

Justification for non-substantive change request:

The Commission is requesting increased burden allotments for the remaining five months on the clearance. The Commission underestimated the additional annual burden needed in September 2019 when submitting the prior non-substantive change request. As indicated in the prior non-substantive change request, the Commission based its original projected annual amounts on the caseload of the prior three years and the projected increase in future caseload. The number and complexity of investigations are a reflection of the petitions filed with the Commission and are outside the agency's control. Compared to the previous years used for the Commission's projections, the agency's more recent caseload has increased (in terms of the sheer volume of petitions) and shifted toward products with less concentrated industries and markets (such as agricultural products and consumer goods). The prior non-substantive change attempted to account for these factors but shortly after the request for the increase to the burden allotment, there were two proceedings filed with extremely large respondent universes that vastly reduced the additional burden that was approved. For these reasons, the Commission is requesting a further revision to its existing burden limits as detailed in the following tabulation.

	Currently approved burden	Additional burden (January 2020 - June 2020)	Revised total burden
Respondents	23,670	7,574	31,244
Hours	674,578	215,865	890,443
Cost	78,595,001	25,150,400	103,745,401