

SUPPORTING STATEMENT

OMB Control Number 0704-0434 — Radio Frequency Identification Advance Shipment Notices

A. JUSTIFICATION

1. Need for the Information Collection

This information collection requirement is implemented in Defense Federal Acquisition Regulation Supplement (DFARS) clause 252.211-7006, Passive Radio Frequency Identification. The Department of Defense (DoD) has a requirement for contractors to submit advance shipment notices (ASNs) for shipments that require passive Radio Frequency Identification (RFID). A passive RFID tag is required for cases and palletized unit loads packaging levels and any additional consolidation level(s) deemed necessary by the requiring activity for shipments of items that—

a. Contain items in any of the classes of supply defined in DoD 4140.1-R, DoD Supply Chain Materiel Management Regulation, AP1.1.11.; and

b. Will be shipped to—

i. One of the locations listed at http://www.acq.osd.mil/log/sci/RFID_ship-to-locations.html;

ii. A location outside the contiguous United States when the shipment has been assigned Transportation Priority 1; or

iii. Any additional location(s) deemed necessary by the requiring activity.

DoD considers the Radio Frequency Identification (RFID) to be a strategic imperative, necessary to deliver supplies to the warfighter more quickly, while increasing visibility of materiel throughout the supply chain.

2. Use of the Information

a. Contractors use Wide Area WorkFlow (WAWF) to electronically submit ASNs in advance of shipments of items described in section A.1. of this supporting statement. Detailed procedures for contractors on the use of WAWF is provided at <https://wawf.eb.mil/>. The ASN includes the RFID tag data to be encoded (as specified in paragraph (d) of the clause at 252.211-7006) using the instructions provided in the EPC™ Tag Data Standards in effect at the time of contract award. The EPC™ Tag Data Standards are available at <http://www.epcglobalinc.org/standards/>.

i. If the Contractor is an EPCglobal™ subscriber and possesses a unique EPC™ company prefix, the Contractor may use any of the identifiers and encoding instructions described in the most recent EPC™ Tag Data Standards document to encode tags.

ii. If the Contractor chooses to employ the DoD identifier, the Contractor shall use its previously assigned Commercial and Government Entity (CAGE) code and shall encode the tags in accordance with the tag identifier details located at http://www.acq.osd.mil/log/rfid/tag_data.htm.

iii. If the Contractor uses a third-party packaging house to encode its tags, the CAGE code of the third-party packaging house is acceptable.

iv. Regardless of the selected encoding scheme, the Contractor with which the Department holds the contract is responsible for ensuring that the tag ID encoded on each passive RFID tag is globally unique.

b. The information collected in accordance with DFARS clause 252.211-7006, as described above, is necessary because DoD needs the data element in the advance shipment notice to permit association of RFID tag data with the corresponding shipment. DoD depots use the information in the ASN to match the passive RFID tag data to the corresponding shipment upon arrival.

3. Use of Information Technology

Improved information technology is used to the maximum extent practicable and 100% electronic submission of information is anticipated. Contractors must use electronic means to submit the advance shipment notice in accordance with the procedures located at <https://wawf.eb.mil/>.

4. Non-duplication

As a matter of policy, DoD reviews the Federal Acquisition Regulation to determine whether adequate language already exists. This information collection does not duplicate any other requirement.

5. Burden on Small Business

The collection is not expected to have a significant impact on a substantial number of small businesses. The burden applied to small business is the minimum consistent with applicable laws, Executive Orders, regulations, and prudent business practices.

6. Less Frequent Collection

An advance shipment notice is required prior to any shipment of materiel containing RFID tag data. Less frequent collection of this information would not permit prompt association of the RFID data with the corresponding shipment and, therefore, would impair visibility of DoD assets.

7. Paperwork Reduction Act Guidelines

There are no special circumstances for collection. Collection of this information is consistent with the guidelines at 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

a. Collection is consistent with the guidelines in 5 CFR 1320.6. Public comments were solicited in the *Federal Register* on May 13, 2016 ([81 FR 29851](#)). No comments were received in response to this notice.

b. The estimated number of respondents and responses are based on data available in Wide Area WorkFlow on RFID ASNs for fiscal year (FY) 2014 and FY 2015, which was validated by subject matter experts in Logistics and Material Readiness/Supply Chain Integration (L&MR/SCI).

c. A notice of submission to OMB for clearance of this information collection was published in the *Federal Register* on July 29, 2016 ([81 FR 49964](#)).

9. Gifts or Payment

No payment or gift will be provided to respondents, other than remuneration of contractors under their contracts.

10. Confidentiality

This information is disclosed to DoD depots in order to use an ASN to match the passive RFID tag data to the corresponding shipment upon arrival.

11. Sensitive Questions

No sensitive questions are involved.

12. Respondent Burden, and its Labor Costs

DFARS Clause 252.211-7006: RFID ASNs	
Number of respondents	5,217
Responses per respondent	3,782
Number of responses	19,732,850
Seconds per response ¹	1.16
Estimated hours (number of responses multiplied seconds per response)	6,353
Cost per hour (hourly wage) ²	\$16.65
Annual public burden (estimated hours multiplied by cost per hour)	\$105,777

13. Respondent Costs Other Than Burden Hour Costs

None.

14. Cost to the Federal Government

When the clause is included, contractors are required to affix RFIDs to certain cases or pallets being shipped to DLA depots or USTRANSCOM locations and to enter Advanced Shipment Notices (ASNs) in Wide Area WorkFlow (WAWF). The RFIDs on the shipments are scanned automatically as the pallet moves through the entry of the receiving warehouse and then auto-matched to the ASN that has been entered by the contractor in WAWF. The ASN is not a new process/transaction, but rather the same existing Material Inspection Receiving Report (MIRR) transaction being sent to WAWF by contractors, with additional data (RFID data elements) added to the transaction. In April 2005, WAWF added the RFID tag ID as an additional data element in the MIRR. The Government burden associated with the review and approval of MIRRs is captured under OMB Control Number 0704-0248, Defense Federal Acquisition Regulations Supplement (DFARS) Appendix F, Material Inspection and Receiving Report and related forms. For these reasons we estimate that it will not take the Government any additional time to review the advance shipment notices.

DFARS Clause 252.211-7006: RFIDS ASNs	
Number of responses	19,732,850
Seconds per response *	0
Estimated hours (number of responses multiplied hours per response)	0

¹ Based on the total processing time in seconds (22,870,646) divided by the number of responses (19,732,850) and rounding. See section 15 for more details on calculations.

² The cost per hour has been increased to reflect the Office of Personnel Management's General Schedule (GS) 3, Step 5 (equivalent) hourly rate of \$12.22 for calendar year 2016, plus 36.25 percent burden, instead of the calendar year 2012 rate.

Cost per hour (hourly wage)	0
Annual cost to the Government (est. hours multiplied by cost per hour)	0

* The ASN/RFID matching process is automated.

15. Reasons for Change in Burden

The burden estimates for this revision are based on data available in Wide Area WorkFlow for the RFID ASNs outlined in the table below.

Number of Shipments per Year	Number of Suppliers	Number of ASNs	Processing Time ³ (Seconds)	Hours	Burden ⁴
1 to 10	1,593	6,283	1,130,940	314	\$5,228
11 to 50	1,326	34,121	2,047,260	569	\$9,474
51 to 500	1,612	287,244	287,244	80	\$1,332
501 to 5,000	524	767,233	767,233	213	\$3,546
5,001 to 15,000	83	682,971	682,971	190	\$3,163
Over 15,000	79	17,954,998	17,954,998	4,987	\$83,034
Total	5,217	19,732,850	22,870,646	6,353	\$105,777

The following table illustrates the change in burden estimates from 2013 to 2016:

0704-0434 ICR	2013	2016	Change
Number of respondents	5,450	5,217	-233

³ “Processing Time” for 10 shipments is estimated to require 180 seconds of additional processing time based on manual entry of the data element via the website. “Processing Time” for 50 shipments is estimated to require 60 seconds of additional processing time based on manual entry of the data element via the website. Processing time for 500, 5,000, 15,000 and 25,000 shipments is estimated to require one second of additional processing time based on automatic electronic transmittal of the data.

⁴ Equals “Hours” multiplied by the “Cost per Hour” in the previous table \$16.65.

Responses per respondent	1,640	3,782	+2,142
Number of responses	8,940,996	19,732,850	+10,791,854
Seconds per response	1.35	1.16	-0.19
Estimated hours	3,354	6,353	+2,999
Cost per hour	\$16.16	\$16.65	+\$0.49
Annual public burden	\$54,201	\$105,777	-\$51,576

According to subject matter experts in L&MR/SCI, the increase in the total number of responses are due to surges in support of new operations in theater, increased humanitarian support, and increased sales. The number of respondents may increase or decrease each year based on the number of contractors receiving awards that contain the clause at 252.2111-7006 and require an RFID ASN to be submitted.

16. Publication of Results

Results of this collection will not be published.

17. Non-Display of OMB Expiration Date

We do not seek approval to not display the expiration dates for OMB approval of the information collection.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

There are no exceptions to the certification accompanying this Paperwork Reduction Act submission.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods will not be employed.