

**SUPPORTING STATEMENT  
INSULAR POSSESSION CERTIFICATE OF ORIGIN  
1651-0016**

- 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 3229, Insular Possession Certificate of Origin, is used by shippers and importers to declare that goods being imported into the United States are produced or manufactured in a U.S. insular possession from materials grown, produced or manufactured in such possession. This form includes a list of the foreign materials in the goods, including their description and value. CBP Form 3229 is used as documentation for goods entitled to enter the U.S. free of duty. This form is authorized by General Note 3(a)(iv) of the Harmonized Tariff Schedule of the United States (19 U.S.C. 1202) and is provided for by 19 CFR Part 7.3. CBP Form 3229 is accessible at <https://www.cbp.gov/newsroom/publications/forms?title=3229&=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.**

CBP Form 3229 helps CBP determine whether or not imported merchandise is exempt from duty under the applicable statutory provisions.

- 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.**

This information is automated through 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.**

The information collection is unique and 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 collection of information does not have a significant impact on small businesses or other entities.

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

If this information were not collected, CBP would have no means of verifying the claim for duty free treatment under the applicable statutory provisions.

**7. Explain any special circumstances.**

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(c)(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.**

Public comments were solicited through two Federal Register notices including a 60-day notice published on November 30, 2021 (Volume 86, Page 67962) on which no comments were received, and a 30-day notice published on February 15, 2022 (Volume 87, Page 8595) 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 declaration.

**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 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**

There are no questions of a personal or sensitive nature on this declaration.

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

Collection	Total Annual Burden Hours	No. Of Respondents	No. of Responses Per Respondent	Total Responses	Time Per Response
CBP Form 3229	753	113	20	2,260	20 minutes

### Public Cost

The estimated cost to the respondents is \$23,622. This is based on the estimated burden hours (753) multiplied by the average loaded hourly wage rate for importers (\$31.37). 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 (\$21.04), 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 (1.4912), the assumed occupational group for importers, to account for non-salary employee benefits.<sup>1</sup> This figure is in 2020 U.S. dollars and CBP assumes an annual growth rate of 0 percent; the 2020 U.S. dollar value is equal to the 2021 U.S. dollar value.

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

There are no capital or start-up costs associated with this information collection.

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

The estimated annual cost to the Federal Government associated with the review of these records is \$27,484. This is based on the number of responses that must be reviewed (2,260) multiplied by the time burden to review and process each response (0.166 hours) = 375 hours multiplied by the average hourly loaded rate for a CBP Trade and Revenue employee (\$73.29)<sup>2</sup> = \$27,484.

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

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1 Source of median wage rate: U.S. Bureau of Labor Statistics. Occupational Employment Statistics, "May 2020 National Occupational Employment and Wage Estimates United States." Updated March 31, 2021. Available at [https://www.bls.gov/oes/2020/may/oes\\_nat.htm](https://www.bls.gov/oes/2020/may/oes_nat.htm). Accessed June 1, 2021. The total compensation to wages and salaries ratio is equal to the calculated average of the 2020 quarterly estimates (shown under Mar., June, Sep., Dec.) of the total compensation cost per hour worked for Office and Administrative Support occupations (\$28.8875) divided by the calculated average of the 2020 quarterly estimates (shown under Mar., June, Sep., Dec.) of wages and salaries cost per hour worked for the same occupation category (\$19.3725). 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 2020, "Table 3. Civilian workers, by occupational group: employer costs per hours worked for employee compensation and costs as a percentage of total compensation, 2004-2020." March 2021. Available at <https://www.bls.gov/web/ecec/ececrtrn.pdf>. Accessed June 1, 2021.

2 CBP bases this wage on the FY 2021 salary and benefits of the national average of CBP Trade and Revenue positions, which is equal to a GS-12, Step 1. Source: Email correspondence with CBP's Office of Finance on September 7, 2021.

**Items 13 or 14 of this Statement.**

There has been no increase or decrease in the estimated annual burden hours previously reported for this information collection. There is no change to the information collected. A minor correction in calculations caused a slight increase in total annual burden on ROCIS.

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

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

- 18. Explain each exception to the certification statement identified in Item**

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.