

INFORMATION COLLECTION SUPPORTING STATEMENT

EXIS Information System (EXIS)

- 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. (Annotate the CFR parts/sections affected).**

The Exercise Information System (EXIS) is a voluntary, online tool developed by TSA to support the mission of a program developed and implemented by TSA to fulfill requirements of the Implementing Recommendations of the 9/11 Commission Act of 2007 (9/11 Act)¹ These statutory requirements led to the development of the Intermodal Security Training Exercise Program (I-STEP) for the Transportation Systems Sector (TSS).

I-STEP is a design, development, and tracking resource of security exercises that can assess and improve the capabilities of all surface transportation modes to prevent, prepare for, mitigate against, respond to, and recover from acts of terrorism. Within this program, EXIS is an interactive resource for the TSS. As an interactive system, information collection is necessary for the program to be successful.

Use of EXIS is completely voluntary for industry and government entities (Federal, State, and local) within the TSS. While TSA expects the EXIS tool to be useful to industry, as described above, use of the system would not guarantee compliance with any existing or future TSA, DHS, or other Federal regulation.

- 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.**

EXIS is intended to be used by stakeholders in the TSS with a desire to conduct security exercises, including publicly- or privately-owned transportation companies or assets. TSA will collect five kinds of information online from transportation stakeholders: (1) user registration information; (2) nature and scope of exercise; (3) corrective actions/lessons learned/best practices; (4) evaluation feedback on EXIS itself; and (5) After-Action Reports.

TSA will collect registration information from all EXIS users. Most likely, these users will be mid-level staffers at the transportation company/agency. TSA will use the information to ensure only those who are involved in transportation security with a “need-to-know” can utilize the features of EXIS, which is necessary because the content may contain Sensitive Security Information (SSI). See 49 CFR part 1520. Although participation in EXIS is voluntary, for those who choose to participate, TSA requires those respondents to submit registration information.

¹Pub. L. 110-53, 121 Stat. 266 (Aug. 3, 2007). See 9/11 Act secs. 1407 (public transportation, codified at 6 U.S.C. 1136(a)), 1516 (railroads, codified at 6 U.S.C. 1166), and 1533 (over-the-road buses, codified at 6 U.S.C. 1183).

TSA is revising this information collection by modifying the type of user registration information collected. TSA previously collected the User's name, Professional Contact Information, Agency/Company, Job Title, Supervisor's Name, and Employment Verification Contact Information. In the revised collection, TSA will collect the User's Name, Agency/Organization Name and Type, Job Title, Supervisor or other Sponsor's Name, Professional Phone Number, Professional Email Address, Employment Verification Contact Name, Employment Verification Contact Information, and the Reason for Needing an EXIS account. In addition, the following optional registration information can be added by the user: Professional (business), Country, City, State, Zip Code, Mobile Phone Number, Alternate Email, and Preferred Transportation Sector.

In addition, because EXIS content may contain SSI, all users are also required to submit an electronic non-disclosure agreement (NDA) pertaining to SSI usage.² Furthermore, all users will be required to review and acknowledge review of SSI handling and protection requirements. The burden of reading and acknowledging the NDA and the SSI handling and protection requirements is accounted for in the registration burden estimate under Question 12.

After users are registered, the EXIS user can provide information regarding the nature and scope of the exercise that they would like to conduct. TSA then can access this information in order to generate an appropriate exercise for the user. Such information includes:

- Exercise Properties
- Objectives
- Scenario Events
- Participating Agencies
- Exercise Attendees
- Pre-Exercise Data (to assess the user's state of readiness for a transportation security incident prior to initiating the training exercise)

After the completion of the exercise, the EXIS user can input information regarding the exercise. The EXIS user can ultimately use this information for generating an "After Action Report". TSA will also collect this information in order to capture lessons learned and best practices. Such information includes:

- Corrective Actions
- Best Practices
- Lessons Learned

Users can submit feedback on EXIS itself through a voluntary evaluation survey called the "Evaluation Team Feedback". TSA collects this information for the purpose of evaluating the usefulness of EXIS in facilitating security training exercises for the users. TSA can then modify EXIS to better suit its users' needs. This survey encompasses:

- Evaluation Materials
- Evaluator Training

² To the extent that exercise information and results may be SSI in accordance with 49 U.S.C. 114(r) and 49 CFR Part 1520, TSA will protect it as such.

- Team Composition
- Logistics

Finally, as previously mentioned, EXIS users can access data to generate and/or submit formal “After Action Reports” which may include:

- Exercise Overview
- Goals and Objectives
- Event Synopsis
- Analysis of Critical Issues
- Exercise Design Characteristics
- Conclusions
- Executive Summary

A user’s exercise data is only accessible to other users who have been granted proper access to that exercise. By default, users have no access to other users exercise data. Stakeholders use the report to identify strengths or areas in which they can assign resources to mitigate risk and enhance the security posture within their organization.

- 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. [Effective 03/22/01, your response must SPECIFICALLY reference the Government Paperwork Elimination Act (GPEA), which addresses electronic filing and recordkeeping, and what you are doing to adhere to it. You must explain how you will provide a fully electronic reporting option by October 2003, or an explanation of why this is not practicable.]**

EXIS is an electronic system, accessible through the Internet, and all information is collected electronically; thus this information collection is compliant with GPEA. The basis for adopting an online submission process includes ease of accessibility for EXIS users, ease of information storage, and ease of control over information dissemination. Users can go to “<https://exis.tsa.dhs.gov/default.aspx>” to access the public-facing EXIS site and to request access by inputting registration information.

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

TSA is not aware of any other web portal in the government that is designed to generate transportation security training exercises and to record the data/results of such exercises. The purpose of EXIS is unique, and therefore any similar information already available cannot be modified to accomplish it.

- 5. If the collection of information has a significant impact on a substantial number of small businesses or other small entities (Item 5 of the Paperwork Reduction Act submission form), describe the methods used to minimize burden.**

The collection of information will not have a significant impact on a substantial number of small businesses 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.

There has been growing demand among government and industry security partners across the nation to expand I-STEP, which TSA developed and implemented to fulfill the 9/11 Act requirement³ for DHS to establish an exercise program for the Transportation Systems Sector (TSS). I-STEP brings public and private sector partners together to exercise, train, share information, and address transportation security issues to protect travelers, commerce, and infrastructure. Through the program, TSA facilitates modal and intermodal exercises and workshops throughout the country. The program also provides training support to help modal operators meet their training objectives.

Without EXIS, there is no similar platform to make this information available. Using EXIS, transportation stakeholders have access to a system that will allow them to generate and conduct security exercises, expanding the reach and effectiveness of the I-STEP program and its mission to improve the capabilities of all surface transportation modes to prevent, prepare for, mitigate against, respond to, and recover from acts of terrorism. EXIS also collects lessons learned and best practices from such exercises and makes them available for the benefit of members of the TSS that participate in EXIS

Because an interactive system like EXIS requires the user to provide information, without the information collection the user could not make selections and the system would not be able to generate these documents; conversely, without the system-generated documents, the user would not be able to conduct their exercise. Once the user gains access and logs in, they are prompted to enter a variety of information related to the exercise they would like to create. This information ranges from basic input fields, such as the name, date, and location of the exercise, to more substantial requirements, including selecting exercise objectives, tasks, and a scenario. Once the user has submitted their information, the system uses their selections to generate customized exercise documents that are ready to be used to conduct the final exercise.

Failure to collect this information will limit TSA's ability to effectively test security countermeasures, security plans, and the ability of a modal operator to respond to and quickly recover after a transportation security incident. The TSS has over 100,000 operators which need support from TSA, and insufficient awareness, prevention, response, and recovery to a transportation security incident will result in increased vulnerability of the U.S. transportation network and a reduced ability of DHS to assess system readiness. The personnel resource requirements for conducting a security exercise using the resources of the I-STEP program team limit the availability of this resource to transportation stakeholders. The Exercise Information System (EXIS) is a voluntary, online tool developed by TSA that supports the I-STEP mission by expanding the availability of these resources and enhancing the partnership with TSS stakeholders. Based on consultations with its TSS stakeholders,

³ See 9/11 Act secs. 1407 (public transportation, codified at 6 U.S.C. 1136(a)), 1516 (railroads, codified at 6 U.S.C. 1166), and 1533 (over-the-road buses, codified at 6 U.S.C. 1183).

TSA developed EXIS as a technology platform to expand both I-STEP resources and the availabilities of these resources for TSS operators. EXIS was designed by the Federal government with input from industry partners to support their risk reduction efforts, both in the initial design of the program and for its ongoing operations.

Failure to collect user registration information will prevent TSA from making this system available to transportation stakeholders as it would not have the ability to evaluate whether transportation stakeholders have a “need-to-know” in order to access and use EXIS. EXIS is an SSI-level system. Therefore, collection of registration information is necessary in order to determine whether users should have access to the system.

In addition, failure to collect/monitor information regarding the nature and scope of the user’s desired exercise will prevent TSA from properly generating a relevant and useful training exercise for the user. A failure to collect corrective actions, best practices, lessons learned, and After-Action Reports from the user once the exercise is complete will hamper TSA’s attempt to record and document security feedback as well as TSA’s ability to disseminate such information to other members of the TSS.

Finally, a failure to collect feedback on EXIS’s performance will limit TSA from adjusting the properties and capabilities of EXIS to better suit the needs of the TSS.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5(d)(2).

TSA will conduct this collection in a manner consistent with the general information collection guidelines in 5 CFR 1320.5(d)(2).

8. Describe efforts to consult 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. 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.

Pursuant to 5 CFR 1320.8(d), TSA published a 60-day notice soliciting comments from persons outside of the agency regarding the data collection procedures of EXIS. See 82 FR 39900 (Aug. 22, 2017).

TSA received a comment on the 60-day notice from the Chemical Facility Security News blog, inquiring about the limited detail in the notice on TSA’s burden estimate. TSA responded to the commenter that supporting calculations and explanations are included in the Information Collection Supporting Statement. Based on historical EXIS information, TSA provided detailed burden estimates (see question 12).

The commenter also questioned TSA’s choice not to use the Federal eRulemaking Portal to manage the comments on their EXIS ICRs. TSA instructs the public to submit comments to

the TSA PRA mailbox. Nevertheless, TSA has captured comments from the <https://www.regulations.gov/document>, recognizing that the public has been using this additional vehicle. However, the site often contains multiple errors, failing to copy the FR notice accurately and giving the wrong closing date for comments. TSA has checked the site and no comments have been provided for the EXIS collection in all the ICR submissions.

TSA later published a 30-day notice soliciting further comments. See 82 FR 56260 (Nov. 28, 2017). This notice generated no further comments on the collection.

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

TSA will not provide payment 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.

TSA will not provide any assurance of confidentiality to respondents. TSA will gather and store all information pursuant to the Privacy Act, as applicable, as well as any information deemed SSI pursuant to 49 CFR Part 1520. The collection is covered by a Privacy Impact Assessment (PIA), DHS/ALL/PIA-015 Web Portals (June 15, 2009). In addition, the collection is covered by the following System of Records Notices (SORNs), DHS/ALL-004 General Information Technology Access Account Records System (GITAARS) and DHS/ALL-002 DHS Mailing and Other Lists System. See 77 FR 71659 (November 25, 2008) and 73 FR 71659 (November 25, 2018), respectively.

11. Provide additional justification for any questions of sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

TSA does not ask questions of a private, sensitive nature.

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

TSA estimates the total annualized hour burden for EXIS's collection of information to be 4,804.12 hours, and the annualized hour burden cost to be \$419,401.34. This was calculated by first estimating the 2017 full access population and the limited access population. TSA used the current number of full access users at the end of 2016 (754) and multiplied by 1.0 plus the average full access growth rate⁴ 24.301 percent to estimate the full access population in 2017 to be (937). The full access user growth rate of 24.301 percent plus 1.0 was applied to each preceding year's population to estimate the number of full access users for 2018-2020 (see Table 1).

TSA estimates the future number of limited access users by taking the actual number of limited access users at the end of 2016 (4,744) and adding the average number of new limited

⁴ The annual growth rate for full access users rate was determined by dividing the number of full access users in 2015 (606) by the number of full access users in 2014 (488) and subtracting 1.0 to get 24.2 percent, and by dividing the number of full access users in 2016 (754) by the number of full access users in 2015 (606) and subtracting 1.0 to get 24.4 percent. The average growth rate for both years is 24.3 percent.

access users enrolled per month during the first 5 months of 2017 (75.2) multiplied by 12 to estimate the number of new limited access users for 2017 (902.4), and total number of limited access users in 2017 of 5,464. The limited access user growth rate of 19.02⁵ percent plus 1.0 was applied to each preceding year's population to estimate the number of limited access users for 2018-2020 (see Table 1).

Table 1: Estimated Full Access and Limited Access Population			
Calendar Year	Full Access Population	Limited Access	Total
	A	B	C = A + B
2018	1,164.99	6,720.45	7,885.45
2019	1,448.10	7,998.81	9,446.92
2020	1,800.01	9,520.34	11,320.35
Total	4,413.11	24,239.61	28,652.72
Annualized	1,471.04	8,079.87	9,550.91

Note: Calculations may not be exact due to rounding in tables.

TSA then estimates the number of full access users that will design and conduct an annual exercise and their hourly burden (Table 2). Of the full access population (A), TSA estimates 50 percent will conduct one exercise per year. That number is then multiplied by 3.5 hours, the amount of time spent designing and conducting an exercise.

Table 2: Full Access Exercise Design Burden Hours			
Calendar Year	Full Access Users	Full Access Exercise Design Responses	Hour Burden = Responses x (3.5 hrs)
	A	B = A x 0.5	C = B x 3.5
2018	1,164.99	582.50	2,038.74
2019	1,448.10	724.05	2,534.18
2020	1,800.01	900.01	3,150.02
Total	4,413.11	2,206.55	7,722.94
Annualized	1,471.04	735.52	2,574.31

Note: Calculations may not be exact due to rounding in tables.

Next, TSA estimates the number of new limited access users that will design and conduct an annual exercise (Table 3). TSA estimates that 5 percent of the new limited users will conduct an annual exercise, and multiplies this number by 3.5 hours.

Table 3: New Limited Access Exercise Design Burden Hours

⁵ The annual growth rate, 1.190219224 was calculated by taking the estimated number of limited access users for 2017 (5,646) and dividing by the actual number of limited access users in 2016 (4,744), yielding a growth rate of 19.02 percent. 2014 and 2015 was not available for this population.

Calendar Year	New Limited Access Users	Limited Access Responses	Hour Burden = Responses x (3.5 hrs)
	A	B = A x 0.05	C = B x 3.5
2018	1,074.05	53.70	187.96
2019	1,278.36	63.92	223.71
2020	1,521.53	76.08	266.27
Total	3,873.94	193.70	677.94
Annualized	1,291.31	64.57	225.98

Note: Calculations may not be exact due to rounding in tables.

In addition, TSA estimates that all limited access users not conducting an exercise will participate in a survey (Table 4). TSA reduced the number of surveys for limited access users from Table 1 per year by the number of limited access user incurring the exercise design burden in Table 3. The number of limited access users conducting a survey only is multiplied by the amount of time to conduct the survey (15 minutes or 0.25 hour) to obtain the survey hour burden.

Table 4: Limited Access Survey Burden Hours		
Calendar Year	Number of Limited Access Survey Responses	Hour Burden = Survey Responses x (0.25 hr)
	A	B = A x 0.25
2018	6,666.75	1,666.69
2019	7,934.90	1,983.72
2020	9,444.27	2,361.07
Total	24,045.91	6,011.48
Annualized	8,015.30	2,003.83

Note: Calculations may not be exact due to rounding in tables.

The sum of the total annualized hour burden for the full access exercise population and limited access population conducting an annual exercise, plus limited access exercise population participating in a survey only, is 4,804.12 hours. Table 5 provides the calculations.

Table 5: Total Hour Burden				
Calendar Year	Full Access Users Exercise Design Burden	Limited Access Users Exercise Design Burden	Limited Access User Survey Burden	Total Hour Burden
	A	B	C	C = A + B + C
2018	2,038.74	187.96	1,666.69	3,893.38
2019	2,534.18	223.71	1,983.72	4,741.62
2020	3,150.02	266.27	2,361.07	5,777.35
Total	7,722.94	677.94	6,011.48	14,412.35
Annualized	2,574.31	225.98	2,003.83	4,804.12

Note: Calculations may not be exact due to rounding in tables.

TSA estimates the annualized hour burden cost to respondents to be \$419,401.34. This is calculated based on the annualized respondent hour burden (4,804.1) multiplied by a respondent's average fully loaded hourly wage rate of \$87.30⁶. See Table 6 for the calculations.

Table 6: Respondent Hour Burden Cost		
Calendar Year	Respondent Hour Burden	Hour Burden Cost = Response Hours x \$87.30
2018	3,893.38	\$339,893.99
2019	4,741.62	\$413,944.88
2020	5,777.35	\$504,365.16
Total	14,412.35	\$1,258,204.03
Annualized	4,804.12	\$419,401.34

Note: Calculations may not be exact due to rounding in tables.

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

Beyond the hourly burden, there are no respondent or recordkeeper costs estimated for this collection.

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, and other expenses that would not have been incurred without this collection of information.

TSA estimates the total cost to the Federal government associated with the EXIS information collection request to be approximately \$794,138.27 annually. This includes TSA staff costs

⁶TSA calculated the weighted average wage rate of \$59.64 for the hourly burden for managers in multiple transportation modes based on past participation per mode and the average hourly wage rate for managers. TSA used the Bureau of Labor Statistics (BLS) Occupational Employment Statistics (OES) data on Standard Occupation Code (SOC) 11-1021 General and Operations Managers for each transportation mode that has participated in EXIS. Aviation had 403 participants, NAICS 481000 - Air Transportation had an average hourly wage rate of \$60.62), Maritime had 33 participants (NAICS 483000 Water Transportation had an average hourly wage rate of \$73.98), Highway and Motor Carrier had 66 participants (484000 Truck Transportation, 485200 Interurban and Rural Bus Transportation had average hourly wages of \$50.99 and \$57.62, respectively, resulting in Highway and Motor Carrier average of \$54.31), Mass Transit and Passenger Railroads had 165 participants (NAICS 485100 Urban Transit Transportation had an average hourly wage rate of \$54.26), Pipeline had 34 participants (NAICS 486000 Pipeline Transportation had an average hourly wage rate of \$62.59), Postal and Shipping had 3 participants (NAICS 491000 Postal Service Transportation had an average hourly wage rate of \$60.50), Freight Railroads had 154 participants (NAICS 482000 - Rail Transportation had an average hourly wage rate of \$61.36). TSA then accounts for compensation and benefits with a compensation factor of 1.463900415, calculated by total compensation of \$35.28 divided by wages of \$24.10 for All Civilian Workers. TSA multiplies the weighted average hourly wage rate \$59.64 by 1.463900415 to calculate a loaded wage rate of \$87.30. Sources: BLS, OES, SOC, https://www.bls.gov/oes/2016/May/naics3_481000.htm https://www.bls.gov/oes/2016/May/naics3_483000.htm https://www.bls.gov/oes/2016/May/naics3_484000.htm https://www.bls.gov/oes/2016/May/naics4_485100.htm https://www.bls.gov/oes/2016/May/naics3_486000.htm https://www.bls.gov/oes/2016/May/naics3_491000.htm https://www.bls.gov/oes/2016/May/naics3_482000.htm,

OES data: Last Modified Date: March 30, 2017, Access Date: 6/27/2017) BLS, Employer Costs for Employee Compensation (ECEC), News Release, Table 1, (Total Compensation for Civilians, Private Sector, Local and State Government Employees). Data as of March 2017, Released June 9, 2017. https://www.bls.gov/news.release/archives/ecec_06092017.htm

and other infrastructure costs to maintain and update EXIS. TSA staff costs were calculated by assuming a H/I band program analyst receiving an annual H/I band blended fully-loaded compensation of \$106,092.18.⁷ Program analysts will each spend roughly 20 hours per week on EXIS-related duties. This estimate was used to calculate a TSA FTE of 1.5 (3 employees multiplied by 20 hours per week multiplied by 52 weeks (3,020) then divided by 2,080 hours. TSA multiplies \$106,092.18 by 1.5 FTE to estimate a program analyst cost of \$159,138.27. In addition, TSA estimates the annual contracting cost to be \$635,000.00 based on an existing EXIS contract. The total cost to government is shown in Table 7.

H/I Annual Compensation	FTE per year	TSA FTE Costs	Contracting Annual	Total TSA Costs
A	B = (3 employees x 20 hours x 52 weeks) / 2,080	C = A x B	D	E = C + D
\$106,092.18	1.5	\$159,138.27	\$635,000.00	\$794,138.27

Note: Calculations may not be exact due to rounding in tables.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

TSA is adjusting the burden estimate based on the latest available data for the previous three years. In this revision, TSA is modifying the type of user registration information collected. TSA previously collected the User's name, Professional Contact Information, Agency/Company, Job Title, Supervisor's Name, and Employment Verification Contact Information. In the revised collection, TSA will collect the User's Name, Agency/Organization Name and Type, Job Title, Supervisor or other Sponsor's Name, Professional Phone Number, Professional Email Address, Employment Verification Contact Name, Employment Verification Contact Information, and the Reason for Needing an EXIS account. In addition, the following optional registration information can be added by the user: Professional (business), Country, City, State, Zip Code, Mobile Phone Number, Alternate Email, and Preferred Transportation Sector.

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.

User registration information will not be published. Information regarding exercise properties, lessons learned, and best practices from past exercises will be made available online to certain users in the aggregate after removal of personal, proprietary, time, date, and location information.

As previously discussed, an EXIS user has the ability to limit the availability of his/her exercise information to a select group of other EXIS users by creating an exercise community. EXIS communities are not "bulletin boards" in the sense that all members of the community can contribute information. Rather, the community owner can post information regarding his/her exercise and other community members can only observe the posted

⁷ TSA summed the annual fully loaded compensation for H & I band of \$80,069.19 and \$132,115.17, respectively and divided by 2 to calculate an average of \$106,092.18 blended H/I annual loaded rate.

information. Because such information may be SSI, all EXIS users will have unique usernames and passwords that meet or exceed the DHS standards of SSI access to log into EXIS. An SSI Content Management Plan has been approved for EXIS by the Office of Intelligence, and EXIS hardware and software have been approved to handle SSI by the Office of Information Technology.

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.

Not applicable.

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

Not applicable.