

**OMB Case 0704-0216**  
**SUPPORTING STATEMENT**

**A. JUSTIFICATION**

1. This is a request for extension of the information collection requirement currently approved under OMB Control Number 0704-0216, which expires June 30, 2013. The estimated burden under this clearance decreased by 388 hours, from 859 hours to 471 hours (TAB A). The estimated burden decreased by 388 hours as a result of information provided by subject matter experts that reflects the need to decrease the number of respondents under DFARS 252.228-7000, Reimbursement for War-Hazard Losses, by 11 respondents (440 hours), increase the hours under DFARS 252.228-7005, Accident Reporting and Investigation Involving Aircraft, Missiles, and Space Launch Vehicles by 17 respondents (17 hours), and increase the hours under DFARS 252.228-7006, Compliance with Spanish Laws and Insurance, by 70 respondents (35 hours). The significant decrease in hours under DFARS 252.228-7000, Reimbursement for War-Hazard Losses, results from decreasing the annual respondents from 21 to 10 based on a statement by a subject matter expert that there was no more than one potential respondent in the last two years. Since 10 respondents is the typical number of respondents for an information collection, 10 respondents was used for DFARS 252.228-7000, Reimbursement for War-Hazard Losses.

This information collection requirement pertains to information that an offeror/contractor must submit to the Department of Defense (DoD) in response to the requirements of the provisions and clauses in 48 CFR Chapter 2, Defense Federal Acquisition Regulation Supplement (DFARS) Subpart 228, Bonds and Insurance, and the related clauses at 252.228 (TAB B). Specific circumstances requiring information collection are as follows:

a. DFARS 252.228-7000, Reimbursement for War-Hazard Losses, requires the contractor to provide notice and supporting documentation to the Government regarding claims or potential claims under the clause.

b. DFARS 252.228-7005, Accident Reporting and Investigation Involving Aircraft, Missiles, and Space Launch Vehicles, requires the contractor to report promptly to the ACO all pertinent facts relating to each accident involving an aircraft, missile, or

space launch vehicle being manufactured, modified, repaired, or overhauled in connection with the contract.

c. DFARS 252.228-7006, Compliance with Spanish Laws and Insurance, requires the contractor to provide a written representation that the contractor, and any non-Spanish subcontractor, have obtained the required types of insurance in the minimum amounts specified in the contract. This information is obtained from non-Spanish concerns under service or construction contracts to be performed in Spain by other than Spanish concerns.

2. Uses of information:

The information collected under 252.225-7000 and 252.225-7005 is used by DoD claims investigators to determine the amount and extent of claims placed against the Government. If this information is not provided, the contractor would not be reimbursed for claims issued against the Government.

The information collected under 252.228-7006 is necessary to permit the contracting officer to assess whether or not a non-Spanish contractor or subcontractor, performing a service or construction contract in Spain, has insurance adequate to cover the risk assumed by the contractor.

3. Improved information technology is used to the maximum extent practicable.

4. As a matter of policy, DoD reviews the Federal Acquisition Regulation (FAR) to determine if adequate language already exists. The DFARS requirements apply solely to DoD and are not considered duplicative of any language in the FAR. No similar information is available.

5. DoD has determined that the existing information collection requirements do not have a significant impact on a substantial number of small businesses or other small entities.

6. The DFARS imposes these collections of information in the following circumstances:

- In case of an accident or potential claim. Less frequent collection would impede contracting officers in performing

their administrative functions in an effective and efficient manner.

- On an occasional basis, as contracts meeting the specified criteria are awarded. Less frequent collection or no collection of information would result in increased risk for the Government.

7. There are no special circumstances for collection. Collection is consistent with the guidelines in 5 CFR 1320.6.

8. Public comments were solicited in the Federal Register on March 13, 2013 (78 FR 15935) (TAB C), as required by 5 CFR 1320.8(d). No public comments were received.

9. There will be no payment or gifts to respondents, other than remuneration of contractors.

10. There are no questions of a sensitive nature.

11. Not applicable.

12. Estimates of Public Burden Hours and Associated Annualized Cost. For details, see the matrix at TAB E. The estimated annualized cost per hour has increased from \$43.00 to \$43.35; based on FY 2012 General Schedule salary table (TAB D). As a result of the decrease in estimated hours, by 388 hours, the estimated total annual cost to the public has decreased from \$36,937 to \$20,418.

I. Respondents	125
II. Total annual responses	125
III. Hours per response	3.77
IV. Total annual hours	471
V. Cost per hour	\$43.35*
VI. Total annual cost to public	\$ 20,418

\*Based on equivalent of GS-12, step (5) salary plus 32.45% overhead, rounded to the nearest whole dollar.

13. We do not estimate any annual cost burden apart from the hour burdens in Items 12 and 14.

14. Annualized Cost to the Government. The time required for the Government is based on receiving and reviewing the

information submitted by the contractor. We estimate that the time associated with this task is approximately 20.43 hours per response (32 hours to review accident reports or potential claims, .5 hours to verify adequate insurance). The estimated annualized cost per hour has increased from \$43.00 to \$43.35, based on FY 2012 General Schedule salary table (the FY 2013 General Schedule salary table has not been released). As a result of this rate increase and hours adjustment, the estimated total annual cost to the government has increased from \$43,043 to \$53,234.

I. Total annual responses	125
II. Hours per response	9.82
III. Total annual hours	1,228
IV. Cost per hour	\$43.35*
V. Total annual cost to Government	\$53,234

\*Based on GS-12, step (5) salary plus 32.45% overhead, rounded to the nearest whole dollar.

15. The estimate of public burden hours has decreased by 388 hours, from 859 hours to 471 hours. The hours decreased as a result of the number of respondents decreasing under 228-7000, Reimbursement for War-Hazard Losses, from 21 respondents to 10 respondents based on input from a subject matter expert. The hours per response under 228-7000, Reimbursement for War-Hazard Losses, are 40 hours per response, so the decrease in number of respondents from 21 to 10 reduced the total hours significantly. The increase in respondents under 228-7005, Accident Reporting and Investigation Involving Aircraft, Missiles, and Space Launch Vehicles, and 228-7006, Compliance with Spanish Laws and Insurance, did not offset the 228-7000, Reimbursement for War-Hazard Losses decrease in hours, since the hours per respondent are 1 and 0.50, respectively.

16. Results of this collection will not be published.

17. We do not seek approval not to display the expiration date for OMB approval of the information collection.

18. There are no exceptions to the certification statement identified in Item 19 of OMB Form 83-I.

#### B. Collections of Information Employing Statistical Methods.

Statistical methods will not be employed.