

**1 Supporting Statement A for  
Paperwork Reduction Act Submission**

**Commercial Use Authorizations  
OMB Control Number 1024-0268**

**Terms of Clearance:** None.

**Justification**

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

Conducting commercial operations in a unit of the National Park System without a contract, permit, Commercial Use Authorization (CUA), or some other written agreement is prohibited. Section 418, Public Law 105-391 (54 U.S.C. 101925) gives the Secretary of the Interior the authority to authorize a private person, corporation, or other entity to provide services to visitors in units of the National Park System through a CUA. Such authorizations are not considered concession contracts. We (National Park Service, NPS) authorize commercial operations that originate and operate entirely within a park (in-park); commercial operations that provide services originating and terminating outside of the park boundaries; noncommercial organized children's camps, outdoor clubs, and nonprofit institutions; and other uses as the Secretary determines appropriate. The commercial operations include a range of services, such as mountain climbing guides, boat repair services, transportation services and tours, canoe livery operations, hunting guides, retail sales at festivals, fun runs, catering services, and dozens of other visitor services.

Section 418 limits CUAs to:

- Commercial operations with annual gross receipts of not more than \$25,000 resulting from services originating and provided solely within a unit of the National Park System;
- Incidental use of resources of the unit by commercial operations which provide services originating and terminating outside of the boundaries of the unit; or
- Uses by organized children's camps, outdoor clubs and nonprofit institutions (including back country use) and such other uses as the Secretary determines appropriate.

Nonprofit institutions are not required to obtain CUAs unless taxable income is derived by the institution from the authorized use.

The legislative mandate of the National Park Service (NPS), found at 54 U.S.C. 100101(a), is to preserve America's natural wonders unimpaired for future generations, while also making them available for the enjoyment of visitors. Meeting this mandate requires the NPS to balance preservation with use. Maintaining a good balance requires both information and limits. The

information requested will allow the unit manager to evaluate requests for a commercial use to determine impact on the resources and the appropriateness of the activity.

**2. Indicate how, by whom, how frequently, and for what purpose the information is to be used.**

We collect information on the CUA Application (Form 10-650), the CUA Annual Report (Form 10-660), and CUA Monthly Report (Form 10-660A). We use the information from these forms to:

- manage the program and operations,
- determine the qualifications and abilities of the commercial operators to provide a high quality, safe, and enjoyable experience for park visitors,
- determine the impact on the parks natural and cultural resources, and
- manage the use and impact of multiple operators.

**CUA Application (Form 10-550)**

Interested parties obtain the CUA application from the park in which the activity is to occur. The form may be downloaded from the park website or requested in hard copy. Applications may be submitted during an appropriate window of time or an appropriate duration before an event. They are typically issued for 1 year, with 2 years being the maximum allowed by law. They may be issued for a single event. Authorizations are not renewable, and a new application must be submitted to continue the authorization beyond the current term.

Each park will customize the application by including the park name and address, contact person name and telephone number, and park-specific approved services and fee schedule/payment information. We collect the following information:

- type of service applicant will offer,
- business Name (as shown on State business license),
- type of Business (corporation, partnership, LLC, sole proprietorship, non-profit, other),
- primary Contact Information (In Season) – mailing address, telephone numbers, email and website,
- contact Information (Off season) – mailing address, telephone numbers, email and website,
- state Business License (number, expiration),
- Employer Identification Number (EIN),
- vehicles/vessels, and
- violations of any state, Federal, or local laws or regulations committed by the company, its officers, or its employees.

Some parks have minimum requirements for businesses that offer services to visitors relating to the safety and welfare of the visitors and protection of the resources. These requirements may include documentation of first aid training, an emergency response plan, limits to group size,

etc. Park-specific requirements are identified during the application process and documentation of the minimum requirements may be required of the applicant.

### **CUA Monthly Report (Form 10-660A)**

NPS must strictly manage some CUA activities by imposing restrictions such as daily visitor limits to protect sensitive natural and cultural resources. Parks may require the submission of the CUA Monthly Report to more closely track these CUA activities and associated visitor use. Park staff use the information in the report to check the average and actual use of each commercial operator throughout the season, in order to ensure maximum daily limits and seasonal average limits are not exceeded. By closely monitoring this information, the parks can ensure that commercial operators do not exceed the authorized use before the end of the season and create a gap when prospective visitors cannot be accommodated. It also ensures that commercial operators do not receive an unsatisfactory rating or suspension of their authorizations due to exceeding use limits. The statistics collected in the CUA Monthly Report can then be rolled up into the Annual Report. We collect the following information:

- contact information and services provided,
- report of monthly visitor service for all CUA activities, and
- reportable injuries.

### **CUA Annual Report and Instructions (Form 10-660)**

The NPS requires submission of the CUA Annual Report every year. If monthly reports are required by the park, the CUA holder compiles the visitor use statistics and injury information collect in the CUA Monthly Report and provides additional annual financial information. We collect the following information:

- contact information and services provided,
- report of annual visitor service for all CUA activities,
- annual gross revenues derived from all CUA activities, and
- reportable injuries.

The NPS maintains this operational information and with the exception of the visitor use statistics, does not disseminate it to the public. This information allows the park to manage the impacts of the commercial use on the natural and cultural resources and the visiting public. Knowing the level of use an area is receiving allows the manager to measure and control the impacts of excessive use, including trail maintenance, landscape maintenance, parking limitations, trash collection, utility use, or degradation of the visitors experience. The financial information that is gathered allows the park to determine that legislatively mandated financial limits are being met for in-park operations (gross receipts not to exceed \$25,000).

**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 and specifically how this collection meets GPEA requirements.**

We provide the forms in a fillable version available to download from the NPS and park websites in keeping with Government Paperwork Elimination Act (GPEA). Forms can be submitted electronically via email, submitted by hard copy in the mail, by fax, or in person. Efforts are being made to make the form electronically submittable, eliminating the need to print hard copies and fax or email them, which will better support the GPEA requirements and reduce the time requirement of the CUA applicants and holders as well as the NPS. There will always be an option to submit the forms in hard copy.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

The information requested in the CUA application is not otherwise available in the NPS. The CUA application and report information is gathered and stored at the issuing park. There is only one office in each park that coordinates the CUA permits. The information collected from commercial operators in the reports is unique and is not collected elsewhere in the NPS.

There is no duplication in the CUA Annual Report and the CUA Monthly Report. The CUA Annual Report provides visitor information, financial information, and reportable injury statistics. CUA holders that are required to submit the CUA Monthly report, which includes visitor statistics and reportable injury information, are only required to provide the additional financial information in the CUA Annual Report.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

Historically, small businesses have provided the majority of the visitor services authorized under CUAs.

The CUA Application gathers the minimum key information necessary for NPS to determine the capability, resources, and fitness of the business operation to provide the service. It also gathers the minimum amount of information needed to protect park resources.

The reports collect service activity (visitors served), gross annual revenues, and injury information. In most cases, the financial information required at the end of the operating year is very simple. There are no requirements for audited financial statements, advanced recordkeeping, or retention of records beyond what the IRS requires.

**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.**

The NPS legislative mandate is to preserve America's natural wonders unimpaired for future generations, while also making them available for the enjoyment of the visitor. In order to manage the CUA program, the NPS requires accurate and current data on the business applicants, as well as the necessary operational information to ensure the business is providing the required services, staff, equipment, insurance, certifications and licenses to meet the operational and liability requirements, while providing a safe, legal, and quality service to the visitors to National Parks. This information also assists the NPS to determine if the resources in an area are being negatively impacted. Not collecting this information could negatively impact NPS resources and visitors.

**The CUA Application** information is collected at the start of any commercial activity and may be collected for a single event, an annual permit, or a biennial permit. It cannot be collected less frequently.

**The CUA Annual Report** information consists of three types of data: visitation information, financial information, and reportable injury statistics. Since the CUA authorization is issued for a maximum term of 2 years, and considering that many CUAs are issued for single events or short term activities, collecting the data less than annually compromises the ability of NPS to manage or enforce the legislatively instituted program, ensure that financial requirements are met, and protect the natural and cultural resources from degradation. Requiring CUA holders to report on their activities and gross revenues annually or per event, as required by the stipulation, may be less time consuming for them than asking for this information on a less frequent schedule. Retrieving accurate data after 2 years may be problematic for the CUA holder.

**The CUA Monthly Report** information consists of two types of data: visitation information and reportable injury statistics. Parks may require these statistics when CUA activities are limited and strictly managed in order to ensure maximum daily limits and seasonal average limits are not exceeded. These reports can be consolidated, with the addition of financial information, into the CUA Annual Report.

**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;**
- **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;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**

- 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 statute 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; or
- requiring respondents to submit proprietary trade secrets, 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.

NPS must strictly manage some CUA activities by imposing restrictions such as daily visitor limits to protect sensitive natural and cultural resources. Parks may require the submission of the CUA Monthly Report to more closely track these CUA activities and associated visitor use. Park staff use the information in the report to check the average and actual use of each commercial operator throughout the season, in order to ensure maximum daily limits and seasonal average limits are not exceeded. By closely monitoring this information, the parks can ensure that commercial operators do not exceed the authorized use before the end of the season and create a gap when prospective visitors cannot be accommodated. It also ensures that commercial operators do not receive an unsatisfactory rating or suspension of their authorizations due to exceeding use limits. The statistics collected in the CUA Monthly Report can then be rolled up into the Annual Report.

There are no other special circumstances that require us to collect this information in a manner inconsistent with OMB guidelines.

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 in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

**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.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three 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.**

On January 11, 2016, we published in the Federal Register (81 FR 1202) a notice requesting public comment on this information collection. The comment period ended on March 11, 2016.

NPS issues roughly 5,900 CUA permits each year. We received comments from 0.1% of current CUA holders in response to this notice.

Comment Received 02/08/2016: Angela Head of Beluga Air. LLC:

The proposal to increase reporting requirements from a yearly to monthly timeframe is concerning. The operating season in Alaska runs from approximately June 1<sup>st</sup> to August 30<sup>th</sup>. The required yearly reports take a serious amount of time and effort to prepare accurately. In the midst of the very busy season, visitor safety and trip quality are the primary concerns. In-season monthly reporting would increase the likelihood of error/omission based upon the limited amount of time that could be dedicated to paperwork.

The requirement of monthly reporting would increase the overhead cost of the CUA program due to increased deadlines, enforcement efforts and data management. The cost would be passed to CUA holders and finally to the end user – the park visitor. This is not an appropriate or necessary cost increase for accessing our public spaces.

NPS Response/Action Taken: NPS must strictly manage some CUA activities by imposing restrictions such as daily visitor limits to protect sensitive natural and cultural resources. Parks may require the submission of the CUA Monthly Report to more closely track these CUA activities and associated visitor use to ensure that maximum daily limits and seasonal average limits are not exceeded. By closely monitoring this information, the parks can also ensure that commercial operators do not exceed the authorized use before the end of the season and create a gap when prospective visitors cannot be accommodated.

Additionally, in Katmai National Park only, CUA holders that provide transportation are required to submit the CUA Monthly report in addition to the CUA Annual Report. The vast majority of visitors access the park by plane or boat operated by authorized commercial service providers and there are no entrance stations to track the number of visitors. The CUA Monthly reports provide the only means of securing an accurate visitor count and are used to influence short-term resource management decisions. By requiring only those authorized transportation providers to submit the CUA Monthly report, duplicate reporting is eliminated.

We did not make any changes to our information collection based on this comment.

Comment Received 02/03/2016: Carl Donohue of Expeditions Alaska:

The National Park Service should reconsider the requirement for monthly reporting. Monthly reporting does not make sense for operations in places like Alaska, where the majority of CUA holders operate in a very tight window of time. CUA holders in Alaska do not operate in January, February, March, April, May, October, November, or December. The proposed monthly reporting does not seem reasonable. During the brief operating window, June to September, reporting becomes burdensome do to remote operating locations.

Requiring each CUA holder to ensure guests pay for park entrance fees results in visitors paying the entrance fee multiple times during their visit. For instance, visitors may utilize a floatplane CUA holder to access the park, then a separate CUA holder to guide them during hikes.

In addition, because visitors use multiple CUA holders during their trip, it may result in overinflating the visitor count. CUA holders are required to report visitation statistics. The Park Service should find a way to avoid miscounting the number of visitors and inflating their visitation numbers.

*NPS Response/Action Taken:* NPS must strictly manage some CUA activities by imposing restrictions such as daily visitor limits to protect sensitive natural and cultural resources. Parks may require the submission of the CUA Monthly Report to more closely track these CUA activities and associated visitor use to ensure that maximum daily limits and seasonal average limits are not exceeded. By closely monitoring this information, the parks can also ensure that commercial operators do not exceed the authorized use before the end of the season and create a gap when prospective visitors cannot be accommodated.

Additionally, Mr. Donohue commented that visitors may be subject to multiple entrance fee payments due the common visitation practice in Alaska of using multiple CUA holders to access a park and the requirement that CUA holders ensure guests have paid for Park entrance. This requirement is not a condition of the CUA Application nor is it included in the CUA Monthly or CUA Year Reports. We did not make any changes to our information collection based on this comment.

Mr. Donohue also commented that the practice of using multiple CUA holders to access an area may result in an over inflation of visitor statistics due to the requirement that each CUA holder report visitor data, i.e. visitors may be counted more than once. Collecting visitor statistics from multiple CUA holders helps park managers understand demand for particular activities and predict future trends. Understanding these trends in visitor use is vital in proper resource management.

Only CUA holders that provide transportation to and from the park are required to submit the CUA Monthly report in addition to the CUA Annual Report in Katmai National Park and Preserve. The vast majority of visitors access the park by plane or boat operated by authorized commercial service providers and there are no entrance stations to track the



number of visitors. The CUA Monthly reports provide the only means of securing an accurate visitor count and are used to influence short-term resource management decisions. By requiring only those authorized transportation providers to submit the CUA Monthly report, duplicate reporting is eliminated.

We did not make any changes to our information collection based on this comment.

Comment Received 02/29/2016: Dave Bachrach of AK Adventures, Inc.:

The proposal to increase the required reporting for CUA holders from annually to monthly is concerning. The primary concern during the short visitor season, approximately June 1 to August 30, is for visitor safety and for the quality of their experience. Requiring monthly reporting during that time would be burdensome and unreasonable. There is little to no access to computers or client records while in the field with visitors, commonly 10 to 14 days.

Monthly reporting would also increase the administrative workload to the NPS staff which would increase the overhead cost of managing the CUA program. This cost would most certainly be passed along to the CUA holder and finally to the park visitor. This is not an appropriate or necessary cost increase for accessing public lands.

*NPS Response/Action Taken*: NPS must strictly manage some CUA activities by imposing restrictions such as daily visitor limits to protect sensitive natural and cultural resources. Parks may require the submission of the CUA Monthly Report to more closely track these CUA activities and associated visitor use to ensure that maximum daily limits and seasonal average limits are not exceeded. By closely monitoring this information, the parks can also ensure that commercial operators do not exceed the authorized use before the end of the season and create a gap when prospective visitors cannot be accommodated.

Additionally, in Katmai National Park only CUA holders that provide transportation are required to submit the CUA Monthly report in addition to the CUA Annual Report. The vast majority of visitors access the park by plane or boat operated by authorized commercial service providers and there are no entrance stations to track the number of visitors. The CUA Monthly reports provide the only means of securing an accurate visitor count and are used to influence short-term resource management decisions. By requiring only those authorized transportation providers to submit the CUA Monthly report, duplicate reporting is eliminated.

We did not make any changes to our information collection based on this comment.

Comment Received 02/25/2016: John Rogers of Katmai Coastal Bear Tours:

Oppose the change from yearly to monthly reporting of visitor use because CUAs operate only one to four month of the year and monthly reporting would create unnecessary

burden.

*NPS Response/Action Taken:* NPS must strictly manage some CUA activities by imposing restrictions such as daily visitor limits to protect sensitive natural and cultural resources. Parks may require the submission of the CUA Monthly Report to more closely track these CUA activities and associated visitor use to ensure that maximum daily limits and seasonal average limits are not exceeded. By closely monitoring this information, the parks can also ensure that commercial operators do not exceed the authorized use before the end of the season and create a gap when prospective visitors cannot be accommodated.

Additionally, in Katmai National Park only CUA holders that provide transportation are required to submit the CUA Monthly report in addition to the CUA Annual Report. The vast majority of visitors access the park by plane or boat operated by authorized commercial service providers and there are no entrance stations to track the number of visitors. The CUA Monthly reports provide the only means of securing an accurate visitor count and are used to influence short-term resource management decisions. By requiring only those authorized transportation providers to submit the CUA Monthly report, duplicate reporting is eliminated.

We did not make any changes to our information collection based on this comment.

Comment Received 02/10/2016: Perry Mollan of Katmai Wilderness Lodge made the following comment(s):

Katmai Wilderness Lodge is strongly opposed to the proposal for required monthly reporting. The monthly reporting is in direct contrast with the NPS stated summary proposal of reducing paperwork and respondent burden. Also, monthly reporting would result in inaccurate reporting that would need to be adjusted in annual report and will put CUA holders under stress to complete the report during the very busy, short operating season in Alaska.

If monthly reporting is found to be necessary, reports should be filed at the end of each month based on real numbers rather than a report filed at the beginning of the month based on projected numbers.

*NPS Response/Action Taken:* NPS must strictly manage some CUA activities by imposing restrictions such as daily visitor limits to protect sensitive natural and cultural resources. Parks may require the submission of the CUA Monthly Report to more closely track these CUA activities and associated visitor use to ensure that maximum daily limits and seasonal average limits are not exceeded. By closely monitoring this information, the parks can also ensure that commercial operators do not exceed the authorized use before the end of the season and create a gap when prospective visitors cannot be accommodated.

Additionally, in Katmai National Park only CUA holders that provide transportation are required to submit the CUA Monthly report in addition to the CUA Annual Report. The vast majority of visitors access the park by plane or boat operated by authorized commercial service providers and there are no entrance stations to track the number of visitors. The CUA Monthly reports provide the only means of securing an accurate visitor count and are used to influence short-term resource management decisions. By requiring only those authorized transportation providers to submit the CUA Monthly report, duplicate reporting is eliminated.

We did not make any changes to our information collection based on this comment.

We also received a comment from Jean Public. The commenter did not address the information collection requirements, but stated that the Government should charge CUA holders fees to operate on public lands. NPS is legally required to charge a fee for commercial operations [Section 418, Public Law 105-391 (54 U.S.C. 101925)]. Parks, at a minimum, charge a fee to recover costs associated with the management and administration of CUAs. We did not make any changes to our information collection based on this comment.

In addition to the Federal Register notice, the following nine (9) CUA holders were emailed copies of the forms and instructions. They were given contact information for both electronic response and a mailing address if they wanted to reply in hard copy. We followed up by telephoning the CUA holders that did not respond to the email requests. They were asked to suggest ways to improve the forms and for comments on:

- whether or not the collection of information is necessary, including whether or not the information will have practical utility; whether there are any questions they felt were unnecessary.
- the accuracy of our estimate of the burden for this collection of information;
- ways to enhance the quality, utility, and clarity of the information to be collected; and
- ways to minimize the burden of the collection of information on respondents.

Homer Air, Inc. 907-235-8591	Acadia Mountain Guides 207-288-8186	Adventure Cycling Association 406-721-1776
Crystal River Outfitters 231-334-4420	Hansers Wreckers 800-345-1754	Hatteras Island Horseback Riding 252-216-9191
Living Adventure Co. 715-779-9503	Caught Lookin Charters 305-333-8149	Kittatinny Canoes 800-356-2852

We received responses from the following five (5) individuals:

A representative of Living Adventure Inc. made the following comment(s):

Gathering the information by asking questions found on the CUA forms is useful for tracking patterns and all of the questions are helpful. The amount of time it takes to

complete the forms is directly related to previous experience. The first time completing the forms takes longer but the process becomes quicker each year. The revised forms are more succinct and easier to understand than in previous versions.

The issuance of a two-year CUA instead of a one-year CUA would minimize the time dedicated to information collection.

NPS Response/Action Taken: CUAs are typically issued for 1 year, with 2 years being the maximum allowed by Public Law 105-391(c)(3). CUAs may also be issued for one-time events. Term limits are determined by the issuing park. Parks choose to authorize permits for shorter terms when resource management requires modification of permit conditions on a more frequent basis than every two years. We did not make any changes to our information collection based on this comment.

A representative of Crystal River Outfitters made the following comment(s):

The current CUA process is acceptable and easy to deal with.

NPS Response/Action Taken: No action required.

A representative of Hansers Wreckers made the following comment(s):

The process seems to work well and we have no problem with the reporting requirements.

NPS Response/Action Taken: No action required.

A representative of Caught Lookin Charters made the following comment(s):

There are no problems with the forms or the reports.

NPS Response/Action Taken: No action required.

A representative of Hatteras Island Horseback Riding made the following comment(s):

The current forms take approximately 2 hours to complete and are not burdensome. The forms are fairly clear and collect the appropriate information.

If a CUA is already on file, requiring the applicant to only fill out sections where changes have been made. A renewal would allow a CUA to be issued without the permittee needing to submit a complete new application. A renewal form could be developed in the future to provide that same information.

NPS Response/Action Taken: No preferential right of renewal or other provisions for renewal are allowable by law [Section 418, Public Law 105-391 (54 U.S.C. 101925)]. We did

not make any changes to our information collection based on this comment.

Despite multiple attempts to solicit feedback by email and telephone call from the remaining four (4) businesses, no responses were received.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

We do not provide payments or gifts to respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

We do not provide any assurance of confidentiality. The information collected is subject to the requirements of the Privacy Act and the Freedom of Information Act. We maintain the information in accordance with Privacy Act System of Records, Commercial Use Authorization (CUA) System-NPS-24 (78 FR 20944, April 8, 2013).

**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.**

We do not ask questions of a sensitive nature.

**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 differences in activity, size, or complexity, show the range of estimated hour burden, and explain 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.
- 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.

We estimate that we will receive 64,900 responses totaling 61,950 annual burden hours. This collection is targeted at businesses operating commercial services within national parks. There are roughly 5,900 active permits each year.

We estimate the total dollar value of the annual burden hours for this collection to be \$1,986,117. We used the below listed rates in accordance with Bureau of Labor Statistics news release USDL-16-1150, June 9, 2016, Employer Costs for Employee Compensation—March 2016, (<http://www.bls.gov/news.release/pdf/ecec.pdf>) to calculate the total annual burden. Table 1 of the bulletin lists the hourly wage plus benefits for private industry workers as \$32.06.

ACTIVITY	NO. OF RESPONDENTS	NO. OF ANNUAL RESPONSES <sup>1</sup>	COMPLETION TIME PER RESPONSE	TOTAL ANNUAL HOURS	\$ VALUE OF ANNUAL BURDEN HOURS (\$31.70/hour)
<b>Form 10-550 - Application</b> Private Sector	5,900	5,900	2.5 hours	14,750	\$ 472,885.00
<b>Form 10-660 - Annual Report</b> (incl. recordkeeping) Private Sector	5,900	5,900	1.25 hours	7,375	236,442.50
<b>Form 10-660A - Monthly Report</b> (incl. recordkeeping) Private Sector	5,900	53,100	45 minutes	39,825	1,276,789.50
<b>Totals</b>	<b>17,700</b>	<b>64,900</b>		<b>61,950</b>	<b>\$1,986,117.00</b>

<sup>1</sup> All CUA holders must submit an annual report. The season for many of the CUAs is 6 to 8 months. In Alaska it is shorter; in the south it may be longer. Therefore, we estimate that monthly reports will be submitted an average of nine times a year. For the purposes of this information collection, we assume all CUA holders are required to submit monthly reports. In actuality, less than 15% of CUA holders are required to submit monthly reports.

**13. Provide an estimate of the total annual non-hour cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)**

- 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 (including filing fees paid for form processing). 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 keep records for the government or (4) as part of customary and usual business or private practices.

We estimate the nonhour burden costs for this information collection to be \$590,000 for application fees. Application fees range from \$50 to \$250 depending on the level of effort to issue, accept, review, and approve the CUA. We estimate that the average application fee is \$100.

**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, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.**

We estimate the annual cost to the Federal government to administer this information collection is \$626,657 (rounded) (\$556,707 for salaries/benefits plus \$69,950 for other costs). To determine hourly wage rates, we used the Office of Personnel Management Salary Table 2016-RUS ([https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/16Tables/html/RUS\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/16Tables/html/RUS_h.aspx)) as an average nationwide rate. We used Bureau of Labor Statistics news release USDL-16-1150, June 9, 2016, Employer Costs for Employee Compensation—March 2016, (<http://www.bls.gov/news.release/pdf/ecec.pdf>) to calculate benefits.

Applications and reports are reviewed at national parks in all 50 States, some of which are in locality pay areas. The majority of personnel involved in this project are in the RUS locality.

For the application, we have included staff time for creating and posting the application; mailing it, if necessary; answering queries; receiving and reviewing the application; entering information into a database; and filing. For reports, we included time for receiving and tracking the data, reconciling it with monthly reports, and filing.

Table 14.1 – Salaries and Benefits

Position/ Grade	Hourly Rate	Hourly Rate w/Benefits (1.57 x hourly rate, rounded)	Annual Hours Applications	Annual Hours Reports	Total Annual Hours	Annual Cost
Clerk, GS-5/step 5	\$17.55	\$27.55	5,900	8,850	14,750	\$406,362.50
Concession Specialist, GS-9/ Step 5	26.59	41.75	984	1,475	2,459	102,663.25
Concession Manager, GS-11/step 5	32.17	50.51	472	472	944	47,681.44
<b>Total</b>			<b>7,356</b>	<b>10,797</b>	<b>18,153</b>	<b>\$556,707.19</b>

Table 14.2 - Other Costs

Action	Travel	Printing	Equipment and Supplies	Total
Training for park coordinators 25/year @ \$2,500	\$62,500	\$200	\$50	\$62,750
Equipment and Supplies at park level (currently only 144 parks)			\$7,200	\$7,200
<b>Total</b>	<b>\$62,500</b>	<b>\$200</b>	<b>\$7,250</b>	<b>\$69,950</b>

**15. Explain the reasons for any program changes or adjustments in hour or cost burden.**

We made adjustments in hour and cost burden estimates because the number of received CUA applications fluctuates on a yearly basis. Over the last three years the NPS has seen an annual increase of approximately 800 CUA applicants.

Requirements for CUA Monthly Reports are decided at the park level. Numerous comments were received regarding the new requirement for monthly reporting at KATM. Public concerns were voiced during public meetings with current and potential CUA holders at KATM. The park addressed those concerns by requiring only those CUA holders who provide transportation to the park to submit monthly reports in order to maintain an accurate visitor count.

In addition, the individual burden hours were eliminated because all CUA holders are licensed businesses, not individuals. Therefore, all burden for this collection is being reported under the Private Sector category.

**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 CUA holder’s contact information and details of the services provided are collected in the application form and will be published to advertise the services offered. The parks, where the



activity takes place, will make the information available online, typically in a spreadsheet format. The information will also be available for requests by phone or in person. Confidential information will not be released.

**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.**

We will display the OMB control number and expiration date on the forms.

**18. Explain each exception to the certification statement.**

There are no exceptions to the certification statement.