

**SUPPORTING STATEMENT  
FOR PAPERWORK REDUCTION ACT SUBMISSION 3048-0015  
FORM EIB 92-51**

**General Instructions**

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, 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 information specified in Section A below. If an item is not applicable, provide a brief explanation. OMB reserves the right to require the submission of additional information with respect to any request for approval.

**Specific Instructions**

**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 Export-Import Bank of the United States, pursuant to the Charter of the Export-Import Bank of the United States, as amended through P.L. 112-122, May 30, 2012, cited as the Export-Import Bank Act of 1945, as amended; Certain provisions codified at 12 United States Code section 635 et seq. require that in the provision of its financing support the Export-Import Bank makes a judgment that the financing offers “reasonable assurance of repayment”. Specifically, Sec. 2(a) (1) of the Act states, “The objects of and purposes of the Bank shall be to aid in financing and to facilitate exports of goods and services, imports, and the exchange of commodities and services . . . “ Further in that section the Bank is “authorized and empowered to do a general banking business . . . “ Sec. 2(b)(1) (A) further states “the Export-Import Bank is directed, in the exercise of its functions to provide guarantees, insurance and extensions of credit . . . ” Sec. 2(b) (1)(B) then goes on to say that the financing provided by the Export-Import Bank “shall generally be for specific purposes, and, in the judgment of the Board of Directors, offer ***reasonable assurance of repayment;***” (emphasis added). In order for Ex-Im Bank’s Board of Directors to make a judgment about reasonable assurance of repayment, Ex-Im Bank needs to request relevant information about the parties to a specific transaction and the credit standing and experience of the parties. This application form is the mechanism Ex-Im Bank uses to request the necessary information upon which a judgment of assurance of repayment can be made. This specific application form, the “Application for Special Buyer Credit Limit (SBCL) Under Multi-Buyer Export Credit Insurance Policies”, will be used by entities involved in the export of US goods and services, to provide Ex-Im

Bank with the information necessary to facilitate the determination of a reasonable assurance of repayment.

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.

This form is used by an exporter or financial institution (or broker acting on their behalf) in order to obtain approval for coverage of a specific overseas buyer. The information received provides Ex-Im Bank staff with the information necessary to make a determination of the eligibility of the buyer and transaction for Ex-Im Bank assistance under its insurance program.

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.

The majority of these forms are received electronically, together with electronic attachments of supporting credit information. Ex-Im Bank processing is fully electronic and concludes with the issuance of a document sent electronically to the applicant. Technology accelerates the entire process but does not necessarily reduce the amount or substance in credit information required from the applicant on new Special Buyer Credit Limit applications. However, renewal processing of these applications can be significantly abbreviated without need of updated credit information depending on the amount of the transaction and the exporter's experience. Accessibility of this policy document is considerably approved for exporters thru technology.

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.

All applications are independent of each other; therefore this is no duplication since each application corresponds to a unique insurance product. In circumstances where some information may already be on file at Ex-Im Bank the application includes language allowing the applicant to indicate so.

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

Pursuant to the response in #3 above, the burden to small businesses is reduced largely through unnecessary, back-and-forth transmission of paper or hard copy documents whose timeliness through the mail system is inconsistent, untimely,

and could be lost in transit.

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.

For smaller transaction amounts (\$300,000 or less) conceivably, only one initial application is required and all yearly future renewals may be accomplished electronically at Ex-Im Bank without any additional effort from the exporter provided the credit amount on the foreign customer generally stays within this limit and the exporter continues to have good experience. There are no legal burdens to less frequent collection of information directly from the exporter.

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;
  - \*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.

No comments were received.

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

Not applicable.

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, 19 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.

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 provides. This justification should include the reasons why the agency considered 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.

Not applicable.

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

The number of respondents;	3,400
Estimated time per respondents:	30 minutes
The frequency of response;	Annually
Annual hour burden;	1,700 total hours

The estimated burden was calculated using an average of ½ hour for each submission (per policyholder/exporter per year on average). This includes completing the form, accumulating and attaching required credit information.

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).

Not applicable

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

Reviewing time per response.: 1 hour	
Responses per year	3,400
Reviewing time per year	3,400 hours
Average Wages per hour	\$30.25
Average cost per year	

(time * wages)	\$102,850
Benefits and overhead	28%
Total Government Cost	\$131,648

15. 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.

This request is for an extension of the expiry date.

16. 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

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

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results.

Statistical methods are not used in this information collection.