SUPPORTING STATEMENT – PART A

DoD Application for Priority rating for Production or Construction Equipment (DD Form 691) OMB Control Number 0704-0055

A.  JUSTIFICATION

1.  Need for the Information Collection

This is a request for renewal of the information collection requirement previously approved under OMB Control Number 0704-0055, *Department of Defense Application for Priority Rating for Production or Construction Equipment*

Under the priorities and allocations authority in Title I of the Defense Production Act of 1950, as amended [50 U.S.C App. 2061, et seq.], the President is authorized to (1) require that contracts or orders relating to certain approved defense or energy programs be accepted and performed on a preferential basis over all other contracts or orders, and (2) allocate materials and facilities in such a manner as to promote approved programs.

The responsibility for carrying out the Title I priorities and allocations authority for industrial resources is delegated to the Department of Commerce (DOC) in Executive Order 13603. DOC delegates to the Department of Defense (DoD) priorities and allocations authority for industrial resources to require certain contracts and orders supporting approved national defense programs be accepted and performed on a preferential basis. DoD established DD Form 691, *Department of Defense Application for Priority Rating for Production or Construction Equipment,* as the instrument for contractors to request priority rating authority for production or construction equipment needed to support weapon systems and other important defense programs. This form is the vehicle with which contractors may request priority for preferential contract performance in order to acquire industrial equipment in a timely manner, thereby facilitating development and support of weapons systems and other important defense programs.

2.  Use of the Information

The information collected in the DD Form 691 is used by DoD to determine if it is appropriate to use the priorities and allocations authority to authorize the placement of a priority rating on a contract or purchase order for production or construction equipment. This is done to assure timely availability of production or construction equipment to meet current national defense requirements. Without this information, DoD would not be able to assess a contractor's stated requirement to obtain timely delivery of the equipment needed for fulfillment of contractual obligations supporting approved programs. Submission of the information is voluntary.

Respondents are companies/facilities specifically identified as being of interest to the Department of Defense and have relevant approved national defense program.

The information collected from the DD Form 691 collection instrument is used for contactors to apply a priority rating authority to contracts and orders supporting approved national defense programs be accepted and performed on a preferential basis. Contractors and suppliers are made aware of the DD Form 691 through DOD Manual 4400.1 and through Defense Acquisition University training modules, as well as the Manufacturing Industrial Base Policy website.

The DD Form 691 can be obtained on the Office of Manufacturing and Industrial Base Policy website located at: http://www.acq.osd.mil/mibp/titleOne.html or from <http://www.dtic.mil>. The completed form should be emailed to the DPAS POC in the Office of Manufacturing and Industrial Base Policy. The POC is: Juan Millan, email: juan.l.millan.civ@mail.mil. Telephone number: 571-372-6243.

3.  Use of Information Technology

100% of responses will be collected electronically. Electronic information technology is used to the maximum extent practicable. Automated word processing, contractor automated data bases, and electronic access or transfer are used wherever they exist in the information preparation process. DD Form 691 is to be transmitted to the listed POC above via email.

4.  Non-duplication

The information collection is prescribed by DoD Directive 4400.1, *Defense Production Act Programs* and DoD 4400.1-M, Department *of Defense Priorities and Allocations Manual,* and is not a duplication of any similar information.

5.  Burden on Small Business

The burden applied to small business is the minimum consistent with applicable laws, executive orders, regulations, and prudent business practices.

6.  Less Frequent Collection

Collecting this information less frequently has been considered and accommodated to the maximum extent practical. The DD Form 691 is the mechanism to authorize the placement of a priority rating by DOD contractors on a contract or purchase order for production or construction equipment to ensure the preferential acceptance and performance of such contracts and orders supporting national defense requirements. If this collection were not conducted or conducted less frequently, the supply of critical items to the Government may be delayed or disrupted.

7.  Paperwork Reduction Act Guidelines

There are no special circumstances that require this collection to be conducted in a manner inconsistent with the guidelines in Section 1320.5(d)(2) of title, 5 CFR. By following guidelines in 1320.5(d)(2) of title 5, CFR, DoD ensures unnecessary duplication of efforts; reduces the burden on small entities; uses plain language; ensures consistency with reporting and recordkeeping practices; and clearly explains to applicants what information is collected and why DoD is collecting it.

8.  Consultation and Public Comments

Part A: PUBLIC NOTICE

Public comments were solicited in the Federal Register *October 13 2015.*

*80 FRN 61387.* No public comments were received. A 30 Day Federal Register Notice was published in the Federal Register on *August 17, 2016. 81 FRN 54793.*

 Part B: CONSULTATION

MIBP consults with contractors, DoD civilian employees, and other individuals, primarily through email and other electronic media, to obtain feedback regarding improvement of information collection efforts and instructions. The program continually implements improvements based on this feedback.

9.  Gifts or Payment

No payment or gift will be provided to respondents.

10.  Confidentiality

The information collected will be disclosed only to the extent consistent with prudent business practices and current regulations and statutory requirements.

DoD Contractor and Suppliers engaging in this collection should ensure that the name, address, and phone number supplied does not contain any personal information.

Confidentiality of the information provided by the DOD contractor and suppliers is safe-guarded under Section 705(d) of the Defense Production Act of 1950, as amended (50 U.S.C. App. 4555). This section provides a criminal penalty for any person who willfully publishes or discloses information collected under the authority of the Act which is deemed confidential or with reference to which a request for confidential treatment is made by the person furnishing the information. This data collection does not require the provision of personal identifying information. Therefore, the data collection instrument does not require a Privacy Act Statement or a Privacy Impact Statement. A System of Records Notice is not required because records are not retrievable by personally identifiable information. The information collected is consistent with prudent business practice, current regulations, and statutory requirements.

11.  Sensitive Questions

The collection does not solicit any sensitive information.

12.  Respondent Burden, and its Labor Costs

We estimate that an average of one hour will be required for each respondent to review, prepare, and submit this collection of information (DD Form 691). The estimated cost is based on the current mean hourly wage for a General & Operations Manager (Bureau of Labor Statistics, Occupation Code: 11-1021)

|  |
| --- |
| Estimation of Respondent Burden Hours |
|  | Number of Respondents | Number of Responses per Respondent | Number of Total Annual Responses | Response Time (Amount of time needed to complete the collection instrument) | Respondent Burden Hours (Total Annual Responses multiplied by Response Time) Please compute these into hours) |
| DD Form 691 | 610 | 1 | 610 | 1 hour | 610 hours |
| Total (AVERAGE) | 610 | 1 | 610 | 1 hour | 610 hours |

|  |
| --- |
| Labor Cost of Respondent Burden |
|  | Number of Responses | Response Time per Response | Respondent Hourly Wage | Labor Burden per Response (Response Time multiplied by Respondent Hourly Wage) | Total Labor Burden (Number of Respondents multiplied by Response Time multiplied by Respondent Hourly Wage) |
| DD Form 691 | 610 | 1 | $57.44 | $57.44 | $35,038.40 |
| Total (AVERAGE) | 610 | 1 | $57.44 | $57.44 | $35,038.40 |

13.  Respondent Costs Other Than Burden Hour Costs

There are no start-up, capital, operational and maintenance costs imposed by this collection.

14.  Cost to the Federal Government

We estimate the Government will spend a total of 2 hours in receiving, reviewing, and analyzing the information submitted by the respondents. The average cost is based on the current salary of a GS-14, step 5, plus 32.45% fringe benefit rates.

|  |
| --- |
| Labor Cost to the Federal Government |
|  | Collection Instrument #1 | Total |
| Number of Responses | 610 | 610 |
| Processing Time Per Response (in hours) | 2 Hour | 2 Hour |
| Hourly Wage of Worker(s) Processing Responses | $62.77 | $62.77 |
| Cost to Process Each Response (Processing Time Per Response multiplied by Hourly Wage of Worker(s) Processing Responses) | $125.54 | $125.54 |
| Total Cost to Process Responses (Cost to Process Each Response multiplied by Number of Responses | $76,579 | $76,579 |

|  |
| --- |
| Operational and Maintenance Costs |
| Equipment | Printing | Postage | Software Purchases | Licensing Costs | Other | Total |
| n/a | n/a | n/a | n/a | n/a | n/a | 0 |

|  |
| --- |
| Total Cost to the Federal Government |
| Operational and Maintenance Costs | Labor Cost to the Federal Government | Total Cost (O&M Costs + Labor Cost) |
| 0 | $76,579 | $76,579 |

15.  Reasons for Change in Burden

This is a request for reinstatement with change of a previously approved collection for which approval has expired with no change in the substance or method of collection. The only change has been an increase in the respondent hourly wage.

16.  Publication of Results

Results of this collection will not be published.

17.  Non-Display of OMB Expiration Date

Display of the expiration date for OMB approval of the information collection is appropriate. DoD is not seeking approval to omit display of an expiration date of OMB approval on the collection instrument.

18.  Exceptions to "Certification for Paperwork Reduction Submissions"

DoD is not seeking exceptions to the provisions certified to in Item 19.a. of the OMB Form 83-I.