

Electronic Reporting of Information Requirements for Importation of Nonconforming Vehicles

OMB Control Number 2060-0095, EPA ICR # 0010.14

Justification for Non-Substantive Change

EPA is requesting a non-substantive change to ICR 0010.13 (OMB 2060-0095). This ICR covers the information collection requirements for the importation of light-duty vehicle, light-duty truck, and on-road motorcycle vehicles and engines. The instrument currently used to collect the information covered by this ICR is EPA Declarations Form 3520-1. This form is used by importers to identify the product being imported and whether it is conforming, nonconforming, exempt, or excluded. Generally, this form is required to be submitted to Customs and Border Patrol (CBP) to facilitate entry at the time of importation. While the form is currently available in a fillable PDF format, it is filled-in, printed and supplied to CBP (and/or to EPA upon request) in paper format.

CBP is currently working on a major effort to streamline the imports process for all commodities, including the vehicles and engines covered by this form. As part of these efforts CBP will be transitioning to the electronic filing of required documentation rather than paper submittals. As part of the transition, CBP will be conducting a pilot program to validate that the electronic filing process is working as intended. Currently, the ICR only covers the hardcopy submission of the form. Therefore, EPA is requesting a non-substantive change to this ICR to allow for electronic submission of the information from the Form 3520-1. Electronic submission will be conducted via a direct exchange of data files between the importers' and the government's information systems rather than via a standard form. As such there is no revised version of instrument. In order to facilitate the exchange of data, an email address for the respondent will also be captured in addition to the standard contact information already contained on the Form 3520-1.

The current ICR approved by OMB estimates the reporting burden of the form to be 0.5 hours for each of 12,000 responses, for a total annual burden of 6,000 hours and a labor cost of \$196,440. EPA believes that the electronic submission of the form will ultimately reduce burden for importers, however no changes in burden are being requested here. This ICR expires on October 31, 2016 and the next renewal will include new burden estimates to reflect the transition from paper to electronic filing, based on the Agency's experience with the pilot.