

**2015 SUPPORTING STATEMENT
OMB NO. 0581-0126**

Regulations Governing the Inspection and grading Services of Manufactured or Processed Dairy Products, and the certification of Sanitary Design and Fabrication of Equipment Used in the Slaughter, Processing, and Packaging of Livestock and Poultry Products

A. Justification.

1. EXPLAIN THE CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY. IDENTIFY ANY LEGAL OR ADMINISTRATIVE REQUIREMENTS THAT NECESSITATE THE COLLECTION.

Approval is requested for the attached forms and information collections for 7 CFR 58, Subpart A, Regulations Governing the Inspection and Grading Services of Manufactured or Processed Dairy Products, and 7 CFR 54, Subpart C, Regulations Governing the Certification of Sanitary Design and Fabrication of Equipment Used in the Slaughter, Processing, and Packaging of Livestock and Poultry Products. The Agricultural Marketing Act of 1946 (7 U.S.C. 1621-1627), Title II, Section 202 states, "The Congress hereby declares that a sound, efficient, and privately operated system for distributing and marketing agricultural products is essential to a prosperous agriculture and is indispensable to the maintenance of full employment and to the welfare, prosperity, and health of the Nation. It is further declared to be the policy of Congress to promote through research, study, experimentation, and through cooperation among Federal and State agencies, farm organizations, and private industry a scientific approach to the problems of marketing, transportation, and distribution of agricultural products similar to the scientific methods which have been utilized so successfully during the past that such products capable of being produced in abundance may be marketed in an orderly manner and efficiently distributed." Section 203 describes the policy of Congress is "To develop and improve standards of quality, condition, quantity, grade, and packaging, and recommend and demonstrate such standards in order to encourage uniformity and consistency in commercial practices." Section 203 (h) clarifies the policy, "To inspect, certify, and identify the class, quality, quantity, and condition of agricultural products when shipped or received in interstate commerce, under such rules and regulations as the Secretary of Agriculture may prescribe, including assessment and collection of such fees as will be reasonable and as nearly as may be to cover the cost of the service rendered, to the end that agricultural products may be marketed to the best advantage, that trading may be facilitated, and the consumers may be able to obtain the quality product which they desire, except that no person shall be required to use the service authorized by the subsection."

Additionally, the 1999 Omnibus Appropriations Bill requires the Agricultural Marketing Service (AMS) to develop a voluntary, user-fee funded program to inspect and certify equipment used to process livestock and poultry products (Pub. L. 105-277, sec. 747). Previously this function was carried out by USDA on a mandatory prior approval basis

by the Food Safety and Inspection Service (FSIS) as a prerequisite for equipment use in Federally inspected meat and poultry packing and processing establishments. FSIS continues to verify that the equipment is of such material and construction as will facilitate its thorough cleaning and otherwise avoid adulteration and misbranding of product. However, to provide Federally inspected establishments with the flexibility to use equipment designed in a manner they deem best to maintain a sanitary environment for food production without having to seek prior approval, FSIS published a document in the Federal Register of August 25, 1997, (62 FR 45016) which eliminates the mandatory FSIS prior approval program. Under 7 CFR 54, Subpart C, the Dairy Programs, Dairy Grading Branch, has been delegated the authority to administer the inspection and certification of equipment used in the livestock and poultry industry by the Livestock and Seed Programs.

The Government, industry, and the consumer will be well served if the Government can help ensure that dairy, meat and poultry products are produced under sanitary conditions with equipment meeting sanitary design and fabrication standards and that buyers have the choice of purchasing the quality of the product and equipment they desire. The dairy grading program is a voluntary user fee program. In order for a voluntary inspection program to perform satisfactorily with a minimum of confusion, there must be written requirements and rules for both Government and industry. The Regulation provides the minimum requirements to carry out the intent of Congress.

2. INDICATE HOW, BY WHOM, AND FOR WHAT PURPOSE THE INFORMATION IS TO BE USED. EXCEPT FOR A NEW COLLECTION, INDICATE THE ACTUAL USE THE AGENCY HAS MADE OF THE INFORMATION RECEIVED FROM THE CURRENT COLLECTION.

The Act and the Regulations are used by USDA, cooperating State inspectors and users as the basis of authority under which official inspection or grading services are provided. The information requested is used to identify the product offered for grading; to identify a request from a manufacturer of equipment used in the dairy, meat or poultry industries for evaluation for sanitary design and construction; to identify and contact the party responsible for payment of the fee and expense for the inspection, grading or equipment evaluation; to identify applicants who wish to be authorized to display official identification on product packaging materials, equipment, utensils, or on descriptive or promotional materials. This is a 'fee for service' program with voluntary participation. All costs are recovered. Only information essential to provide service is requested.

These forms and information collections are essential to carry out and administer the inspection and grading program. The following forms are used:

- (a) **DA-162, Equipment Review Request (same form is filed for Appeal Inspection and for Reinspection or Regrading)** is completed by the applicant requesting inspection service for a piece of equipment or a utensil. The form is

completed prior to performance of the inspection or appeal inspection by the applicant and provides information necessary to perform the inspection such as name and address of the applicant, identification of the party responsible for payment of inspection fees and expenses, the type of equipment or utensil, and location where the equipment or utensil is to be inspected. An applicant or other persons who have a financial interest in a piece of equipment, portion of a piece of equipment, or utensil may request appeal service when the applicant or other persons who have a financial interest in a piece of equipment, portion of a piece of equipment, or utensil disagree with the determination as to compliance with the standard as documented in the applicable report.

An Appeal Inspection is requested when the compliance with the standard as documented in the applicable report is contested by an applicant or other persons who have a financial interest in a piece of equipment, portion of a piece of equipment, or utensil. The observations made by the original inspector are reviewed and verified to confirm the final determination.

A 3-A Third Party Verification is requested by an applicant when they wish to display the 3-A Symbol on a piece of equipment to show that the equipment complies with the applicable 3-A Standard. AMS has 3-A Certified Conformance Evaluators that perform this certification for 3-A Sanitary Standards Inc. on a user-fee basis for the industry.

- (b) **Application for Reinspection or Regrading**. No longer required to be a separate item. This function is completed and accounted for in the above (a), Form DA-162.
- (c) **DA-201B, Application for Butter Grading Service**, is completed by both the party requesting grading service and by the grader performing the service. The manifest portion is completed, prior to grading by the applicant (name and address of the applicant, shipper or seller, receiver or buyer, date product manufactured, churn number, number of packages, and marked weight). The grader's worksheet portion is completed by a USDA or cooperating State inspector during the actual grading function describing the packages, (size, number of packages, marked weight or net weight if test weighing is performed, lot number, markings and whether product was stored in cooler or freezer).
- (d) **DA-201C, Cheese Grader's Memorandum**, is completed by both the party requesting grading service and by the grader performing the service. The manifest portion is completed prior to grading by the applicant (name and address of applicant, shipper or seller, receiver or buyer, date product manufactured, vat number, number of packages, and marked weight). The grader's worksheet portion is completed by a USDA or cooperating State inspector during the actual grading function describing the packages, (size, number of packages, marked

weight or net weight if test weighing is performed, lot number, markings and whether product was stored in cooler or freezer).

- (e) **DA-155, Application to use Official Identification or Grade Labels**, is the formal application submitted by distributors and packers of dairy products and manufacturers of equipment used in the dairy, livestock, or poultry industries applying for approval to display a USDA official identification or grade label on their product packaging materials, equipment, utensils, or descriptive or promotional materials. The application is completed only once and remains in effect (unless withdrawn for breach of regulations) while the manufacturer, distributor or packer remains in business. The applicant, in signing, agrees to furnish copies of the official identification or grade labels at no cost to the Government; to conform to regulations governing inspection and grading; and to not offer for sale or publicly display any inspected, graded or evaluated product in packaging materials, equipment, utensils, descriptive or promotional materials bearing official identification or grade label under a trade name other than that of the applicant unless such trade name is submitted, together with the proper address, to the Administrator at the time approval is requested of the official identification or grade label to be used.
- (f) **DA-156, Request to Display Official Identification or Grade Labels**, is the formal request submitted by distributors and packers of dairy products and manufacturers of equipment used in the dairy, livestock, or poultry industries applying for approval to display a USDA official identification or grade label on a specific product packaging material, equipment, utensil, or descriptive or promotional material. The application is completed only once and remains in effect (unless withdrawn for breach of regulations) while the manufacturer, distributor or packer remains in business. The applicant, by signing, affirms compliance to the regulations and such instructions as may be issued by the Administrator, Agricultural Marketing Service, covering inspection, grading and evaluation of products, packaging materials, equipment, utensils, or descriptive or promotional materials, and attests that an approved Application To Use Official Identification or Grade Labels, Form DA-155 is on file with Dairy Programs.
- (g) **Labeling Requirements**. In order to display USDA official identification or grade label on specific product packaging material, equipment, utensil, or descriptive or promotional material, the applicant must prepare the format of the materials that will display the official identification for approval. This preparation generally consists of typesetting camera ready shields to existing packaging material templates or on promotional materials such as data sheets or advertisement copy. When official identification is used for product packaging materials, the manufacturing runs of the product are identified with a grading certificate code or packaging date.
- (h) **DA-157, Request to Validate a Prior Meat and Poultry Equipment**

Acceptance is the formal request submitted by manufacturers of equipment used in the livestock, or poultry industries requesting validation of a piece of equipment or a utensil that has had prior acceptance. Equipment designs which have been accepted as meeting the standards criteria must be re-evaluated on a 4-year cycle to assure that the designs have not changed or that they continue to comply with updated standards.

3. DESCRIBE WHETHER, AND TO WHAT EXTENT, THE COLLECTION OF INFORMATION INVOLVES THE USE OF AUTOMATED, ELECTRONIC, MECHANICAL, OR OTHER TECHNOLOGICAL COLLECTION TECHNIQUES OR OTHER FORMS OF INFORMATION TECHNOLOGY, E.G. PERMITTING ELECTRONIC SUBMISSION OF RESPONSES, AND THE BASIS FOR THE DECISION FOR ADOPTING THIS MEANS OF COLLECTION. ALSO, DESCRIBE ANY CONSIDERATION OF USING INFORMATION TECHNOLOGY TO REDUCE BURDEN.

In accordance with the E-Government Act, Dairy Grading is continually involved in the review of computer applications. Forms 155, 156, 157 and DA-162 are available as pdf-fillable and can be found at <http://www.ams.usda.gov/resources/forms#dairy>. Since the last submission no progress has been made on merging Forms 201B and 201C. Once these forms are merged successfully, a change of request will be submitted to OMB for approval.

4. DESCRIBE EFFORTS TO IDENTIFY DUPLICATION. SHOW SPECIFICALLY WHY ANY SIMILAR INFORMATION ALREADY AVAILABLE CANNOT BE USED OR MODIFIED FOR USE FOR THE PURPOSE(S) DESCRIBED IN ITEM 2 ABOVE.

Duplication is not a possibility for required information from applications for inspection or grading purposes. Information relating to display of official identification or grade labels on packaging materials, equipment, utensils, or descriptive or promotional materials is not requested until files have been reviewed to determine if there were prior approvals.

5. IF THE COLLECTION OF INFORMATION IMPACTS SMALL BUSINESSES OR OTHER SMALL ENTITIES (ITEM 5 OF THE OMB FORM 83-1), DESCRIBE THE METHODS USED TO MINIMIZE BURDEN.

The Small Business Administration (<http://www.sba.gov>) defines, in 13 CFR part 121, small agricultural producers as those having annual receipts of no more than \$750,000 and small agricultural service firms (first handlers and importers) as those having annual receipts of no more than \$6.5 million. Even though there is a reduction in the number of applicants we still feel that under these definitions, we estimate that 10% are considered small business. The burden on small businesses is not an obstacle since the completion of the involved forms requires minimal time and readily available information.

6. DESCRIBE THE CONSEQUENCE TO FEDERAL PROGRAM OR POLICY ACTIVITIES IF THE COLLECTION IS NOT CONDUCTED OR IS CONDUCTED LESS FREQUENTLY, AS WELL AS ANY TECHNICAL OR LEGAL OBSTACLES TO REDUCING BURDEN.

Collecting data less frequently would eliminate the information needed to perform inspection and grading, and meet the requirements of the Agricultural Marketing Act of 1946 and the 1999 Omnibus Appropriations Bill. Timing and frequency of data collection is designed to meet the needs of the industry and yet minimize the burden on the reporting public.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES THAT WOULD CAUSE AN INFORMATION COLLECTION TO BE CONDUCTED IN A MANNER:

- **REQUIRING RESPONDENTS TO REPORT INFORMATION TO THE AGENCY MORE OFTEN THAN QUARTERLY;**

Routine requests for grading products normally represent a single day's production or less which is offered for grading within 3-5 days after the date of manufacture. Routine requests for inspection of a piece of equipment or a utensil represent a specific item or identified model of the equipment or utensil.

- **REQUIRING RESPONDENTS TO PREPARE A WRITTEN RESPONSE TO A COLLECTION OF INFORMATION IN FEWER THAN 30 DAYS AFTER RECEIPT OF IT;**

- **REQUIRING RESPONDENTS TO SUBMIT MORE THAN AN ORIGINAL AND TWO COPIES OF ANY DOCUMENT;**

Only originals are required.

- **REQUIRING RESPONDENTS TO RETAIN RECORDS, OTHER THAN HEALTH, MEDICAL, GOVERNMENT CONTRACT, GRANT-IN-AID, OR TAX RECORDS FOR MORE THAN 3 YEARS;**

Respondents are not required to retain records.

- **IN CONNECTION WITH A STATISTICAL SURVEY, THAT IS NOT DESIGNED TO PRODUCE VALID AND RELIABLE RESULTS THAT CAN BE GENERALIZED TO THE UNIVERSE OF STUDY;**

- **REQUIRING THE USE OF A STATISTICAL DATA CLASSIFICATION THAT HAS NOT BEEN REVIEWED AND APPROVED BY OMB;**

- **THAT INCLUDES A PLEDGE OF CONFIDENTIALITY THAT IS NOT SUPPORTED BY AUTHORITY ESTABLISHED IN STATUE OR REGULATION, THAT IS NOT SUPPORTED BY DISCLOSURE AND DATA SECURITY POLICIES THAT ARE CONSISTENT WITH THE PLEDGE, OR WHICH UNNECESSARILY IMPEDES SHARING OF DATA WITH OTHER AGENCIES FOR COMPATIBLE CONFIDENTIAL USE;**
- **REQUIRING RESPONDENTS TO SUBMIT PROPRIETARY TRADE SECRET, OR OTHER CONFIDENTIAL INFORMATION UNLESS THE AGENCY CAN DEMONSTRATE THAT IT HAS INSTITUTED PROCEDURES TO PROTECT THE INFORMATION'S CONFIDENTIALITY TO THE EXTENT PERMITTED BY LAW.**

Respondents are not required to provide trade secret or other confidential information on the forms. However, respondents seeking inspection of a piece of equipment or utensil may voluntarily provide trade secret or confidential information during the inspection. This information is not required to be retained by USDA.

There are no other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

8. IF APPLICABLE, PROVIDE A COPY AND IDENTIFY THE DATE AND PAGE NUMBER OF PUBLICATION IN THE FEDERAL REGISTER OF THE AGENCY'S NOTICE, REQUIRED BY 5 CFR 1320.8(d), SOLICITING COMMENTS ON THE INFORMATION COLLECTION PRIOR TO SUBMISSION TO OMB. SUMMARIZE PUBLIC COMMENTS RECEIVED IN RESPONSE TO THAT NOTICE AND DESCRIBE ACTIONS TAKEN BY THE AGENCY IN RESPONSE TO THESE COMMENTS. SPECIFICALLY ADDRESS COMMENTS RECEIVED ON COST AND HOUR BURDEN.

As required by 5 CFR 1320.8(d), the agency published a 60-day notice in the Federal Register on May 28, 2015, Vol. 80, No.102 page 30431. No comments were received.

DESCRIBE EFFORTS TO CONSULT WITH PERSONS OUTSIDE THE AGENCY TO OBTAIN THEIR VIEWS ON THE AVAILABILITY OF DATA, FREQUENCY OF COLLECTION, THE CLARITY OF INSTRUCTIONS AND RECORDKEEPING, DISCLOSURE, OR REPORTING FORMAT (IF ANY), AND ON THE DATA ELEMENTS TO BE RECORDED, DISCLOSED, OR REPORTED.

The Department has cooperative agreements with the States and has excellent working relations and exchange of information with industry contacts that use our services. The inspector may be a Federal or cooperating State employee, but all are under Federal

supervision. Our National Field Director works very closely with State officials. All parties are readily available to exchange information and do so on a regular basis. The Act provides for Federal and State cooperation for which States are reimbursed for services performed.

Public contact and opportunities for public comments in these circumstances would be appropriate when changes are made in the regulations which are infrequent. Even though State and local governments are potential respondents, consultations are not made except as indicated in the paragraph above.

The information is collected only by authorized representatives of the USDA, AMS, and Dairy Programs.

CONSULTATION WITH REPRESENTATIVES OF THOSE FROM WHOM INFORMATION IS TO BE OBTAINED OR THOSE WHO MUST COMPILE RECORDS SHOULD OCCUR AT LEAST ONCE EVERY 3 YEARS -- EVEN IF THE COLLECTION OF INFORMATION ACTIVITY IS THE SAME AS IN PRIOR PERIODS. THERE MAY BE CIRCUMSTANCES THAT MAY PRECLUDE CONSULTATION IN A SPECIFIC SITUATION. THESE CIRCUMSTANCES SHOULD BE EXPLAINED.

The National Field Director or his/her designate are in contact with the providers of the information each time grading is requested by the numerous firms using our services. The information required is readily available from normal business and production records maintained by the firm. There have been no complaints from industry. They understand that it is necessary to identify products that they wish to have graded.

Additionally, the Department routinely consults with the Trade Associations representing the segments of the dairy, meat and poultry industries in which we provide service on topics of mutual concern. The following individuals and organizations representing users of the services were provided information concerning the reporting requirements and encouraged to provide comments and recommendations. No comments were received.

Mr. Jamie Jonker
National Milk Producers Federation
(703) 243-6111

Ms. Cary Frye
International Dairy Foods Association
(202) 737-4332

Mr. John T. Umhoefer
Executive Director
Wisconsin Cheese Makers Association

(608) 828-4550

9. EXPLAIN ANY DECISION TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS, OTHER THAN REMUNERATION OF CONTRACTORS OR GRANTEES.

No payments or gifts have been provided.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS AND THE BASIS FOR THE ASSURANCE IN STATUTE, REGULATION, OR AGENCY POLICY.

Confidentiality cannot be assured of the information requested on the forms because it is not proprietary information and therefore cannot be withheld if requested under the Freedom of Information Act.

11. PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE, SUCH AS SEXUAL BEHAVIOR AND ATTITUDES, RELIGIOUS BELIEFS, AND OTHER MATTERS THAT ARE COMMONLY CONSIDERED PRIVATE. THIS JUSTIFICATION SHOULD INCLUDE THE REASONS WHY THE AGENCY CONSIDERS THE QUESTIONS NECESSARY, THE SPECIFIC USES TO BE MADE OF THE INFORMATION, THE EXPLANATION TO BE GIVEN TO PERSONS FROM WHOM THE INFORMATION IS REQUESTED, AND ANY STEPS TO BE TAKEN TO OBTAIN THEIR CONSENT.

No sensitive data is requested.

12. PROVIDE ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION. THE STATEMENT SHOULD:

- **INDICATE THE NUMBER OF RESPONDENTS, FREQUENCY OF RESPONSE, ANNUAL HOUR BURDEN, AND AN EXPLANATION OF HOW THE BURDEN WAS ESTIMATED. UNLESS DIRECTED TO DO SO, AGENCIES SHOULD NOT CONDUCT SPECIAL SURVEYS TO OBTAIN INFORMATION ON WHICH TO BASE HOUR BURDEN ESTIMATES. CONSULTATION WITH A SAMPLE (FEWER THAN 10) OF POTENTIAL RESPONDENTS IS DESIRABLE. IF THE HOUR BURDEN ON RESPONDENTS IS EXPECTED TO VARY WIDELY BECAUSE OF DIFFERENCE IN ACTIVITY, SIZE, OR COMPLEXITY, SHOW THE RANGE OF ESTIMATED HOUR BURDEN, AND EXPLAIN**

There are 168 respondents each responding approximately 78.68 times for a total of 2,252 hours (rounded). See AMS-71 spreadsheet for breakout.

THE REASONS FOR THE VARIANCE. GENERALLY, ESTIMATES SHOULD NOT INCLUDE BURDEN HOURS FOR CUSTOMARY AND USUAL BUSINESS PRACTICES.

- **IF THIS REQUEST FOR APPROVAL COVERS MORE THAN ONE FORM, PROVIDE SEPARATE HOUR BURDEN ESTIMATES FOR EACH FORM AND AGGREGATE THE HOUR BURDENS IN ITEM 13 OF OMB FORM 83.1.**
- **PROVIDE ESTIMATES OF ANNUALIZED COST TO RESPONDENTS FOR THE HOUR BURDENS FOR COLLECTIONS OF INFORMATION, IDENTIFYING AND USING APPROPRIATE WAGE RATE CATEGORIES. THE COST OF CONTRACTING OUT OR PAYING OUTSIDE PARTIES FOR INFORMATION COLLECTION ACTIVITIES SHOULD NOT BE INCLUDED HERE. INSTEAD, THIS COST SHOULD BE INCLUDED IN ITEM 14.**

Estimated respondent costs are \$51,525.76 (2,252 hours x \$22.88/hr.-estimated hourly rate of individuals submitting the reports – see Bureau of Labor Statistics (<http://www.bls.gov>). This sum is deemed to be reasonable should the respondents be compensated for their time.

13. PROVIDE AN ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS OR RECORDKEEPERS RESULTING FROM THE COLLECTION OF INFORMATION. (DO NOT INCLUDE THE COST OF ANY HOUR BURDEN SHOWN IN ITEMS 12 AND 14).

- **THE COST ESTIMATE SHOULD BE SPLIT INTO TWO COMPONENTS: (a) A TOTAL CAPITAL AND START-UP COST COMPONENT (ANNUALIZED OVER ITS EXPECTED USEFUL LIFE); AND (b) A TOTAL OPERATION AND MAINTENANCE AND PURCHASE OF SERVICES COMPONENT. THE ESTIMATES SHOULD TAKE INTO ACCOUNT COSTS ASSOCIATED WITH GENERATING, MAINTAINING, AND DISCLOSING OR PROVIDING THE INFORMATION. INCLUDE DESCRIPTIONS OF METHODS USED TO ESTIMATE MAJOR COST FACTORS INCLUDING SYSTEM AND TECHNOLOGY ACQUISITION, EXPECTED USEFUL LIFE OF CAPITAL EQUIPMENT, THE DISCOUNT RATE(S), AND THE TIME PERIOD OVER WHICH COSTS WILL BE INCURRED. CAPITAL AND START-UP COSTS INCLUDE, AMONG OTHER ITEMS, PREPARATIONS FOR COLLECTING INFORMATION SUCH AS PURCHASING COMPUTERS AND SOFTWARE; MONITORING, SAMPLING, DRILLING AND TESTING EQUIPMENT; AND RECORD**

STORAGE FACILITIES.

- **IF COST ESTIMATES ARE EXPECTED TO VARY WIDELY, AGENCIES SHOULD PRESENT RANGES OF COST BURDENS AND EXPLAIN THE REASONS FOR THE VARIANCE. THE COST OF PURCHASING OR CONTRACTING OUT INFORMATION COLLECTION SERVICES SHOULD BE A PART OF THIS COST BURDEN ESTIMATE. IN DEVELOPING COST BURDEN ESTIMATES, AGENCIES MAY CONSULT WITH A SAMPLE OF RESPONDENTS (FEWER THAN 10), UTILIZE THE 60-DAY PRE-OMB SUBMISSION PUBLIC COMMENT PROCESS AND USE EXISTING ECONOMIC OR REGULATORY IMPACT ANALYSIS ASSOCIATED WITH THE RULEMAKING CONTAINING THE INFORMATION COLLECTION, AS APPROPRIATE.**

- **GENERALLY, ESTIMATES SHOULD NOT INCLUDE PURCHASES OF EQUIPMENT OR SERVICES, OR PORTIONS THEREOF, MADE: (1) PRIOR TO OCTOBER 1, 1995, (2) TO ACHIEVE REGULATORY COMPLIANCE WITH REQUIREMENTS NOT ASSOCIATED WITH THE INFORMATION COLLECTION, (3) FOR REASONS OTHER THAN TO PROVIDE INFORMATION OR KEEPING RECORDS FOR THE GOVERNMENT, OR (4) AS PART OF CUSTOMARY AND USUAL BUSINESS OR PRIVATE PRACTICES.**

There are no capital/startup costs or operation/maintenance costs associated with the information collection.

- 14. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT. ALSO, PROVIDE A DESCRIPTION OF THE METHOD USED TO ESTIMATE COST, WHICH SHOULD INCLUDE QUANTIFICATION OF HOURS, OPERATION EXPENSES (SUCH AS EQUIPMENT, OVERHEAD, PRINTING, AND SUPPORT STAFF), AND ANY OTHER EXPENSE THAT WOULD NOT HAVE BEEN INCURRED WITHOUT THIS COLLECTION OF INFORMATION. AGENCIES ALSO MAY AGGREGATE COST ESTIMATES FROM ITEMS 12, 13, AND 14 IN A SINGLE TABLE.**

There is no direct cost to the Federal government because this is a voluntary, user fee-funded program. All costs are recovered.

- 15. EXPLAIN THE REASON FOR ANY PROGRAM CHANGES OR ADJUSTMENTS REPORTED IN ITEMS 13 OR 14 OF THE OMB FORM 83-I.**

Due to changes in markets between 2012 and 2015 the number of respondents has dropped to 168, based on 2014 requests. The amount of time required to complete most of the forms was revised upward to reflect information provided by respondents. The

time to complete initial requests is longer than the time to complete subsequent requests. The 2012 estimate was based on discussions with returning applicants. The number of requests for AMS services continues to rise resulting in an increased number of responses. The increased number of responses along with the adjustment upward in the time it takes to complete some forms resulted in an increase of 1,887 burden hours (rounded). (See Attachment 1 for Q#15 breakout of these adjustments.)

16. FOR COLLECTIONS OF INFORMATION WHOSE RESULTS WILL BE PUBLISHED, OUTLINE PLANS FOR TABULATION, AND PUBLICATION. ADDRESS ANY COMPLEX ANALYTICAL TECHNIQUES THAT WILL BE USED. PROVIDE THE TIME SCHEDULE FOR THE ENTIRE PROJECT, INCLUDING BEGINNING AND ENDING DATES OF THE COLLECTION OF INFORMATION, COMPLETION OF REPORT, PUBLICATION DATES, AND OTHER ACTIONS.

The collected information will not be published.

17. IF SEEKING APPROVAL TO NOT DISPLAY THE EXPIRATION DATE FOR OMB APPROVAL OF THE INFORMATION COLLECTION, EXPLAIN THE REASONS THAT DISPLAY WOULD BE INAPPROPRIATE.

There is confusion to respondents thinking their applications for service or authorization to use and display official identification or grade labels are good for only the length of time noted in the expiration date. Therefore, we are seeking approval not to display the OMB expiration date on these forms.

18. EXPLAIN EACH EXCEPTION TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19, "CERTIFICATION FOR PAPERWORK REDUCTION ACT SUBMISSIONS," OF OMB FORM 83-I.

No exceptions are requested to the certification statement identified in item 19.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

The proposed information collection procedures do not employ statistical methods of collection. The records that must be maintained are unique to individual production days of product or are for specific pieces of equipment or utensils. The information is used by interested parties to identify a finished product, equipment or utensils on covering certificates.