

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	67,721	6,382,591
Obligated Parties	6,522	993,093	76,693	7,226,109
RIN Owners	7,767	907,013	81,510	7,682,253
Exporters	1,377	160,803	14,451	1,361,975
Total	22,119	2,814,476	240,375	22,652,928

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	Reporting: Submission of Quarterly RFS Activity Report (reporting of RIN holding threshold compliance, corporate and contractual affiliates)	0.50	0.00	0.00	47	717	4	2,868	1,434	134,796	RFS0105: RFS ACTIVITY REPORT/URF
\$80.1435	Reporting: Calculations related to quarterly RFS Activity Report	4.00	0.00	0.00	376	717	4	2,868	11,472	1,078,368	RFS0105: RFS ACTIVITY REPORT/URF
\$80.1451	Reporting: Upfront requirement to read and understand revised quarterly RFS Activity Report	1.00	0.00	0.00	94	717	1	717	717	67,398	RFS0105: RFS ACTIVITY REPORT/URF; w/in EMTS
\$80.1452	Reporting: 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	Reporting: Attest Engagements (RIN holding threshold compliance)	4.00	0.00	0.25	423	717	1	717	3,047	303,291	USER GUIDE TO OTAQREG FOR ATTEST ENGAGEMENTS FOR THE RFS
\$80.1454	Recordkeeping: 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	Recordkeeping: Calculation of daily aggregated RIN holdings	0.05	0.00	0.00	5	717	260	186,420	9,321	876,174	CBP
\$80.1454	Recordkeeping: 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	Recordkeeping: Retention of records supporting reports (RIN holdings, trade price substantiation, type of transaction, contact information for unregistered affiliates, documentation supporting an exemption)	0.05	0.00	0.00	5	717	260	186,420	9,321	876,174	CBP
GRAND TOTAL						6,453		753,567	67,721	6,382,591	

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 Par

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

Information Collection Activity		Hours and Cost				Number of Respondents
Citation	Activity	Standard Industry Mix Hours/Response	Clerical Only Hours/Response	Purchased Services Hours/Response	Total Cost/Response (dollars)	
§80.1451	Reporting: Submission of Quarterly RFS Activity Report (reporting of RIN holding threshold compliance, corporate and contractual affiliates)	0.50	0.00	0.00	47	723
§80.1435	Reporting: Calculations related to quarterly RFS Activity Report	4.00	0.00	0.00	376	723
§80.1451	Reporting: Upfront requirement to read and understand revised quarterly RFS Activity Report	1.00	0.00	0.00	94	723
§80.1452	Reporting: RIN trade price, transaction type	0.01	0.00	0.00	1	723
§80.1464	Reporting: Attest Engagements (RIN holding calculations, affiliated parties)	4.00	0.00	0.25	423	723
§80.1451	Reporting: Internal systems updates to accommodate calculations related to new reporting requirements	40.00	0.00	0.00	3,760	723
§80.1454	Recordkeeping: Calculation of daily aggregated RIN holdings	0.05	0.00	0.00	5	723
§80.1454	Recordkeeping: Calculation of compliance with primary RIN holdings threshold	0.01	0.00	0.00	1	723
§80.1454	Recordkeeping: Calculation of compliance with secondary RIN holdings threshold	0.01	0.00	0.00	1	15
§80.1454	Recordkeeping: Retention of records supporting reports (RIN holdings, trade price substantiation, type of transaction, contact information for unregistered affiliates, documentation supporting an exemption)	0.05	0.00	0.00	5	723
GRAND TOTAL						6,522

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

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iners plus 263 importers, total of 723 obligated parties)

Total Hours and Cost				Applicable Forms
<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>	
4	2,892	1,446	135,924	RFS0105: RFS ACTIVITY REPORT/URF
4	2,892	11,568	1,087,392	RFS0105: RFS ACTIVITY REPORT/URF
1	723	723	67,962	RFS0105: RFS ACTIVITY REPORT/URF; w/in EMTS
260	187,980	1,880	176,701	w/in EMTS
1	723	3,073	305,829	USER GUIDE TO OTAQREG FOR ATTEST ENGAGEMENTS FOR THE RFS
1	723	28,920	2,718,480	CBP
365	263,895	13,195	1,240,307	CBP
365	263,895	2,639	248,061	CBP
365	5,475	55	5,147	CBP
365	263,895	13,195	1,240,307	CBP
	993,093	76,693	7,226,109	

ng 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	Reporting: Submission of Quarterly RFS Activity Report (reporting of RIN holding threshold compliance, corporate and contractual affiliates)	0.50	0.00	0.00
§80.1435	Reporting: Calculations related to quarterly RFS Activity Report	4.00	0.00	0.00
§80.1451	Reporting: Upfront requirement to read and understand revised quarterly RFS Activity Report	1.00	0.00	0.00
§ 80.1452	Reporting: RIN trade price, transaction type	0.01	0.00	0.00
§80.1464	Reporting: Attest Engagements (RIN holding threshold compliance)	4.00	0.00	0.25
§80.1454	Recordkeeping: Internal systems updates to accommodate RIN holdings data	40.00	0.00	0.00
§80.1454	Recordkeeping: Calculation of daily aggregated RIN holdings	0.05	0.00	0.00
§80.1454	Recordkeeping: Calculation of compliance with primary RIN holdings threshold	0.01	0.00	0.00
§80.1454	Recordkeeping: Retention of records supporting reports (RIN holdings, trade price substantiation, type of transaction, contact information for unregistered affiliates, documentation supporting an exemption)	0.05	0.00	0.00
GRAND TOTAL				

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 Hours and Cost						
<i>Total Cost/ Response (dollars)</i>	<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>	Applicable Forms
47	863	4	3,452	1,726	162,244	RFS0105: RFS ACTIVITY REPORT/URF
376	863	4	3,452	13,808	1,297,952	RFS0105: RFS ACTIVITY REPORT/URF
94	863	1	863	863	81,122	RFS0105: RFS ACTIVITY REPORT/URF; w/in EMTS
1	863	260	224,380	2,244	210,917	w/in EMTS
423	863	1	863	3,668	365,049	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	81,510	7,682,253	

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Table 4 - Expor

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	Reporting: Submission of Quarterly RFS Activity Report (reporting of RIN holding threshold compliance, corporate and contractual affiliates)	0.50	0.00	0.00
§80.1435	Reporting: Calculations related to quarterly RFS Activity Report	4.00	0.00	0.00
§80.1451	Reporting: Upfront requirement to read and understand revised quarterly RFS Activity Report	1.00	0.00	0.00
§80.1452	Reporting: RIN trade price, transaction type	0.01	0.00	0.00
§80.1464	Reporting: Attest Engagements (RIN holding threshold compliance)	4.00	0.00	0.25
§80.1454	Recordkeeping: Internal systems updates to accommodate RIN holdings data	40.00	0.00	0.00
§80.1454	Recordkeeping: Calculation of daily aggregated RIN holdings	0.05	0.00	0.00
§80.1454	Recordkeeping: Calculation of compliance with primary RIN holdings threshold	0.01	0.00	0.00
§80.1454	Recordkeeping: Retention of records supporting reports (RIN holdings, trade price substantiation, type of transaction, contact information for unregistered affiliates, documentation supporting an exemption)	0.05	0.00	0.00
GRAND TOTAL				

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

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

Burden and Cost by Type of Party

ters (Assumes 153 Exporters)

Total Hours and Cost					
<i>Total Cost/ Response (dollars)</i>	<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>
47	153	4	612	306	28,764
376	153	4	612	2,448	230,112
94	153	1	153	153	14,382
1	153	260	39,780	398	37,393
423	153	1	153	650	64,719
3,760	153	1	153	6,120	575,280
5	153	260	39,780	1,989	186,966
1	153	260	39,780	398	37,393
5	153	260	39,780	1,989	186,966
	1,377		160,803	14,451	1,361,975

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Applicable Forms
RFS0105: RFS ACTIVITY REPORT/URF
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w/in EMTS
USER GUIDE TO OTAQREG FOR ATTEST ENGAGEMENTS FOR THE RFS
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imated, so we assume daily batching of transactions.

Labor Costs				
<i>Labor Type</i>	<i>Labor Cost/hour</i>	<i>Labor + Overhead/hour^a</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
Total Employer Cost/hour				94.00
Purchased Services^b				188

^a Overhead is calculated to be equal to the cost of labor.

^b 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 have received from industry on the actual cost of such services.

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

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