

**SUPPORTING STATEMENT  
PART A  
FOR PAPERWORK REDUCTION ACT SUBMISSION 3048-XXX  
SURVEY EIB 00-02**

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain information specified in Section A below. If an item is not applicable, provide a brief explanation. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The purpose of the proposed Survey is to fulfill a statutory mandate (the Export-Import Bank Act of 1945, as amended, 12 U.S.C. 635) that directs Ex-Im Bank to report annually to the U.S. Congress any action taken toward providing export credit programs that are competitive with those offered by official foreign export credit agencies. The Report measures competitiveness through a series of comparisons which draw on quantitative information about the programs and policies of the major foreign export credit agencies. For instance, the report evaluates EXIM's competitiveness on the core financing elements of official export credit support: interest rates, risk premia, and risk taking. In addition, EXIM provides a comparative assessment of how well the financing elements are packaged into major programs: aircraft, project finance, co-financing, environmental exports, and services exports. Finally, EXIM evaluates noteworthy public policy considerations that affect EXIM's services and therefore have the potential to impact U.S. exporter competitiveness: economic impact, content, and shipping policies.

The Act further stipulates that the annual report on competitiveness should include the results of a survey of U.S. exporters and commercial lending institutions to determine whether their export financing is competitive with that of their foreign counterparts. The same survey is sent to both lenders and exporters to get their perspectives on all aspects affecting competitiveness. In order to meet the statutory goal, the survey asks companies about which export credit agencies

that they worked with in the past year and whether the programs offered were competitive with U.S. EXIM's offerings. Survey respondents are generally offered a range of answers from Far Less Competitive to Much More Competitive. Aside from identifiable questions just for sub-suppliers, all survey questions are equally applicable to both commercial lending institutions and exporters.

2. Indicate how, by whom and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

Ex-Im Bank uses the information to report on the competitiveness of Ex-Im Bank's programs and policies. The Bank has reported on information received from the current collection in the annual Competitiveness Report. Past reports may be found on the Banks's web site at:

<http://www.exim.gov/news/reports/competitiveness-reports>

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 submissions 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.

This survey will be administered electronically, via e-mail. Electronic administration of this survey was chosen to help to keep costs low. The Bank will administer the survey on a web site, which will reduce postage costs to Survey respondents, reduce the use of paper by Ex-Im Bank, and eliminate the need (and associated costs) for duplicate data entry by Ex-Im Bank as Bank staff can download the data into a useable database.

4. Describe effort 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 Survey is conducted annually, as required by Ex-Im Bank's Congressional mandate. An annual Survey provides a broad enough time horizon to ensure quality responses.

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

This Survey does not impact small business or other small entities.

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 Survey is conducted annually, as required by Ex-Im Bank's Congressional mandate.

Less frequent surveying would diminish the value of the Survey, because the policies of Ex-Im Bank's foreign competitors are frequently adjusted, and a less frequent survey would not capture reactions to individual programmatic changes.

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;
  - \*in connection with a statistical survey, that is not designed to produce valid or reliable results that can be generalized to the universe of study;
  - \*requiring the use of 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.

Not applicable.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.

No comments were received.

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

No payments or gifts have been or will be provided to respondents.

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

Ex-Im Bank and its officers and employees are subject to the Trade Secrets Act, 19 USC Sec 1905, which requires Ex-Im Bank to protect confidential business and commercial information from disclosure, as well as, 12 CRF 404.1, which provides that, except as required by law, Ex-Im Bank will not disclose information provided in confidence without the submitter's consent.

11. Provide additional justification for any question of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered provides. This justification should include the reasons why the agency considered 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.

Not applicable. No information of sensitive nature is requested.

12. Provide estimates of the hour burden of the collection of information. The statement should include

The number of respondents:	150
Estimated time per respondents:	90 minutes
The frequency of response:	Annually
Annual hour burden:	225 total hours
Average wages per hour	52.04*
Average cost per year	11,709

\* (based on Department of Labor Statistics median hourly wages for select management occupations, May 2012 National Occupational Employment and Wage Estimates United States, [http://www.bls.gov/oes/current/oes\\_nat.htm#11-0000](http://www.bls.gov/oes/current/oes_nat.htm#11-0000))

The estimated burden was calculated using an average of 90 minutes for each survey submission (per lender/exporter per year on average). This includes the time to review instructions, search existing data resources, gather the data needed, and complete the information collection.

13. Provide an estimate for the total annual cost burden to respondents or records keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in items 12 and 14).

Not applicable.

14. Provide estimates of annualized costs to the Federal government.

Reviewing time per response:	45 minutes
Responses per year:	150
Reviewing time per year:	112.5 hours
Average Wages per hour:	\$42.50

Average cost per year:  
(time \* wages) \$4,781.25  
Benefits and overhead: 20%  
Total Government Cost: \$5,737.5

Explain the reasons for any program changes or adjustment in reported items 13 or 14 of OMB from 83-1.

There are no changes or adjustments reported in items 13 and 14 of the OMB Form 83-I.

15. For collection 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.

No complex analytical techniques will be used in the tabulation of the data. Survey results will be aggregated and the responses would not be attributable to individual survey participants. Relevant highlights from the survey will be published internally and externally. Response rate data will be included in the publication and all the dependencies in generating the conclusions will be stated.

The following schedule outlines the project management plan. The plan is subject to change based on variables that may be beyond Ex-Im Bank's control.

OMB clearance processes: January 8, 2016 – February 12, 2016  
Survey administration to predetermined sample: February 12, 2016 – March 4, 2016  
Survey analysis and tabulation: March 4, 2016 – March 14, 2016  
Publication of survey highlights in Competitiveness Report on ExIm.gov: June 30, 2016

16. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Ex-Im Bank is not seeking this approval.

17. Explain each exception to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-1.

No exceptions