

**Supporting Statement
Entry Summary
1651-0022**

A. Justification:

- 1. 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 7501, *Entry Summary*, is used to identify merchandise entering the commerce of the United States, and to document the amount of duty and/or tax paid. CBP Form 7501 is submitted by the importer, or the importer's agent, for each import transaction. The data on this form is used by CBP as a record of the import transaction; to collect the proper duty, taxes, certifications and enforcement information; and to provide data to the U.S. Census Bureau for statistical purposes. CBP Form 7501 must be filed within 10 working days from the time of entry of merchandise into the United States. Collection of the data on this form is authorized by 19 U.S.C. 1484 and provided for by 19 CFR 142.11 and CFR 141.61. CBP Form 7501 and accompanying instructions can be found at <https://www.cbp.gov/newsroom/publications/forms?title=7501&=Apply>

- 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 on CBP Form 7501 is vital to CBP in carrying out the regulatory requirements associated with import transaction documentation. CBP Form 7501 "Entry Summary" documents relevant information (e.g. appraisalment, classification, origin, etc.) regarding the imported commodity.

Most entry summaries are filed electronically and payments for duties are made using the Automated Clearinghouse (ACH). However, if a supplemental payment is necessary after the initial ACH payment, this may be in the form of a check or cash. CBP Form 7501A Document/Payment Transmittal is used to reconcile a presented payment with the associated entry so the respondent's account is properly credited.

- 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.**

Most entry summaries of 7501 data are filed electronically through the Automated Broker Interface (ABI).

CBP Form 7501A Document/Payment Transmittal is not submitted electronically because it is used to transmit information and documents to CBP that are not electronic, such as check or cash payments. The form is generally used for supplemental payments, which are usually submitted to CBP via check. However, the form is available in an electronic format on the CBP website, <https://www.cbp.gov/newsroom/publications/forms?title=7501&=Apply>

- 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 collected in any other form, and therefore is not duplicated elsewhere.

- 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, as well as any technical or legal obstacles to reducing burden.**

CBP's ability to collect data on the proper amount of duties, applicable fees, taxes and the protection of revenue could be significantly jeopardized if the CBP Form 7501 is not submitted as regulations prescribe.

- 7. Explain any special circumstances.**

This information is collected in a manner consistent with the guidelines of 5 CFR 1320.6.

- 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 a Federal Register notice published on August 7, 2020 (Volume 85, Page 47977) on which the following comment was received:

CBP has received one comment in support of the continued collection of information for CBP Form 1651-0022. The comment is accompanied with a letter of support from the Bureau of Economic Analysis, Chief Economist. The letter describes how the information collected by CBP Form 7501 (Entry Summary) is used in the agency's input-output models, along with other national accounts at the BEA. The letter also contains a detailed table on how the specific data elements from the form are used to build the agency's input-output models.

And a 30-day notice published on January 11, 2021 (86 FR 1983) on which no comment has 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.

A PIA for the Automated Commercial Environment (ACE), dated July 31, 2015, and a SORN for IIS, dated July 26, 2016 (Vol. 81, Page 48826) will be included in this ICR. There are no assurances of confidentiality provided to the respondents of this information collection.

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	Total Burden	NO. OF	RESPONSES PER	TOTAL	TIME PER
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	HOURS	RESPONDENTS	RESPONDENT	RESPONSES	RESPONSE
7501- Formal Entry (Electronic submission)	1,920,073	2,336	9,903	23,133,408	5 minutes (.083 hours)
7501- Formal Entry (Paper submission)	92,336	28	9,903	277,284	20 minutes (.333 hours)
7501- Formal Entry with Softwood Lumber Act of 2008 * (Paper only)	266,433	210	1,905	400,050	40 minutes (.666 hours)
7501- Informal Entry (Electronic submission)	403,538	1,883	2,582	4,861,906	5 minutes (.083 hours)
7501- Informal Entry (Paper submission)	12,265	19	2,582	49,058	15 minutes (0.25 hours)
7501A- Document/Payment Transmittal (Paper only)	300	20	60	1,200	15 minutes (0.25 hours)
Exclusion approval information letter	250	5,000	1	5,000	3 minutes (0.05 hours)
TOTAL	2,695,195			28,727,906	

Public Cost

The estimated cost to the respondents is \$84,278,748. This is based on the estimated burden hours (2,695,195) multiplied by (x) the average loaded hourly wage rate for importers (\$31.27). CBP calculated this loaded wage rate by first multiplying the Bureau of Labor Statistics' (BLS) 2020 median hourly wage rate for Cargo and Freight Agents (\$21.03), which CBP assumes best represents the wage for importers, by the ratio of BLS' average 2020 total compensation to wages and salaries for Office and Administrative Support occupations (1.4762), the assumed occupational group for importers, to account for non-salary employee benefits.^{1,2} CBP then adjusted this

¹ Source: U.S. Bureau of Labor Statistics. Occupational Employment Statistics, "May 2016 National Occupational Employment and Wage Estimates, United States- Median Hourly Wage by Occupation Code." Updated March 31, 2017. Available at http://www.bls.gov/oes/2016/may/oes_nat.htm. Accessed June 20, 2017.

² The total compensation to wages and salaries ratio is equal to the calculated average of the 2016 quarterly estimates (shown under Mar., June, Sep., Dec.) of the total compensation cost per hour worked for Office and Administrative Support occupations (\$25.3575) divided by the calculated average of the 2016 quarterly estimates (shown under Mar., June, Sep., Dec.) of wages and salaries cost per hour worked for the same occupation category (\$17.1775). Source of total compensation to wages and salaries ratio data: U.S. Bureau of Labor Statistics. Employer Costs for Employee

figure, which was in 2017 U.S. dollars, to 2020 U.S. dollars by applying a 1.0 percent annual growth rate to the figure, as recommended by the U.S. Department of Transportation's value of travel time guidance.³

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.

There are no recordkeeping, capitalization start-up or maintenance costs associated with this 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 records is \$352,893,597. This is based on the number of responses that must be reviewed (28,727,906) multiplied by (x) the time burden to review and process each response (.166 hours) = 4,768,832 hours multiplied by (x) the average hourly loaded rate for a CBP Trade and Revenue employee (\$74.00)⁴ = \$352,893,597.

This number has increased, however, in ROCIS the federal government cost section is blocked from change during a non-substantive change request. Please note the increased number shown above

15. Explain the reasons for any program changes or adjustments reported in Items 12 or 13 of this Statement.

There is an increase in the burden hours due to the addition of the Exclusion approval information letter.

16. For collection of information whose results will be published, outline plans for tabulation, and publication.

Compensation. Employer Costs for Employee Compensation Historical Listing March 2004 – March 2017, “Table 3. Civilian workers, by occupational group: employer costs per hours worked for employee compensation and costs as a percentage of total compensation, 2004-2017 by respondent type.” June 20, 2017. Available at <http://www.bls.gov/ncs/ect/sp/ececqrtn.pdf>. Accessed June 20, 2017.

3 Source: U.S. Department of Transportation, Office of Transportation Policy. *The Value of Travel Time Savings: Departmental Guidance for Conducting Economic Evaluations Revision 2 (2015 Update)*, “Table 4 (Revision 2-corrected): Recommended Hourly Values of Travel Time Savings.” April 29, 2015. <http://www.transportation.gov/sites/dot.gov/files/docs/Revised%20Departmental%20Guidance%20on%20Valuation%20of%20Travel%20Time%20in%20Economic%20Analysis.pdf>. Accessed June 20, 2017.

4 CBP bases this wage on the FY 2017 salary and benefits of the national average of CBP Trade and Revenue positions, which is equal to a GS-13, Step 3. Source: Email correspondence with CBP's Office of Finance on June 14, 2017.

This information collection will not be published for statistical purposes.

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

CBP does not seek approval to not display the expiration date.

- 18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions”.**

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.