

**SUPPORTING STATEMENT**  
**U.S. Department of Commerce**  
**International Trade Administration**  
**Aluminum Import Monitoring and Analysis System**  
**OMB Control No. 0625-XXXX**

**A. JUSTIFICATION**

**This is a request for approval of a new information collection.**

**1. Explain the circumstances that make the collection of information necessary.**

The Aluminum Import Monitoring and Analysis (AIM) System is vital to facilitate the real-time monitoring of aluminum imports in a volatile market. AIM will operate under the authority vested as part of the Census Act (13 U.S.C. 301(a) and 302).

In order to monitor aluminum imports in real-time and to provide the public with real-time data, the Department of Commerce must collect and provide timely aggregated summaries about imports of certain aluminum products. The Aluminum Import License form will collect the necessary information.

**2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.**

The import aluminum license information is necessary for the U.S. Government (USG) to assess import trends of covered products in real time and to share summary level information with the public via a website: <https://trade.gov/aluminum/>.

The information listed on the Aluminum Import License form will be required of all importers of subject merchandise prior to, or at the time of, entry into the United States and has been deemed necessary by the Commerce Department and the Administration to adequately assess potential surges in imports of covered aluminum products. Commerce uses the information collected in an online monitoring system to display aggregate statistical trends to the public.

The licensing system uses information already required of an importer. Commerce does not charge a fee for the license. The U.S. Customs and Border Protection (CBP) will require the license number generated by the successful submission of the license form when a broker or importer files his/her CBP entry summary (which happens within 10 business days of importation). The license can be obtained up to 60-days prior to importation or on the date of Customs summary filing (Form 7501). If the license number is not submitted to CBP with the summary documents, CBP will consider the entry summary to be incomplete and may request that the shipment be redelivered.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.**

The Aluminum Import License is available to all importers through an Internet website. Although importers without an Internet connection can be accommodated via facsimile, all license applications can be filled out electronically through the online licensing system. Using electronic submission as the basis for this system allows for the quickest and most efficient means for collecting the required information and aggregating the information submitted in the form.

**4. Describe efforts to identify duplication.**

The Census Bureau has the capability to report similar official import statistics on a monthly basis, but with a significant lag time after the products have entered the United States. Based on our experience with steel imports, the lag time could be up to 70 days after importation of the covered aluminum products, and by that time the imports may have already had an impact on the market. Any remedy against injurious sales of aluminum products can only be effective if information about these sales is made available quickly.

**5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.**

The vast majority of applicants will be major aluminum importers, producers and brokers. There are very few small businesses that are users of the licensing system; however, for importers bringing in small amounts of aluminum, there is a low value license option which is less burdensome.

**6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

Failure to collect information about aluminum imports before or just after importation would disrupt the goals and objectives of the President's mandate. As a result of unmonitored surges, U.S. aluminum producers could be injured by surges of imports.

**7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.**

The information collected will be consistent with the OMB guidelines.

**8. Provide information of the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to**

**obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

A Federal Register Notice requesting comments from the public was recently announced in the Federal Register on Day, Month XX, 2020 (Volume XX, Number XXX, pg. XXXX).

No comments were received in response to this notice.

**9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.**

No payments or gifts are being offered to the respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.**

To the extent that the information submitted by the parties contains trade secrets, Commerce will protect such information from disclosure, including disclosure pursuant to requests under the Freedom of Information Act, as required by the Trade Secrets Act, 18 U.S.C. § 1905. Such assurance is not provided in writing, but general information regarding confidentiality and the Trade Secrets Act is available upon request.

To process the license online, at the bottom of the license form the applicant acknowledges that he recognizes this information will be aggregated and posted on the website to supplement other information publicly available about aluminum with imports.

**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.**

No questions of a sensitive nature are asked.

**12. Provide an estimate in hours of the burden of the collection of information.**

It is estimated that 1,750 major brokers and importers will fill out the Aluminum Import License form. Each importer or broker must fill out the form for each entry of the subject merchandise. We estimate that 278,538 regular licenses and 50 low value licenses will be issued each year. On average, each broker would apply for approximately 171 licenses each year. The average time to complete the form is estimated to be 10 minutes. This estimate includes the time necessary to complete the form using information that is necessary for the completion of the other documents required for entry of the product into the United States. We do not expect the response time to vary widely because some of the same information is used to fill out other Customs documents filed at the time of entry. The Opt-out Form information is listed below.

<b>Form Used</b>	<b>Number of Respondents</b>	<b>Time to Complete</b>	<b>Total Number of Responses</b>	<b>Total Hours</b>
License	1,700	10 min/license	278,538	<b>46,423</b>
Opt-out Form	50	5 min/form	50	5

**TOTAL RESPONDENTS = 1,750    TOTAL RESPONSES = 278,588**

**TOTAL BURDEN HOURS = 46,428**

**13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in Question 12 above).**

None.

**14. Provide estimates of annualized cost to the Federal government.**

The average public sector salary for processing the licenses is \$25.00 per hour.

<b>Form Used</b>	<b>Time to Process</b>	<b>Number of Responses</b>	<b>Total Hours</b>
License	30 seconds	278,538	2,321
Opt-out Form	5 seconds	50	N/A

Cost to Government: Total Hours (2,321) x Avg. Salary (\$25/hour) = \$58,025.  
Processing and issuance of the license is done electronically.

**15. Explain the reasons for any program changes or adjustments.**

N/A.

**16. For collections whose results will be published, outline the plans for tabulation and publication.**

Summary data produced from the information collected in the Aluminum Import License form will be posted on the Internet and updated weekly to result in a rolling monthly average. No

complex analytical techniques will be used.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.**

N/A.

**18. Explain each exception to the certification statement.**

N/A.

**B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS**

The collection does not employ statistical methods.