

**SUPPORTING STATEMENT**  
**U.S. Department of Commerce**  
**International Trade Administration**  
**Domestic and International Client Export Services and Customized Forms Renewal**  
**OMB Control No. 0625-0143**

**Abstract**

The International Trade Administration's (ITA) U.S. Commercial Service (CS) is mandated by Congress to broaden and deepen the U.S. exporter base. ITA accomplishes this by providing counseling, programs and services to help U.S. organizations export and conduct business in overseas markets. This information collection package enables the CS to provide appropriate export services to U.S. exporters and international buyers.

ITA offers a variety of services to enable clients to begin exporting/importing or to expand existing exporting/importing efforts. Before ITA can provide export-related services to clients, such as assistance with identifying potential partners or providing due diligence, specific information is required to determine the client's business objectives and needs. This information collection is designed to elicit such data so that appropriate services can be proposed and conducted to most effectively meet the client's exporting goals. Without these forms the ITA is unable to provide services when requested by clients.

As a result, ITA requests approval to renew this information collection and the set of questions used to generate the customized forms have been approved under the aforementioned information collections.

**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.**

The International Trade Administration's (ITA) U.S. Commercial Service (CS) is mandated by Congress to broaden and deepen the U.S. exporter base. The CS accomplishes this by providing counseling, programs and services to help U.S. organizations export and conduct business in overseas markets. This information collection package enables the CS to provide appropriate export services to U.S. exporters and international buyers.

The Commercial Service (CS) offers a variety of services to enable clients to begin exporting/importing or to expand existing exporting/importing efforts. Clients may learn about our services from business related entities such as the National Association of Manufacturers, Federal Express, State Economic Development offices, the internet or word of mouth. The CS provides a standard set of services to assist clients with identifying potential overseas partners, establishing meeting programs with appropriate overseas business contacts and providing due diligence reports on potential overseas business partners. The CS also provides other export-related services considered to be of a "customized nature" because they do not fit into the standard set of CS export

services, but are driven by unique business needs of individual clients.

The dissemination of international market information and potential business opportunities for U.S. exporters are critical components of the Commercial Service's export assistance programs and services. U.S. companies conveniently access and indicate their interest in these services by completing the appropriate forms via ITA and CS U.S. Export Assistance Center websites.

The CS works closely with clients to educate them about the exporting/importing process and to help prepare them for exporting/importing. When a client is ready to begin the exporting/ importing process our field staff provide counseling to assist in the development of an exporting strategy. We provide fee-based, export-related services designed to help a clients export/import. The type of export-related service that is proposed to a client depends upon a client's business goals and where they are in the export/import process. Some clients are at the beginning of the export process and require assistance with identifying potential distributors, whereas other clients may be ready to sign a contract with a potential distributor and require due diligence assistance.

Before the CS can provide export-related services to clients, such as assistance with identifying potential partners or providing due diligence, specific information is required to determine the client's business objectives and needs. For example, before we can provide a service to identify potential business partners we need to know whether the client would like a potential partner to have specific technical qualifications, coverage in a specific market, English or foreign language ability or warehousing requirements. This information collection is designed to elicit such data so that appropriate services can be proposed and conducted to most effectively meet the client's exporting goals. Without these forms the CS is unable to provide services when requested by clients.

The forms ask U.S. exporters standard questions about their company details, export experience, information about the products or services they wish to export and exporting goals. A few questions are tailored to a specific program type and will vary slightly with each program. (More details about specific forms and uses are provided in Question 2.) CS staff use this information to gain an understanding of client's needs and objectives so that they can provide appropriate and effective export assistance tailored to an exporter's particular requirements.

As a result, the CS requests approval to renew this information collection and the set of questions used to generate the customized forms have been approved under the aforementioned information collections.

**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.**

CS Trade Specialists in domestic Export Assistance Centers and Commercial Specialists at overseas Posts use the information to customize forms relative to the services required by each client. These forms are used whenever a client requests a CS service. The information provides the specialists with the client's background data, special requests and service requirements.

The forms are used internally and are not disseminated to the public.

Additionally, U.S. companies that are interested in obtaining export assistance or participating in a CS export-related program will provide the CS with information about:

- The export-related programs and services that they wish to participate in
- Company background such as product/service to be exported, industry, company size (fees, where applicable, are determined according to company size in accordance with OMB cost recovery requirements) export experience, company contact information, client name and contact information
- Exporting goals and objectives such as markets of interest, industries, potential end-users
- Commercial Service relationships such as the U.S. Export Assistance Center(s) previously contacted and CS staff with whom the client may have previously worked

The collected information will be used by CS staff in counseling and assisting domestic and international clients, and in fulfilling U.S. firms' requests for export assistance services and programs.

The collection is voluntary and the frequency will be on-going and will depend upon the demand U.S. companies have for CS services and programs. These forms are used by firms to indicate their interest in participating in a service or program; therefore, if a firm is not interested in obtaining a CS service or participating in an export/import-related program, there is no need for the firm to complete a form. Companies access these forms via ITA and CS websites and they may submit them via the Internet.

**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 CS is focused on registering its clients through export.gov and designed to capture basic client contact information. Moreover, as the client expands its exporting/importing needs, additional information will be collected and stored in a database in order to reduce client burden. With the new website the functionality for pre-populating forms becomes available and with the approval of this information collection, CS will be able to begin the process design and ability to pre-populate forms once a client has registered on export.gov. The export.gov project was delayed but has made tremendous progress and plans to release the new website in January 2013.

However, this feature is also contingent on funding. The client will now only have to answer the relevant questions at hand with the ability to update as needed. By capturing the client information and storing it in export.gov, the CS will be able to access pre-populated client information without having them to re-enter it. This will reduce both the client's and CS's burden, and allow for more customized and efficient services.

**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 Question 2**

There is no duplication of information within the DOC or another government entity. The information collected represents unique client information that is required by the CS to efficiently and effectively provide services to U.S. exporters and international buyers so to document the effectiveness of our services in creating export successes.

The CS maintains a central customer relationship management (CRM) system (Salesforce) that is accessible to domestic and internationally-based CS staff. Client information is stored in the CTS and CS staff can check to see whether we have the necessary information about a client's exporting needs and goals thereby eliminating duplication of information and ensuring that we do not ask clients to provide information that we already have.

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

This information collection involves small businesses. The CS will consolidate existing currently approved questions to create an all-inclusive and flexible package to ensure that clients only provide the information needed and reduce client burden by utilizing pre-populated data. With increased forms creation flexibility and the ability to immediately ascertain key information, CS can effectively aid U.S. organizations to achieve their exporting/importing and expansion goals. The minimal information will be collected to provide the best export/import services no matter the size of the organization.

Moreover, the majority of these forms have been in use by the Commercial Service for five years and during this time we have not received any negative feedback from either clients or client-facing staff regarding the use of these forms.

**6. Describe the consequence 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.**

If the collection is not conducted or is conducted less frequently, the quality of service that CS provide to private sector clients may drastically decrease and we may be hindered in meeting our customer's specific needs and requirements. Also, CS is moving away from products to solutions and this shift in service delivery requires very specific and detailed information. This detailed client information allows CS to deliver more effective and efficient services based on client specific requirements.

Also, if approval is not granted for use of these documents, the CS ability to conduct its congressional mandate of broadening and deepening the export base may not be met.

These documents enable clients to request and obtain export-related services. Also, provide the CS with details about clients' products/services to enable the CS to provide clients with the assistance they require to successfully export their goods/services to international buyers.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

This collection will be conducted in a manner consistent with OMB guidelines.

**8. If applicable, provide a copy and identify the date and page number of publications 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.**

A Federal Register Notice soliciting public comment was published on July 6, 2021, (Vol. 86, page 35475), and no comments were received.

CS staff consults with respondents and clients to determine areas where improvements to the application, form, questionnaire, or survey and its process can be made. CS also provides opportunities in its applications, forms, questionnaires, and surveys for respondents to provide their feedback on how to improve the application, form, questionnaire, or survey.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

Not applicable. Respondents will not receive payments or gifts.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.**

All responses to this collection of information will be provided confidentiality to the extent allowed by law. This assurance will be printed at the bottom of each form.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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**

No questions of a sensitive nature are asked.

**12. Provide estimates of the hour burden of the collection of information.**

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under 'Annual Cost to Federal Government'.**

It is estimated that 50,000 domestic and 50,000 international clients will request services at least

twice (100,000+100,000) for a total of **200,000** responses. The average time to complete a request is 5 for Contact information to 5 minutes for Organization and Events/Activities information (10 minutes is used for this request). The total burden hours will be 33,333.

### Estimated Respondent Burden Hours

Information Collection Instrument (i.e., Type of Response)	Type of Respondent / Occupational Title	Number of Respondents (a)	Number of Responses Per Respondent (b)	Total Number of Responses (c) = (a) x (b)	Burden Hours Per Response (d)	Total Burden Hours (e) = (c) x (d)
Combined Customer Survey Questions	Business or other for-profit organizations; Not-for-profit institutions;	100,000	2	100,000	.167	33,333
<b>Total</b>						<b>33,333</b>

**13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).**

- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should consider costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

Based on the following customer makeup of CS's client population shown below, and median salary data taken from glassdoor.com, CS estimates that the total annual to our respondents will be \$1,006,323 (estimated total burden time is 33,333 hours).

Respondent Occupation	% of Client Pop.	Median Salary	Hourly Rate	Weighted Avg. Rate
Executive	27%	\$102,690.00	\$49.37	\$13.55
International Business Development	25%	\$52,649.00	\$25.31	\$6.43
Sales	20%	\$24,809.00	\$11.93	\$2.39
Customer Service	9%	\$31,493.00	\$15.14	\$1.33
Government Relations	7%	\$79,168.00	\$38.06	\$2.60
Export Logistics	6%	\$50,612.00	\$24.33	\$1.43
Policy Director	3%	\$78,029.00	\$37.51	\$1.16
External Consultant/Legal Representative	1%	\$78,120.00	\$37.56	\$0.52
In-house Legal Counsel	1%	\$143,307.00	\$68.90	\$0.78
Other	8%	\$59,039.00	\$28.38	\$2.21
Weighted Avg. Hourly Rate				\$30.19
			x 33,333 hours	\$1,006,323.27

**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.**

**Agencies may also aggregate cost estimates from Question 12, 13, and 14 in a single table.**

- It will take CS staff approximately 5 minutes to review each response and the total burden hours to review 200,000 responses will total 16,667 hours. 16,667 hours X \$25/hour staff time = \$416,667

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

None.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

Not applicable.

**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.**

Not applicable.

**18. Explain each exception to the certification statement identified in "Certification for Paperwork Reduction Act Submissions."**

Not applicable.

**B. Collections of Information Employing Statistical Methods**

This collection of information does not employ statistical methodologies.

**LEGAL AUTHORITY: PUBLIC LAW 15 U.S.C. et seq and 15 U.S.C. 171 et seq.**