port base fees, or the import/export license and nondesignated port application fees, and the business must meet all of the criteria for participation.

Businesses may request to participate in the fee exemption program for low-risk importations and exportations using the Service's electronic declaration filing system (eDecs). Businesses must certify that they will exclusively import and export wildlife shipments that meet the following criteria:

- Each shipment does not contain live wildlife.
- Each shipment does not contain wildlife that requires a permit or certificate under 50 CFR 15, 17, 18, 20, 21, 22, or 23 or is listed under 50 CFR 16.
- Each shipment contains 25 or fewer wildlife parts and products containing wildlife.
- Each wildlife shipment is valued at \$5,000 or less.
- The importer/exporter has not been assessed a civil penalty, issued a violation notice, or convicted of any misdemeanor or felony violations involving the import or export of wildlife.
- The business has had two or fewer wildlife shipments that were refused clearance in the 5 years prior to requesting participation in the fee exemption program.
- The business has not previously participated in the program and been removed for failure to meet the criteria.

Businesses must continue to meet the program criteria while participating in the program. If the business fails to meet the criteria after approval, it will be removed from the program. While such a business would still be able to import or export wildlife, it would need to pay the

applicable designated port base inspection fees for its shipments. The certification must be renewed annually.

If approved to participate in the program, the business must file FWS Form 3-177 and all required accompanying documents electronically using eDecs for each shipment and must meet all other requirements of 50 CFR 14. Using subsequent submissions of electronic FWS Forms 3-177, we will confirm that the business exclusively imports or exports nonliving, non-Federally protected wildlife, and that each wildlife shipment contains 25 or fewer specimens valued at \$5,000 or less.

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].

To reduce the information collection burden on the public, FWS Form 3-177, with instructions for its completion, is available for electronic submission at <https://edecs.fws.gov>. Approximately 85 percent of respondents submit responses electronically. This is an increase from approximately 80 percent of respondents who submitted responses electronically that was used as a basis for our 2009 request to OMB to renew this collection of information. We anticipate that the use of eDecs will expand in the future, which will further reduce the burden on the public.

The fee waiver certification required in order to participate in our user fee exemption program can only be submitted electronically through eDecs.

4. Describe efforts to identify duplication.

The Service is the lead agency for enforcement on the importation and exportation of wildlife shipments under the ESA, and is the lead agency for CITES implementation within the United States. The information that we collect on FWS Form 3-177 is not collected by any other Government agency.

U.S. Customs and Border Protection (CBP) is coordinating the implementation of the International Trade Data System (ITDS). ITDS will consolidate all of the requirements for all Federal Government agencies that have jurisdiction over a given import shipment. When or if ITDS goes on line, electronic Forms 3-177 submitted through our eDecs system must include a CBP entry number and a CBP line item number with each FWS Form 3-177 line item. This CBP requirement will enable ITDS to accept electronic FWS Form 3-177 data. However, the CBP entry number and line item number are preexisting information and would not impose any additional burden on respondents. This possible duplication of information collection will only apply to the electronic submission of FWS Form 3-177.

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

We collect the minimum information necessary to allow us to fulfill our responsibilities under the ESA and CITES. FWS Form 3-177 is designed for easy use and detailed instructions are included. If using eDecs, respondents can complete the form electronically in about half

the time needed to complete the form by hand. The fee waiver certification only requires respondents to certify that they meet the criteria.

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 ESA makes it unlawful to import or export fish, wildlife, or plants without filing a declaration or report deemed necessary for enforcing the Act or upholding CITES. This information we collect on FWS Form 3-177 is necessary for us to fulfill the statutory requirements of the ESA and the obligations of the United States as a party country to CITES. In addition, without this information, we would not be able to monitor imports or exports of wildlife shipments and, therefore, would be unable to determine if imports or exports of wildlife shipments are in compliance with Federal, State and foreign laws. If the user fee exemption program were not established, small businesses will not be able to take advantage of the exemption from the designated port base inspection fees. Collecting this information on an annual basis is a reasonable timeframe to ensure that these businesses continue to exclusively import or export non-living, non-Federally protected wildlife, that each wildlife shipment contains 25 or fewer specimens, and that each wildlife shipment is valued at \$5000 or less.

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.**

FWS Form 3-177

The only special circumstance that is inconsistent with OMB guidelines is the timeframe for the retention of documents by commercial importers and exporters of wildlife and wildlife products. FWS Form 3-177 contains a requirement that importers and exporters must provide all relevant information including supplemental documentation as required in 50 CFR 14.52(c). To obtain clearance of an imported or exported shipment of wildlife or wildlife products, an importer or exporter must present all relevant shipping documents, and all permits, licenses or other documents required by the laws or regulations of any foreign country or the United States, including FWS Form 3-177. Generally speaking, with the exception of FWS Form 3-177, these are preexisting documents that are either completed by foreign governments or the carrier or

are part of a normal business practice and would not impose any additional burden on the importer or exporter. In addition, it should be noted that our data indicates that at least 25% of these documents are submitted electronically with FWS Form 3-177 and we anticipate that this percentage will increase in the future. Under 50 CFR 14.93(c)(1), (c)(2) and (c)(3), we require that commercial importers and exporters of wildlife and wildlife products maintain all documents that fully describe each import and export, and all permits, licenses or other documents required by the laws or regulations of any foreign country or the United States for each import and export, for a period of five years. This time period is consistent with the records requirements contained in our general permit procedures in 50 CFR 13.46. Since commercial importers and exporters may have applied for and been issued permits under the general permit procedures, we believe it would be in the public interest that the records maintenance requirements of this information collection be consistent with those in the general permit procedures.

- 8. Provide 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 (or in response to a PRA statement) and describe actions taken by the agency in response to these comments.**

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. [Please list the names, titles, addresses, and phone numbers of persons contacted.]

FWS Form 3-177

On October 3, 2012, we published in the Federal Register (77 FR 60454), a notice that we planned to ask OMB to renew approval for our information collection associated with FWS Form 3-177. In that notice, we solicited public comments for 60 days, ending December 3, 2012. No comments were received in response to this notice.

Fee waiver certification

On October 26, 2012, we published in the Federal Register (77 FR 65321) the collection of information associated with the fee waiver certification as part of an interim rule implementing our **user** fee exemption program for low-risk importations and exportations. We received two comments. One commenter recommended changes to the fee waiver program. The other commenter objected to the waiver of fees for any businesses. Neither addressed the information collection requirements, and we have not made any changes to the collection.

Opportunities for informal public comment are available with members of the importing and exporting wildlife community regarding the Service's inspection process, of which FWS Form 3-177 and the fee waiver certification are a part. These interactions provide the Service with feedback on ways to improve the information collection.

In addition to the Federal Register notice and ongoing communication with importers and exporters, we contacted the following persons and asked for comments on the information collection contained in FWS Form 3-177 and the fee waiver certification:

Owner: Jose Merjil JD Logistics 517 Nino Aguilera Street El Paso, TX 79901 915-443-6357	Owner: Mark Schumacher - fee waiver certification Mark Schumacher Furs, LLC 3439 NW 126 th Avenue Portland, OR 97229 503-453-0022
Manager: Denise Bonnici Lazare's Furs 493 Ouellette Avenue Windsor, Ontario Canada N9A1Y2 313-961-4731	Brenda Biermann - fee waiver certification Elsheimer Fur Company LLC S 2471 State Road 131 LaFarge, WI 54639 608-625-4181
Kim White- Operations Manager Orion Taxidermy LTD. 1175 Athabasca Street, E Moose Jaw SK Canada 306-692-46530	Owner: Charles Hartman - fee waiver certification Gobbler Ridge Taxidermy 200 Brookside Drive Belton, MO 64012-2904 816-331-7959
Letty Valencia Entry Department Loera Customs Brokerage-CFS 5845 E. 14 th Street Brownsville, TX 78521 956-831-9000	Owner: Christopher Richard - fee waiver certification Whitetail Fly Tying Supplies 7060 Whitetail Court Toledo, OH 43617-1391 419-843-2106
Tracy Menard, Customer Service Representative Metro Custom Brokers 1 Lincoln Blvd. Rouses Point, NY 12979 518-297-3000	

FWS Form 3-177

Three commenters indicated that the estimated cost and time burden estimates for the completion of FWS Form 3-177 by hand and electronically are reasonably accurate. One individual suggested that 15 to 20 minutes was a more accurate estimate for completing FWS Form 3-177 electronically. One individual suggested that completing FWS Form 3-177 by hand could take more than 20 minutes. This same individual suggested that it would only take 3 minutes to complete FWS Form 3-177 electronically for one species with an additional minute needed for each additional species, provided that the filer is familiar with scientific names and species codes. This same individual suggested that the average per hour salary for individuals completing FWS Form 3-177 is \$45. This same individual suggested that our species search engine should be modified to accept any species common name. Since the regulations and treaties that we enforce identify species by scientific name and because common names can vary greatly, this suggestion is not practical. Another individual suggested that the average per hour salary for individuals completing FWS Form 3-177 is \$15 - \$16. This same individual suggested that experienced filers may require less than our estimated time of 5 minutes to complete FWS Form 3-177 electronically due to familiarity with eDecs. The general consensus among the individuals consulted was that our eDecs system was very user friendly. Based on this outreach, we believe our burden estimates are within reason and we did not make any changes to the information collection

Fee Waiver Certification

Results from the four consultations indicate that the estimated cost and time burden estimates for the completion of the fee waiver certification are well within reason.

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

We do not provide any gifts or payments to respondents.

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

We do not provide any assurance of confidentiality. All records made available under this information collection are subject to the Privacy Act and we will maintain them in a secure system of records (Interior-FWS 20, 48 FR 54719) accessible only by authorized Service employees. These records may be subject to disclosure under the Freedom of Information Act.

If there is an indication of a violation of a statute, regulation, rule, order, or license, whether civil, criminal, or regulatory in nature, we may transfer the information to the appropriate Federal, State, local, or foreign agency charged with investigating or prosecuting those violations. In the event of litigation, we may transfer the information to the U.S. Department of Justice.

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.

We do not ask questions of a sensitive nature.

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

FWS Form 3-177

We currently have 10,083 commercial import and export license holders who can be expected to submit FWS Forms 3-177 and 3-177a on a regular basis. In addition, there are probably nearly as many individuals or organizations who are not license holders that will submit these forms for clearance of an import or export wildlife shipment. Included among these individuals or organizations are commercial importers or exporters who deal exclusively in products that are exempt from import/export license requirements; public institutions such as museums; Federal, State or municipal agencies; and private individuals.

We estimate that approximately 20,741 respondents will complete 183,303 forms annually to request clearance of an import or export wildlife shipment. Approximately 28,332 of these responses will be completed by hand, each requiring approximately 15 minutes to complete (5 minutes to review instructions and 10 minutes to complete the form). Approximately 154,971 responses will be submitted electronically. Using eDecs should reduce the time to complete FWS Form 3-177; therefore, we estimate each electronic response will require approximately 10 minutes to complete (5 minutes to review instructions and 5 minutes to complete the form).

Fee waiver certification

We estimate that approximately 1,000 respondents will complete fee waiver certifications annually to request participation in our user fee exemption program for low-risk importations and exportations. All respondents must respond electronically, each requiring approximately 1 minute to complete the certification.

The total dollar value of the annual burden hours for the submission of FWS Form 3-177 and the fee waiver certification is approximately \$939,344. We used the Bureau of Labor Statistics news release USDL-12-2404, December 11, 2012, Employer Costs for Employee Compensation—September 2012 (<http://www.bls.gov/news.release/ecec.t01.htm>), to estimate average hourly wages and calculate benefits:

- Individuals - We used the wage and salary costs for all workers from Table 1, which states an hourly rate of \$21.32. To calculate benefits, we multiplied that rate by 1.4, resulting in an hourly rate of \$29.85.
- Private Sector - We used the wage and salary costs for all workers from Table 5, which states an hourly rate of \$20.36. To calculate benefits, we multiplied that rate by 1.4, resulting in an hourly rate of \$28.50.
- State Government - We used the wage and salary costs for all workers from Table 3, which states an hourly rate of \$26.91. To calculate benefits, we multiplied that rate by 1.5, resulting in an hourly rate of \$40.37.

Requirement	Annual No. of Respondents	Total Annual Responses	Completion Time per Response	Total Annual Burden Hours*	Hourly Labor Costs including benefits	Total Dollar Value of Annual Burden Hours*
3-177 (hard copy)						
Individuals	1,124	1,124	15 minutes	281	\$29.85	\$ 8,388
Private Sector	2,005	27,170	15 minutes	6,793	\$28.50	193,601
Government	19	38	15 minutes	10	\$40.37	404
3-177 (electronically)						
Individuals	211	211	10 minutes	35	\$29.85	1,045
Private Sector	17,352	154,700	10 minutes	25,783	\$28.50	734,816
Government	30	60	10 minutes	10	\$40.37	404
Fee Waiver Certification (electronically)						
Private Sector	1,000	1,000	1 minute	17	\$28.50	686
Total	21,741	184,303		32,929		\$939,344

*rounded

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

There is no nonhour cost burden to respondents.

14. Provide estimates of annualized costs to the Federal Government.

We estimate that the total annual cost to the Federal Government for this information collection is \$2,672,797, which includes:

FWS Form 3-177 (\$2,671,932)

- **Salary/Benefit Costs - \$2,331,627** (\$50.88 X 45,826 hours). Wildlife inspectors (GS-11) are the primary staff persons who will process these certifications. Wildlife inspectors are located across the United States, many in large cities. Therefore, we used Office of Personnel Management Salary Table 2012-DCB to determine an average hourly wage (\$33.92). We multiplied the hourly rate by 1.5 to account for benefits in accordance with BLS news release USDL 12-2404, December 11, 2012, resulting in a total hourly cost factor of \$50.88. We estimate that it will take approximately 15 minutes to process each form (184,303), for a total of 45,826 hours.
- **Operational Expenses - \$2,625.** Includes printing and distribution costs.
- **Data Entry - \$337,680.** We contract for data entry. We estimate an hourly rate including benefits of \$24.12 and approximately 14,000 hours each year for contract personnel to transfer data from FWS Form 3-177 into the law enforcement database. The number of data entry hours is consistent with our last submission because personnel are continuing to work on a backlog of forms and data entry now includes the scanning process.

Fee waiver certification (\$865)

- **Salary/Benefit Costs - \$865** (\$50.88 X 17 hours). Wildlife inspectors (GS-11) are the primary staff persons who will process these certifications. Wildlife inspectors are located across the United States, many in large cities. Therefore, we used Office of Personnel Management Salary Table 2012-DCB to determine an average hourly wage (\$33.92). We multiplied the hourly rate by 1.5 to account for benefits in accordance with BLS news release USDL 12-2404, resulting in a total hourly cost factor of \$50.88. We estimate that it will take approximately 1 minute to process each certification form (1,000), for a total of 17 hours.

15. Explain the reasons for any program changes or adjustments.

We are reporting 184,303 responses totaling 32,929 annual burden hours, which is an adjustment increase of 2,303 responses and a decrease of 488 burden hours. In addition to increasing our estimated number of responses based on our experience over the last 3 years, this ICR includes the addition of 1,000 hours for fee waiver certifications (currently approved under 1018-0152). The decrease in burden hours can be attributed to the increase in the number of FWS Forms 3-177 that will be submitted electronically.

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

We do not publish the information collected on FWS Forms 3-177 and 3-177a or the fee waiver certification statement collected in our eDecs system; however, we do use some of the information collected on FWS Forms 3-177 and 3-177a to compile an annual report for the CITES Secretariat (see item 2).

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. We will display the OMB control number and expiration date.

18. Certification.

There are no exceptions to the certification statement.