## Supporting Statement Delivery Ticket 1651-0081

### A. Justification

 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.

CBP Form 6043, *Delivery Ticket*, is used to document transfers of imported merchandise between parties. This form collects information such as the name and address of the consignee; the name of the importing carrier; lien information; the location of where the goods originated and where they were delivered; and information about the imported merchandise. CBP Form 6043 is completed by warehouse proprietors, carriers, Foreign Trade Zone operators and other trade entities involved in transfers of imported merchandise. This form is authorized by 19 U.S.C. 1551a and 1565, and provided for by 19 CFR 4.34, 4.37 and 19.9. It is accessible at: https://www.cbp.gov/newsroom/publications/forms

The respondents to this information collection are members of the trade community who are familiar with CBP regulations.

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 is to be used for shipment tracking purposes by CBP officers to document transfers of imported merchandise between parties.

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.

The information on the Delivery Ticket, Form 6043 can be submitted electronically via the Automated Commercial Environment (ACE).

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.

Without this information, CBP would not be able to document transfers of imported merchandise between parties.

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 two Federal Register notices published on June 5, 2019 (84 FR 26129) on which no comments were received, and on August 27, 2019 (84 FR 44910) 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.

All data submitted and entered into ACE is subject to and protected by the Trade Secrets Act (18 U.S.C. 1905) and is considered confidential, except to the extent as otherwise provided by law. A PIA for the Automated Commercial Environment

(ACE) dated July 31, 2015, and a SORN for the Import Information System, dated July 26, 2016 (81 FR 48826) 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.

FORM NUMBER/ TITLE	TOTAL ANNUAL BURDEN HOURS	NO. OF RESPONDENTS	NO. OF RESPONSES PER RESPONDENT	TOTAL RESPONSES	TIME PER RESPONSE
Delivery Ticket Form 6043	57,800	1156	200	231,200	15 minutes (0.25 hours)

#### **Public Cost**

The estimated cost to the respondents is \$3,940,226. This is based on the estimated burden hours (57,800) multiplied by the average loaded hourly wage rate for warehouse operators (\$68.17). CBP calculated this loaded wage rate by first multiplying the Bureau of Labor Statistics' (BLS) 2018 median hourly wage rate for Transportation, Storage, and Distribution Managers (\$45.54), which CBP assumes best represents the wage for warehouse operators, by the ratio of BLS' average 2018 total compensation to wages and salaries for Management, Business, and Financial occupations (1.4970), the assumed occupational group for warehouse operators, to account for non-salary employee benefits. <sup>1,2</sup> This

<sup>1</sup> Source of median wage rate: U.S. Bureau of Labor Statistics. Occupational Employment Statistics, "May 2018 National Occupational Employment and Wage Estimates United States." Updated April 2, 2019. Available at https://www.bls.gov/oes/2018/may/oes\_nat.htm. Accessed June 4, 2019.

<sup>2</sup> The total compensation to wages and salaries ratio is equal to the calculated average of the 2018 quarterly estimates (shown under Mar., June, Sep., Dec.) of the total compensation cost per hour worked for Management, Business, and Financial occupations (\$69.3800) divided by the calculated average of the 2018 quarterly estimates (shown under Mar., June, Sep., Dec.) of wages and salaries cost per hour worked for the same occupation category (\$46.3450). Source of total compensation to wages and salaries ratio data: U.S. Bureau of Labor Statistics. Employer Costs for Employee Compensation. Employer Costs for Employee Compensation Historical Listing March 2004 – December 2018, "Table 3. Civilian workers, by occupational group: employer costs per hours worked for employee compensation and costs as a percentage of total compensation, 2004-2018." March 2019.

figure is in 2018 U.S. dollars and CBP assumes an annual growth rate of 0 percent; the 2018 U.S. dollar value is equal to the 2019 U.S. dollar value.

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 associated with the review of these documents is \$2,565,252. This is based on the number of responses that must be reviewed (231,200) multiplied by the time burden to review and process each response (0.166 hours) = 38,379 hours multiplied by the average hourly loaded rate for a CBP Officer (\$66.84)<sup>3</sup> = \$2,565,252.

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 based on updated agency estimates in time per response being reduced to 15 minutes, there has also been an increase in respondents based on agency estimates. There is no change to the information collected or to CBP Form 6043.

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.

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

18. "Certification for Paperwork Reduction Act Submissions."

Available at https://www.bls.gov/web/ecec/ececqrtn.pdf. Accessed June 4, 2019.

<sup>3</sup> CBP bases this wage on the FY 2019 salary and benefits of the national average of CBP Officer positions, which is equal to a GS-11, Step 9. Source: Email correspondence with CBP's Office of Finance on June 12, 2019.

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.