

SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION

Federal Fish and Wildlife Permit Applications and Reports— Migratory Birds; 50 CFR 10, 13, 20, 21 OMB Control Number 1018-0022

Terms of Clearance: We are proposing to revise the collection as described in question 2, to include merging the currently approved information collections under OMB Cont. No. 1018-0175, “Federal Fish and Wildlife Permit Applications and Reports—Special Double-Crested Cormorants; 50 CFR 21” (exp. 01/31/2024) into this collection. If OMB approves this request, we will discontinue use of OMB Control Number 1018-0175.

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

The U.S. Fish and Wildlife Service (Service) is responsible for ensuring that migratory bird populations do not become threatened or endangered. As part of this effort, we collect information to determine the eligibility of applicants in certain activities in accordance with the criteria in various Federal wildlife conservation laws and international treaties, including the Migratory Bird Treaty Act (MBTA, 16 U.S.C. 703 *et seq.*) and the Lacey Act (16 U.S.C. 3371 *et seq.*).

Regulations implementing these statutes are in Chapter I, Subchapter B of Title 50, Code of Federal Regulations, which stipulate general and specific requirements that, when met, allow us to issue permits to authorize activities that are otherwise prohibited:

50 CFR § 10 – General Provisions

50 CFR § 13 – General Permit Procedures

50 CFR § 20 – Migratory Bird Hunting

50 CFR § 21 – Migratory Bird Permits

50 CFR § 22 – Eagle Permits (requirements transferred back to 1018-0167)

Section VII of the U.S.-Canada Migratory Bird Treaty authorizes the taking of migratory birds that, under extraordinary conditions, become seriously injurious to agricultural or other interests.

Falconry – Raptors (birds of prey) are afforded Federal protection by the 1972 amendment to the Convention for the Protection of Migratory Birds and Game Animals, February 7, 1936, United States—Mexico, as amended; the Convention between the United States and Japan for the Protection of Migratory Birds in Danger of Extinction and Their Environment, September 19, 1974; and the Convention Between the United States of America and the Union of Soviet Socialist Republics (Russia) Concerning the Conservation of Migratory Birds and Their Environment, November 26, 1976.

The taking and possession of raptors are strictly prohibited, except as permitted under regulations implementing the MBTA. The regulations govern the issuance of permits for activities with migratory birds. They are in title 50, Code of Federal Regulations, parts 10, 13, 21, and 22. Raptors also may be protected by State, Tribal, and territorial regulations. Our authority also is based on the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d). The Eagle Act extends additional protections for bald eagles and golden eagles and addresses

some human activities that may affect these species. The Act specifies circumstances under which falconers may take golden eagles from the wild.

On February 9, 2005, we issued regulations governing falconry (70 FR 6978-6992). These regulations addressed changes in the practice of falconry and responded to a request from the Association of Fish and Wildlife Agencies that we consider eliminating duplicative Federal/State falconry permitting. Beginning in 2014, the Service passed the authority to issue permits for the practice of falconry to individual States (50 CFR 21.29, [78 FR 72830](#)). As part of this change in authority, we required States to maintain databases of falconers authorized to conduct falconry in their States and required falconers to report transfers of falconry birds. We require each State that maintains its own database to ensure that it is compatible with the Service's database. To date, 48 States utilize the system provided by the Service. The Service's database continues to track take of birds from the wild by falconers and to maintain records of persons permitted by the States to practice falconry, as required by 50 CFR 21.29(k)(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. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.

Applications – All Service permit applications are in the 3-200 series of forms, each tailored to a specific activity based on the regulatory requirements for specific types of permits. Sections A through D on the applications is the same for all permit types. These sections collect standard identifier information, such as the name and address, telephone and fax numbers, tax identification number, and email address for the applicant. Regulations at 50 CFR 13.12, "General information requirements on applications for permits", require submission of this information. Standardizing general information common to the application forms makes filing of applications easier for the public as well as expedites our review of applications. We use this information to establish a permit record and is unique to the applicant.

Section E of each application collects information specific to the activity the applicant wishes to conduct, as well as information concerning:

- The applicant's education and experience conducting the activity;
- The type of species and number of bird(s) are involved in the activity;
- Whether the bird(s) will be euthanized or kept in captivity; and,
- The method used if euthanization of the bird(s) is necessary.

For captive-held bird(s), we ask for information about the holding facility, including the size of the enclosures and the material used in construction of the facility.

Additional Section E questions standard to all applications determine

- The location of records required by statute;
- Who, other than the permittee, will be conducting the authorized activity; and,
- To determine that the applicant is not otherwise disqualified to receiving a permit because of past violations of wildlife statutes.

For applications for resolving conflicts with birds using lethal measure for things like damage to property, loss of income or loss of resources, applicants are required to provide additional recommendation from the US Department of Agriculture, Animal and Plant Health Inspection Service (APHIS), [Wildlife Services](#) (WS). APHIS-WS consults with the applicant and provides

information on non-lethal techniques for resolving the conflict or, where necessary, the number and species of birds that should be killed to alleviate the conflict by providing the applicant with a [Permit Review Form \(WS-37\)](#). The applicant needing to kill birds to resolve conflicts must provide this recommendation to us as part of the application.

On all applications for permits that authorize the lethal take of birds, we include a question regarding information the applicant may have regarding the effects of their proposed activity on other species. The Service is required to conduct a National Environmental Policy Act (NEPA) review of all permits and recent litigation has put a public focus on the adequacy of our review of permits under NEPA. This has resulted in the Service conducting greater review of permit applications that request the lethal take of birds. In most cases this review results in application of a Categorical Exclusion, but in cases where the permit may have effects on federally listed Threatened or Endangered species, Birds of Conservation Concern, or Eagles the review requires greater scrutiny of the permit. This question asks the applicant to voluntarily provide any such information they may possess to assist the Service in expediting this NEPA review.

The information that we collect on applications and reports is the minimum necessary for us to determine if the applicant meets/continues to meet issuance requirements for the particular activity and that any birds held in captivity are done so in a healthful and humane manner. In instances where birds will be killed we use the information collected on the application to determine that the birds do not suffer needlessly.

Monitoring and Reporting - Most permit types require the permittee to submit a report of their activities on an annual basis. These reports are used by the Service to ensure the applicant remains in compliance with the terms of their permit. Number of birds reported by activity is used to ascertain the effects of the specific permit and the permitting program on populations of birds to ensure the program is not causing a decline that could be avoided.

Submission of reports is generally on an annual basis, although some are dependent on specific events. Events that result in the death of an unusually large number of birds or Federally listed Threatened or Endangered species or eagles requires the permittee to report such events within 48 hours or as soon as practical. Service biologists use these immediate reports to provide technical assistance to minimize additional take during the existing event and to prevent these events in the future.

We continually review the application and report forms in this collection to clarify the questions asked and the information requested and to be consistent across all applications. This effort focuses on questions frequently misinterpreted or not addressed by applicants to ensure they (a) are easier to understand and complete and (b) will accommodate future electronic permitting.

At this time, the ePermits system is not capable of accepting migratory bird reporting information online, so permittees need to continue to use the pdf versions of the report form to satisfy their reporting requirements. The exact timeline of when online reporting within ePermits will be possible is uncertain at this time.

Recordkeeping – Some permittees must maintain records of the take that occurs from the permitted activity and the data gathered through surveys and monitoring. These data are used to assess the impacts of the project on the species potentially affected and the effectiveness of the permitting program.

Permit Exceptions – Notifications (50 CFR 21.12)

50 CFR 21.12 General exceptions to permit requirements, imposes recordkeeping requirements for institutions authorized to acquire by gift or purchase, possess, transport, and by gift or sale dispose of lawfully acquired migratory birds or their progeny, parts, nests, or eggs without a permit. These records are used to establish a chain of custody of birds acquired and disposed of by these exempt institutions. The associated burden for these exceptions is included in Attachment A – Burden Calculations. Zoos we contacted indicated an average of 5 hours per week to maintain the records so we used an estimated of 260 hours per year for the burden associated with this new IC (5 hours each X 52 weeks per year).

Amendments – Amendments to a permit may be requested by the permittee, or the Service may amend a permit for just cause upon a written finding of necessity. Amendments comprise changes to the permit authorization or conditions. This includes, but is not limited to, an increase or decrease in the estimated amount of take or changes in ownership of a project. The permittee must apply for amendments to the permit by submitting a description of the modified activity and the changed impacts. These are considered substantive amendments and incur a fee. A permittee is not required to obtain a new permit if there is a change in the legal individual or business name, or in the mailing address of the permittee. A permittee is required to notify the issuing office within 10 calendar days of such change. This provision does not authorize any change in location of the conduct of the permitted activity when approval of the location is a qualifying condition of the permit.

Transfers – In general, permits issued under 50 CFR part 21 are not transferable.

Falconry Program Requirements – Beginning in 2014, the Service passed the authority to issue permits for the practice of falconry to individual States (50 CFR 21.29, [78 FR 72832](#)). As part of this change in authority, we required States to maintain databases of falconers authorized to conduct falconry in their States and required falconers to report transfers of falconry birds using the paper version of FWS Form 3–186A. We require each State that maintains its own database to ensure that it is compatible with the Service's database. To date, 49 States utilize the system provided by the Service. The Service's database continues to track take of birds from the wild by falconers and to maintain records of persons permitted by the States to practice falconry, as required by 50 CFR 21.29(k)(1). The following requirements subject to OMB approval are associated with the falconry program:

Recordkeeping Requirements 50 CFR 21.29

Falconers are required to maintain basic records on falconry birds in their possession. Data from newly acquired falconry birds should be provided to state wildlife officials via paper forms or entering the information on the Federal 3-186A database on their profile within 10 days from the day on which the raptor was taken from the wild. This time requirement may vary per state requirements. Each state may do what they deem appropriate for record keeping as long as those standards are within the sideboards established for Federal Falconry regulations (50 CFR 21.29).

States must ensure their permitted falconers upload data directly into the Federal 3-186A database, or provide data to states for data transcription by state administrators into the Federal 3-186 A database. Falconers may, via their state permitting regulations maintain their profiles, add new 3-186 A forms for newly acquired birds, edit exiting 3-

186A forms for birds lost or dead, delete 3-186 A forms when appropriate, and report any intra/interstate moves and address changes.

There is no Federal requirement that forces falconers to report health/injury issues, unless those injuries are caused by federally supplied non-reusable bands, and bands must be removed. Falconers possessing un-banded birds in this situation are required to possess exemption paperwork provided by the State falconry administrators when transporting or flying the raptor. However, falconers are required to maintain their birds under humane conditions [50 CFR 21.29 9(d)], and report fatalities via paper forms or uploading the information to the Federal 3-186A database. Falconers, per federal and state requirements must carry permits or legible copies of permits in their immediate possession when trapping, transporting, working with, or flying falconry raptors.

Information related to falconry acquisitions and bird transfers are used by state/federal wildlife officials to review and evaluate take of falconry species and subsequent impact to wild raptor populations across state lines; and to evaluate compliance with state/federal falconry rules and regulations. Accurate recordkeeping for raptors acquired by falconers via the 3-186A database is a requirement in law, and is absolutely essential to the framework in place that allows for the practice of the sport. It also provides several benefits to falconers when a falconer crosses state lines with a raptor, or if a falconer moves and needs to document his/her experience in the new state for a permit there.

Banding Requirements 50 CFR 21.29 & 21.30

Falconry birds requiring bands bred in captivity must be banded with seamless metal bands and may have an ISO (International Organization for Standardization) compliant (134.2 kHz) microchip in addition to the band (see 50 CFR 21.29, 21.30). Falconry birds of the following species (Goshawk, Harris's Hawk, Peregrine Falcon, and Gyrfalcon) acquired in the wild, or acquired from another falconer or rehabilitator must be banded with a permanent, non-reusable, numbered Service leg band supplied by the State agency. Some states require other species of wild caught falconry birds should banded with agency supplied, non-reusable bands. Wild caught falconry birds may also be affixed with ISO compliant microchips in addition to the bands. Band numbers of acquired birds must be reported to state wildlife officials via paper forms or uploading the information to the Federal 3-186A database within 10 days from the day on which the raptor was taken from the wild. This time requirement may vary per state rules and regulations.

Information related to band numbers on falconry acquisitions and transfers are used by state/federal wildlife officials to review and evaluate take of falconry species and subsequent impact to wild raptor populations across state lines; and to evaluate compliance with state/federal falconry rules and regulations.

Required Notifications 50 CFR 21.29

Falconers must maintain adequate records documenting the take, transfer, loss, re-banding, or microchipping of each falconry raptor until 5 years after they have transferred the lost bird or it has died. Additionally, a falconer is required to notify his/her State 30 days in advance via email of any change in address or the location of the facilities where birds are held. Information related to banding records of falconry acquisitions, transfers, loss, re-banding, and microchipping are to be maintained by the falconer for 5 years after the falconry bird(s) have been transferred, lost, or died.

Information related to falconry records are used by state/federal wildlife officials to review and evaluate take of falconry species and subsequent impact to wild raptor populations across state lines; and to evaluate compliance with state/federal falconry rules and regulations.

If a falconer changes residence to a new State, Tribal area, or Federal Territory and take falconry birds with them, they must inform both the former state, and the permitting authority of their address change within 30 days of the move (meaning post-move). These records assist State/Federal wildlife agencies in maintaining current information to contact the falconer in a timely manner, and to evaluate compliance with state/federal falconry rules and regulations. In addition, they serve to document a falconer's experience, which determines the falconer's eligibility for advancement through the different falconry permit classes (i.e., Apprentice, General, and/or Master).

PROPOSED REVISIONS TO THIS INFORMATION COLLECTION

With this submission, we are proposing the following revisions to the existing information collection:

Revisions to Section E in Permit Applications – In 2020, the Service implemented a new automated permit application called ePermits. The ePermits system allowed the Service to move towards a streamlined permitting process to reduce the information collection burden on the public, particularly small businesses. Public burden reduction is a priority for the Service; the Assistant Secretary for Fish and Wildlife and Parks; and senior leadership at the Department of the Interior. The intent of the ePermits system is to fully automate the permitting process to improve the customer experience and to reduce time burden on respondents. This system enhances the user experience by allowing users to enter data from any device that has internet access, including personal computers, tablets, and smartphones. It also links the permit applicant to the Pay.gov system for payment of the associated permit application fee.

Users of the ePermits system register for and use an account which will then automatically populate the forms they complete with the required identification information. The system eliminates the need for applicants to enter their information multiple times when they apply for separate permits, thereby reducing burden on the applicant. The account registration process will also provide private sector users an opportunity to self-identify as a small business, which will enable the Service to more accurately report burden associated with information collection requirements placed on them.

Section E of each permit application is customized based on the permit type. At this time, the ePermits system is unable to fully automate section E of the permit application process. As a result of challenges with the development of forms within the ePermits system, we do not have a timeline for full automation of section E. However, we anticipate beginning the digitization of the report forms contained in this collection during 2023 and believe that the digitization of section E on application forms should be finalized by fiscal year 2024, as funding and resources become available.

We do not anticipate changes to the questions within section E of each application form. We also do not plan to make changes to the annual report forms contained in this collection. However, we do anticipate proposing the following changes to certain permit application forms contained in this collection, to include:

- Applicants will be able to select the type of business they manage (for-profit, small business, farm, not-for-profit, or government entity).

- Requesting businesses using ePermits to provide email addresses for both the principal officer and the business.
- The signature block will be replaced by with electronic submission of the online application.
- The ePermits system will also:
 - Allow a user to apply on behalf of another individual or business, as a new way to identify if a consultant is applying for a client.
 - Ask for the name of the authorized individual to include on the permit and allow a business to nickname their applications.
 - Ask the applicant to identify the location where the majority of the authorized activities will occur.
 - Ask the applicant to identify the physical address of the preparer of application.
 - Ask the applicant to identify if they are tax exempt.
 - Prompt the applicant to provide their preferred contact method.
 - Prompt the applicant to describe changes associated with amendments or renewals (with changes) of their permit.
 - Prompt the applicant to opt in or out of releasing their information for all applications except migratory bird rehabilitation permits (businesses are automatically opted in).
 - Prompt the applicant to provide a parent permit number, which allows the ePermits System to direct the user to the correct version of their permit for renewals or amendments to a permit.

Falconry Program – We propose to modify FWS Form 3-186A to update the field “USFWS Band Number” to say “USFWS/State/Tribe/Territory band number” and to update the field “USFWS Permit Number” to say “USFWS/State/Tribe/Territory permit number.”

Migratory Bird Permit Program Service Manual Chapters – With this submission, we will seek OMB approval of the Migratory Bird Permit Program Handbook and associated Service Manual chapters at 724 FW 1 (“Overview of Migratory Bird Permitting”) and 724 FW 2 (“Migratory Bird Permits”), all of which contain information collections. The Handbook provides detailed procedures and other operational information to implement the Service Manual chapters in part 724 (“Migratory Bird Permits”) and more generally in part 720 (“Migratory Bird Management”).

New and existing information collections contained in the Handbook requiring OMB approval include the following:

- Renewal procedures associated with the reauthorization of an existing permit (with or without changes to the conditions);
- Reinstatement procedures associated with the reauthorization of an existing permit (with or without changes to the conditions);
- Discontinuance procedures at the permittee’s request to discontinue a valid permit;
- Solicitation of appropriate documentation from entities authorized to act on behalf of State, local, Tribal, and Federal government agencies to verify their exempt status for fee exemption purposes;
- Fee waiver request process as outlined in 50 CFR 13.11(d)(3)(iii);
- Requests for reconsideration of a denial, partial denial, suspension, or revocation of a permit (requiring submission of a written request with the required information in 50 CFR 13.29(b) within 45 days after the permit decision); and
- Appeals of reconsideration request decisions (requiring the permittee submit a

written request to the Regional Director (see 50 CFR 13.29(e)) within 45 days of the reconsideration decision).

Information Collection Requirements for Double Crested Cormorants - With this submission, we are proposing to merge the currently approved information collections from OMB Cont. No. 1018-0175, "Federal Fish and Wildlife Permit Applications and Reports—Special Double-Crested Cormorants; 50 CFR 21" (exp. 01/31/2024), into this collection. We will discontinue 1018-0175 upon OMB approval of this submission. The following information collection requirements are being transferred:

FWS Form 3-200-90, Special Double-Crested Cormorant Permit Application (and amendments, as appropriate)

This new permit would be available only to State or Tribal fish and wildlife agencies responsible for migratory bird management on lands and in waters managed by those agencies within their jurisdictions. Under this permit, the Service would authorize State and Tribal fish and wildlife agencies to conduct lethal take to reduce conflicts involving depredation at State- and Tribal-owned or operated aquaculture facilities (including hatcheries); impacts to health and human safety; impacts to threatened and endangered species (as listed under the Endangered Species Act and listed species identified in State- or Tribal-specific legislation as threatened or endangered) or those listed as Species of Greatest Conservation Need in State Wildlife Action Plans; damage to State- or Tribal-owned property and assets; and depredations of wild and publicly stocked fish managed by State fish and wildlife agencies or federally recognized Tribes and accessible to the public or all Tribal members. Take activities to prevent depredation on aquatic Species of Greatest Conservation Need may occur only in natural or public waters.

Any State or Tribal fish and wildlife agency wishing to obtain a permit must submit FWS Form 3-200-90, "Federal Fish and Wildlife Permit Application Form – Special Double-Crested Cormorant," to the appropriate Regional Director, containing the general information and certification required by 50 CFR 13.12(a). All Service permit applications are in the 3-200 series of forms, each tailored to a specific activity based on the regulatory requirements for specific types of permits. Sections A through D on the applications are the same for all permit types. These sections collect standard identifier information, such as the name and address, telephone and fax numbers, tax identification number, and email address for the applicant. Regulations at 50 CFR 13.12, "General information requirements on applications for permits," require submission of this information. Standardizing general information common to the application forms makes filing of applications easier for the public as well as expedites our review of applications. We use this information to establish a permit record that is unique to the applicant. These annual permits, managed by calendar year, allow for alignment with permit processing cycles and the need to evaluate allocation at the beginning of a calendar year.

Section E of each application collects information specific to the activity the applicant wishes to conduct, as well as information concerning:

- (1) A brief description of the State's or Tribe's double-crested cormorant conflicts, including physical locations and types of conflict;
- (2) A detailed description of the nonlethal methods (i.e., active hazing, passive hazing, habitat management, and changes in management practices) that the applicant has implemented or will implement, and how these activities will address one or more of the issues;

- (3) The requested annual take of double-crested cormorants by life-stage, including eggs and nests;
- (4) A description of long-term plans to eliminate or significantly reduce continued need to take double-crested cormorants;
- (5) A statement indicating that the State or Tribe will inform and brief all employees and subpermittees of the requirements of these regulations and permit conditions;
- (6) A list of all subpermittees who may conduct activities under the Special Double-Crested Cormorant Permit, including their names, addresses, and telephone numbers; and
- (7) The name and telephone number of the individual in the applicant's agency who will oversee the double-crested cormorant management activities authorized under the permit.

FWS Form 3-202-56, Annual Report – Special Double-Crested Cormorant –

In conjunction with issuance of the Special Double-Crested Cormorant permit, we will require the permittee submit Form 3-202-56, "Annual Report – Special Double-Crested Cormorant," detailing activities, including the date, numbers, and locations and life stages of birds, eggs, and nests taken and nonlethal techniques utilized, by January 31 for activities conducted during the preceding calendar year. The Service will require an annual report by the State or Tribe prior to any permit renewal. We will collect the following information via Form 3-202-56 to ensure the applicant remains in compliance with the terms of their permit:

- (1) Permittee contact information, permit number, permit calendar year, and permit report due date;
- (2) Description of non-lethal techniques utilized;
- (3) Month and location of activity;
- (4) Purpose;
- (5) Numbers of birds killed, nests oiled, and/or nests destroyed;
- (6) Final Disposition (what they did with the birds, eggs, carcasses [e.g., buried; incinerated; euthanized and donated]); and
- (7) Take of non-target birds species, including numbers of birds.

Recordkeeping - Any State or Tribal agency, when exercising the privileges of this permit, must keep records of all activities, including those of subpermittees, carried out under the authority of the special permit.

Designation of Subpermittees - States and Tribes may designate subpermittees who must operate under the conditions of the permit. Subpermittees must be at least 18 years of age and can be employees of State and Tribal fish and wildlife agencies, U.S. Department of Agriculture–Wildlife Services employees, and employees of other Federal, State, or Tribal agencies or private companies licensed to conduct wildlife damage abatement. The permittee must provide the Service with the name of any subpermittees who will be conducting activities under their permit.

Landowner Notifications - If a State or Tribe must enter private property to access State and Tribal lands or waters where take is approved in their permit, the State or Tribe must obtain authorization from the private property owner.

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.

We encourage electronic submissions via the ePermits system. However, we offer PDF versions of the forms on our forms and permits website (<https://www.fws.gov/forms>) to be submitted by mail, or by fax. Applicants may complete the fillable application online, but must email the application to the regional office, or print and submit the application form with an electronic or original signature and submit the applicable processing fee by mail. Applicants may send supporting information by email or fax, if we already have their application and they are able to reference an application number.

Bird and Bat Injury and Mortality Reporting – We offer the option to submit injury and mortality reports (Form 3-202-17: Bird and Bat Injury and Mortality Reporting) via our online Injury and Mortality Reporting (IMR) system as an alternative to the Excel spreadsheet version of this form. Submitting this way allows a user to collect all their data in a standardized way within a centralized system and export a report easily in order to do their own analysis, or to submit to the regional permit office when their report is due. The user can also allow multiple users to view and enter data securely within the same system under the same project record, which promotes efficiency and collaboration.

Falconry Requirements – We require States to maintain databases of falconers authorized to conduct falconry in their States and required falconers to report transfers of falconry birds using the paper version of FWS Form 3-186A. We require each State that maintains its own database to ensure that it is compatible with the Service's database. To date, 48 States utilize the system provided by the Service. The Service's database continues to track take of birds from the wild by falconers and to maintain records of persons permitted by the States to practice falconry, as required by 50 CFR 21.29(k)(1).

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.

Other than the general identifying information (name, address, telephone number, email address), the information that we collect is not available from any other source. Other than the general identifying information standard for each application, collection of duplicate information is minimal.

Many permittees renew permits for ongoing activities. We retain information from their original application so they do not have to duplicate information that is unchanged for the new permit. If an existing permittee requests a new type of permit (such as a rehabilitator who applies for an education permit), applicants may reference existing permit files for information relevant to the new application. This allows the applicant to submit only the additional information necessary to meet the requirements of a new type of permit.

We utilize an electronic permit issuance and tracking system that facilitates easier retrieval of file information, further reducing duplicate information requests for use in renewals, extensions, and repeat applications. Ongoing development of our permit issuance and tracking system will ensure that no duplication arises among Service offices.

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

We collect only the minimum information necessary to establish eligibility of the applicant and to assess the effect of the permit program on populations of birds. Small businesses or other small entities are affected primarily by the nest and egg depredation order, which requires online registration and reporting in order to destroy resident Canada goose nests and eggs. Although we require that registrations be renewed each year, registrants do not need to reenter information if the information entered during the initial registration is still current.

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 we do not collect the information, or if we collect the information less frequently, we would be unable to implement many federally mandated wildlife protection programs. Further, we would be unable to issue permits to applicants since the collected information is either required on the permit or authorization itself or is needed to make the necessary biological and legal findings under applicable statutes and treaties. If we were not able to satisfy the information requirements necessary to issue a permit, the public would be unable to conduct otherwise prohibited activities, such as possession of migratory birds

States/Tribes are not allowed to participate in the light geese conservation order in a given year unless they collect information on activities conducted under the program. Without such information, we would not be able to evaluate the effectiveness of the population control program and could not fulfill our responsibilities under the Migratory Bird Treaty Act. Collections conducted less frequently than annually would not allow us to properly manage light geese populations.

Not conducting this information collection would compromise our ability to conserve resident Canada goose populations in an informed and responsible manner and could consequently jeopardize the health of resident Canada goose populations in the United States. The information is necessary to ensure that the program complies with MBTA and treaty terms. Further, because of other current and potential impacts on these goose populations (primarily special and regular hunting seasons), we believe that accurate and complete annual monitoring of take is justified.

Under the falconry regulation, the Service has delegated the permitting responsibility to the States. However, in the regulation, the Service as committed to maintaining the falconry 3-186A database, which tracks the take of raptors for falconry purposes. If the database was not approved, the Service would be out of compliance with the regulation and would be unable to fulfill our responsibility of periodic analysis of the biological impact of falconry on raptor populations.

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.**

Permit regulations (50 CFR 21.27(c)(5) and 21.30(d)(6)) require that Special Purpose Game Bird and Raptor Propagation permit holders file an FWS Form 3-186A (Migratory Bird Acquisition and Disposition Report) with the Service within 5 days of a transaction (take from the wild, buy, sell, or transfer).

Permit regulations (21.29(e)(2)) require that State-permitted falconers file an FWS Form 3-186A within 5 days of a transaction (take from the wild, buy, sell, or transfer).

Permit regulations (50 CFR 21.25(c)(5)) require that Waterfowl Sale and Disposal permit holders file an FWS Form 3-186 with the Service by the end of the month during which a waterfowl sale is conducted. The MBTA, which was enacted to protect migratory birds from market hunting, strictly regulates commerce. These are the only four permits that authorize sale and purchase. Current information regarding commercial activity under the permits is necessary to enforce the regulations.

Scientific Collecting permittees (FWS Forms 3-200-7; 3-202-1) and Special Purpose Utility permittees (FWS Forms 3-202-81; 3-202-17) who encounter a dead or injured bald eagle or golden eagle, or threatened or endangered species in the wild are required to report it to the Service's Office of Law Enforcement as soon as possible, preferably no later than 48 hours from discovery of the bird, or at the beginning of the next business day. This short timeframe better enables OLE to investigate the mortality or injury and/or direct the transfer of the carcass while it is still as fresh as possible to the National Eagle and Wildlife Property Repository for distribution to Native Americans for Indian religious purposes.

Accidental take of species federally listed as threatened or endangered must be reported within 48 hours to ensure the carcasses are protected in a way that would not preclude use as evidence in any law enforcement action.

Permit regulations (50 CFR 13.46) require that records of any taking, possession, transportation, sale, purchase, barter, export or import of wildlife pursuant to a permit be maintained for 5 years from the expiration date of the permit. The statute of limitations for enforcement is 5 years.

Permit regulations (21.29(e)(2)) require that State-permitted falconers file a report within 5 days of a transaction (take from the wild, buy, sell, or transfer). The MBTA, which was enacted to protect migratory birds from market hunting, strictly regulates commerce.

A falconer is required to notify his/her State 30 days in advance via email of any change in address or the location of the facilities where birds are held. Information related to banding records of falconry acquisitions, transfers, loss, re-banding, and microchipping are to be maintained by the falconer for 5 years after the falconry bird(s) have been transferred, lost, or died. Information related to falconry records are used by State/Federal wildlife officials to review and evaluate take of falconry species and subsequent impact to wild raptor populations across state lines; and to evaluate compliance with state/federal falconry rules and regulations.

If a falconer changes residence to a new State, Tribal area, or Federal Territory and take falconry birds with them, they must inform both the former state, and the permitting authority of their address change within 30 days of the move (meaning post-move). These records assist State/Federal wildlife agencies in maintaining current information to contact the falconer in a timely manner, and to evaluate compliance with state/federal falconry rules and regulations. In addition, they serve to document a falconer's experience, which determines the falconer's eligibility for advancement through the different falconry permit classes (i.e., Apprentice, General, and/or Master).

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 May 17, 2022, we published in the *Federal Register* ([87 FR 29872](#)) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on July 18, 2022. In a continued effort to increase public awareness of, and participation in, our public commenting processes associated with information collection requests, the Service also published the *Federal Register* notice on Regulations.gov (Docket No. [FWS-HQ-MB-2022-0056](#)) to provide the public with an additional method to submit comments (in addition to the typical Info_Coll@fws.gov email and U.S. mail submission methods). We received the following comments in response to that notice:

Comment 1: Electronic comment received May 17, 2022 via Regulations.gov (FWS-HQ-MB-2022-0056-0002) from Jean Publiee.

Agency Response to Comment 1: The commenter did not address the information collection requirements. No response is required.

Comment 2: Anonymous electronic comment received July 18, 2022 via Regulations.gov (FWS-HQ-MB-2022-0056-0003).

Agency Response to Comment 2: The commenter did not address the information collection requirements. No response is required.

Comment 3: Electronic comment received July 18, 2022 via Regulations.gov (FWS-HQ-MB-2022-0056-0004) from Laura Bies, on behalf of the Ornithological Council. The commenter explained that their organization works with many individuals that must secure MBTA permits from the U.S. Fish & Wildlife Service. Given this, ensuring that the process of applying for, renewing, and amending MBTA permits is efficient and predictable is of the utmost concern to the commenter. They commented about slow response times on permit processing and helpdesk inquiries and encouraged the agency to continue working to reduce processing times, including hiring and training additional permit staff, as needed. In addition, they urged the agency to move forward quickly with digitization of Section E in the ePermits system. They also expressed that while the official policy allows permittees to continue their work without their renewal in hand if they submit a renewal request 30 days or more before permit expiration, they would feel more confident if they have written evidence of this from the agency. Another concern of the commenter was regarding an internal USFWS guidance that resulted in regional permit offices requiring that MBTA permits for import/export list each individual shipment in detail.

Agency Response to Comment 3: These comments have been shared with the permits and ePermits teams. These teams are already currently working to address many of the commenter's concerns. Between a recent influx of funding to improve the ePermits system and a push to hire more staff, we expect that wait times for permits and responses will continue to decrease significantly over the next few years. Regarding the comment about the written evidence of the authorization to continue activities if submitting the request 30 days or more before your permit expires, we are sending that language out with the automatic renewal noticed generated by the ePermits system (sent 60 days before your permit expiration date). If the permittee wishes to print this out and keep it with their permit, along with evidence of their renewal submission date (e.g. a screenshot of the permittee's dashboard showing they submitted their renewal application on or before the 30 day window), this should be sufficient to demonstrate the permittee's authority to continue their activities legally, should that come into question.

Comments regarding the import/export permits were referred to the Service's International Affairs (IA) program for a response in the SSA for their collection, since those comments pertain to an IA permit & process. A copy of the International Affairs program response to that concern is as follows:

"We are pleased to see that the commenter is in support of our ePermits system with the acknowledgement that we continue to build and improve the system. We continue to work to improve our responsiveness to our customers' questions. For WBCA permits, the Service's position is that this exemption is only allowed for those specimens that are accessioned into a museum or scientific institution's collection. Specimens that are subject to collection under a researcher's activities and are not accessioned into an institution's collection would not be eligible for this exemption and the researcher should apply for the necessary import permits.

For CITES permit endorsements, Resolution Conf. 12.3 (Rev CoP18) provides that “export permits and re-export certificates be endorsed, with quantity, signature, and stamp, by an inspecting official, such as Customs, in the export endorsement block of the document. If the export document has not been endorsed at the time of export, the Management Authority of the importing country should liaise with the exporting country's Management Authority, considering any extenuating circumstances or documents, to determine the acceptability of the document”. As this is a regulatory requirement and recommendation under a CITES resolution, the commenter has continued to experience barriers to obtaining the required endorsements; consequently, they submitted a petition requesting we eliminate this requirement from our regulations. These regulations are currently being updated at this time and may address the Ornithological Society’s concerns. For application Form 3-200-47, based on our discussion above, this change would preclude researchers that obtain dead specimens that are not accessioned into a museum or scientific institution no means of applying for a permit. Therefore, we will not make this change.”

On October 28, 2022, we published in the *Federal Register* (87 FR 65233) a notice to extend the comment period for this renewal. In that notice, we solicited comments for an additional 60 days, ending on December 27, 2022. In a continued effort to increase public awareness of, and participation in, our public commenting processes associated with information collection requests, the Service also published the *Federal Register* notice on Regulations.gov (Docket No. [FWS-HQ-MB-2022-0056](#)) to provide the public with an additional method to submit comments (in addition to the typical Info_Coll@fws.gov email and U.S. mail submission methods). We received the following comments in response to that notice:

Comment 4: Electronic comment received October 29, 2022 via Regulations gov (FWS-HQ-MB-2022-0056-0006) from Jean Publiee. The commenter did not address the information collection requirements.

Agency Response to Comment 4: The commenter did not address the information collection requirements. No response is required.

Comment 5: Anonymous electronic comment received December 26, 2022 via Regulations gov (FWS-HQ-MB-2022-0056-0007). The commenter did not address the information collection requirements.

Agency Response to Comment 5: The commenter did not address the information collection requirements. No response is required.

In addition to the *Federal Register* notices described above, we consulted with the nine (9) individuals identified below who familiar with this collection of information in order to validate our time burden estimate and asked for comments on the questions below:

Organization	Title
Private citizen	N/A
Cold Springs Taxidermy	Owner
Cooper Tire & Rubber Company	Employee
Private citizen	N/A
Yakima Area Arboretum	Employee
Houston Zoo	Employee
Knoll Ranch LLC	Employee

Whatcom Humane Society
Private citizen

Manager
N/A

“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”

Comments: The commenter thought the information collected for the Migratory Bird Taxidermy permit application was appropriate; but was really confused on what type of bird species had to be entered to apply for the permit. It was not clear there was a general classification that covered all birds for taxidermy. The commenter suggested that it would be better to clearly state for Migratory Bird Taxidermist what selection needs to be made to cover all migratory ducks, geese, and swans, etc. The commenter thought the site was difficult to navigate and specifically had trouble trying to filter and find the proper permit.

Agency Response/Action Taken: We will address the commenter’s difficulty navigating the ePermits site with the ePermits team to identify a solution and prevent this from happening in the future, if it has not already been identified as an issue to be resolved. The team is currently working to improve the user experience in finding the proper permit and forms. We are anticipating that the user experience will become much easier and more user friendly in the coming year.

Comments: The commenter commented on the following forms: Notice of Transfer or Sale of Migratory Waterfowl (Form 3-186), Migratory Bird Special Purpose Possession (Education) Permit Acquisition and Transfer Request (Form 3-202-12), Annual Report - Special Purpose - Possession for Education (Form 3-202-5), Annual Report - Rehabilitation (Form 3-202-4), Annual Report - Waterfowl Sale and Disposal (Form 3-202-2). The commenter felt that all of the information requested was practical and necessary.

Agency Response/Action Taken: No response required.

“The accuracy of our estimate of the burden for this collection of information”

Comments: The commenter indicated the burden to fill out form the Migratory Bird Special Purpose Possession (Education) Permit Acquisition and Transfer Request (Form 3-202-12) was significantly higher for them than the 1.5 hour estimate currently recorded for this form. This particular commenter reported an estimate burden of 6 hours to fill out this form.

Agency Response/Action Taken: We believe this high estimate is likely specific to this particular permittee type and is not reflective of the burden of the majority of the permittees utilizing this form. We still believe that the average burden across all permittees utilizing this form is 1.5 hours, as it is currently recorded.

“Ways to enhance the quality, utility, and clarity of the information to be collected”

Comments: Regarding Annual Report form Rehabilitation (Form 3-202-4), the commenter indicated that the order of sections (A, B,C, etc) is confusing and suggested that it would be nice just to have individual supplemental sheets of each.

Agency Response/Action Taken: We will consider the commenter’s feedback as we work to improve our forms and reporting process.

“Ways to minimize the burden of the collection of information on respondents”

Comments: Regarding the form Notice of Transfer or Sale of Migratory Waterfowl (Form 3-186), the commenter suggested that adding email submissions to the form would reduce the burden of the data entry for them for this form.

Agency Response/Action TakenWe will consider the commenter’s feedback as we work to improve our forms and reporting process.

Additional comments received during the outreach:

Comments: Regarding the Migratory Bird Special Purpose Possession (Education) Permit Acquisition and Transfer Request form (Form 3-202-12), the commenter suggested that the sender or the receiver should send in this information, but not both (which is the current requirement).

Regarding the Annual Report - Special Purpose - Possession for Education form (Form 3-202-5), the commenter suggested that there should be a column to report birds that are retired and not used for programs or static display.

Regarding the Migratory Bird Depredation application form (3-200-13), the commenter specifically commented on the ePermits application process. They said that as far as simplicity of the ePermits, they found it easy to follow. However, they indicated that they have had trouble updating the permit with a new chief officer and C/O person. They requested the updated; but neither were updated and they have tried to contact the issuer a couple times with no response.

Agency Response/Action Taken: Regarding the comment on the Migratory Bird Special Purpose Possession (Education) Permit Acquisition and Transfer Request form (Form 3-202-12), we will consider the commenter’s feedback as we work to improve our forms and reporting process.

Regarding the comment on the Annual Report - Special Purpose - Possession for Education form (Form 3-202-5), we will consider the commenter’s feedback as we work to improve our forms and reporting process.

The commenter’s issues related to difficulties changing their contact information has been shared with the permit processor and they responded that it should be reconciled shortly.

Despite multiple attempts to solicit feedback, we did not receive responses from 6 of the 9 individuals contacted for targeted outreach.

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. Information is collected and protected in accordance with the Privacy Act (5 U.S.C. § 552a) and the Freedom of Information Act (5 U.S.C. 552). We will maintain the information in a secure System of Records (Permits System—Interior, FWS–21, September 4, 2003, 68 FR 52610; modification published June 4, 2008, [73 FR 31877](#)).

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 **56,758 responses** totaling **409,026 annual burden hours** for this information collection (see Attachment A). The total dollar value of the annual burden hours is approximately **\$16,263,906** (rounded) (see Attachment A). To reflect annualized cost burden more accurately for this information collection, Attachment A reflects three (3) different rates explained as follows:

(1) Nationwide ICs Using General BLS Statistical Data

We used table 1 from the of Bureau of Labor Statistics (BLS) [News Release](#) USDL-22-2307, March 15, 2023, Employer Costs for Employee Compensation—December 2022, to calculate the total annual burden.

- Individuals – the table lists the hourly rate for all workers as \$42.48, including benefits.
- Private Sector – the table lists the hourly rate for all workers as \$40.23, including benefits.
- Government – the table lists the hourly rate for all workers as \$57.60, including benefits.

(2) Specialized ICs Related to Management, Scientific, and Technical Consultants in the

Oil and Gas Industry

The cost burden associated with certain activities are often conducted using contracted services does not fit well within the hourly rates published by the BLS. The cost of these services can vary widely depending on size of the consulting company, the seniority of the persons providing the services, and the reputation of the consulting firm. In general, individuals contracting for these services select a smaller company with less experienced personnel as opposed to a large company that selects a renowned consulting firm employing senior scientists with decades of experience.

As a cost comparison basis, we determined consulting rates offered to the federal government through GSA indicate a range of \$35 to \$150 per hour. Accordingly, we used BLS May 2021 National Industry-Specific Occupational Employment and Wage Estimates for NAICS Code [211100, "Oil and Gas Extraction"](#) which lists a median hourly wage of \$64.47 (11-1021, General and Operations Managers). To account for benefits, we used 45% as an average overhead rate for contracted work, resulting in a fully burdened hourly rate for consultants of **\$93.48** (rounded).

(3) Specialized ICs Related to Archivists, Curators, and Museum Workers

The cost burden for permit exceptions under 50 CFR 21.12 are generally attributed to curators. The BLS Occupational Outlook Handbook (2021) for [Archivists, Curators, and Museum Workers](#) lists a median hourly rate of \$24.09. We multiplied this specialized rate by 1.42 in accordance with BLS News Release USDL-22-0469 for private industry workers to obtain the fully burdened rate of **\$34.21** (rounded).

13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers 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 nonhour cost burden to respondents for this information collection to be **\$639,715** (see Attachment A uploaded to ROCIS). These costs are primarily for application processing fees, which range from \$0 to \$2,000, depending on the activity.

The nonhour burden costs associated with the conservation order for the control of light geese (IC transferred from 1018-0103) is higher. We estimate that each participating State/Tribe will incur overhead costs (materials, printing, postage, etc.) of approximately \$2,000 associated with mailing surveys related to conservation order for the control of light geese participants for a total of \$78,000 in non-hour burden costs (39 responses x \$2,000). Conservation order participants manually report the data back to the States/Tribes who then report it electronically to the Service (as explained in question 3).

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 total cost to the Federal Government to administer this information collection will be **\$2,696,514** (rounded) (see Attachment A).

Service biologists (GS-11/13) and permit examiners (GS-9/12), with support of GS-7 staff, will:

- Review and determine the adequacy of the information an applicant provides.
- Conduct any internal research necessary to verify information in the application or evaluate the biological impact of the proposed activity.
- Assess the biological impact of the proposed activity on the bald or golden eagle.
- Evaluate whether the proposed activity meets the issuance criteria.
- Prepare or review NEPA documentation.
- Prepare either a permit or a denial letter for the applicant.
- When necessary to evaluate the impact of the proposed activity, visit the location to examine site-specific conditions.
- Monitor reports.

Permits are processed in our eight Regional Offices, which are located in major cities across the United States. Therefore, we used Office of Personnel Management Salary Table [2023-DCB](#) to obtain the most up-to-date hourly rates for staff. In accordance with BLS [News Release](#) USDL-22-2307, we multiplied the hourly rate by 1.61 to calculate the fully burdened rates for each staff member. The table below shows Federal staff and grade levels performing various tasks associated with this information collection.

Position/Grade	Hourly Rate	Hourly Rate (Incl. Benefits)	Time Spent On Collection	Weighted Average/Hr
Clerical/Office Assistant (GS-07/05)	\$ 28.84	\$ 46.43	5%	\$ 2.32
Legal Documents/Permit Examiner (GS-09/05)	35.27	56.78	30%	17.03
Legal Documents/Permit Examiner (GS-11/05)	42.68	68.71	30%	20.61
Biologist (GS-11/05)	42.68	68.71	10%	6.87
Permit Chief (GS-12/05)	51.15	82.35	20%	16.47
Branch/Division Chief, Solicitor (GS-14/05)	71.88	115.73	5%	5.79
	Weighted Average/Hour:		100%	\$ 69.09

*All figures rounded

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

We are reporting an increase (due to agency discretion) of **3,248 annual responses**, an increase of **13,863 burden hours**, and an increase of **\$148,665** to annual cost burden due to changes in the Migratory Bird Permit Program Service Manual Chapters and the merging of five collections concerning Special Double-Crested Cormorant Permits (Forms 3-200-90 and 3-202-56) into this collection.

We are reporting no change (due to adjustment in agency estimate) to annual responses, an increase of 196 burden hours, and no change to annual cost burden due to adjustments concerning Forms 3-186a, 3 202-2, 3-202-6, and 3-202-7.

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 information contained in the 3-186A falconry database is publicly available to: (1) provide falconers and States with the information necessary to allow the efficient movement of falconers and raptors held under falconry permits among States; and (2) ensure that falconers can formally document their experience regardless of the States in which they have resided, which is required to advance from the apprentice- to general- to master-class permit levels.

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.

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

There are no exceptions to the certification statement.