

SUPPORTING STATEMENT
Passenger List, Crew List
(Form I-418)
OMB No. 1651-0103

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.**

CBP Form I-418 is prescribed by the Department of Homeland Security, Customs and Border Protection (CBP), for use by masters, owners, or agents of vessels in complying with Sections 231 and 251 of the Immigration and Nationality Act (INA). This form is filled out upon arrival of any person by commercial vessel at any port within the United States from any place outside the United States. The master or commanding officer of the vessel is responsible for providing CBP officers at the port of arrival with lists or manifests of the persons on board such conveyances. CBP is working to allow for electronic submission of the information on CBP Form I-418. This form is provided for in 8 CFR 251.1, 251.3, and 251.4. A copy of CBP Form I-418 can be found at http://forms.cbp.gov/pdf/CPB_Form_I418.pdf

- 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.**

CBP Form I-418 is for use by masters, owners, or agents of conveyances in complying with sections 231 and 251 of the INA. This form provides necessary information for the identification of arriving passengers and crew and serves as a "traveling manifest" to be updated, as necessary, from the time a conveyance arrives in the United States until it departs.

- 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.**

CBP is working on a project to automate the submission of the I-418 data elements using eNOAD transmissions. Currently 33 percent of I-418 data is captured using eNOAD data instead of the paper form.

- 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.**

This information is not duplicated in any other place or any other form.

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

This information collection does not have an impact on small businesses or other small entities.

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

Under section 231 of the INA, no master or commanding officer of an arriving vessel or aircraft shall be granted clearance until he or she has provided the passenger/crew list to CBP officers at the port of arrival.

- 7. Explain any special circumstances.**

This information is collected in a manner consistent with the guidelines of 5 CFR 1320.5(d)(2).

- 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 describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

Public comments were solicited through two Federal Register notices: a 60-day notice published on May 7, 2013 (Volume 78, Page 26648) on which one comments was received, and a 30-day notice published on August 2, 2013 (Volume 78, Page 46998) on which no comments have been received.

A letter, dated July 8, 2013 was received from James H.I. Weakley, President, Lake Carriers Association, in which they request that the paper I-418 be eliminated and eNOAD data be used instead.

CBP agrees with the commenter and we are running a pilot that is now open to all carriers in which eNOAD data will be used in lieu of a paper I-418.

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

There is no offer of a monetary or material value for this information collection.

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

A SORN was published on December 18, 2008 (Volume 73, Page 68435) for Advanced Passenger Information Systems. A copy of this SORN will be submitted with this ICR.

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.

There are no questions of a sensitive nature.

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

INFORMATION COLLECTION	TOTAL ANNUAL BURDEN HOURS	NO. OF RESPONDENTS	NO. OF RESPONSES PER RESPONDENT	TOTAL RESPONSES	TIME PER RESPONSE
Passenger List/ Crew List Form I-418	96,000	96,000	1	96,000	60 minutes

Public Cost

The estimated annual public cost is \$4,329,600. This is based on the burden hours (96,000) multiplied (x) by the average hourly rate (\$45.10) = \$4,329,600.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.

There are no record keeping, capital, start-up or maintenance costs associated with this information collection.

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 estimated annual cost to the Federal Government associated with the review of these records is **\$929,228**. This is based on the number of responses (96,000) that must be reviewed (x) the time to review and process each response (.166 hours) = 15,936 hours (x) the average hourly rate (\$58.31) = \$929,228.

15. Explain the reasons for any program changes or adjustments reported in Items 12 or 13 of this Statement.

The burden hours were increased due to better estimates of the number of I-418's filed.

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

This information collection will not be published for statistical purposes.

17. If seeking approval to not display the expiration date, explain the reasons that displaying the expiration date would be inappropriate.

CBP will display the expiration date for OMB approval of this information collection.

18. "Certification for Paperwork Reduction Act Submissions."

CBP does not request an exception to the certification of this information collection.

B. Collection of Information Employing Statistical Methods

No statistical methods were employed.