SUPPORTING STATEMENT – PART A

A. JUSTIFICATION

1. Need for the Information Collection

DPS collects data to support the following: The information collection requirement is necessary to private sector commercial Transportation Service Providers (TSPs), who are under contract with the DoD for shipment/storage of personal property, to identify ownership, schedule pickup and delivery of personal property, to include privately owned vehicles, motorcycles, and house trailers/motor homes, Bills of Lading for services rendered, personal property counseling checklist. U.S. Customs and Border Protection Declaration for personal property shipments, re-weigh of personal property, shipment evaluation and inspection reports, receipt for unaccompanied baggage, mobile home inspection record, temporary commercial storage at Government expense, accessorial services-mobile home, report of contractor services, and claims for loss and damage. To disclose information to other Federal agencies in order to manage an optimize DoD authorizing activity, emergency contact information in the event of an emergency. By following specific procedures contractors are solicited, bids evaluated, and contractors selected. The legal authority for acquisition or rates for transportation of DoD Household Goods and Unaccompanied Baggage shipments is 37 U.S.C., Section 476.

Legal or administrative requirements that mandate the collection of data are;

Public Law 100-562, Imported Vehicle Safety Compliance Act of 1988; 5 U.S.C. 5726, Storage Expenses, Household Goods and Personal Effects, 10 U.S.C. 113, Secretary of Defense; 10 U.S.C. 3013, Secretary of the Army; 10 U.S.C. 5013, Secretary of the Navy; 10 U.S.C. 8013, Secretary of the Air Force, 19 U.S.C. 1498, Entry Under Regulations; 37 U.S.C. 476, Travel and Transportation Allowances, Dependents, Baggage, and Household Effects; Federal Acquisition Regulation (FAR); Joint Federal Travel Regulation (JTR), Volumes I and II, DoD Directive 4500.9E, Transportation and Traffic Management; DoD Directive 5158.4, United States Transportation Command; DoD Instruction 4500.42, DoD Transportation Reservation and Ticketing Services; DoD Regulation 4140.1, DoD Materiel Management Regulation; DoD Regulation 4500.9, Defense Transportation Regulation; and DoD Regulation 4515.13-R, Air Transportation Eligibility and E.O. 9397 (SSN).

2. <u>Use of the Information</u>

In accordance with the provisions of the DoD 4500.9R, Defense Transportation Regulation (DTR), Part IV, Personal Property, the revised DD Form 619, Statement of Accessorial Services Performed, is used by the Household Goods TSP industry to identify accessorial services performed and other charges for billing purposes on Household Goods and Unaccompanied Baggage shipments. The DoD 4500.9R is the Government regulation that contains the information and guidance on the use of the DD Form 619 for billing.

3. <u>Use of Information Technology</u>

Data is placed into the Defense Personal Property System (DPS) and information collected pre-populates the DD Form 619. Pre-populate DD Form 619 is printed by the TSP who completes it manually at the customers pickup address.

4. Non-duplication

There are no other forms or documents available that are used for the purposes for which the DD Form 619 is used for.

5. Burden on Small Business

The DD Form 619 is completed manually by all TSPs of which some are considered small business. However, the burden on the small businesses are not considered excessive.

6. <u>Less Frequent Collection</u>

All shipments moved may require the completion of the DD Form 619 so less frequent collection is not possible.

7. Paperwork Reduction Act Guidelines

There are no special circumstances that require that the collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

- a. The 60 day Federal Register Notice was published on 9 April 2014 (Volume 79, Number 68) pages 19590 and 19590. No public comments were received.
- b. Service representatives, their respective Service Head Quarters, and SDDC were consulted during and after the redesign of the DD Form 619 was complete. All required documentation, (i.e. DD Form 67) accompanied the DD Form 619 and was coordinated via digital signature.

9. Gifts or Payment

No payments or gifts will be made to respondents other than remuneration to contractors.

10. Confidentiality

Confidentiality ensures that only those personnel with the appropriate security clearance and the need-to-know shall be allowed access to data processed, handled or stored on system components. Confidentiality targets the protection of information from unauthorized access. Personnel, physical and administrative security mechanisms applied to the system shall minimize risks of unauthorized disclosure of command and control information.

Provide the Privacy Act System of Records Notice (SORN) Identifier "Proposed Collection; Comment Request" Docket ID: USAF 2014-0007. A Privacy Impact Assessment was accomplished in 2013. https://www.ustranscom.mil/foia/pia/DPS_PIA_2014_WEB.pdf11. Sensitive Questions

None applicable.

12. Respondent Burden, and its Labor Costs

a. Estimation of Respondent Burden

Information extracted from historical data provided by Personal Property Shipping Offices (PPSO), and Joint Personal Property Shipping Offices (JPPSO). There are currently 876 DoD approved TSPs participating in the movement of personal property worldwide. Historical data discovered that each TSP accomplished the DD Form 619 260 times annually. The total of DD Form 619's historically accomplished was 227,760. It takes approximately 5 minutes to complete one DD Form 619. This equates to 18,980 total hours to the TSP community.

b. Labor Cost of Respondent Burden

Labor cost used was the average hourly rate (\$15.50) of a clerk. This equates to \$294,190 of "labor cost" to complete the historical number of DD Form 619's accomplished.

13. Respondent Costs Other Than Burden Hour Costs

Not applicable.

14. Cost to the Federal Government

Total time required by a Transportation Office technician to process

45,000 DD Form 619's

20 minutes to process form = 3 submissions per hour

45,000/3 = 15,000 hours

15,000 hours * GS5/1 (\$15.50 hourly rate) = \$232,500

15. Reasons for Change in Burden

Decreased in the burden of this request is due to connectivity of DPS and the Third Party Payment System into the Defense Personal Property Program. This form was previously cleared under 0702-0022, and 0702-0018.

16. Publication of Results

Not applicable

17. Non-Display of OMB Expiration Date

Not applicable. The new OMB Expiration Date on the DD Form 619 will be present in the top right corner of the form as it currently is.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

There are no exceptions to "Certification for Paperwork Reduction Submissions".