

1 Supporting Statement A for Paperwork Reduction Act Submission

Commercial Use Authorizations OMB Control Number 1024-0268

Terms of Clearance: None.

Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

Conducting commercial operations in a unit of the National Park System without a contract, permit, Commercial Use Authorization (CUA), or some other written agreement is prohibited. Section 418 in Public Law 105-391 (54 U.S.C. 101925) gives the Secretary of the Interior the authority to authorize a private person, corporation, or other entity to provide services to visitors in units of the National Park System through a CUA. Such authorizations are not considered concession contracts. We (National Park Service, NPS) authorize commercial operations that originate and operate entirely within a park (in-park); commercial operations that provide services originating and terminating outside of the park boundaries; noncommercial organized children's camps, outdoor clubs, and nonprofit institutions; and other uses as the Secretary determines appropriate. The commercial operations include a range of services, such as mountain climbing guides, boat repair services, transportation services and tours, canoe livery operations, hunting guides, retail sales at festivals, fun runs, catering services, and dozens of other visitor services.

Section 418 limits CUAs to:

- Commercial operations with annual gross receipts of not more than \$25,000 resulting from services originating and provided solely within a unit of the National Park System
- Incidental use of resources of the unit by commercial operations which provide services originating and terminating outside of the boundaries of the unit
- Uses by organized children's camps, outdoor clubs, and nonprofit institutions (including backcountry use) and other uses as the Secretary determines appropriate

Nonprofit institutions are not required to obtain CUAs unless taxable income is derived by the institution from authorized use.

The legislative mandate of the NPS, found at 54 U.S.C. 100101(a), is to preserve America's natural wonders unimpaired for future generations, while also making them available for the enjoyment of visitors. Meeting this mandate requires the NPS to balance preservation with use. Maintaining a good balance requires both information and limits. The information requested will allow the unit manager to evaluate requests for a commercial use to determine impact on the resources and the appropriateness of the activity.

Regulations resulting in information collection required for a CUA include:

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- 36 CFR 1.6—Permits
 - 36 CFR 2—Resource Protection, Public Use and Recreation
 - 36 CFR 5—Commercial and Private Operations
 - 36 CFR 7—Special Regulations
 - 36 CFR 13—National Park System Units in Alaska

2. Indicate how, by whom, how frequently, and for what purpose the information is to be used.

We use the currently approved forms to collect information: 10-550 *Commercial Use Authorization Application*, 10-660 *Commercial Use Authorization Annual Report*, and 10-660A *Commercial Use Authorization Monthly Report*. We use the information from these forms to:

- Manage the program and operations.
- Determine the qualifications and abilities of the commercial operators to provide a high-quality, safe, and enjoyable experience for park visitors.
- Determine the impact on the park's natural and cultural resources.
- Manage the use and impact of multiple operators.
- Calculate CUA management fees.

When deemed necessary, the following forms may be customized on a park-by-park basis to include park-specific information (e.g., park name, address, point of contact name and telephone number; park-specific approved services and conditions, fee schedule/payment information, etc.).

Form 10-550 Commercial Use Authorization Application

This form is available on park websites and hard copy format. Forms may be submitted during an appropriate window of time before an event. Commercial Use Authorizations are typically issued for one (1) year however, two (2) years is the maximum allowed by law. Authorizations are not renewable, and new applications are required to continue beyond the current authorized term. This form collects the following information:

- Type of service applicant will offer
- Business Name
- Primary Contact Information (In Season) – mailing address, telephone numbers, email and website
- Contact Information (Off season) – mailing address, telephone numbers, email and website
- Type of Business (corporation, partnership, LLC, sole proprietorship, non-profit, other)
- State Business License (number, expiry) if applicable
- Employer Identification number
- Proof of required liability insurance
- Owned/leased/hired vehicles/vessels/aircraft used to conduct business
- NPS employment if applicable
- Violations of any State, Federal, or local laws or regulations committed by the company, its officers, or its employees.

Some parks have minimum requirements for businesses offering services relating to the safety and welfare of visitors and protection of resources. These requirements may include documentation of first aid training, an emergency response plan, limits to group size, etc. Park-specific requirements are identified during the application process and documentation of the minimum requirements may be required of the applicant.

This form is changing because there is a need to clarify requested information. Updates for each form are listed in the tables below.

Old Question	New Question	Reason For Change
<p>9. Liability Insurance: Provide proof of liability insurance. The CUA operator must maintain General Liability insurance naming the United States of America as additional insured. Minimum coverage amount is \$500,000 per occurrence. Some activities will require increased coverage or other types of liability insurance; see Park-Specific CUA Insurance Requirements (“Attachment A”).</p>	<p>9. Liability Insurance: Provide proof of liability insurance. We recommend obtaining an Acord form from your insurance provider. The CUA operator must maintain General Liability insurance naming the United States of America as additional insured. Minimum coverage amount is \$500,000 per occurrence. Some activities will require increased coverage or other types of liability insurance; see Park-Specific CUA Insurance Requirements (“Attachment A”).</p>	<p>Amended because most operators do provide an Acord form and the form is much easier for CUA coordinators to read to ensure adequate insurance coverage than other proof of insurance forms. The Acord form is the industry standard.</p>

Form 10-550s, Commercial Use Authorization Application – Short Term

The NPS recognizes the need to streamline the application process for one-time events, such as for vendors during farmer’s markets or operations lasting no more than seven (7) consecutive days. Short-term Authorizations are not renewable, and new applications are required to continue beyond the current authorized term.

The form collects the following information:

- Type of service the applicant will offer
- Business Name
- Primary Contact Information (In Season) – mailing address, telephone numbers, email, and website
- Type of Business (For-profit or non-profit)
- State Business License (number, expiry) if applicable
- Employer Identification Number
- Proof of required liability insurance
- Owned/leased/rented vehicles used to conduct business
- NPS employment if applicable
- Violations of any State, Federal, or local laws or regulations committed by the company, its officers, or its employees

Form 10-660A Commercial Use Authorization Monthly Report

NPS must strictly manage some CUA activities by imposing restrictions such as daily visitor limits to protect sensitive natural and cultural resources. Some parks may require the CUA Monthly Report to track CUA activities and associated visitor use. We estimate only 10% of CUA holders are required to complete the CUA Monthly Report.

To ensure maximum daily limits and seasonal average limits are not exceeded, parks use the forms to check the average and actual use of each commercial operator throughout the season. Monitoring this information ensures that commercial operators do not exceed the authorized use before the end of the season creating a gap when prospective visitors cannot be accommodated. It also ensures that commercial operators do not receive unsatisfactory ratings or suspension of their authorizations due to exceeding use limits. The information collected in the CUA Monthly Reports can be included in the Annual Report. Form 10-660A collects the following information:

- Contact information and services provided
- Report of Monthly Visitor Service for all CUA activities
- Reportable Injuries

Old Question	New Question	Reason For Change
2. Fax	Removing this question from the form	No longer accepting forms via Fax.

Form 10-660 Commercial Use Authorization Annual Report and Instructions

The NPS requires submission of the CUA Annual Report every year. If monthly reports are required, the CUA holder compiles the information collected in the CUA Monthly Report and provides additional annual financial information. Form 10-660 collects the following information:

- Contact information and services provided.
- Report of annual visitor service for all CUA activities.
- Annual gross revenues derived from all CUA activities.
- Reportable injuries.

This information allows the park to manage the impacts of commercial use on natural and cultural resources and the visiting public. Knowing the level of use allows park managers to measure and control the impacts of excessive use (e.g., trail maintenance, landscape maintenance, parking limitations, trash collection, utility use, or degradation of visitor experience, etc.). The financial information allows the park to determine that the legislatively mandated financial limits are being met for in-park operations (gross receipts not to exceed \$25,000) and allows the park to calculate CUA management fees, if applicable.

Old Question	New Question	Reason For Change
5. What percentage of the service you provide takes place in the park?	What percentage of the service(s) you provide takes place in the park or is park-dependent? The NPS defines park-dependent services as those commercial activities that are packaged and sold, marketed to include, or coincidentally include, entry into the park.	Expanded for clarification
6. Enter the total gross receipts for your operation:	Enter the total gross receipts for your operation, whether those operations occurred inside or outside the park.	Expanded for clarification
7. Enter the portion of the total gross receipts earned that result from visiting the park:	7. Enter the gross receipts you earned as a result of doing business authorized by the CUA	Reworded for clarification

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 and specifically how this collection meets GPEA requirements.

In accordance with Government Paperwork Elimination Act (GPEA), all forms are available in a fillable format on the NPS and park websites. Electronic forms are downloaded and submitted via email, postal mail, fax, or in person. Efforts to make the submission process 100% electronic via an online CUA portal will eliminate the need to print, fax, mail, or email forms. There will always be an option to request and submit hard-copy forms.

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 efforts. The information requested in the CUA application is not otherwise collected by the NPS.

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

Historically, small businesses have provided the majority of the visitor services authorized under CUAs. The CUA Application gathers key information necessary to determine the capability, resources, and fitness of the business to provide the services or activity, and information needed to protect park resources.

Small businesses are minimally impacted by completing Form 10-660 *Commercial Use Authorization Annual Report* as a course of normal business operations. The financial information required at the end of the operating year is straightforward and there are no

requirements for audited financial statements, advanced recordkeeping, or retention of records beyond what the IRS requires.

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.

To manage the CUA program, the NPS requires accurate and current data on the business applicants. Operational information is necessary to ensure that businesses provide the services, staff, equipment, insurance, certifications, and licenses to meet operational and liability requirements while providing a safe, legal, and quality service to National Park visitors. This information assists the NPS to determine if the resources in an area are being negatively impacted. Not collecting this information could negatively affect NPS resources and visitor experiences.

Form 10-550 - The CUA Application and 10-550s CUA Application – Short Term: collects information at the start of any commercial activity and/or a single event, annual permit, or biennial permit. It cannot be collected less frequently.

Form 10-660 The CUA Annual Report: collects three types of data: (1) visitation information, (2) financial information, and (2) reportable injury statistics. The CUA authorization is issued for a maximum term of 2 years, or many for single events or short-term activities. Collecting the information on a less frequent basis would require retaining and retrieving information for the report after 2 years which would assume additional recordkeeping requirements for the CUA holder.

Form 10-660A Commercial Use Authorization Monthly Report: collects two types of data, (1) visitation information and (2) reportable injury statistics. Parks require this information when CUA activities are limited and strictly managed to ensure maximum daily and seasonal average limits are not exceeded. These reports can be consolidated, with the addition of financial information, into the CUA Annual Report.

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

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily

- **impedes sharing of data with other agencies for compatible confidential use; or requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

Some parks may require CUA holders to submit Form 10-660A *Commercial Use Authorization Monthly Report* if additional information is needed to monitor park visitation to ensure minimal impact to park resources. There are no other special circumstances, that require us to collect this information in a manner inconsistent with OMB guidelines.

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 in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe 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.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On September 12, 2022, we published a 60-day notice in the Federal Register (87 FR 55839) requesting public comment on this information collection. The comment period ended on November 14, 2022. No comments were received. In addition to that notice, we solicited comments from nine (9) previous CUA applicants regarding the process. The following table includes the titles and organizations of the individuals providing feedback to our request.

Table 8.1. Organizations outside the agency providing feedback

Position	Affiliation
1. Director of Operations	Ace Express Coaches
2. Owner	In Our Nature Guiding Services LLC
3. Company Founder and Owner	Luxus Travel Inc, dba Utah Luxury Tours
4. Owner/Guide	Yellow Wood Guiding
5. Director	ATW-RTT LLC, dba Rein Teen Tours
6. Assistant Manager	Buck Wild Hummer Tours
7. Shareholder	Crystal River Outfitters
8. Owner	Walleye King
9. Owner	Willigan's Adventures

“Whether or not the collection of information is necessary, including whether or not the information will have practical utility; whether there are any questions they felt were unnecessary.”

Respondent #1: Ace Express Coaches (comment received 10/26/22):

I do believe that you gather the necessary information to better understand traffic needs in the parks, but I do not understand why you want information on my entire fleet of buses. I may have 5 or 6 pieces of equipment that enter your park, but I do not know which ones will actually enter the park until a week or two before the trip. Yet I send a mile-long list. Every vehicle in my fleet carries the exact same insurance, the only difference in the equipment is oftentimes the number of passengers it holds or the manufacturer.

NPS Response/Action Taken: NPS requires CUA applicants to provide information for each vehicle they plan to operate when providing the commercial service authorized by the CUA. This information allows NPS to determine if the CUA applicant has the appropriate commercial automobile insurance coverage required by federal and state law. Insurance coverage requirements vary based in part on vehicle size and carrying capacity, as well as whether the vehicle is owned, leased, or borrowed. CUA applicants are also required to provide a copy of their insurance certificate upon application submission.

Respondent #2: In Our Nature Guiding Service LLC (comment received 10/29/22): *The forms should be a fillable pdf. It would be useful to have tick boxes next to the activities being applied for instead of having to fill it in. The application question and acknowledgment of risk submissions are redundant. Once they are on file, they shouldn't have to be submitted each year unless there is a change.*

I have been struggling to understand why we have to pick apart how much of our income was earned on each activity. If there's not a functional reason, then I think that we should be submitting reports based on totals and not have to do all of the different work sheets. It takes a considerable amount of extra effort to do. If it's not particularly useful for you all, then I'd love to not do it.

NPS Response/Action Taken: Efforts are underway to make the submission process 100% electronic via an online CUA portal. This system will allow applicants to create a user profile. Information included in that user profile will prepopulate CUA applications eliminating the requirement that CUA applicants reenter application information when applying for multiple CUAs.

The financial information collected in the CUA Annual Report allows the park to determine that the legislatively mandated financial limits are being met for in-park operations (gross receipts not to exceed \$25,000) and allows the park to calculate CUA management fees for each CUA, if applicable.

Respondent #3: Luxus Travel Inc, dba Utah Luxury Tours (comment received 10/28/22): *I am applying to multiple parks and I am sharing the same, nearly the same details, it would seem to be best to apply to national parks with 1 10-550 and “Mark Off” those parks specifically the outfitter chooses to submit to.*

Vehicles breakdown, get upgraded, leased, sold, and updating the parks mid-season to VIN numbers is a very unlikely event to occur. If the vehicles are marked correctly and additional

insured is set, then let that be the standard. The real question is do you have an MCC and active DOT #, if so what are they and be sure those numbers are visible for vehicles with more than 15 seats and weigh over 10,000lbs..

Determining the portion of total gross receipts earned that result from visiting the park is not an easy calculation for our multi-day, multi-park, multi-state tours. We give it our very best effort and are confident we are being as accurate as possible. No interest in shortchanging the very parks we create/operate a successful business within. The opposite is interesting, what if we are overpaying?

NPS Response/Action Taken: Efforts are underway to make the submission process 100% electronic via an online CUA portal. This system will allow applicants to create a user profile. The information included in that user profile will prepopulate CUA applications eliminating the requirement that CUA applicants reenter application information when applying for multiple CUAs.

NPS requires CUA applicants to provide information for each vehicle they plan to operate when providing the commercial service authorized by the CUA. This information allows NPS to determine if the CUA applicant has the appropriate commercial automobile insurance coverage required by federal and state law. Insurance coverage requirements vary based in part on vehicle size and carrying capacity, as well as whether the vehicle is owned, leased, or borrowed. CUA applicants are also required to provide a copy of their insurance certificate upon application submission.

The financial information collected in the CUA Annual Report allows the park to determine that the legislatively mandated financial limits are being met for in-park operations (gross receipts not to exceed \$25,000) and allows the park to calculate CUA management fees for each CUA, if applicable.

Respondent #5 ATW-RTT LLC, dba Rein Teen Tours (comment received 10/21/22): *I believe this information is necessary. I would recommend creating a "universal" form which could apply to all the NPS. This is necessary for collection of appropriate fees.*

NPS Response/Action Taken: Efforts are underway to make the submission process 100% electronic via an online CUA portal. This system will allow applicants to create a user profile. Information included in that user profile will prepopulate CUA applications eliminating the requirement that CUA applicants reenter application information when applying for multiple CUAs.

No response or action is required for the following feedback.

Respondent #4 Yellow Wood Guiding (comment received 10/26/22): Easy and straightforward.

Respondent #6 Buck Wild Hummer Tours (comment received 10/26/22): *I feel that all the questions are necessary and have not found any that I think are unnecessary.*

Respondent #7 Crystal River Outfitters (comment received 10/26/22): *The application allows adequate opportunity for the operator to explain their proposed use and provide documentation to support the legitimacy of their business operations through the requested information. Effectively captures a snapshot of yearly business activity.*

Respondent #8 Walleye King (comment received 10/29/22) *Yes, it's necessary and everything is good.*

Respondent #9 Willigan's Adventures (comment received 10/28/22): *Yes, all information is 100% necessary and practical. No unnecessary questions.*

“What is your estimate of the amount of time it takes to complete each form in order to verify the accuracy of our estimate of the burden for this collection of information?”

Respondent	Form 10-550 Application	Form 10-660 – Annual Report	Form 10-66A – Monthly Report
1. Ace Express Coaches	.25	.75	N/A
2. In Our Nature Guiding Services LLC	1	3	N/A
3. Luxus Travel Inc, dba Utah Luxury Tours	5	4	.25
4. Yellow Wood Guiding	.25	.25	N/A
5. ATW-RTT LLC, dba Rein Teen Tours	.25	.25	N/A
6. Buck Wild Hummer Tours	2	.75	N/A
7. Crystal River Outfitters	2	1	N/A
8. Walleye King	.25	.25	N/A
9. Willigan's Adventures	4	.5	N/A
Average Hours	1.2	1.2	.25

NPS Response/Action Taken: The CUA program consulted with the respondents to determine the average time to complete the forms in this collection. The average reported time aligns with or falls below the NPS burden assessment.

“Do you have any suggestions for us on ways to enhance the quality, utility, and clarity of the information to be collected?”

Respondent #1: Ace Express Coaches (comment received 10/26/22): *It really seems like the NP service could do one CUA just check a box which parks you want access to, pay your fees and carry on. A lot less paperwork! For everyone I would think.*

NPS Response/Action Taken: Efforts are underway to make the submission process 100% electronic via an online CUA portal. This system will allow applicants to create a user profile. Information included in that user profile will prepopulate CUA applications eliminating the requirement that CUA applicants reenter application information when applying for multiple CUAs.

Respondent #2: In Our Nature Guiding Services LLC (comment received 10/29/22): *Fillable pdfs are great. Something like a fillable online document would be better, especially with e-signatures. Word documents are a pain to work with across platforms and they make large files that sometimes don't make it through the CUA email system, thus delaying receipt. Some kind of notification that documents have been received would also be helpful. I submit stuff then wait weeks and sometimes the files haven't gone through the NPS email because of file size restrictions but none of us know.*

NPS Response/Action Taken: Efforts are underway to make the submission process 100% electronic via an online CUA portal. This system will automatically provide notification to the applicant when an application has been received and is under review.

Respondent #5: ATW-RTT LLC, dba Rein Teen Tours (comment received 10/21/22): *It would*

be very helpful if a standardized form (10-550) was created that would apply to all of the National Parks.

NPS Response/Action Taken: Efforts are underway to make the submission process 100% electronic via an online CUA portal. This system will allow applicants to create a user profile. Information included in that user profile will prepopulate CUA applications eliminating the requirement that CUA applicants reenter application information when applying for multiple CUAs.

Respondent #9: Willigan's Adventures (comment received 10/28/22): *It has been easy enough to complete and straightforward to understand – except a few points where an item might not apply to our particular application. I had to call a couple of times the first time we applied with questions. IE under the insurance checklists. Not all are required to submit auto coverage (explained further down the application). Also, if use independent contractors vs employees then Workers Comp not required etc... being a checklist feels like ALL must be submitted. Maybe add "if applicable to your application"??*

NPS Response/Action Taken: Efforts are underway to make the submission process 100% electronic via an online CUA portal. This system will allow applicants to select the service type for which they are applying and questions not specific to that service type will not appear for the applicant.

No response or action is required for the following feedback.

Respondent #6: Buck Wild Hummer Tours (comment received 10/26/22): *No, I think it's all pretty clear and easy to use.*

Respondent #7: Crystal River Outfitters (comment received 10/28/22): *None. Forms are effective.*

Respondent #8: Walleye King (comment received 10/29/22): *I think the process is perfectly fine AS IS.*

"Any ideas you might suggest which would minimize the burden of the collection of information on respondents?"

Respondent #1: Ace Express Coaches (comment received 10/26/22): *It really seems like the NP service could do one CUA just check a box which parks you want access to, pay your fees and carry on. A lot less paperwork! For everyone I would think.*

NPS Response/Action Taken: Efforts are underway to make the submission process 100% electronic via an online CUA portal. This system will allow applicants to create a user profile. Information included in that user profile will prepopulate CUA applications eliminating the requirement that CUA applicants reenter application information when applying for multiple CUAs.

Respondent #2: *In Our Nature Guiding Services LLC (comment received 10/29/22): About 5 hours would be saved if annual gross earnings were lumped instead of parsed out by activity.*

NPS Response/Action Taken: The financial information collected in the CUA Annual

Report allows the park to determine that the legislatively mandated financial limits are being met for in-park operations (gross receipts not to exceed \$25,000) and allows the park to calculate CUA management fees for each CUA, if applicable.

Respondent #3: Luxus Travel Inc, dba Utah Luxury Tours (comment received 10/28/22): *Have a renewal application process, with 5 to 10 key questions and Bingo, reduce the reinvent the wheel scenario. For the past 10 year, I may have more than 400 hours of CUA applications.*

NPS Response/Action Taken: There is no preferential right of renewal for CUAs and the maximum term for CUAs is two years according to Section 418 in Public Law 105-391 (54 U.S.C. 101925) so applicants must completely reapply each time they want to be issued a new CUA. Efforts are underway, however, to make the submission process 100% electronic via an online CUA portal. This system will allow applicants to create a user profile. Information included in that user profile will prepopulate CUA applications eliminating the requirement that CUA applicants reenter application information when applying for new CUAs.

Respondent #9: ATW-RTT LLC, dba Rein Teen Tours (comment received 10/21/22): *It would be very helpful if a standardized form (10-550) was created that would apply to all of the National Parks.*

NPS Response/Action Taken: Efforts are underway to make the submission process 100% electronic via an online CUA portal. This system will allow applicants to create a user profile. Information included in that user profile will prepopulate CUA applications eliminating the requirement that CUA applicants reenter application information when applying for multiple CUAs.

No response or action is required for the following feedback.

Respondent #4: Yellow Wood Guiding (comment received 10/26/22): *Organizing my annual data is very simple and I have had my spreadsheets set up for over a decade to get that data onto the Reports. Informing CUA applicants of the info needed may be the only thing I suggest for someone new or less organized.*

Respondent #6: Buck Wild Hummer Tours (comment received 10/26/22): *I like that the forms are now able to be digitally signed, so that we don't have to print them out multiple times for review and signatures.*

Respondent #7: Crystal River Outfitters (comment received 10/28/22): *None. Any quality operator should easily have the requested documentation readily available.*

Respondent #8: Walleye King Outfitters (comment received 10/29/22) *It's not that hard. Keep it as is.*

Respondent #9: Willigan's Adventures Walleye King Outfitters (comment received 10/28/22): *Please don't try to minimize the burden!! A business shouldn't complain about providing the required information. What we are applying for needs requirements, guidelines, and restrictions. Everything that is required is logical and expected. If an applicant has their business in order, legal and legitimate it shouldn't be hard to produce the required documents or fill out a form. If they don't and they need to complain, then maybe they aren't organized enough or business savvy enough yet to be trusting them with visitor*

safety.

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

We do not provide payments or gifts to respondents.

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

We do not provide any assurance of confidentiality. The information collected is subject to the requirements of the Privacy Act and the Freedom of Information Act. We maintain information collected in accordance with Privacy Act System of Records, Commercial Use Authorization System-NPS-24 (78 FR 20944, April 8, 2013).

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.

We do not ask questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **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.**

We estimate that we will receive **16,050** annual responses totaling **23,325** annual burden hours (Table 12.1). We estimate the dollar value of the burden hours is **\$1,009,338** (rounded). We used the rates listed below in accordance with Bureau of Labor Statistics (BLS) News Release [USDL-22-1892](#), June 2022 Employer Costs for Employee Compensation— released September 20, 2022.

- Private Individuals. Table 1 lists the total compensation as **\$41.03**, including the multiplier for benefits.

Table 12.1 Total Annual Hour Burden

Activity	No. of Annual Responses	Completion Time per Response	Total Annual Hours	Rate Including Benefits	\$ Value of Annual Burden Hours
Form 10-550 - Application	5,000	2.5 hours	12,500	\$41.03	\$512,875
Form 10-550s – Application Short-Term	50	1.5 hours	75	\$41.03	\$4,103
Form 10-660 - Annual Report (incl. recordkeeping)	5,000	1.25 hour	6,250	\$41.03	\$205,150
Form 10-660A - Monthly Report (incl. recordkeeping)	6,000	45 minutes	4,500	\$41.03	\$184,635
Totals	0		0		0

13. Provide an estimate of the total annual non-hour cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- 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 take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). 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 collection 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.

We estimate the non-hour burden costs for this information collection to be **\$1,262,500** for application fees. Application fees range from \$150 to \$350 depending on the level of effort to issue, accept, review, and approve the CUA. With this, we assume an average application fee of \$250 (\$250 × 5,050 applications per year).

Table 13.1 Non-hour Cost Burden

CAU Applications	Number Received	Application Fee (average)	Non-hour burden costs
Form 10-550 (Private Sector)	5,000	\$250	\$1,250,000
Form 10-550s (Private Sector)	50	\$250	\$12,500
TOTAL	5,050	\$250	0

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.

We estimate the annual cost to the Federal government to administer this information collection is **\$1,157,260** (\$1,087,260 for salaries/benefits plus \$70,000 for other costs detailed in table 14.2).

NPS personnel in parks responsible for reviewing CUA applications reside in all 50 States. Many of the parks are not in defined locality pay areas. Therefore, we used the Office of Personnel Management Salary Table [2022-DCB](#) to determine the hourly rates and multiplied the hourly rate by 1.6 to account for benefits in accordance with News Release [USDL-22-1892](#), June 22 Employer Costs for Employee Compensation— released September 20, 2022, to estimate average hourly wages and to calculate benefits. The staff time for each activity follows:

- **Applications:** includes time for creating, posting, and mailing (when necessary) the application; answering queries; receiving and reviewing applications; data entry and filing.
- **Reports:** includes time for receiving and tracking data, reconciling monthly reports, and filing.

Table 14.1 Total annual cost to the Federal Government

Position	GS Level	Hourly Rate	Hourly Rate incl. benefits*	Annual Hours			Annual Cost**
				Applications	Reports	Total	
Budget Tech	7/5	\$23.72	\$49.97	1,263	1,263	2,526	\$126,224
CUA Coordinator/ Concessions Manager	9/5	\$29.02	\$46.43	12,625	5,500	18,125	\$841,544
Superintendent	14/5	\$59.13	\$94.61	1,263	0	1,263	\$119,492
							0

*Hourly Rate x Benefits multiplier (1.6 rounded)

** Rounded

Table 14.2 – Operational Expenses

Action	Cost
Training Expenses for 25 park coordinators /year @ \$2,500	\$62,500
Equipment and Supplies at park level (estimated 145 parks @ \$50)	7,250
Printing	\$250
	0

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

Based on our experiences with annual and monthly reports and the number of received CUA applications since the last renewal, we made adjustments to reflect the change over the last three years. Please see Table 15.1 for a breakdown of the associated program changes.

Form 10-550 CUA Application - In 2019, NPS estimated the number of CUA applicants to be 5,800. Based on the number of applications received between 2019 and 2022, NPS now assumes it will receive approximately 5,000 CUA applications annually. The net decrease of 800 responses results in a net decrease of 2,000 burden hours.

Form 10-550s CUA Application (short form) - This form was added in 2019, and NPS estimated 120 applicants with 180 burden hours. This form was not used between 2019 and 2022, but NPS plans to begin using it in 2023. NPS estimates there will be 50 applicants resulting in 75 burden hours. The net decrease of 70 responses results in a net decrease of 105 burden hours.

Form 10-660 Annual Report – Based upon the revised estimated number of received Form 10-550 and Form 10-550s, we expect to receive 5,050 reports which will cause a net decrease of 800 respondents submitting annual reports causing a net increase decrease of 1,000 hours.

Form 10-660A - Monthly Report - In 2019, NPS estimated it would receive Form 10-660A from 5,800 CUA holders 9 months out of the year, equating to 52,200 total responses and 39,150 burden hours. This was overestimated because NPS assumed all CUA holders would submit Form 10-660A. Currently, approximately 10% of CUA holders are required by NPS units to submit Form 10-660A. This means NPS estimates it will receive Form 10-660A from 505 CUA holders 9 months out of the year, equating to 4,500 total responses. The reduction of 46,200 responses resulted in a net decrease of 37,755 hours.

Table 15.1. Program Changes due to Agency estimate

Form	Previously Approved		Current Request		Program Change due to Agency Estimate	
	Number of responses	Time Burden (hours)	Number of responses	Time Burden (hours)	Number of responses	Time Burden (hours)
Form 10-550 - Application	5,800	14,500	5,000	12,500	-800	-2000
Form 10-550s – Application Short form	120	180	50	75	-70	-105

Form	Previously Approved		Current Request		Program Change due to Agency Estimate	
	Number of responses	Time Burden (hours)	Number of responses	Time Burden (hours)	Number of responses	Time Burden (hours)
Form 10-660 - Annual Report	5,800	7,520	5,000	6,250	-800	-1,000
Form 10-660A - Monthly Report	52,200	39,150	6,000	4,500	-46,200	-34,650
TOTAL	00	0	0	0	0	0

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.

The CUA holder's contact information and details of the services provided are collected in the application form and may be published on NPS unit websites to advertise the services offered. The parks, where the activity takes place, may make the information available online, typically in a spreadsheet format. The information may also be available for requests by phone or in person. NPS will not routinely release information considered confidential (e.g., financial information).

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.

We will display the OMB control number and expiration date on the forms.

18. Explain each exception to the certification statement.

There are no exceptions to the certification statement.