

**Total Hours and Cost**

	<i>Number of Respondents</i>	<i>Total Number of Responses per Year</i>	<i>Total Hours/Year</i>	<i>Total Cost/Year</i>
RIN Generators	6,453	753,567	58,543	5,519,896
Obligated Parties	6,522	993,093	75,391	7,103,777
RIN Owners	7,767	907,013	70,464	6,643,892
Exporters	1,377	160,803	12,492	1,177,886
<b>Total</b>	<b>22,119</b>	<b>2,814,476</b>	<b>216,891</b>	<b>20,445,451</b>

Annual Respondent Burden and Cost by Type of Party											
Table 1 - RIN Generators (Assuming 595 Producers and 122 Importers of Renewable Fuels, for a total of 717 RIN Generators)											
Information Collection Activity		Hours and Cost				Total Hours and Cost					Applicable Forms
Citation	Activity	Standard Industry Mix Hours/Response	Clerical Only Hours/Response	Purchased Services Hours/Response	Total Cost/Response (dollars)	Number of Respondents	Number of Responses per party/year	Total Number of Responses per Year	Total Hours/Year	Total Cost/Year	
\$80.1451	<b>Reporting:</b> Submission of Quarterly RFS Activity Report (reporting of RIN holding threshold compliance, 4x/yr.)	0.05	0.00	0.00	5	717	4	2,868	143	13,480	RFS010#: RFS ACTIVITY REPORT/URF
\$80.1451	<b>Reporting:</b> Calculations related to quarterly RFS Activity Report	2.00	0.00	0.00	188	717	4	2,868	5,736	539,184	RFS010#: RFS ACTIVITY REPORT/URF
\$80.1451	<b>Reporting:</b> Upfront requirement to read and understand revised quarterly RFS Activity Report	1.00	0.00	0.00	94	717	1	717	717	67,398	RFS010#: RFS ACTIVITY REPORT/URF
\$80.1452	<b>Reporting:</b> RIN trade price, transaction type	0.01	0.00	0.00	1	717	260	186,420	1,864	175,235	w/in EMTS
\$80.1464	<b>Reporting:</b> Attest Engagements (RIN holding threshold compliance)	1.00	0.00	0.25	141	717	1	717	896	101,097	USER GUIDE TO OTAQREG FOR ATTEST ENGAGEMENTS FOR THE RFS
\$80.1454	<b>Recordkeeping:</b> Internal systems updates to accommodate RIN holdings data	40.00	0.00	0.00	3,760	717	1	717	28,680	2,695,920	CBP
\$80.1454	<b>Recordkeeping:</b> Calculation of daily aggregated RIN holdings	0.05	0.00	0.00	5	717	260	186,420	9,321	876,174	CBP
\$80.1454	<b>Recordkeeping:</b> Calculation of compliance with primary RIN holdings threshold	0.01	0.00	0.00	1	717	260	186,420	1,864	175,235	CBP
\$80.1454	<b>Recordkeeping:</b> Retention of records supporting reports (RIN holdings, trade price substantiation, type of transaction, contact information for unregistered affiliates, reason for transaction)	0.05	0.00	0.00	5	717	260	186,420	9,321	876,174	CBP
<b>GRAND TOTAL</b>						6,453		753,567	58,543	5,519,896	

Assumptions: Assumes 260 \*work days\* for determining daily transactional and routine reporting. Most routine/daily recordkeeping and reporting is highly automated, so we assume daily batching of transactions.

Rounding: Decimals below .5 are rounded down; decimals of .5 and above are rounded up.

**Annual Respondent Burden and Cost by Type of Party**

*Table 2 - Obligated Parties (Refiners/Importers of Non-Renewable Gasoline and Diesel Fuel, assumes 460 refiners)*

Information Collection Activity		Hours and Cost					
<i>Citation</i>	<i>Activity</i>	<i>Standard Industry Mix Hours/Response</i>	<i>Clerical Only Hours/Response</i>	<i>Purchased Services Hours/Response</i>	<i>Total Cost/Response (dollars)</i>	<i>Number of Respondents</i>	<i>Number of Responses per party/year</i>
§80.1451	<b>Reporting:</b> Submission of Quarterly RFS Activity Report (reporting of RIN holding threshold compliance, 4x/yr.)	0.05	0.00	0.00	5	723	4
§80.1451	<b>Reporting:</b> Calculations related to quarterly RFS Activity Report	4.00	0.00	0.00	376	723	4
§80.1451	<b>Reporting:</b> Upfront requirement to read and understand revised quarterly RFS Activity Report	1.00	0.00	0.00	94	723	1
§80.1452	<b>Reporting:</b> RIN trade price, transaction type	0.01	0.00	0.00	1	723	260
§80.1464	<b>Reporting:</b> Attest Engagements (RIN holding calculations; affiliated parties)	4.00	0.00	0.25	423	723	1
§80.1451	<b>Reporting:</b> Internal systems updates to accommodate calculations related to new reporting requirements	40.00	0.00	0.00	3,760	723	1
§80.1454	<b>Recordkeeping:</b> Calculation of daily aggregated RIN holdings	0.05	0.00	0.00	5	723	365
§80.1454	<b>Recordkeeping:</b> Calculation of compliance with primary RIN holdings threshold	0.01	0.00	0.00	1	723	365
§80.1454	<b>Recordkeeping:</b> Calculation of compliance with secondary RIN holdings threshold	0.01	0.00	0.00	1	15	365

\$80.1454	<b>Recordkeeping:</b> Retention of records supporting reports (RIN holdings, trade price substantiation, type of transaction, contact information for unregistered affiliates)	0.05	0.00	0.00	5	723	365
<b>GRAND TOTAL</b>						6,522	

Assumptions: Assumes 260 \*work days\* for determining daily transactional and routine reporting. Most routine/daily recordke

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plus 263 importers, total of 723 obligated parties)

<b>Total Hours and Cost</b>			Applicable Forms
<i>Total Number of Responses per Year</i>	<i>Total Hours/Year</i>	<i>Total Cost/Year</i>	
2,892	145	13,592	RFS010#: RFS ACTIVITY REPORT/URF
2,892	11,568	1,087,392	RFS010#: RFS ACTIVITY REPORT/URF
723	723	67,962	RFS010#: RFS ACTIVITY REPORT/URF
187,980	1,880	176,701	w/in EMTS
723	3,073	305,829	USER GUIDE TO OTAQREG FOR ATTEST ENGAGEMENTS FOR THE RFS
723	28,920	2,718,480	CBP
263,895	13,195	1,240,307	CBP
263,895	2,639	248,061	CBP
5,475	55	5,147	CBP

			CBP
263,895	13,195	1,240,307	
993,093	75,391	7,103,777	

aping and reporting is highly automated, so we assume daily batching of transactions.

**Annual Respondent Burden**

*Table 3 - RIN Owners (A)*

Information Collection Activity		Hours and Cost		
<i>Citation</i>	<i>Activity</i>	<i>Standard Industry Mix Hours/Response</i>	<i>Clerical Only Hours/Response</i>	<i>Purchased Services Hours/Response</i>
§80.1451	<b>Reporting:</b> Submission of Quarterly RFS Activity Report (reporting of RIN holding threshold compliance, 4x/yr.)	0.05	0.00	0.00
§80.1451	<b>Reporting:</b> Calculations related to quarterly RFS Activity Report	2.00	0.00	0.00
§80.1451	<b>Reporting:</b> Upfront requirement to read and understand revised quarterly RFS Activity Report	1.00	0.00	0.00
§ 80.1452	<b>Reporting:</b> RIN trade price, transaction type	0.01	0.00	0.00
§80.1464	<b>Reporting:</b> Attest Engagements (RIN holding threshold compliance)	1.00	0.00	0.25
§80.1454	<b>Recordkeeping:</b> Internal systems updates to accommodate RIN holdings data	40.00	0.00	0.00
§80.1454	<b>Recordkeeping:</b> Calculation of daily aggregated RIN holdings	0.05	0.00	0.00
§80.1454	<b>Recordkeeping:</b> Calculation of compliance with primary RIN holdings threshold	0.01	0.00	0.00
§80.1454	<b>Recordkeeping:</b> Retention of records supporting reports (RIN holdings, trade price substantiation, type of transaction, contact information for unregistered affiliates, reason for transaction)	0.05	0.00	0.00
<b>GRAND TOTAL</b>				

Assumptions: Assumes 260 \*work days\* for determining daily transactional and routine re

Rounding: Decimals below .5 are rounded down; decimals of .5 and above are rounded u

**1 and Cost by Type of Party**

ssumes 863 RIN Owners)

Total Cost/ Response (dollars)	Total Hours and Cost					Applicable Forms
	Number of Respondents	Number of Responses per party/year	Total Number of Responses per Year	Total Hours/ Year	Total Cost/Year	
5	863	4	3,452	173	16,224	RFS010#: RFS ACTIVITY REPORT/URF
188	863	4	3,452	6,904	648,976	RFS010#: RFS ACTIVITY REPORT/URF
94	863	1	863	863	81,122	RFS010#: RFS ACTIVITY REPORT/URF
1	863	260	224,380	2,244	210,917	w/in EMTS
141	863	1	863	1,079	121,683	USER GUIDE TO OTAQREG FOR ATTEST ENGAGEMENTS FOR THE RFS
3,760	863	1	863	34,520	3,244,880	CBP
5	863	260	224,380	11,219	1,054,586	CBP
1	863	260	224,380	2,244	210,917	CBP
5	863	260	224,380	11,219	1,054,586	CBP
	7,767		907,013	70,464	6,643,892	

reporting. Most routine/daily recordkeeping and reporting is highly automated, so we assume

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e daily batching of transactions.

**Annual Respondent Burden and**

*Table 4 - Exporters (Assun*

<b>Information Collection Activity</b>		<b>Hours and Cost</b>			
<i>Citation</i>	<i>Activity</i>	<i>Standard Industry Mix Hours/Response</i>	<i>Clerical Only Hours/Response</i>	<i>Purchased Services Hours/Response</i>	<i>Total Cost/Response (dollars)</i>
§80.1451	<b>Reporting:</b> Submission of Quarterly RFS Activity Report (reporting of RIN holding threshold compliance, 4x/yr.)	0.05	0.00	0.00	5
§80.1451	<b>Reporting:</b> Calculations related to quarterly RFS Activity Report	2.00	0.00	0.00	188
§80.1451	<b>Reporting:</b> Upfront requirement to read and understand revised quarterly RFS Activity Report	1.00	0.00	0.00	94
§80.1452	<b>Reporting:</b> RIN trade price, transaction type	0.01	0.00	0.00	1
§80.1464	<b>Reporting:</b> Attest Engagements (RIN holding threshold compliance)	1.00	0.00	0.25	141
§80.1454	<b>Recordkeeping:</b> Internal systems updates to accommodate RIN holdings data	40.00	0.00	0.00	3,760
§80.1454	<b>Recordkeeping:</b> Calculation of daily aggregated RIN holdings	0.05	0.00	0.00	5
§80.1454	<b>Recordkeeping:</b> Calculation of compliance with primary RIN holdings threshold	0.01	0.00	0.00	1
§80.1454	<b>Recordkeeping:</b> Retention of records supporting reports (RIN holdings, trade price substantiation, type of transaction, contact information for unregistered affiliates, reason for transaction)	0.05	0.00	0.00	5
<b>GRAND TOTAL</b>					

Assumptions: Assumes 260 \*work days\* for determining daily transactional and routine report

Rounding: Decimals below .5 are rounded down; decimals of .5 and above are rounded up.

**d Cost by Type of Party**

(for 153 Exporters)

<b>Total Hours and Cost</b>					Applicable Forms
<i>Number of Respondents</i>	<i>Number of Responses per party/year</i>	<i>Total Number of Responses per Year</i>	<i>Total Hours/Year</i>	<i>Total Cost/Year</i>	
153	4	612	31	2,876	RFS010#: RFS ACTIVITY REPORT/URF
153	4	612	1,224	115,056	RFS010#: RFS ACTIVITY REPORT/URF
153	1	153	153	14,382	RFS010#: RFS ACTIVITY REPORT/URF
153	260	39,780	398	37,393	w/in EMTS
153	1	153	191	21,573	USER GUIDE TO OTAQREG FOR ATTEST ENGAGEMENTS FOR THE RFS
153	1	153	6,120	575,280	CBP
153	260	39,780	1,989	186,966	CBP
153	260	39,780	398	37,393	CBP
153	260	39,780	1,989	186,966	CBP
1,377		160,803	12,492	1,177,886	

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ching of transactions.

<b>Labor Costs</b>				
<i>Labor Type</i>	<i>Labor Cost/hour</i>	<i>Labor + Overhead/hour<sup>a</sup></i>	<i>Portion attributed/hour</i>	<i>Employer Cost/hour</i>
Managerial	57.20	115	0.05	5.75
Technical/Professional	52.99	106	0.7	74.20
Clerical	19.67	40	0.2	8.00
Legal	57.25	115	0.05	5.75
<b>Total Employer Cost/hour</b>				<b>94.00</b>
<b>Purchased Services<sup>b</sup></b>				<b>188</b>

<sup>a</sup> Overhead is calculated to be equal to the cost of labor.

<sup>b</sup> The cost of purchased services (for example, cost of attest auditors) is calculated at twice the Employer Cost. This figure makes for an easily understandable estimate, and matches past fees we have received from industry on the actual cost of such services.

The estimates used the Bureau of Labor Statistics figures from "National Industry-Specific Occupations". These were the most recent estimates available at the time of development of the proposed rule.

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