

SUPPORTING STATEMENT

A. Justification.

1. The Gambling Devices Act of 1962 (15 U.S.C. §§ 1171-1178) (“the Act”) and the Code of Federal Regulations (28 C.F.R. §§ 3.1-3.5) require that any entity which participates in the interstate commerce of gambling devices register with the Department of Justice Criminal Division on an annual basis prior to engaging in business. The Act specifically states that certain information must be provided in order to register. This submission to OMB is for approval of a revision to a currently approved collection which is about to expire. The Criminal Division has changed the wording, but not the substance, of certain questions on the form in order to clarify what is being asked; the number of respondents (and hence the burden hours to the public and the cost to the government) has also increased since the collection was originally approved.
2. The Criminal Division provides registration information to local, state, and federal law enforcement, who use the information to ensure compliance with the law and to prosecute violators.
3. The Criminal Division does not currently collect any of this information via automated, electronic, mechanical, or other technological collection technique. The form is available online at www.justice.gov/criminal/oeo/gambling as a fillable, printable PDF. Respondents can scan the signed form and email it to Gambling.Registration@usdoj.gov. However, plans are underway to automate the registration process, and the estimated completion date of this automation project is Fall of 2014.
4. The Criminal Division is not aware of any other federal organizations that collect this information. State gaming commissions collect the same information, if not more, from gambling license applicants; however, federal law mandates that each entity covered by the Act must submit the required information to the Criminal Division.
5. This data collection is not believed to have a significant economic impact on small businesses.
6. The Act mandates the collection of this data on an annual basis. It is therefore not possible for the Criminal Division to reduce the frequency or to stop the collection of this data.
7. There are no special circumstances associated with this data collection.
8. The 60-day and 30-day notices have been published in the *Federal Register* and are attached. To date, no responses from the public have been received.

There has been no consultation with persons outside the agency regarding this data collection. Since the Criminal Division reviews all requests for registration for completeness, some questions on the form currently being submitted to OMB have been re-worded based on the

mistakes people have made in completing the previous version of the form. The specific changes being made are as follows:

- The e-mail address to which respondents can email their completed request for registration form has been added underneath the fax number.
- In the first paragraph, language has been added to have the registrant indicate whether the registration request is a new registration request or a re-registration request, responding with a yes or no answer. If it is a re-registration request, the registrant is asked to provide the the file number.

9. The Criminal Division does not provide payments or gifts to respondents.

10. The Criminal Division does not provide any assurance of confidentiality to respondents. The Freedom of Information Act Unit, Office of Enforcement Operations, Criminal Division has determined that the data collected is a matter of public record.

11. This data collection does not involve any questions of a sensitive nature.

12. Approximately 7,400 respondents will register each year. It is estimated that it will take approximately 0.08 hours (five minutes) to complete the request for registration, for a total annual reporting burden of 617 hours. The annualized cost to respondents for this hour burden is minimal, as it only involves filling in the form and mailing, faxing, or e-mailing it to the Criminal Division.

13. There are no capital or start-up costs associated with this information collection, as no special equipment is required. Operation and maintenance costs are also estimated to be zero, as this data collection merely involves providing basic information about the respondent to the Criminal Division.

14. Estimate of annualized cost to the Federal government:

Personnel:	\$31,500.00
Collection and processing:	\$3,726.00
Total cost to the Federal government:	\$35,226.00

It is estimated that staff spends approximately 2,000 hours per year processing registration requests. The collection and processing figure includes all other costs associated with this information collection, such as printing, mailing, supplies, etc.

15. The annualized cost to the government has increased due to an increase in the number of respondents. In the past two years, some states have cracked down on entities which were not registered, and others have passed laws making more forms of gambling legal. Both factors have led to more entities seeking to register.

16. There are no “results” from this data collection that will be tabulated and published.

17. The expiration date for OMB approval of the information collection will be displayed.

18. There are no exceptions to the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”

B. Collections of Information Employing Statistical Methods

This information collection does not require the employment of statistical methods.