

## SUPPORTING STATEMENT – PART A

### A. JUSTIFICATION

#### 1. Need for the Information Collection

DPS collects data to support the following: The information collection requirement is necessary to private sector commercial Transportation Service Providers (TSPs), who are under contract with the DoD for shipment/storage of personal property, to identify ownership, schedule pickup and delivery of personal property, to include privately owned vehicles, motorcycles, and house trailers/motor homes, Bills of Lading for services rendered, personal property counseling checklist. U.S. Customs and Border Protection Declaration for personal property shipments, re-weigh of personal property, shipment evaluation and inspection reports, receipt for unaccompanied baggage, mobile home inspection record, temporary commercial storage at Government expense, accessorial services-mobile home, report of contractor services, and claims for loss and damage. To disclose information to other Federal agencies in order to manage an optimize DoD authorizing activity, emergency contact information in the event of an emergency. By following specific procedures contractors are solicited, bids evaluated, and contractors selected. The legal authority for acquisition or rates for transportation of DoD Household Goods and Unaccompanied Baggage shipments is 37 U.S.C., Section 476.

Legal or administrative requirements that mandate the collection of data are;

Public Law 100-562, Imported Vehicle Safety Compliance Act of 1988; 5 U.S.C. 5726, Storage Expenses, Household Goods and Personal Effects, 10 U.S.C. 113, Secretary of Defense; 10 U.S.C. 3013, Secretary of the Army; 10 U.S.C. 5013, Secretary of the Navy; 10 U.S.C. 8013, Secretary of the Air Force, 19 U.S.C. 1498, Entry Under Regulations; 37 U.S.C. 476, Travel and Transportation Allowances, Dependents, Baggage, and Household Effects; Federal Acquisition Regulation (FAR); Joint Travel Regulation (JTR), DoD Directive 4500.9E, Transportation and Traffic Management; DoD Directive 5158.4, United States Transportation Command; DoD Instruction 4500.42, DoD Transportation Reservation and Ticketing Services; DoD Regulation 4140.1, DoD Materiel Management Regulation; DoD Regulation 4500.9, Defense Transportation Regulation; and DoD Regulation 4515.13-R, Air Transportation Eligibility and E.O. 9397 (SSN).

#### 2. Use of the Information

In accordance with the provisions of the DoD 4500.9R, Defense Transportation Regulation (DTR), Part IV, Personal Property, the revised DD Form 619, Statement of Accessorial Services Performed, is used by the Household Goods TSP industry to identify accessorial services performed and other charges for billing purposes on Household Goods and Unaccompanied Baggage shipments. The DoD 4500.9R is the Government regulation that contains the information and guidance on the use of the DD Form 619 for billing.

### 3. Use of Information Technology

The DD Form 619 is completed 100% electronically by the TSP who completes it the customer's pickup address.

### 4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

### 5. Burden on Small Business

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

### 6. Less Frequent Collection

All shipments moved may not require the completion of the DD Form 619 so less frequent collection is possible.

### 7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

### 8. Consultation and Public Comments

A 60-Day Federal Register Notice (FRN) for the collection published on Friday, November 2, 2018. The 60-Day FRN citation is 83 FRN 55150. No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice for the collection published on Friday February 15, 2019. The 30-Day FRN citation is 84 FRN 4451.

Service representatives, their respective Service Head Quarters, and SDDC were consulted during and after the redesign of the DD Form 619 was complete. All required documentation, (i.e. DD Form 67) accompanied the DD Form 619 and was coordinated via digital signature.

### 9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

### 10. Confidentiality

Confidentiality ensures that only those personnel with the appropriate security clearance and the need-to-know shall be allowed access to data processed, handled or stored on system components. Confidentiality targets the protection of information from unauthorized access. Personnel, physical and administrative security mechanisms applied to the system shall minimize risks of unauthorized disclosure of command and control information.

Provide the Privacy Act System of Records Notice (SORN) Identifier "Proposed Collection; Comment Request" Docket ID: USAF 2014-0007. A Privacy Impact Assessment was accomplished in 2013. [https://www.ustranscom.mil/foia/pia/DPS\\_PIA\\_2014\\_WEB.pdf](https://www.ustranscom.mil/foia/pia/DPS_PIA_2014_WEB.pdf)

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden, and its Labor Costs

a. Estimation of Respondent Burden

Information extracted from historical data provided by Personal Property Shipping Offices (PPSO), and Joint Personal Property Shipping Offices (JPPSO). There are currently 876 DoD approved TSPs participating in the movement of personal property worldwide. Historical data discovered that each TSP accomplished the DD Form 619 260 times annually. The total of DD Form 619's historically accomplished was 227,760. It takes approximately 5 minutes to complete one DD Form 619. This equates to 18,980 total hours to the TSP community.

b. Labor Cost of Respondent Burden

Labor cost used was the average hourly rate (\$15.50) of a clerk. This equates to \$294,190 of "labor cost" to complete the historical number of DD Form 619's accomplished.

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

14. Cost to the Federal Government

Total time required by a Transportation Office technician to process

45,000 DD Form 619's

20 minutes to process form = 3 submissions per hour

$45,000/3 = 15,000$  hours

15,000 hours \* GS5/1 (\$15.50 hourly rate) = \$232,500

15. Reasons for Change in Burden

There has been no change in burden since the last approval.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.”.