

**Supporting Statement
Certificate of Registration
1651-0010**

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.**

Travelers who do not have proof of prior possession in the United States of foreign made articles and who do not want to be assessed duty on these items can register them prior to departing on travel. In order to register these articles, the traveler completes CBP Form 4457, *Certificate of Registration for Personal Effects Taken Abroad*, and presents it at the port at the time of export. This form must be signed in the presence of a CBP official after verification of the description of the articles is completed. CBP Form 4457 is accessible at:

<http://www.cbp.gov/newsroom/publications/forms?title=4457&=Apply>

CBP Form 4455, *Certificate of Registration*, is used primarily for the registration, examination, and supervised lading of commercial shipments of articles exported for repair, alteration, or processing, which will subsequently be returned to the United States either duty free or at a reduced duty rate. CBP Form 4455 is accessible at:

<http://www.cbp.gov/newsroom/publications/forms?title=4455&=Apply>

CBP Forms 4457 and 4455 are used to provide a convenient means of showing proof of prior possession of a foreign made item taken on a trip abroad and later returned to the United States. This registration is restricted to articles with serial numbers or unique markings. These forms are provided for by 19 CFR 148.1.

- 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 uses this information to determine whether the article is dutiable.

- 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.**

Passengers must show this form to a CBP officer at the port so they can bring their possessions (such as cameras) into the U.S. free of duty. It would not, therefore, be useful to submit this information electronically. Passengers may also need to present this form to foreign officials when entering a country abroad.

- 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.**

There is no duplication of information.

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

The collection of information does not affect small businesses or 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.**

There is no consequence to the federal program, however, the result would be a collection of duties on articles that could have been entered in the U.S. free of duty.

- 7. Explain any special circumstances.**

This collection is not inconsistent with the guidelines of 5 CFR 1320.6

- 8. Provide a copy and identify the date and page number 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.**

Public comments were solicited through a Federal Register on March 23, 2020 (87 FR 16219) on which 4 comments were received, and on August 22, 2022 (87 FR 51438) on which no comments have been received.

CBP received 4 public comments during the 60-day period, one comment received from Senator Murkowski, one comment from the Safari Club International (SCI), one comment from the World Forum on Shooting Activities (WFSA), and one comment received from the National Rifle Association (NRA ILA).

Summary of Comments Submitted:

Each comment received is in regard to the expiration date displayed on the CBP Form 4457, and the difficulties respondents have when importing a weapon into a foreign country. There are also requests from respondents to extend the expiration date longer than 3 years. Also, comment expressed confusion with foreign governments regarding OMB control number.

CBP Response:

Firearm importation into another country is outside the scope of this form. This form is intended to provide proof that the firearm has been temporarily exported for

personal use and is being returned in the same condition. We use that to allow for duty free and license free importation upon arrival in the US. Requirements for foreign importation are the responsibility of the exporter. The OMB control number is not the expiration date for the form, and we have conveyed that to foreign governments.

To alleviate the negative impacts to entry that respondents are experiencing, when entering a foreign country. CBP is requesting that OMB/OIRA allow the removal of the expiration date from the form. Until CBP receives approval, CBP will update the PRA statement located on the bottom of CBP Form 4557, to relay to readers that the form is under review, pending a new expiration date, but still valid for us. There will also be a disclaimer on the CBP.GOV Forms website, affirming the form is still valid for use.

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

There is no payment or gift to respondents.

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 ACE, dated July 31, 2015, and a SORN for Import Information System, dated July 26, 2016 (Vol. 81, Page 48826), will be included in this ICR.

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.

INFORMATION COLLECTION	TOTAL ANNUAL BURDEN HOURS	NO. OF RESPONDENTS	NO. OF RESPONSES PER RESPONDENT	TOTAL RESPONSES	TIME PER RESPONSE
Certificate of					10 minutes

Registration (Form 4455) Paper Form	9,960	60,000	1	60,000	(.166 hours)
Certificate of Registration Personal Effects (Form 4457) Paper Form	7,000	140,000	1	140,000	3 minutes (.05 hours)
TOTAL	16,960	200,000		200,000	

Public Cost

The estimated cost to the respondents is \$590,378. This is based on the estimated burden hours (16,960) multiplied by the average loaded hourly wage rate for importers (\$34.81). CBP calculated this loaded wage rate by first multiplying the Bureau of Labor Statistics' (BLS) 2021 median hourly wage rate for Cargo and Freight Agents (\$22.55), which CBP assumes best represents the wage for importers, by the ratio of BLS' average 2021 total compensation to wages and salaries for Office and Administrative Support occupations (1.4819), the assumed occupational group for brokers, to account for non-salary employee benefits.¹ CBP assumes an annual growth rate of 4.15% based on the prior year's change in the implicit price deflator, published by the Bureau of Economic Analysis.

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

There were no record keeping, capital, 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 \$3,396,000. This is based on the number of responses that must

¹ Source of median wage rate: U.S. Bureau of Labor Statistics. Occupational Employment Statistics, "May 2021 National Occupational Employment and Wage Estimates United States." Updated March 31, 2022. Available at https://www.bls.gov/oes/current/oes_nat.htm. Accessed May 25, 2022. The total compensation to wages and salaries ratio is equal to the calculated average of the 2021 quarterly estimates (shown under Q01, Q02, Q03, Q04) of the total compensation cost per hour worked for Office and Administrative Support occupations (\$29.6125) divided by the calculated average of the 2021 quarterly estimates (shown under Q01, Q02, Q03, Q04) of wages and salaries cost per hour worked for the same occupation category (\$19.9825). Source of total compensation to wages and salaries ratio data: U.S. Bureau of Labor Statistics. Employer Costs for Employee Compensation. "ECEC Civilian Workers - 2004 to Present." March 2022. Available at <https://www.bls.gov/web/ecec.supptoc.htm>. Accessed May 25, 2022.

be reviewed (200,000) multiplied by the time burden to review and process each response (0.25 hours) = 50,000 hours multiplied by the average hourly loaded rate for a CBP Officer ($\$67.92$)² = \$3,396,000.

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

There has been no increase or decrease in the estimated annual burden hours previously reported for this information collection. There are no changes to the information collected.

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

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.

Public comments were solicited through a Federal Register on March 23, 2022 (87 FR 16219) on which 4 comments were received. The comments were submitted by organizations that represent multiple individuals that utilize the CBP form 4457. A summary of the comments is that the expiration date displayed on the form causes difficulties when entering the foreign country. Outbound Enforcement & Policy (OEP), Cargo and Conveyance Security (CCS) has addressed this issue on many occasions by these same groups that submitted public comment to the Federal Register. I believe the issue lay in that an individual exporting a personal owned weapon to a foreign country is not required to submit Electronic Export Information (EEI). The foreign country believes the CBP form 4457 as an export document when its intended use is upon return to the United States. It is for this purpose that we request the expiration date not be annotated on the CF 4457.

18. Explain each exception to the certification statement.

CBP does not request an exception to the certification of this information collection.

² CBP bases this wage on the FY 2022 salary and benefits of the national average of CBP Officer Positions, which is equal to a GS-11, Step 10. Source: Email correspondence with CBP's Office of Finance on June 27, 2022.