

## SUPPORTING STATEMENT

### OMB Control Number 0704-0434 — Radio Frequency Identification Advance Shipment Notices

#### A. JUSTIFICATION

##### 1. Need for the Information Collection

This information collection requirement is implemented in Defense Federal Acquisition Regulation Supplement (DFARS) clause 252.211-7006, Passive Radio Frequency Identification. The Department of Defense (DoD) has a requirement for contractors to submit advance shipment notices (ASNs) for shipments that require passive Radio Frequency Identification (RFID). A passive RFID tag is required for cases and palletized unit loads packaging levels and any additional consolidation level(s) deemed necessary by the requiring activity for shipments of items that—

a. Contain items in any of the classes of supply defined in DoD 4140.1-R, DoD Supply Chain Materiel Management Regulation, AP1.1.11.; and

b. Will be shipped to—

i. One of the locations listed at [http://www.acq.osd.mil/log/sci/RFID\\_ship-to-locations.html](http://www.acq.osd.mil/log/sci/RFID_ship-to-locations.html);

ii. A location outside the contiguous United States when the shipment has been assigned Transportation Priority 1; or

iii. Any additional location(s) deemed necessary by the requiring activity.

DoD considers RFID to be a strategic imperative, necessary to deliver supplies to the warfighter more quickly, while increasing visibility of materiel throughout the supply chain.

##### 2. Use of the Information

a. Contractors use Wide Area WorkFlow (WAWF) to electronically submit ASNs in advance of shipments of items described in section A.1. of this supporting statement. Detailed procedures for contractors on the use of WAWF is provided at <https://wawf.eb.mil/>. The ASN includes the RFID tag data to be encoded (as specified in paragraph (d) of the clause at 252.211-7006) using the instructions provided in the EPC™ Tag Data Standards in effect at the time of contract award. The EPC™ Tag Data Standards are available at <http://www.epcglobalinc.org/standards/>.

i. If the Contractor is an EPCglobal™ subscriber and possesses a unique EPC™ company prefix, the Contractor may use any of the identifiers and encoding instructions described in the most recent EPC™ Tag Data Standards document to encode tags.

ii. If the Contractor chooses to employ the DoD identifier, the Contractor shall use its previously assigned Commercial and Government Entity (CAGE) code and shall encode the tags in accordance with the tag identifier details located at <https://www.acq.osd.mil/log/sci/ait.html>.

iii. If the Contractor uses a third-party packaging house to encode its tags, the CAGE code of the third-party packaging house is acceptable.

iv. Regardless of the selected encoding scheme, the Contractor with which the Department holds the contract is responsible for ensuring that the tag ID encoded on each passive RFID tag is globally unique.

b. The information collected in accordance with DFARS clause 252.211-7006, as described above, is necessary because DoD needs the data element in the advance shipment notice to permit association of RFID tag data with the corresponding shipment. DoD depots use the information in the ASN to match the passive RFID tag data to the corresponding shipment upon arrival.

### 3. Use of Information Technology

Improved information technology is used to the maximum extent practicable and 100% electronic submission of information is anticipated. Contractors must use electronic means to submit the advance shipment notice in accordance with the procedures located at <https://wawf.eb.mil/>.

### 4. Non-duplication

As a matter of policy, DoD reviews the Federal Acquisition Regulation to determine whether adequate language already exists. This information collection does not duplicate any other requirement.

### 5. Burden on Small Business

The collection is not expected to have a significant impact on a substantial number of small businesses. The burden applied to small business is the minimum consistent with applicable laws, Executive Orders, regulations, and prudent business practices.

### 6. Less Frequent Collection

An advance shipment notice is required prior to any shipment of materiel containing RFID tag data. Less frequent collection of this information would not permit prompt association of the RFID data with the corresponding shipment and, therefore, would impair visibility of DoD assets.

## 7. Paperwork Reduction Act Guidelines

There are no special circumstances for collection. Collection of this information is consistent with the guidelines at 5 CFR 1320.5(d)(2).

## 8. Consultation and Public Comments

a. Collection is consistent with the guidelines in 5 CFR 1320.6. Public comments were solicited in the *Federal Register* on July 18, 2019 ([84 FR 34379](#)). No comments were received in response to this notice.

b. The estimated number of respondents and responses are based on data available in Wide Area WorkFlow on RFID ASNs for fiscal year (FY) 2014 and FY 2015, which was validated by subject matter experts in Logistics and Material Readiness/Supply Chain Integration (L&MR/SCI).

c. A notice of submission to OMB for clearance of this information collection was published in the *Federal Register* on September 25, 2019 ([84 FR 50415](#)).

## 9. Gifts or Payment

No payment or gift will be provided to respondents, other than remuneration of contractors under their contracts.

## 10. Confidentiality

This information is disclosed to DoD depots in order to use an ASN to match the passive RFID tag data to the corresponding shipment upon arrival.

## 11. Sensitive Questions

No sensitive questions are involved.

## 12. Respondent Burden, and its Labor Costs

When the clause, Passive Radio Frequency Identification, is included, contractors are required to affix RFIDs to certain cases or pallets being shipped to DLA depots or USTRANSCOM locations and to enter Advanced Shipment Notices (ASNs) in Wide Area WorkFlow (WAWF). The RFIDs on the shipments are scanned automatically as the pallet moves through the entry of the receiving warehouse and then auto-matched to the ASN that has been entered by the contractor in WAWF. The ASN is not a new process/transaction, but rather the same existing Material Inspection Receiving Report (MIRR) transaction being sent to WAWF by contractors, with additional data (RFID data elements) added to the transaction. In April 2005, WAWF added the RFID tag ID as an additional data element in the MIRR. "Processing Time" for 10 shipments is estimated to require 180 seconds of additional processing

time based on manual entry of the data element via the website. “Processing Time” for 10 shipments is estimated to require 180 seconds of additional processing time based on manual entry of the data element via the website. Processing time for 50 shipments is estimated to require 60 seconds of additional processing time based on manual entry of the data element via the website. Processing time for 500, 5,000, 15,000 and 25,000 shipments is estimated to require one second of additional processing time based on automatic electronic transmittal of the data. Overall, the average processing time for each ASN is 1.16 seconds. This results in a total estimate of 9,707 hours (28,673,846 ASNs \* 1.16 = 33,161,661 seconds converted to 9,707 hours).

DFARS Clause 252.211-7006: RFID ASNs	
Number of respondents	5,217
Responses per respondent	3,782
Number of responses	19,732,850
Seconds per response	1.16
Estimated hours (number of responses multiplied seconds per response)	6,358
Cost per hour (hourly wage)	\$20.00
Annual public burden (estimated hours multiplied by cost per hour)	\$127,160

Notes: The cost per hour is increased to reflect the Office of Personnel Management’s General Schedule (GS) 3, Step 5 (equivalent) hourly rate of \$14.68 for calendar year 2019, plus 36.25 percent burden = \$20.00.

13. Respondent Costs Other Than Burden Hour Costs

None.

14. Cost to the Federal Government

The Government burden associated with the review and approval of MIRRs is captured under OMB Control Number 0704-0248, Defense Federal Acquisition Regulations Supplement (DFARS) Appendix F, Material Inspection and Receiving Report and related forms. For these reasons we estimate that it will not take the Government any additional time to review the advance shipment notices.

DFARS Clause 252.211-7006: RFIDS ASNs	
Number of responses	19,732,850
Seconds per response *	0
Estimated hours (number of responses multiplied hours per response)	0

Cost per hour (hourly wage)	0
Annual cost to the Government (est. hours multiplied by cost per hour)	0

\* *The ASN/RFID matching process is automated.*

15. Reasons for Change in Burden.

The burden estimates for this submission were based on data available in Wide Area WorkFlow for the RFID ASNs and the use of the OPM GS salary rates for Fiscal Year 2019.

16. Publication of Results

Results of this collection will not be published.

17. Non-Display of OMB Expiration Date

We do not seek approval to not display the expiration dates for OMB approval of the information collection.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

There are no exceptions to the certification accompanying this Paperwork Reduction Act submission.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods will not be employed.