

DEPARTMENT OF THE TREASURY
ALCOHOL AND TOBACCO TAX AND TRADE BUREAU

Supporting Statement - Information Collection Request

OMB Control Number 1513-NEW

TTB F 5100.25 Continuing Export Bond for Distilled Spirits and Wine

A JUSTIFICATION.

1. What are the circumstances that make this collection of information necessary and what legal or administrative requirements necessitate the collection? Also include the following: Line of Business/Sub-function and IT Investment, if one is used.

A specific lot of distilled spirits may be withdrawn from the bonded premises of a distilled spirits plant without payment of tax for exportation, use on vessels and aircraft, transfer to and deposit in a foreign trade zone for exportation or storage pending exportation, or transfer to and deposit in a customs bonded warehouse, under 27 CFR 28.91(a)(1), (2), (3), and (5). Similarly, a specific lot of wine may be withdrawn from a bonded wine cellar without payment of tax for such purposes, under 27 CFR 28.121(a), (b), (c), and (d).

If a person other than the proprietor of the bonded premises withdraws the distilled spirits or wine for such purposes, the exporter must file a specific bond on TTB F 5100.25, as provided in 27 CFR 28.61.

This form previously was approved by the Office of Management and Budget under TTB's predecessor agency, the Bureau of Alcohol, Tobacco, and Firearms, but was not transferred over to TTB when TTB was established. We are now seeking OMB approval of TTB F 5100.25 for our use.

This information collection is aligned with:

Line of Business/Sub-function: General Government/Taxation Management.

IT Investment: NONE.

2. How, by whom and for what purpose is this information used?

TTB F 5100.25 provides TTB personnel with information that ensures that products are disposed of in accordance with the applicable regulatory requirements and reduces the likelihood of approving fraudulent claims.

3. To what extent does this collection of information involve the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology? What consideration is given to use information technology to reduce burden?

This is a new information collection request; however, TTB encourages the use of technological advances to collect, store, and retrieve information, and will approve request for the use of information technology on a case by case bases. This form will be available on TTB.gov. TTB will consider this form for electronic submission.

4. What efforts are used to identity duplication? Why can't any similar information already available be used or modified for use for the purposes described in Item 2 above?

This information collection is required by a specific regulatory requirement and no other similar information exists to meet this requirements.

5. If this collection of information impacts small businesses or other small entities, what methods are used to minimize burden?

TTB does not use any method to minimize the burden to small businesses since all entities, regardless of size, are required by regulations to complete this form.

6. What consequences to Federal program or policy activities and what, if any, technical or legal obstacles to reducing burden will occur if this collection is not conducted or is conducted less frequently?

Respondents submit this information, only as often as necessary, to comply with the regulatory requirements. Without this form, TTB's efforts to protect the revenue are hampered; and a void exists in the necessary documentation to verify the disposition of exported distilled spirits and wine.

7. Are there any special circumstances associated with this information collection that would require it to be conducted in a manner inconsistent with OMB guidelines?

There are no special circumstances associated with this information collection.

8. What effort was made to notify the general public about this collection of information? Summarize the public comments that were received and describe the action taken by the agency in response to those comments.

A 60-day Federal Register notice was published for this information collection on Tuesday, July 15, 2014, 79 FR 41357. The notice solicited comments from the general public. TTB received no comments.

9. What decision was made to provide any payment or gift to respondents, other than remuneration of contractors or grantees?

No payment or gift is associated with this collection.

10. What assurance of confidentiality was provided to respondents and what was the basis for the assurance in statute, regulations, or agency policy?

The information is subject to the protections under 5 U.S.C. 552.

11. What justification is there for questions of a sensitive nature? If personally identifiable information (PII) is being collected in an electronic system, identify the Privacy Impact Assessment (PIA) that has been conducted for the information collected under this request and/or Privacy Act System of Records notice (SORN) that has been issued for the electronic system in which the PII is being stored.

We ask no questions of a sensitive nature. This collection is not associated with a PIA or SORN.

12. What is the estimated hour burden of this collection of information?

TTB estimates that respondents (6) will file this form once annually and take 15 minutes to complete this form (6 X 1 = 6 (responses) X 15 minutes = 90 minutes (1.5 hours) total hour burden.

	# Respondents	# Responses Per Respondent	Annual Responses	Hours Per Response	HOUR BURDEN TOTAL
TTB F 5100.25	6	1	6	0.25 (15 minutes)	1.5

13. What is the estimated total annual cost burden to respondents or record keepers resulting from this information collection request (excluding the value of the burden hours in Question 12 above)?

TTB estimate no annual cost burden to respondents or record keepers.

14. What is the annualized cost to the Federal Government?

TTB estimate no cost to the Federal Government.

15. What is the reason for any reported program changes or adjustments?

This is a new information collection. This form was previously approved by the Office of Management and Budget (OMB) under TTB's predecessor agency, the Bureau of Alcohol, Tobacco, and Firearms (ATF), under OMB No. 1512-0142. The information collection was later designated as not subject to the PRA. Due to our current needs and that the requirements are covered by rulemaking, we are seeking OMB approval of the use of TTB F 5100.25.

16. Outline plans for tabulation and publication for collections of information whose results will be published.

The results of this collection will not be published.

17. If seeking approval to not display the expiration date for OMB approval of this information collection, what are the reasons that the display would be inappropriate?

TTB is seeking approval to not display the expiration date. The public interest will be better served by not displaying an expiration date on TTB form. Displaying the expiration date would make it necessary, after each renewal, to update TTB.gov, where the form will be displayed once we receive OMB approval; and other systems where this form may be added and capable of being completed and submitted electronically. In some instances, several pages on our website, where the same form may reside, would have to be updated if the expiration date has to be displayed. Additionally, some businesses print complex and expensive marginally punched continuous versions, at their expense, for use in their computers. By not displaying the expiration date, electronic systems or computers wouldn't have to be updated just to amend the expiration date, or

forms could continue to be used regardless of when the OMB approval has expired. This would reduce costs incurred through additional system updates for TTB and the public.

18. What are the exceptions to the certification statement?

- (c) See item 5 above
- (f) This is not a recordkeeping requirement
- (i) No statistics involved
- (j) See item 3 above

B. Collections of Information Employing Statistical Methods.

This collection does not employ statistical methods.