

**Supporting Statement  
Canadian Border Boat Landing Permit (CBP Form I-68)  
1651-0108**

**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.**

The Canadian Border Boat Landing Permit, U.S. Customs and Border Protection (CBP) Form I-68, generally allows select individuals entering the United States along the northern border by small<sup>1</sup> pleasure boats to report their arrival and make entry without having to travel to a designated port of entry for an inspection by a CBP officer. The information collected on CBP Form I-68 allows eligible individuals to be inspected in person only once during the boating season, rather than each time they make an entry. United States citizens, Lawful Permanent Residents of the United States, Canadian citizens, and Landed Residents of Canada who are nationals of the Visa Waiver Program countries listed in 8 CFR 217.2(a) are eligible to apply for the permit.

CBP has developed a smart phone application known as ROAM that will in certain circumstances allow travelers participating in the I-68 program to report their arrival in the United States through the ROAM application, instead of by telephone. The ROAM app, implementing the I-68 program, will allow CBP officers to remotely conduct traveler interviews with a phone's video chat capability, and replace other technologies used for remote inspections that are obsolete or inefficient.

This information collection is provided for by 8 CFR 235.1(g) and Section 235 of Immigration and Nationality Act. CBP Form I-68 is accessible at [http://www.cbp.gov/sites/default/files/documents/CBP%20Form%20I-68\\_0.pdf](http://www.cbp.gov/sites/default/files/documents/CBP%20Form%20I-68_0.pdf).

- 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.**

The information provided is used to perform an initial vetting of the applicant; to help establish identity, alienage, and admissibility of the applicant; and to provide

---

<sup>1</sup> Weighing less than five net tons.

a guideline for any questions that might be necessary when the applicant is interviewed by the CBP officer prior to adjudicating the CBP Form I-68.

CBP uses the information received from the current collection to identify low-risk individuals whom CBP believes do not need to travel to a designated port of entry to report arrival or make entry when they arrive in the United States by small boat.

- 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 I-68 can be submitted electronically via the ROAM app that has been created for smart phone use. CBP Form I-68 is available at:

<https://www.cbp.gov/newsroom/publications/forms?title=68>

- 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 in any other place or any other form.

- 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.**

This collection of information enables people to visit the immediate shore area for the duration of the boating season without having to travel to the nearest CBP port of entry for inspection. This enables low-risk travelers to save an additional two to eight hours of travel time, round-trip, to and from the nearest designated port of entry. Additionally, the app permits CBP to redirect scarce federal law enforcement resources towards high-risk areas and individuals.

- 7. Explain any special circumstances.**

This information is collected in a manner consistent with the guidelines of 5 CFR 1320.5(d)(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 a 60-day FRN published on February 19, 2019 (84 FR 4835) on which no comments were received, and a 30-day FRN published on May 10, 2019 (84 FR 20646) on which no comments have been received.

- 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.**

A SORN for the Global Enrollment System was published on April 21, 2006, (FR 71, Page 20708) and a PIA for this system dated April 20, 2006 will be included in this ICR.

- 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.**

INFORMATION COLLECTION	TOTAL ANNUAL BURDEN HOURS	NO. OF RESPONDENTS	NO. OF RESPONSES PER RESPONDENT	TOTAL RESPONSES	TIME PER RESPONSE
I-68 (paper)	2,988	18,000	1	18,000	10 minutes (0.166 hours)
I-68 (Electronic Submission)	4,150	50,000	1	50,000	5 minutes (0.083 hours)
<b>Total</b>	<b>7,138</b>	<b>68,000</b>		<b>68,000</b>	

### Public Cost

The estimated annual public cost of the burden is \$545,682.

The estimated time cost to the respondents is \$257,682. This is based on the estimated burden hours (7,138) multiplied by (x) the average loaded hourly wage rate for personal-purpose sea travelers (\$36.10). CBP used the U.S. Department of Transportation's (DOT) recommended hourly value of travel time savings for intercity, personal travel by air and high speed rail, which CBP assumes best represents intercity, personal travel by sea. The average hourly wage rate is provided in 2015 U.S. dollars. CBP assumes an annual growth rate of 0 percent; the 2015 U.S. dollar value is equal to the 2018 U.S. dollar value.

In addition, respondents pay \$288,000 in fees as a result of a \$16 Form I-68 filing fee. This is calculated by the number of responses (18,000) multiplied by (x) the filing fee (\$16) = \$288,000. The ROAM app has no fee included with the electronic submission of the I-68.

CBP expects an initial transition of 50,000 respondents from the paper Form I-68 to the ROAM app, which will reduce public burden hours and fee costs. The ROAM app will reduce the burden hours for these respondents who would otherwise submit paper Form I-68 by 8,300 burden hours based on the current estimated time burden of the paper Form I-68. As a result, this will reduce the public cost by \$1,073,070, including the savings from having no filing fee to use the ROAM app (\$800,000).

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

There are no record keeping, capital, start-up or maintenance costs associated with this information 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 is \$371,026.

The estimated annual time cost to the Federal Government associated with the review of the paper Form I-68 is \$345,438. This is based on the number of responses that must be reviewed (18,000) multiplied by (x) the time burden to review and process each response (18 minutes, or 0.3 hours) = 5,400 hours multiplied by (x) the average hourly loaded rate for a CBP Officer ( $\$63.97$ )<sup>2</sup> = \$345,438.

Use of the ROAM app for processing the electronic I-68 form will only require 30 seconds of a CBP Officer's time compared to the 18 minutes currently estimated for the review of the paper Form I-68 submission.

The estimated annual time cost to the Federal Government associated with the review of these documents via the ROAM app is \$25,588. This is based on the number of responses that must be reviewed (50,000) multiplied by (x) the time burden to review and process each response (30 seconds, or 0.008 hours) = 400 hours multiplied by (x) the average hourly loaded rate for a CBP Officer ( $\$63.97$ )<sup>3</sup> = \$25,588.

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

There has been a decrease in the estimated annual burden hours previously reported for this information collection due to updated agency estimates based on creating an electronic Form I-68 submission option via the ROAM app. There are no changes to this collection of information.

**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, explain the reasons that displaying the expiration date would be inappropriate.**

---

<sup>2</sup> CBP bases this wage on the FY 2018 salary and benefits of the national average of CBP Officer positions, which is equal to a GS-12, Step 2. Source: Email correspondence with CBP's Office of Finance on June 1, 2018.

<sup>3</sup> CBP bases this wage on the FY 2018 salary and benefits of the national average of CBP Officer positions, which is equal to a GS-12, Step 2. Source: Email correspondence with CBP's Office of Finance on June 1, 2018.

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

**18. “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.