

SUPPORTING STATEMENT
United States Patent and Trademark Office
Post Allowance and Refiling
OMB CONTROL NUMBER 0651-0033
(August 2013)

A. Justification

1. Necessity of Information Collection

The United States Patent and Trademark Office (USPTO) is required by 35 U.S.C. §§ 131 and 151 to examine applications and, when appropriate, allow applications and issue them as patents. When an application for a patent is allowed by the USPTO, the USPTO issues a notice of allowance and the applicant must pay the specified issue fee (including the publication fee, if applicable) within three months to avoid abandonment of the application. If the appropriate fees are paid within the proper time period, the USPTO can then issue the patent. If the fees are not paid within the designated time period, the application is abandoned (applicant may petition the Director to accept a delayed payment and revive the application with a satisfactory showing that the delay was unavoidable or unintentional; the Petition for Revival of an Application for Patent Abandoned Unavoidably (Form PTO/SB/61) and the Petition for Revival of an Application for Patent Abandoned Unintentionally (Form PTO/SB/64) are approved under information collection 0651-0031). This collection of information encompasses the action an applicant must take to submit an issue fee payment to the USPTO. The rules outlining the procedures for payment of the issue fee and issuance of a patent are found at 37 CFR 1.18 and 1.311-1.317.

This collection of information also encompasses several actions that may be taken after issuance of a patent, pursuant to Chapter 25 of Title 35 U.S.C. A certificate of correction may be requested to correct an error or errors in the patent. If the USPTO determines that the request should be approved, the USPTO will issue a certificate of correction. For an original patent that is believed to be wholly or partly inoperative or invalid, the assignee(s) or inventor(s) may apply for reissue of the patent, which entails several formal requirements, including provision of an oath or declaration specifically identifying at least one error being relied upon as the basis for reissue and stating the reason for the belief that the original patent is wholly or partly inoperative or invalid (e.g., a defective specification or drawing, or claiming more or less than the patentee had the right to claim in the patent). The rules outlining these procedures are found at 37 CFR 1.171-1.178 and 1.322-1.325.

2. Needs and Uses

The public uses this information collection to request corrections of errors in issued patents, to submit applications for reissue patents, and to submit issue fee payments.

The Information Quality Guidelines from Section 515 of Public Law 106-554, Treasury and General Government Appropriations Act for Fiscal Year 2001, apply to this information collection, and this information collection and its supporting statement comply with all applicable information quality guidelines, i.e. OMB and specific operating unit guidelines.

Table 1 lists the specific statutes and regulations authorizing the USPTO to collect this information and outlines how this information is used by the public and the USPTO:

Table 1: Information Requirements and Needs and Uses of Information Collected

Item #	Requirement	Statute	Rule	Form #	Needs and Uses
1	Certificate of Correction	35 U.S.C. §§ 254 and 255	37 CFR 1.322-1.325	PTO/SB/44	<ul style="list-style-type: none"> Used by the patentee to list the number of the patent to be corrected and the corrections to be made. Facilitates matching the patent or patent file with other identifying information in order to make the appropriate corrections. Used by the USPTO to determine whether the indicated corrections should be approved.
2	Petition to Correct Assignee After Payment of Issue Fee (37 CFR 3.81(b))	35 U.S.C. § 255	37 CFR 1.17(i) and 3.81(b)	PTO/SB/141	<ul style="list-style-type: none"> Used by the public to submit the request required for a Certificate of Correction in certain instances where patent issuance is requested to be in the name of the assignee after the date of issue fee payment, or it is requested for a patent to be corrected to state the name of the assignee; and the assignment was submitted for recordation before issuance of the patent. Used by the public to pay the appropriate fee. Used by the USPTO to determine whether the indicated requests should be granted.
3	Reissue Documentation	35 U.S.C. §§ 115, 251, and 252	37 CFR 1.47, 1.63-1.64, and 1.171-1.179	No Form Associated	<ul style="list-style-type: none"> Used by the patentee to submit to the USPTO the remainder of the documentation and information necessary for a reissue patent that is not collected on one of the existing forms. Used by the USPTO to finish processing a request for a reissue application.
4	Reissue Patent Application Transmittal	35 U.S.C. §§ 115, 251, and 252	37 CFR 1.47, 1.63-1.64, and 1.171-1.179	PTO/SB/50 PTO/AIA/50	<ul style="list-style-type: none"> Provides a checklist for the patentee to ensure that the requirements for a reissue application submission are met. Allows the USPTO to identify the type of patent and patent number in order to quickly associate the patent file with the reissue documents.

Item #	Requirement	Statute	Rule	Form #	Needs and Uses
5	Reissue Application Declaration by the Inventor or the Assignee or Substitute Statement in Lieu of an Oath or Declaration for Reissue Patent Application (35 U.S.C. § 115(d) and 37 CFR 1.64)	35 U.S.C. §§ 115, 251, and 252	37 CFR 1.47, 1.63-1.64, and 1.171-1.179	PTO/SB/51/52 PTO/AIA/05/06 PTO/AIA/07	<ul style="list-style-type: none"> Used by the inventor, assignee, or person executing a substitute statement to indicate why the reissue applicant believes the original patent to be wholly or partly inoperative or invalid, to identify at least one error being relied upon as the basis for reissue, and to identify a claim that the application seeks to broaden if the reissue application seeks to enlarge the scope of the claims of the patent. Used by the USPTO to ensure that the requirements of 37 CFR 1.63, 1.64, and 1.175 are met in order to reissue the patent.
6	Supplemental Declaration for Reissue Patent Application to Correct "Errors" Statement (37 CFR 1.175)	35 U.S.C. §§ 115, 251, and 252	37 CFR 1.47, 1.63-1.64, 1.67, and 1.171-1.179	PTO/SB/51S	<ul style="list-style-type: none"> Provides the inventor or assignee with the required language stating that all the errors in the original patent being corrected or any additional errors made during the reissue examination process occurred "without deceptive intent." Used by the USPTO to ensure that the requirements of 37 CFR 1.63 and 1.175 are met in order to reissue the patent.
7	Reissue Application: Consent of Assignee; Statement of Non-Assignment	35 U.S.C. §§ 115, 251, and 252	37 CFR 1.47, 1.63-1.64, and 1.171-1.179	PTO/SB/53 PTO/AIA/53	<ul style="list-style-type: none"> Enables the assignee to consent to filing a reissue application. Used by the USPTO to confirm that all assignees and inventors owning an undivided interest in the original patent consent to the filing of the reissue application.
8	Reissue Application Fee Transmittal Form	35 U.S.C. §§ 115, 251, and 252	37 CFR 1.47, 1.63-1.64, and 1.171-1.179	PTO/SB/56	<ul style="list-style-type: none"> Used by the applicant or the applicant's representatives to calculate the reissue application fee. Used by the USPTO to determine the appropriate reissue application fee.
9	Issue Fee Transmittal	35 U.S.C. §§ 41(a) and 151	37 CFR 1.18 and 1.311-1.317	PTOL-85B	<ul style="list-style-type: none"> Used by the public to submit an issue fee payment to the USPTO. Used by the USPTO to determine whether all of the appropriate information is included at the time of payment of the issue fee, such as assignments, small entity status, method of payment, and certificate of mailing.
10	Issue Fee Transmittal (electronic)	35 U.S.C. §§ 41(a) and 151	37 CFR 1.18 and 1.311-1.317	PTOL-85B	<ul style="list-style-type: none"> Used by the public to submit an issue fee payment to the USPTO electronically. Used by the USPTO to determine whether all of the appropriate information is included at the time of payment of the issue fee, such as assignments, small entity status, and method of payment.

3. Use of Information Technology

Customers may submit the items in this information collection electronically through EFS-Web, the USPTO's online filing system for patent applications and related documents. EFS-Web allows customers to file requests for certificates of correction, issue fee transmittals, reissue patent applications, and associated documents through their standard Web browser without downloading special software, changing their documentation preparation tools, or altering their workflow processes. Customers may create their requests using the tools and processes that they already use and then convert those documents into standard PDF files that are submitted through EFS-Web to the USPTO. The fillable PDF forms, including the Issue Fee Transmittal form (PTOL-85B), that can be submitted through EFS-Web may be downloaded from the USPTO Web site and do not require special PDF creation software.

Registered and unregistered users can file documents securely through EFS-Web. The documents of registered users are protected using a Public Key Infrastructure (PKI) system and digital certificates, which provide authentication and encryption security. Even for filers who are not registered, the documents are submitted to EFS-Web using Transport Layer Security (TLS) or Secure Socket Layer (SSL) protocol.

EFS-Web offers many benefits to filers, including immediate notification that a submission has been received by the USPTO, automated processing of requests, and avoidance of postage and other paper delivery costs. Users can access EFS-Web from any computer with an Internet connection. Since EFS-Web is hosted on the USPTO's secure servers and not on the individual's personal computer, USPTO staff can update EFS-Web without requiring any action from the user. Customers can submit fee payments and other requests in real time. The PDF forms can be passed around to multiple users for collaboration.

EFS-Web integrates with the Patent Application Information Retrieval (PAIR) system, the USPTO's online database that is available through the USPTO Web site. PAIR uses digital certificates to permit only authorized individuals to access information about pending patent applications and to maintain the confidentiality and integrity of the information as it is transmitted over the Internet. Information for issued patents, certificates of correction, and reissue applications is available to the general public.

4. Efforts to Identify Duplication

This information is collected only when an applicant submits an issue fee payment for a patent application allowed by the USPTO, when the patentee or others apply for reissue of a patent, or when the patentee or others request a certificate of correction to correct errors contained in the patent. This information is not collected elsewhere and does not result in a duplication of effort.

5. Minimizing Burden to Small and Micro Entities

The information in this collection is necessary in order to process requests related to certificates of correction, reissue applications, and issue fee payments. The same information is required from every applicant, patent owner, or other customer and is not available from any other source.

Pursuant to section 10(b) of the Leahy-Smith America Invents Act (AIA), the USPTO provides a 50% reduction in the fees for certain patent filings by small entity applicants, such as independent inventors, small businesses, and nonprofit organizations who meet the definition of a small entity provided at 37 CFR 1.27. Also pursuant to section 10(b) of the AIA, the USPTO provides a 75% reduction in the fees set or adjusted under section 10(a) of the Act for certain patent filings by applicants who meet the definition of a micro entity provided at 35 U.S.C. § 123 and 37 CFR 1.29.

This information collection involves payment of fees by customers who may qualify as small entities or micro entities. No significant burden is placed on small or micro entities, in that small entities must only identify themselves as such in order to obtain these benefits, and micro entities must only provide a certification of micro entity status. An assertion or certification of small or micro entity status, respectively, only needs to be filed once in an application or patent (although a fee may be paid in the micro entity amount only if the applicant or patentee is still entitled to micro entity status on the date the fee is paid).

6. Consequences of Less Frequent Collection

This information is collected only when the public submits a related request for a certificate of correction, a reissue patent application, or an issue fee payment. If the information were not collected, the USPTO would not be able to comply with the statutes and regulations governing the issuance of patents, issued patents, and reissue applications. This information could not be collected less frequently.

7. Special Circumstances in the Conduct of Information Collection

There are no special circumstances associated with this collection of information.

8. Consultations Outside the Agency

The 60-Day Notice was published in the *Federal Register* on May 31, 2013 (78 Fed. Reg. 32629). The comment period ended on July 30, 2013. No public comments were received.

9. Payment or Gifts to Respondents

This information collection does not involve a payment or gift to any respondent.

10. Assurance of Confidentiality

The confidentiality of patent applications is governed by statute (35 U.S.C. § 122) and regulation (37 CFR 1.11 and 1.14). The USPTO has a legal obligation to maintain the confidentiality of the contents of unpublished patent applications and related documents. Upon publication of an application or issuance of a patent, the patent application file is made available to the public, subject to the provisions for providing only a redacted copy of the file contents. The entire file of a reissue application is available to the public.

11. Justification for Sensitive Questions

None of the required information in this collection is considered to be sensitive.

12. Estimate of Hour and Cost Burden to Respondents

Table 2 calculates the burden hours and costs of this information collection to the public, based on the following factors:

- **Respondent Calculation Factors**

The USPTO estimates that it will receive approximately 352,150 responses per year for this collection, with approximately 25% of these responses submitted by small entities. Approximately 85% of the total responses for this collection will be submitted electronically, including 100% of the Petitions to Correct Assignee After Payment of Issue Fee (37 CFR 3.81(b)) (PTO/SB/141).

These estimates are based on the Agency's long-standing institutional knowledge of and experience with the type of information collected by these items.

- **Burden Hour Calculation Factors**

The USPTO estimates that it will take the public from 12 minutes (0.20 hours) to 5 hours to gather the necessary information, prepare the appropriate form or document, and submit the information to the USPTO.

These estimates are based on the Agency's long-standing institutional knowledge of and experience with the type of information collected and the length of time necessary to complete responses containing similar or like information.

- **Cost Burden Calculation Factors**

The USPTO uses a professional rate of \$371 per hour for respondent cost burden calculations, which is the mean rate for attorneys in private firms as shown in the 2011 Report of the Economic Survey, published by the Committee on Economics of Legal Practice of the American Intellectual Property Law Association (AIPLA).

The USPTO expects that the information in this collection will be prepared by attorneys, except for the Issue Fee Transmittal, which will be prepared by paraprofessionals at an estimated rate of \$122 per hour.

Table 2: Burden Hour/Burden Cost to Respondents

Item #	Item	Hours (a)	Responses (yr) (b)	Burden (hrs/yr) (c) (a x b)	Rate (\$/hr) (d)	Total Cost (\$/yr) (e) (c x d)
1	Certificate of Correction (PTO/SB/44)	1.00	26,000	26,000	\$371.00	\$9,646,000.00
2	Petition to Correct Assignee After Payment of Issue Fee (37 CFR 3.81(b)) (PTO/SB/141)	0.50	750	375	\$371.00	\$139,125.00
3	Reissue Documentation	5.00	800	4,000	\$371.00	\$1,484,000.00
4	Reissue Patent Application Transmittal (PTO/SB/50, PTO/AIA/50)	0.20	800	160	\$371.00	\$59,360.00
5	Reissue Application Declaration by the Inventor or the Assignee (PTO/SB/51/52, PTO/AIA/05/06) or Substitute Statement in Lieu of an Oath or Declaration for Reissue Patent Application (35 U.S.C. 115(d) and 37 CFR 1.64) (PTO/AIA/07)	0.50	1,150	575	\$371.00	\$213,325.00
6	Supplemental Declaration for Reissue Patent Application to Correct "Errors" Statement (37 CFR 1.175) (PTO/SB/51S)	0.30	500	150	\$371.00	\$55,650.00
7	Reissue Application: Consent of Assignee; Statement of Non-assignment (PTO/SB/53, PTO/AIA/53)	0.20	1,350	270	\$371.00	\$100,170.00
8	Reissue Application Fee Transmittal Form (PTO/SB/56)	0.20	800	160	\$371.00	\$59,360.00
9	Issue Fee Transmittal (PTOL-85B)	0.50	50,000	25,000	\$122.00	\$3,050,000.00
10	Issue Fee Transmittal (electronic) (PTOL-85B)	0.50	270,000	135,000	\$122.00	\$16,470,000.00
	Totals	-----	352,150	191,690	-----	\$31,276,990.00

13. Total Annual (Non-hour) Cost Burden

The total annual (non-hour) cost burden for this collection is calculated in Table 3 below. Postage fees are included in this ICR; filing fees are covered under 0651-0072. This collection has no capital start-up, maintenance, or recordkeeping costs.

Postage

Customers may incur postage costs when submitting the information in this collection to the USPTO by mail. The Petition to Correct Assignee After Payment of Issue Fee (37 CFR 3.81(b)) (PTO/SB/141) and the electronic version of the Issue Fee Transmittal (PTOL-85B) are only submitted online. The USPTO expects that the non-electronic version of the Issue Fee Transmittal (PTOL-85B) and approximately 7% of the other

responses for this collection will be submitted by mail. The USPTO estimates that the average first-class postage cost for a mailed submission will be 92 cents (1-ounce flat 9"x12" envelope) and that approximately 52,198 submissions will be mailed to the USPTO per year.

Table 3: Annual (Non-hour) Postage Costs to Respondents

Item #	Type of cost	Estimated annual responses	Amount	Totals
9	Issue Fee Transmittal (PTOL-85B) – postage for mailed submissions	50,000	\$0.92	\$46,000.00
1, 3-8	Postage for all other mailed submissions (7% of 31,400 other responses that are not electronic only)	2,198	\$0.92	\$2,022.00
	Total postage for mailed submissions	52,198	\$48,022.00
	Total annual (non-hour) cost burden	\$48,022.00

Fees

There are fees associated with the requirements in this collection but they are not included in this information collection request. Instead, the filing fees are covered under OMB control number 0651-0072 America Invents Act Section 10 Patent Fee Adjustments, which was approved by OMB in January 2013. Filing fees are now being removed from the burden calculations in this collection (0651-0033) to avoid double-counting.

14. Annual Cost to Federal Government

The USPTO estimates that it takes USPTO staff approximately 10 minutes (0.17 hours) to 1 hour to process the information in this collection, depending on the type and amount of information submitted. The information in this collection is processed by GS-5, step 1 employees at an estimated cost of \$21.23 per hour (GS-5/1 hourly rate of \$16.33 with 30% (\$4.90) added for benefits and overhead) and GS-7, step 1 employees at an estimated cost of \$26.29 per hour (GS-7/1 hourly rate of \$20.22 with 30% (\$6.07) added for benefits and overhead). The USPTO expects that the electronic version of the Issue Fee Transmittal form will be processed automatically without any direct staff time required.

Table 4 calculates the burden hours and costs to the Federal Government for processing this information collection:

Table 4: Burden Hour/Burden Cost to the Federal Government

Item #	Item	Hours (a)	Responses (yr) (b)	Burden (hrs/yr) (c) (a x b)	Rate (\$/hr) (d)	Total Cost (\$/yr) (e) (c x d)
1	Certificate of Correction (PTO/SB/44)	0.50	26,000	13,000	\$26.29	\$341,770.00
2	Petition to Correct Assignee After Payment of Issue Fee (37 CFR 3.81(b)) (PTO/SB/141)	0.30	750	225	\$26.29	\$5,915.00
3	Reissue Documentation	1.00	800	800	\$21.23	\$16,984.00
4	Reissue Patent Application Transmittal (PTO/SB/50, PTO/AIA/50)	1.00	800	800	\$21.23	\$16,984.00
5	Reissue Application Declaration by the Inventor or the Assignee (PTO/SB/51/52, PTO/AIA/05/06) or Substitute Statement in Lieu of an Oath or Declaration for Reissue Patent Application (35 U.S.C. 115(d) and 37 CFR 1.64) (PTO/AIA/07)	0.30	1,150	345	\$21.23	\$7,324.00
6	Supplemental Declaration for Reissue Patent Application to Correct "Errors" Statement (37 CFR 1.175) (PTO/SB/51S)	0.30	500	150	\$21.23	\$3,185.00
7	Reissue Application: Consent of Assignee; Statement of Non-assignment (PTO/SB/53, PTO/AIA/53)	0.30	1,350	405	\$21.23	\$8,598.00
8	Reissue Application Fee Transmittal Form (PTO/SB/56)	0.30	800	240	\$21.23	\$5,095.00
9	Issue Fee Transmittal (PTOL-85B)	0.17	50,000	8,500	\$21.23	\$180,455.00
10	Issue Fee Transmittal (electronic) (PTOL-85B)	0.00	270,000	0	N/A	\$0.00
	Totals	-----	352,150	24,465	-----	\$586,310.00

15. Reasons for Changes in Burden from the Current Inventory

The USPTO is submitting the following changes for this renewal:

- Adjusting the estimated annual responses and burden hours.
- Removing the fees associated with the information requirements in this collection because these fees have been moved into information collection 0651-0072 America Invents Act Section 10 Patent Fee Adjustments, which was approved by OMB in January 2013 in conjunction with the USPTO rulemaking "Setting and Adjusting Patent Fees" (RIN 0651-AC54). The corresponding fees are now being deleted from 0651-0033 to avoid double-counting those annual (non-hour) costs in the USPTO's inventory.
- Removing recordkeeping costs.

- Adjusting the estimated number of mailed submissions and the estimated postage rate.

This collection has also been updated with two requests for nonsubstantive change since the previous renewal of this collection in August 2010:

- January 2012: Added a form associated with a previously approved information requirement, the Petition to Correct Assignee After Payment of Issue Fee (37 CFR 3.81(b)) (PTO/SB/141).
- July 2012: Added three forms related to the inventor's oath or declaration for a reissue application: Reissue Application Declaration by the Inventor (PTO/AIA/05), Reissue Application Declaration by the Assignee (PTO/AIA/06), and Substitute Statement in Lieu of an Oath or Declaration for Reissue Patent Application (35 U.S.C. 115(d) and 37 CFR 1.64) (PTO/AIA/07).

This information collection is currently approved with a total of 217,684 responses, 124,609 burden hours, and \$284,980,686 in annual (non-hour) costs.

Changes in Responses and Burden Hours from the Current Inventory

The USPTO estimates total annual responses of 352,150 and total annual burden hours of 191,690, which is an increase of 134,466 responses and 67,081 burden hours from the currently approved burden for this collection. These changes are due to administrative adjustments from updated annual response estimates.

Table 5a: Changes in Responses and Burden Hours from the Current Inventory

Item #	Item	Currently approved responses	Updated responses	Change in responses (admin.)	Currently approved burden hours	Updated burden hours	Change in burden hours (admin.)
1	Certificate of Correction (PTO/SB/44)	26,000	26,000	0	26,000	26,000	0
2	Petition to Correct Assignee After Payment of Issue Fee (37 CFR 3.81(b)) (PTO/SB/141)	500	750	250	250	375	125
3	Reissue Documentation	850	800	(50)	4,250	4,000	(250)
4	Reissue Patent Application Transmittal (PTO/SB/50, PTO/AIA/50)	850	800	(50)	170	160	(10)
5	Reissue Application Declaration by the Inventor or the Assignee (PTO/SB/51/52, PTO/AIA/05/06) or Substitute Statement in Lieu of an Oath or Declaration for Reissue Patent Application (35 U.S.C. 115(d) and 37 CFR 1.64) (PTO/AIA/07)	1,135	1,150	15	568	575	7

Item #	Item	Currently approved responses	Updated responses	Change in responses (admin.)	Currently approved burden hours	Updated burden hours	Change in burden hours (admin.)
6	Supplemental Declaration for Reissue Patent Application to Correct "Errors" Statement (37 CFR 1.175) (PTO/SB/51S)	900	500	(400)	270	150	(120)
7	Reissue Application: Consent of Assignee; Statement of Non-assignment (PTO/SB/53, PTO/AIA/53)	1,230	1,350	120	246	270	24
8	Reissue Application Fee Transmittal Form (PTO/SB/56)	850	800	(50)	170	160	(10)
9	Issue Fee Transmittal (PTOL-85B)	12,975	50,000	37,025	6,488	25,000	18,512
10	Issue Fee Transmittal (electronic) (PTOL-85B)	172,394	270,000	97,606	86,197	135,000	48,803
	Totals	217,684	352,150	134,466	124,609	191,690	67,081

Changes in Annual (Non-hour) Costs from the Current Inventory

The total annual (non-hour) cost burden for this renewal submission of \$48,022 is a decrease of \$284,932,664 from the currently approved total of \$284,980,686. This increase in annual costs is due to both program changes and administrative adjustments.

Program changes

- Fees: The fees in this collection are being removed because they have been moved into collection 0651-0072.
- Recordkeeping: Removed costs associated with retaining acknowledgment receipts from online submissions because keeping these items is a suggestion and not a requirement.

Administrative adjustments

- Postage: Increase in part due to adjustments in the estimated number of mailed submissions as well as a small increase in USPS first-class postage rates since the previous renewal.

Table 5b: Changes in Annual (Non-hour) Costs from the Current Inventory

Cost	Currently approved annual cost burden	Program changes	Administrative adjustments	Total change in costs	Updated annual cost burden
Filing fees	\$284,361,310.00	(\$284,361,310.00)	\$0.00	(\$284,361,310.00)	\$0.00
Recordkeeping	\$606,000.00	(\$606,000.00)	\$0.00	(\$606,000.00)	\$0.00
Postage	\$13,376.00	\$0.00	\$34,646.00	\$34,646.00	\$48,022.00
Totals	\$284,980,686.00	(\$284,967,310.00)	\$34,646.00	(\$284,932,664.00)	\$48,022.00

16. Published Collections of Information

No special publication of the items in this collection is planned. However, information regarding patents with certificates of correction, reissue applications filed, and reissue patents granted is published weekly in the *Official Gazette of the United States Patent and Trademark Office*. The *Official Gazette* is published in electronic format on the USPTO Web site.

17. Display of Expiration Date of OMB Approval

The forms in this information collection will display the OMB Control Number and the expiration date of OMB approval.

18. Exceptions to the Certificate Statement

This collection of information does not include any exceptions to the certificate statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection of information does not employ statistical methods.