

OMB Clearance No. 0704-0229
Foreign Acquisition
Supporting Statement

A. Justification

1. Requirement. This information collection requirement is approved under OMB Control Number 0704-0229 and concerns foreign acquisition. This justification supports an extension and revision of the expiration date of the information collection requirement currently approved under OMB Control Number 0704-0229 for Defense Federal Acquisition Regulation Supplement Part 225, Foreign Acquisition and related clauses at part 252.225.

This renewal incorporates into this clearance the following:

- 25 hours approved for DFARS 252.225-7021, Alternate II, paragraph (d) under OMB Clearance 0704-0475, entitled Foreign Participation in Acquisition in Support of Operations in Afghanistan. The final rule for this collection was published in the Federal Register at 75 FR 81915 (DFARS Case 2009-D012) on December 29, 2010.
- 11 hours approved for DFARS 252.225-7046 under OMB Clearance 0704-0488, entitled Defense Trade Cooperation Treaty with the United Kingdom (DFARS 252.225) (see matrix at TAB A). The final rule for this collection was published in the Federal Register at 78 FR 36108 (DFARS Case 2012-D034) on June 17, 2013.

Upon approval of extension of this OMB clearance 0704-0229, OMB clearances 0704-0475 and 0704-0488 will be canceled.

This clearance does not include requirements relating to DFARS 252.225-7022, Trade Agreements Certificate–Inclusion of Iraqi End Products, which has been deleted from the DFARS, due to end of the Iraqi war and corresponding statutory changes.

This information collection requirement 0704-0229 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 DFARS Subpart 252.225, except for data requirements relating to the Synchronized Predeployment and Operational Tracker (SPOT) web-based system. In general, this information collection requirement implements the laws and policies relating to international acquisition, such as–

- The Buy American statute (41 U.S.C. chapter 83 and E.O. 10582);

- The Trade Agreements Act (19 U.S.C. 2501-2515), including the World Trade Organization Government Procurement Agreement and various free trade agreements;
- Advance notification of contract performance outside the United States and Canada (10 U.S.C. 2410g);
- Defense memoranda of understanding and related agreements (10 U.S.C. 2531);
- Determination of public interest under the Buy American statute (10 U.S.C. 2533);
- Berry Amendment, restrictions on specialty metals, and miscellaneous limitations on the procurement of goods other than United States goods (10 U.S.C. 2533a, 10 U.S.C. 2533b, and 10 U.S.C. 2534); and
- Domestic source restrictions in the annual defense appropriations acts (e.g., Section 222 of Pub. L. 100-180 and Section 8064 of Pub. L. 106-259).
- Restrictions on contractor utilization of foreign photovoltaic devices (section 846 of the NDAA for FY 2011).
- Preference for products or services from Afghanistan (section 886 of the NDAA for FY 2008, as amended by section 842 of the NDAA for FY 2013).
- Defense Trade Cooperation Treaties with the United Kingdom and Australia (Pub. L. 111-266).

This clearance covers the following requirements in 48 CFR Chapter 2 (DFARS, available via the Internet at <http://www.acq.osd.mil/dpap/dars>):

a. Buy American Act, Balance of Payments Program, Trade Agreements, Preference for Products or Services from Afghanistan representations and certifications.

- **DFARS 252.225-7000**, Buy American Act–Balance of Payments Program Certificate, as prescribed in 225.1101(1), requires the offeror to identify in its proposal supplies that do not meet the definition of domestic end product, separately listing qualifying country and other foreign end products. The Buy American Act no longer applies to acquisitions of commercial information technology.
- **DFARS 252.225-7020**, Trade Agreements Certificate, as prescribed in 225.1101(5), only requires listing of nondesignated country end products. This provision is used in solicitations for all acquisitions subject to the World Trade Organization Government Procurement Agreement.
- **DFARS 252.225-7035**, Buy American Act–Free Trade Agreements–Balance of Payments Program Certificate, as prescribed in 225.1101(9), requires separate listing of qualifying country (except Canada), FTA country, or other foreign end products.

Alternate I, as prescribed in 225.1101(12)(ii), requires listing of Canadian end products, rather than FTA country end products, in solicitations between \$25,000 and the FTA threshold. The Buy American Act no longer applies to acquisitions of commercial information technology.

- **DFARS 252.225-7023**, Preference for Products or Services from Afghanistan, as prescribed in 225.7703-5(a), requires offerors to identify products or services that are not products or services from Afghanistan.

b. **DFARS 252.225-7021, Alternate II**, Trade Agreements, as prescribed in 225.1101(6)(ii), in order to comply with a condition of the waiver authority provided by the United States Trade Representative (USTR) to the Secretary of Defense, requires contractors from a south Caucasus/central or south Asian state to inform the government of its participation in the acquisition and also advise their governments that they generally will not have such opportunities in the future unless their governments provide reciprocal procurement opportunities to U.S. products and services and suppliers of such products and services.

c. Reports of contract performance outside the United States and Canada.

- **DFARS 252.225-7003**, Report of Intended Performance Outside the United States and Canada—Submission with Offer, and **252.225-7004**, Report of Intended Performance Outside the United States and Canada—Submission after Award, as prescribed in 225.7204(a) and (b) respectively, require offerors and contractors to submit a Report of Contract Performance Outside the United States for subcontracts to be performed outside the United States. The reporting threshold is \$550,000 for contracts that exceed \$11.5 million. The contractor may submit the report on DD Form 2139, Report of Contract Performance Outside the United States, or a computer-generated report that contains all information required by DD Form 2139.

- **DFARS 252.225-7006**, Quarterly Reporting of Actual Contract Performance Outside the United States, as prescribed at 252.7204(c) for use in solicitations and contracts with a value exceeding \$550,000, requires reporting of subcontracts that exceed the simplified acquisition threshold.

d. **DFARS 252.225-7005**, Identification of Expenditures in the United States, as prescribed in 225.1103(1), requires contractors incorporated or located in the United States to identify, on each request for payment under contracts for supplies to be used, or for construction or services to be

performed, outside the United States, that part of the requested payment representing estimated expenditures in the United States.

e. **DFARS 252.225-7010**, Commercial Derivative Military Article–Specialty Metals Compliance Certificate, as prescribed at 225.7003-5(b), requires the offeror to certify that it will take certain actions with regard to specialty metals if the offeror chooses to use the alternative compliance approach when providing commercial derivative military articles to the Government.

f. **DFARS 252.225-7013**, Duty-Free Entry, prescribed at 225.1101(4), requires the contractor or an authorized agent to provide information on shipping documents and customs forms regarding those items that are eligible for duty-free entry.

g. **DFARS 252.225-7018**, Photovoltaic Devices–Certificate, as prescribed at 225.7017-4(b), requires offerors to certify that no photovoltaic devices with an estimated value exceeding \$3,000 will be utilized in performance of the contract or to specify the country of origin.

h. **DFARS 252.225-7025**, Restriction on Acquisition of Forgings, as prescribed in 225.7102-4, also requires contractor retention of records showing compliance with the restrictions until three years after final payment. The contractor agrees to make the records available to the contracting officer upon request. The contractor may request a waiver in accordance with 225.7102-3.

i. **DFARS 252.225-7032**, Waiver of United Kingdom Levies–Evaluation of Offers, and **252.225-7033**, Waiver of United Kingdom Levies, as prescribed in 225.1101(7) and (8) respectively, require United Kingdom offerors and prime contractors, and offerors and prime contractors with subcontracts of a dollar value exceeding \$1 million with United Kingdom firms, to provide certain information necessary for DoD to obtain a waiver of United Kingdom Levies.

j. **252.225-7046**, Exports of Approved Community Members in Response to the Solicitation, requires a representation whether exports or transfers of qualifying defense articles were made in preparing the response to the solicitation. If yes, the offeror represents that such exports or transfers complied with the requirements of the provision.

2. Purpose. Some of the information obtained through the clauses in DFARS 252.225 is used to ensure contractor compliance with restrictions on the acquisition of foreign products. These restrictions are imposed by statute or policy to protect the defense industrial base. Other information is required to enable compliance with our trade agreements, memoranda of understanding, and Defense Trade Cooperation treaties which promote reciprocal trade with our allies. DoD also provides information to the Department of Commerce with regard to Balance of Payments Program. The USTR requirement that contractors from South Caucasus/Central and South Asian states provide information to their government is intended to influence their governments to provide reciprocal procurement opportunities to U.S. products and services and suppliers of such products and services.

3. Information Technology. Improved information technology is used to the maximum extent practicable. Where contractors have automated systems that contain the information needed to report these requirements, contractors may submit the information or report in formats that are compatible with the automated systems.

4. Duplication. As a matter of policy, we review the Federal Acquisition Regulation to determine if adequate language already exists. The requirements in DFARS Part 225 apply solely to DoD and are not duplicative of the requirements in FAR Part 25. This information is not readily available from other sources.

5. Small Business. The information collections associated with small businesses are the minimum consistent with applicable laws, executive orders, regulations, and prudent business practices.

6. Consequence for Non-collection. The frequency for collecting this information was reviewed by the DoD specialists who are most knowledgeable of the requirements and the need for the information. Every attempt has been made to keep the frequency of collection to a minimum. The requirements for the information collection are included in the solicitation package that is sent to prospective contractors. The information must then be provided as follows:

- a. **DFARS 252.225-7000/7020/7023/7035** - With the offer.

b. **DFARS 252.225-7021, Alt II** - After contract award. Less frequent collection would not comply with the USTR requirements.

c. **DFARS 252.225-7003** - With the offer.

DFARS 252.225-7004 - When the information is known and, to the maximum extent practicable, at least 30 days before subcontract award.

DFARS 252.225-7006 - Within 10 days of the end of each Government Quarter.

d. **DFARS 252.225-7005** - On each request for payment.

e. **DFARS 252.225-7010** - With the offer.

f. **DFARS 252.225-7013** - On the shipping documents and customs form when foreign items enter the country.

g. **DFARS 252.225-7018** - With the offer.

h. **DFARS 252.225-7025** - Upon request of the contracting officer or when the contractor requests a waiver.

i. **DFARS 252.225-7032 and 252.225-7033** - With the offer or before award of a subcontract offer of \$1 million to a U.K. firm.

j. **DFARS 252.225-7046** - With the offer.

7. Special Circumstances. Collection is consistent with the guideline in 5 CFR 1320.6. The information will not be collected in a manner that requires an explanation of special circumstances.

8. Public Comments and Consultation. Public comments were solicited in the Federal Register on October 24, 2013 (78 FR 63461), as required by 5 CFR 1320.8(d). No comments were received in response to the Notice of Request for Public Comments, which allowed 60 days for submission of comments. The 30 Day Notice was published January 7, 2014 (79 FR 817). The Department has not received any comments on this publication.

9. Payment to Respondents. No payment or gift will be provided to respondents to this information collection requirement.

10. Confidentiality. The information collected will be disclosed only to the extent consistent with prudent business practices, current regulations, and in accordance with the requirements of the Freedom of Information Act. No assurance of confidentiality is provided to respondents.

11. Sensitive Questions. No sensitive questions are involved.

12. Estimate of Public Burden. The estimated burden hours of the collection of information and the estimated annualized cost to respondents are based on information generated from the Federal Procurement Data System (FPDS) data for FY 2012, other data sources, and estimates of responses and processing times by contracting professionals familiar with the acquisition process.

a. **DFARS 252.225-7000**, Buy American Act–Balance of Payments Program Certificate; **DFARS 252.225-7020**, Trade Agreements Certificate; **DFARS 252.225-7023**, Preference for Products or Services from Afghanistan, and **DFARS 252.225-7035**, Buy American Act–Free Trade Agreements–Balance of Payments Program Certificate.

Only one of these provisions is used in a solicitation (except 252.225-7023 is used with 252.225-7020 if the World Trade Organization Government Procurement Agreement applies). If the items being acquired are subject to trade agreements (listed at DFARS 225.403-70) and another exception does not apply, then DFARS 252.225-7035 is used in acquisitions from \$25,000 to less than \$202,000, and DFARS 252.225-7020 is used in acquisitions of \$202,000 or more. The Buy American Act is no longer applied to acquisitions of commercial information technology. Further, commercial off-the-shelf (COTS) items manufactured in the United States are considered domestic, regardless of component content.

In FY 2012 FPDS indicated the following number of contract awards for DoD supplies:

- 156,575 awards valued between \$3,000 and \$25,000, not including commercial information technology.
- 20,525 awards over \$25,000, products not in a Federal Supply Group subject to trade agreements and not including commercial information technology.
- 38,350 awards between \$25,000 and \$202,000, for products in Federal Supply Groups(FSGs) subject to trade agreements.
- 5,350 awards over \$202,000 for products in FSGs subject to trade agreements.

252.225-7000. A response to 252.225-7000 is not required if the offeror is proposing a domestic end product. DoD estimates that for acquisitions subject to the Buy American Act, if no trade agreements applicable, about 75 percent of the products offered are domestic. The number of responses for 252.225-7000 is therefore calculated as $156,575 + 20,525 = 177,100$ solicitations $\times 3$ (responses per solicitation) $\times .25$ (% offering foreign end products) = 132,825. An estimate of 10 responses per respondent and .25 hours per response, results in estimates of 13,283 respondents and a total of 33,206 hours per year associated with responses to 252.225-7000.

252.225-7020. A response to 252.225-7020 is required only if the product is not U.S.-made, qualifying, or designated. Such response should be rare, because the offeror of such products is unlikely to receive an award. DoD estimates responses only 530 responses to 252.225-7020 ($5,350$ solicitations $\times 3$ responses per solicitation $\times .033$).

252.225-7035. A response to 252.225-7035 is not required if the offeror is proposing a domestic end product. DoD estimates that for acquisitions subject to the Buy American Act and free trade agreements, about 65 percent of the products offered are domestic. The number of responses for 252.225-7035 is therefore calculated as $38,360$ solicitations $\times 3$ (responses per solicitation) $\times .35$ (% offering foreign end products) = 40,280. An estimate of 10 responses per respondent and .25 hours per response, results in estimates of 4,028 respondents and a total of 10,070 hours per year associated with responses to 252.225-7035.

252.225-7023. While the United States conducts operations in Afghanistan, when acquiring products in support of operations in Afghanistan, this provision may be used in lieu of 252.225-7000 or 252.225-7035, or in addition to 252.225-7020, if the acquisition is providing a preference for the products or services from Afghanistan. If acquiring services in support of operations in Afghanistan, use of this provision creates an additional burden, because the Buy American and trade agreements provisions only address the acquisition of products. A response to 252.225-7023 is required only if offering products or services not from Afghanistan, except that if 252.225-7020 is applicable, no listing is required for products listed in paragraph (c)(2) of 252.225-7020. For services, DoD estimates only 50 respondents/100 responses per year that will offer services not from Afghanistan, when the solicitation

expresses a preference for a product or service from Afghanistan.

	-7000 (or -7023)	-7020 (or -7023)	-7035	-7023 (services)	TOTAL
Respondents	13,282	265	4,028	50	17,625
Responses/respondent	<u>x 10</u>	<u>x 2</u>	<u>x 10</u>	<u>x2</u>	<u>x 9.86*</u>
Responses	132,820	530	40,280	100	173,730
Hours per response	<u>x .25</u>	<u>x .25</u>	<u>x .25</u>	<u>x.25</u>	<u>x .25</u>
Total hours	33,205	133	10,070	25	43,433
Cost per hour**	<u>x\$37</u>	<u>\$37</u>	<u>\$37</u>	<u>\$37</u>	<u>\$37</u>
Total annual cost to public	\$1,228,585	\$4,921	\$372,590	\$925	\$1,607,021

* Weighted average (responses/respondents)

** Based on equivalent of CY 2013 GS-11 step 5 salary (\$27.31) plus 36.25% fringe benefit rates (OMB), rounded to nearest dollar.

b. DFARS 252.225-7021, Alternate II

DoD does not estimate any change to the currently approved information collection requirements. This requirement is currently approved under 0704-0475 as follows:

Respondents	100
Responses/respondent	<u>x 1</u>
Responses	100
Hours per response	<u>x .25</u>
Total hours	25
Cost per hour*	<u>x\$50</u>
Total annual cost	\$1,250

** Based on equivalent of CY 2013 GS-13 step 3 salary (\$36.63) plus 36.25% fringe benefit rates (WHS), rounded to nearest dollar.

c. DFARS 252.225-7003, Report of Intended Performance Outside the United States and Canada–Submission with Offer; **252.225-7004**, Report of Intended Performance Outside the United States and Canada–Submission after Award; and **DFARS 252.225-7006**, Quarterly Reporting of Actual Contract Performance Outside the United States.

This information collection requirement is currently approved at 260 hours. We estimate no change in this requirement.

Respondents	40
Responses/respondent	<u>x 13*</u>
Responses	520

Hours per response	<u>x .5</u>
Total hours	260
Cost per hour	<u>x \$37**</u>
Total annual cost to public	\$9,620

* Weighted average (responses/respondents)

** Based on equivalent of CY 2013 GS-11 step 5 salary (\$27.31) plus 36.25% fringe benefit rates (OMB), rounded to nearest dollar.

d. **DFARS 252.225-7005**, Identification of Expenditures in the United States. This information collection requirement is currently approved with an estimated burden of 1,689 hours. The information is required in order to comply with Chapter 13 of the DoD Financial Management Regulation. The clause does not apply to (1) contractors that are incorporated concerns not incorporated in the United States or (2) unincorporated concerns not having principal place of business in the United States.

Respondents	1,000
Responses/respondent	<u>x 3</u>
Responses	3,000
Hours per response	<u>x .5</u>
Total hours	1,500
Cost per hour	<u>x \$37*</u>
Total annual cost to public	\$55,500

* Based on equivalent of CY 2013 GS-11 step 5 salary (\$27.31) plus 36.25% fringe benefit rates (OMB), rounded to nearest dollar.

e. **DFARS 252.225-7010**, Commercial Derivative Military Article-Specialty Metals Compliance Certificate. The estimates are unchanged from those currently approved in OMB clearance 0704-0459, except for the updated cost per hour.

Respondents	50
Responses/respondent	<u>x 1</u>
Responses	50
Hours per response	<u>x 200</u>
Total hours	10,000
Cost per hour	<u>x \$37*</u>
Total annual cost to public	\$370,000

* Based on equivalent of CY 2013 GS-11 step 5 salary (\$27.31) plus 36.25% fringe benefit rates (OMB), rounded to nearest dollar.

f. **DFARS 252.225-7013**, Duty-Free Entry.

The information collection requirement 252.225-7013 is currently approved at 4,200 respondents, 31,500 responses, and 8,865 hours. We do not estimate a change in the estimated burden hours. The information requested in 252.225-7013 supplements the information requested under FAR clause 52.225-10 and is required only if the contractor is requesting duty-free entry. Data indicates an average of approximately 31,500 duty-free entry certificates a year on supplies for DoD.

Respondents	4,200
Responses/respondent	<u>x 7.5</u>
Responses	31,500
Hours per response	<u>x .28*</u>
Total hours	8,865
Cost per hour	<u>x \$37**</u>
Total annual cost to public	\$328,005

* Weighted average (responses/respondents)

** Based on equivalent of CY 2013 GS-11 step 5 salary (\$27.31) plus 36.25% fringe benefit rates (OMB), rounded to nearest dollar.

g. **252.225-7018**, Photovoltaic Devices–Certificate.

This clause is required for use in solicitations for a contract that is expected to exceed the simplified acquisition threshold is an energy savings performance contract, a utility service contract, or a private contract housing awarded by DoD that may result in DoD ownership of photovoltaic devices, by means other than DoD purchase as end products. The offeror is required to certify that no photovoltaic devices are to be utilized in the performance of the contract or, depending on dollar value of the photovoltaic devices, may be required specify the country of origin. Based on information from subject matter experts, DoD estimates approximately 16 contracts per year, 3 responses per solicitation, for a total of 48 responses at .25 hours per response.

Respondents	16
Responses/respondent	3
Responses	48
Hours per response	.25
Total hours	12
Cost per hour	<u>x \$37*</u>
Total annual cost to public	\$444

** Based on equivalent of CY 2013 GS-11 step 5 salary (\$27.31) plus 36.25% fringe benefit rates (OMB), rounded to nearest dollar.

h. 252.225-7025, Restriction on Acquisition of Forgings.

This clause restricts ship propulsion shafts (excluding service and landing craft), periscope tubes, and ring forgings for bull gears greater than 120 inches in diameter. Based on discussions with Navy contracting professionals, we estimate the number of recordkeepers to be 15, the estimated number of shipbuilders per year having open contracts that contain the clause 252.225-7025, and which require any of the restricted forging items as components. We further estimate that it will take each contractor an average of approximately 3 hours per year to keep records showing the domestic source of these components. The number of respondents is estimated at 6 (40 percent of recordkeepers, as in the current clearance). The estimate of 1.5 responses per respondent and .5 hours per response also remains unchanged.

	REPORTS		RECORDS TOTAL
Respondents	6		
Responses/respondent	<u>x 1.5</u>		
Responses	9		
Hours per response	<u>x .5</u>		
Total response hours	5		5
Number of recordkeepers		15	
Hours per recordkeeper		<u>x 3</u>	
Total recordkeeping hours		45	<u>45</u>
Total hours			50
Cost per hour			<u>x \$37*</u>
Total annual cost to public			\$1,850

* Based on equivalent of CY 2013 GS-11 step 5 salary (\$27.31) plus 36.25% fringe benefit rates (OMB), rounded to nearest dollar.

i. 252.225-7032/7033, Waiver of United Kingdom Levies.

This information is currently approved at 100 hours (50 for reporting, 50 for recordkeeping). The new estimate for this requirement is unchanged.

	REPORTS		RECORDS TOTAL
Respondents	50		
Responses/respondent	<u>x 1</u>		
Responses	50		

Hours per response	<u>x 1</u>	
Total response hours	50	50
Number of recordkeepers	50	
Hours per recordkeeper	<u>x 1</u>	
Total recordkeeping hours	50	<u>50</u>
Total hours		100
Cost per hour		<u>x \$37*</u>
Total annual cost to public		\$3,700

* Based on equivalent of CY 2013 GS-11 step 5 salary (\$27.31) plus 36.25% fringe benefit rates (OMB), rounded to nearest dollar.

j. 252.225-7046, Exports of Approved Community Members in Response to the Solicitation.

The provision requires a representation whether exports or transfers of qualifying defense articles were made in preparing the response to the solicitation. If yes, the offeror represents that such exports or transfers complied with the requirements of the provision. This information collection is currently approved under OMB Clearance 0704-0488. DoD does not estimate any change in the approved burden. DoD estimates the number of respondents to be 110 based on an estimate of 22 solicitations per year meeting the specified requirements for use of the provision. DoD estimates it will require approximately 0.1 hours per response. Estimated public burden--

Number of Respondents	110
Responses per Respondent	x 1
Number of Responses	110
Average Hours per Response	x 0.1
Estimated Hours	11
Cost Per Hour*	<u>x \$37</u>
Total Annual Public Burden	\$407

* Based on equivalent of CY 2013 GS-11 step 5 salary (\$27.31) plus 36.25% fringe benefit rates (OMB), rounded to nearest dollar.

13. Annual Cost Burden to Respondents. We do not estimate any annual cost burden apart from the hour burdens in items 12 and 14.

14. Annual Cost to the Federal Government. The time and cost required for Government review of offeror/contractor responses is estimated to be approximately 76,190 hours and \$2,819,030 (see TAB A for details). This estimate is based on receiving, reviewing, and analyzing the information submitted by each offeror.

Number of responses	209,117
Average Government hours per response	<u>x .36*</u>
Total hours	76,190 hrs
Cost per hour	<u>x 37**</u>
Total annual cost to Government	\$2,819,030

* Weighted average (based on total hours/divided by total responses).

** Weighted average (based total dollars divided by total hours).

15. Program Changes or Adjustments. The total estimated public burden of 64,256 hours represents an increase of 7,026 hours, due to—

- Transfer of 25 hours from OMB clearance 0704-0475;
- Transfer of 11 hours from OMB Clearance 0704-0488; and
- An upward adjustment to the estimated number of hours associated with Buy American/trade agreements certificates of almost 7,000 hours, based on FY 2012 FPDS data and re-evaluation of the number of annual responses.

16. Publication of Information Collection Results. Results of this information collection will not be published.

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

18. Exception to the Certification Statement (83i Block 19). There are no exceptions to the certification accompanying this Paperwork Reduction Act submission. The information to respondents required by 5 CFR 1320.8(b)(3) will be provided in a separate Federal Register notice announcing the OMB approval of this collection of information.

B. Collections of Information Employing Statistical Methods.

Results will not be tabulated. Statistical methods will not be employed.

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ESTIMATE OF PUBLIC BURDEN HOURS

	Respond	ANNUAL REPORTING BURDEN				RECORDKEEPING BURDEN			
		Res/Resd	TOT RES	Hrs/Res	RES Hrs	RK	Hrs/RK	REC Hrs	TOT hrs
252.225-									
7000&7023	13,282	10	132,820	0.25	33,205				33,205
-7020	265	2	530	0.25	133				133
7035&7023	4,028	10	40,280	0.25	10,070				10070
7023	50	2	100	0.25	25				25
7021 ALT									
II	100	1	100	0.25	25				25
7003,4,6	40	13	520	0.50	260				260
-7005	1,000	3	3,000	0.50	1,500				1500
-7010	50	1	50	200.00	10,000				10,000
-7013	4,200	7.5	31,500	0.28	8,865				8,865
-7018	16	3	48	0.25	12				12
-7025	6	1.5	9	0.50	5	15	3	45	50
7032&7033	50	1	50	1.00	50	50	1	50	100
-7046	110	1	110	0.10	11				11
TOTAL	23,197	9.01	209,117	0.31	64,161	65	1.46	95	64,256

Req.	COST TO GOVERNMENT				COST TO PUBLIC			
	Resp	Hr/Resp	Govt hr	\$/hr	Govt \$	Publ Hr	\$/hr	PUBL \$
7000&7023	132,820	0.25	33,205	\$37.00	\$1,228,585	33,205	\$37	\$1,228,585
-7020	530	0.25	133	\$37.00	\$4,921	133	\$37	\$4,921
7035&7023	40,280	0.25	10,070	\$37.00	\$372,590	10,070	\$37	\$372,590
7023	100	0.25	25	\$37.00	\$925	25	\$37	\$925
7021 ALT								
II	0	0	0		\$0	25	\$50	\$1,250
7003,4,6	520	0.5	260	\$37.00	\$9,620	260	\$37	\$9,620
-7005	3,000	1	3,000	\$37.00	\$111,000	1,500	\$37	\$55,500
-7010	50	20	1,000	\$37.00	\$37,000	10,000	\$37	\$370,000
-7013	31,500	0.9	28,350	\$37.00	\$1,048,950	8,865	\$37	\$328,005
-7018	48	0.50	24	\$37.00	\$888	12	\$37	\$444
-7025	9	2	18	\$37.00	\$666	50	\$37	\$1,850
7032&7033	50	1	50	\$37.00	\$1,850	100	\$37	\$3,700
-7046	110	0.5	55	\$37.00	2035	11	\$37	\$407

TOTAL	209,117	0.36	76,190	\$37.00	\$2,819,030	64,256	\$37.01	\$2,377,797
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