

**Supporting Statement
Vessel Entrance or Clearance Statement
1651-0019**

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 1300, *Vessel Entrance or Clearance Statement*, was developed through agreement by the United Nations Intergovernmental Maritime Organization (IMO) in conjunction with the United States and various other countries. The form was developed as a single form to replace the numerous other forms used by various countries for the entrance and clearance of vessels. CBP Form 1300 is authorized by 19 U.S.C. 1431, 1433, and 1434, and provided for by 19 CFR 4.7-4.9. This form is accessible at <http://www.cbp.gov/newsroom/publications/forms?title=1300&=Apply>.

- 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 1300 is used to collect essential commercial vessel data at time of formal entrance and clearance in U.S. ports. The form allows the master to attest to the truthfulness of all CBP forms associated with the manifest package, and collects detailed information on the vessel, cargo, purpose of entrance, certificate numbers and expiration for various certificates. It also serves as a record of fees and tonnage tax payments in order to prevent overpayments.

- 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 .**

Currently this form can be filled out on-line, printed, and submitted on paper at the port. However, automated submission of this form is planned for a future release of the Vessel Management System with an anticipated timeframe of 2018.

- 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.**

Some of this information may be provided via eNOAD, however, Office of Field Operation (OFO) personnel does not have access to eNOAD as it is strictly a Coast Guard system. Efforts are being made to automate the process and link information being transmitted to eNOAD to populate like data fields into CBP's system.

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 have an impact on small businesses or other small entities.

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 this information collection was conducted less frequently CBP could not fulfill its regulatory requirements to verify vessel manifest documents and the master of the vessel could receive a fine.

7. Explain any special circumstances.

This information is collected in a manner consistent with the guidelines of 5 CFR 1320.6.

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 including a 60-day notice published on August 21, 2017 (Volume 82, Page 39611) on which one comment was received, and a 30-day notice published on November 9, 2017 (Volume 82, Page 52069) on which one comment has been received.

Two similar comments received: Email from: Glen Nekvasil, Vice President, Lake Carriers' Association,
Comment Author: James Weakley, President, Lake Carriers' Association.

Comment: We respectfully submit that CBP Form 1300 (Vessel Entrance or Clearance Statement) is no longer needed and should be retired. Customs and Border Protection should get the information it needs from the electronic Notice of Arrival and Departure (ENOAD) and reduce the paperwork burden on the maritime

industry. No fewer than 13 of the 30 questions on CBP Form 1300 are answered on the existing ENOAD. Those questions are:

- #2 – Port Arrival/Departure
- #3 – Date & Time of Arrival/Departure
- #4 – Vessel Operating Draft (in feet and inches)
- #5 – Nationality, Name and Type of Vessel
- #7 – Name, Address & Phone No. of Ship's Agent
- #8 – Name & Country of Owner
- #9 – Name & Country of Operator
- #12 – Port Arrived From/Departed For
- #13 – IMO #
- #14 – Official #
- #15 – Particulars of Voyage
- #16 – Brief description of Cargo
- #18 – No. of Crew
- #19 – No. of Passengers (note, our vessels are not allowed to carry passengers)

It would not require significant revision to the ENOAD to integrate the other questions from CBP Form 1300. There needs to be more sharing of information between CBP and the U.S. Coast Guard, which will reduce the sometimes overwhelming paperwork burden on vessel officers and allow them to focus on their primary responsibility: Moving cargo safely and efficiently. In this age of electronic communications, the paper forms need to be retired.

CBP Program Response: Per 19 CFR §4.7, the master of every vessel arriving in the United States and required to make entry shall have on board his vessel a manifest. The manifest shall be legible and complete, in English, to include the original and any required copies. The manifest shall consist of a Vessel Entrance or Clearance Statement, CBP Form 1300, and the following documents: (1) Cargo Declaration, CBP Form 1302, (2) Ship's Stores Declaration, CBP Form 1303, (3) Crew's Effects Declaration, CBP Form 1304, or, optionally, a copy of the Crew List, Customs and Immigration Form I-418, to which are attached crewmember's declarations on CBP Form 5129, (4) Crew List, Customs and Immigration Form I-418, and (5) Passenger List, Customs and Immigration Form I-418. The original and one copy of the manifest must be ready for production on demand.

Some or all of this information may be provided via eNOAD, however, Office of Field Operation (OFO) personnel does not have access to eNOAD as it is strictly a Coast Guard system. Efforts are being made to automate the process and link information being transmitted to eNOAD to populate like data fields into CBP's system, however a definitive timeline for completion has not been established. Upon completion of the automation process, OFO will abstract and utilize the data provide by eNOAD, as applicable, and hereby do what the Requestor is suggesting (i.e. reduce the paperwork burden on the maritime industry).

- 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.**

All data submitted is entered into the Vessel Management System (VMS) which is a sub-database of the Automated Target System (ATS) and a SORN for ATS, dated May 22, 2012 (Vol. 77, Page 30297) will be included in this ICR. PIA coverage is provided by DHS/CBP/PIA-006 Automated Targeting System.

- 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 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
CBP Form 1300	132,000	12,000	22	264,000	30 minutes or (.5) hours

Public Cost

The estimated cost to the respondents is \$6,857,400. This is based on the estimated burden hours (132,000) multiplied by (x) the average loaded hourly wage rate for ship and boat captains and operators (\$51.95). CBP calculated this loaded wage rate by first multiplying the Bureau of Labor Statistics' (BLS) 2016 median hourly wage rate for Ship and Boat Captains and Operators (\$33.48) by the ratio of BLS' average 2016 total compensation to wages and salaries for Transportation and Material Moving occupations (1.5363), the assumed occupational group for ship and boat captains and operators, to

account for non-salary employee benefits.^{1,2} CBP then adjusted this figure, which was in 2015 U.S. dollars, to 2017 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 \$2,346,183. This is based on the number of responses that must be reviewed (264,000) multiplied by (x) the time burden to review and process each response (.133 hours) = 35,112 hours multiplied by (x) the average hourly loaded rate for a CBP Officer (\$66.82)⁴ = \$2,346,183.

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

There has been no increase or decrease in the estimated annual burden hours previously reported for this information collection and there is no change to the

1 Source of median wage rate: U.S. Bureau of Labor Statistics. Occupational Employment Statistics, "May 2016 National Occupational Employment and Wage Estimates, United States- Median Hourly Wage by Occupation Code." Updated March 31, 2017. Available at http://www.bls.gov/oes/2016/may/oes_nat.htm. Accessed June 20, 2017.

2 The total compensation to wages and salaries ratio is equal to the calculated average of the 2016 quarterly estimates (shown under Mar., June, Sep., Dec.) of the total compensation cost per hour worked for Transportation and Material Moving occupations (\$27.08) divided by the calculated average of the 2016 quarterly estimates (shown under Mar., June, Sep., Dec.) of wages and salaries cost per hour worked for the same occupation category (\$18.2775). 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 Employer Costs for Employee Compensation Historical Listing March 2004 – March 2017, "Table 3. Civilian workers, by occupational group: employer costs per hours worked for employee compensation and costs as a percentage of total compensation, 2004-2017 by respondent type." June 20, 2017. Available at <http://www.bls.gov/ncs/ect/sp/ececqrtn.pdf>. Accessed June 20, 2017.

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 20, 2017.

4 CBP bases this wage on the FY 2017 salary and benefits of the national average of CBP Officer positions, which is equal to a GS-12, Step 3. Source: Email correspondence with CBP's Office of Finance on June 14, 2017.

information being collected.

- 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 identified in Item 19, "Certification for Paperwork Reduction Act Submissions".**

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.