

**Supporting Statement
General Declaration
1651-0002**

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.**

CBP Form 7507, *General Declaration*, must be filed for all aircraft entering under the provisions of 19 CFR 122.41. This form is used to document clearance by the arriving aircraft at the required inspectional facilities and inspections by appropriate regulatory agency staffs.

CBP Form 7507 collects information about the flight routing, the numbers of passengers embarking and disembarking, a declaration of health for the persons on board, details about disinfecting and sanitizing treatments during the flight, and a declaration attesting to the accuracy and completeness and truthfulness of all other documents that make up the manifest.

CBP Form 7507 is authorized by 19 U.S.C. 1431, 1433, and 1644a, and provided for by 19 CFR 122.43, 122.52, 122.54, 122.73, and 122.144. This form is accessible at <https://www.cbp.gov/newsroom/publications/forms>.

- 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.**

CBP Form 7507 is used by CBP as a declaration attesting to the accuracy, completeness and truthfulness of all other documents that make up the manifest.

- 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.**

CBP Form 7507 is being automated as part of the Enterprise Data Management System. Currently CBP is testing this system and it is planned that all carriers will submit the 7507 through this system by the end of 2018. Currently this form is a fillable form at: <https://www.cbp.gov/newsroom/publications/forms>

- 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.**

This information is not duplicated elsewhere.

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

This information collection does not involve small businesses.

- 6. Describe consequences 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.**

If the information was collected less frequently, CBP would not be able to enforce regulatory requirements.

- 7. Explain any special circumstances**

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(c)(2).

- 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 describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

Public comments were solicited through two Federal Register notices dated March 13, 2017 (Volume 82, Page 13463) on which no comments were received, and on June 22, 2017 (Volume 82, Page 28509) on which one comment has been received.

Comment received from: John McGraw, Director Regulatory Affairs; National Air Transportation Association.

Comment: NATA believes that Form 7507 no longer remains necessary for on-demand passenger carriers. There are other mandatory CBP data collections of the same or similar information, which are supplied by electronic means. We believe that OMB should require CBP to rely upon these electronic collection methods rather than continuing to impose unnecessary and duplicative collection burdens on operators.

CBP Program Response: TPD is in the process of providing an electronic version of the 7507. There is valuable information to include an important signature as well as information on cargo documents. TPD is making every effort to remove any duplicative reporting in the commercial arena. For now the 7507 remains a required form for commercial carriers. As we endeavor to enhance the ability of CBP to leverage available data, remove duplicitous input and ensure that all required data can be obtained electronically the current rules and regulations remain in place

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

There is no offer of a monetary or material value for this information collection.

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

There is no PII associated with this information collection. No assurances of confidentiality are provided to respondents.

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.

There are no questions of a personal or sensitive nature.

12. Provide estimates of the hour burden of the collection of information.

FORM	TOTAL BURDEN HOURS	NO. OF RESPONDENTS	NO. OF RESPONSES PER RESPONDENT	TOTAL ANNUAL RESPONSES	TIME PER RESPONSE
7507	110,122.6	500	2644	1,322,000	5 minutes (.0833 hours)

Public Cost

The estimated cost to the respondents is \$8,439,796.06. This is based on the estimated burden hours (110,122.6) multiplied by (x) the average loaded hourly

wage rate for aircraft pilots (\$76.64). CBP calculated this loaded wage rate by first multiplying the Bureau of Labor Statistics' (BLS) 2015 annual median wage rate, converted to an hourly rate, for Aircraft Pilots and Flight Engineers (\$49.29), which CBP assumes best represents the wage for aircraft pilots, by the ratio of BLS' average 2015 total compensation to wages and salaries for Transportation and Material Moving occupations (1.5395), the assumed occupational group for aircraft pilots, to account for non-salary employee benefits.^{1,2} CBP then adjusted this figure, which was in 2015 U.S. dollars, to 2016 U.S. dollars by applying a 1.0 percent annual growth rate to the figure, as recommended by the U.S. Department of Transportation's value of travel time guidance.³

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

There are no recordkeeping, capitalization or start-up costs associated with this collection.

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.

The estimated annual cost to the Federal Government associated with the review of these records is \$14,387,273.12. This is based on the number of responses that must be reviewed (1,322,000) multiplied by (x) the time burden to review and process each response (10 minutes or .166 hours) = 219,452 hours multiplied by (x) the average hourly loaded rate for other CBP employees (\$65.56)⁴ = \$14,387,273.12.

¹ Because median hourly wage information was not available for Aircraft Pilots and Flight Engineers, CBP adjusted the annual median wage for Aircraft Pilots and Flight Engineers (\$102,520) to an hourly estimate using the standard 2,080 hours worked per year. Source of median wage rate: U.S. Bureau of Labor Statistics. Occupational Employment Statistics, "May 2015 National Occupational Employment and Wage Estimates, United States- Annual Median Wage by Occupation Code: 53-2010." Updated March 30, 2016. Available at http://www.bls.gov/oes/2015/may/oes_nat.htm. Accessed June 14, 2016.

² The total compensation to wages and salaries ratio is equal to the calculated average of the 2015 quarterly estimates (shown under Mar., June, Sep., Dec.) of the total compensation cost per hour worked for Transportation and Material Moving occupations (\$27.795) divided by the calculated average of the 2015 quarterly estimates (shown under Mar., June, Sep., Dec.) of wages and salaries cost per hour worked for the same occupation category (\$18.055). Source of total compensation to wages and salaries ratio data: U.S. Bureau of Labor Statistics. Employer Costs for Employee Compensation. *Employer Costs for Employee Compensation Historical Listing March 2004 – December 2015*, "Table 3. Civilian workers, by occupational group: employer costs per hours worked for employee compensation and costs as a percentage of total compensation, 2004-2015 by Respondent Type: Transportation and material moving occupations." June 9, 2016. Available at <http://www.bls.gov/ncs/ect/sp/eccecqrtn.pdf>. Accessed June 14, 2016.

³ Source: U.S. Department of Transportation, Office of Transportation Policy. *The Value of Travel Time Savings: Departmental Guidance for Conducting Economic Evaluations Revision 2 (2015 Update)*, "Table 4 (Revision 2-corrected): Recommended Hourly Values of Travel Time Savings." April 29, 2015. <http://www.transportation.gov/sites/dot.gov/files/docs/Revised%20Departmental%20Guidance%20on%20Valuation%20of%20Travel%20Time%20in%20Economic%20Analysis.pdf>. Accessed June 1, 2016.

15. Explain the reasons for any program changes or adjustments reported in Items 12 or 13 of this Statement.

There has been an increase in the estimated annual burden hours previously reported for this information collection due to change in agency estimates. There is no change to the information collected or to CBP Form 7507.

16. For collection of information whose results will be published, outline plans for tabulation, and publication.

This information collection will not be published for statistical purposes.

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.

CBP will display the expiration date for OMB approval of this information collection.

18. Explain each exception to the certification statement.

CBP does not request an exception to the certification of this information collection.

B. Collection of Information Employing Statistical Methods

No statistical methods were employed.

⁴ CBP bases this wage on the FY 2016 salary and benefits of the national average of other CBP positions, which is equal to a GS-13, Step 5. Source: Email correspondence with CBP's Office of Administration on June 27, 2016.