

**Supporting Statement
Entry Summary
1651-0022**

A. Justification:

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

CBP Form 7501, *Entry Summary*, is used to identify merchandise entering the commerce of the United States, and to document the amount of duty and/or tax paid. CBP Form 7501 is submitted by the importer, or the importer's agent, for each import transaction. The data on this form is used by CBP as a record of the import transaction; to collect the proper duty, taxes, certifications, and enforcement information; and to provide data to the U.S. Census Bureau for statistical purposes. CBP Form 7501 must be filed within 10 working days from the time of entry of merchandise into the United States. Collection of the data on this form is authorized by 19 U.S.C. 1484 and provided for by 19 CFR 141.61 and 19 CFR 142.11. CBP Form 7501 and accompanying instructions can be found at: https://www.cbp.gov/newsroom/publications/forms?title_1=7501.

New Change:

CBP is proposing to add the following required data fields to Form 7501:

- For certain Harmonized Tariff Schedule (HTS) classifications of steel imports, the country where the steel used in the manufacture of the product was melted and poured; the country where the steel used in the manufacture of the product was melted and poured applies to the original location where the raw steel is first produced in a steel-making furnace in a liquid state; and then poured into its first solid shape.
- For certain HTS classifications of aluminum imports, the countries where the largest and second largest volume of primary aluminum used in the manufacture of the imported aluminum product was smelted; and the country where the aluminum used in the imported aluminum product was most recently cast. The fields requiring identification of the countries where the largest volume of primary aluminum used in the manufacture of the product was smelted applies to the country where the largest volume of new aluminum metal is produced from alumina (or aluminum oxide) by the electrolytic Hall-Héroult process. Importers may be required to report if primary aluminum from specific countries is used in the imported aluminum product, if required by law and/or Presidential Proclamation.¹

¹ The February 24, 2023 Presidential Proclamation on Adjusting Imports of Aluminum Into the United States requires importers to provide to CBP information necessary to identify the countries where the primary aluminum used in the

- Importers will be required to report on the Form 7501 the steel country of melt and pour and aluminum countries of smelt and cast for imports under those steel and aluminum HTS classifications subject to the Commerce Department's steel and aluminum import license applications, and where applicable, the Section 232 steel and aluminum measures.

These data fields will substantially align the Form 7501 reporting requirements with the Commerce Department's existing reporting requirements for steel melt and pour and aluminum smelt and cast countries for steel and aluminum import license applications under 19 CFR 360.103(c)(1) and 19 CFR 361.103(c)(1). The aluminum and steel license application information is used by the Commerce Department for monitoring of anticipated imports of certain aluminum and steel products into the United States. The Form 7501 data is used by CBP to determine, when imports are entered for consumption, the proper amount of duties, applicable fees, taxes, and imports subject to quota.

These data fields are also required to enforce the tariff rate quotas for imported steel and aluminum established by the following Presidential Proclamations under section 232 of the Trade Expansion Act of 1962, as amended: for products of the European Union, Proclamation 10327 of December 27, 2021 (87 FR 1, January 3, 2022) and Proclamation 10328 of December 27, 2021 (87 FR 11, January 3, 2022); for products of Japan (steel-only), Proclamation 10356 of March 31, 2022 (87 FR 19351, April 1, 2022); and for products of the United Kingdom, Proclamation 10405 of May 31, 2022 (87 FR 33583, June 3, 2022) and Proclamation 10406 of May 31, 2022 (87 FR 33591, June 3, 2022); and any amendments to these Proclamations.

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.

The information on CBP Form 7501 is vital to CBP in carrying out the regulatory requirements associated with import transaction documentation. CBP Form 7501 "Entry Summary" documents relevant information (e.g. appraisal, classification, origin, etc.) regarding the imported commodity.

The steel melt and pour data and aluminum smelt and cast data will be used to enforce the tariff rate quotas established by the Presidential Proclamations under section 232 of the Trade Expansion Act of 1962, as amended. These data fields also may be used for the enforcement of other import measures on steel and aluminum imports, such as antidumping and countervailing duties, and any import

manufacture of certain imports of aluminum articles are smelted and information necessary to identify the countries where such aluminum articles imports are cast. This notice proposes to add the aluminum smelt and cast data fields to Form 7501 independently from the February 24, 2023 Proclamation.

measures based on the steel melt and pour and aluminum melt and cast countries.

Most entry summaries are filed electronically and payments for duties are made using the Automated Clearinghouse (ACH). However, if a supplemental payment is necessary after the initial ACH payment, this may be in the form of a check or cash. CBP Form 7501A Document/Payment Transmittal is used to reconcile a presented payment with the associated entry so the respondent's account is properly credited.

- 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.**

Most entry summaries of 7501 data are filed electronically through the Automated Broker Interface (ABI).

CBP Form 7501A Document/Payment Transmittal is not submitted electronically because it is used to transmit information and documents to CBP that are not electronic, such as check or cash payments. The form is generally used for supplemental payments, which are usually submitted to CBP via check. However, the form is available in an electronic format on the CBP website, <https://www.cbp.gov/newsroom/publications/forms?title=7501&=Apply>

Usability Testing:

CBP completed a usability study on the melt and pour and smelt and cast fields on the Form 7501. A total of 5 persons participated in the study. All participants were employees of CBP's Office of Trade. None of the participants were involved in the development of these new fields on the Form 7501. Participants found the form and instructions to be self-explanatory and easily understandable. Participants provided comments for improvement, including adding the words "steel" to the melt and pour field, and "aluminum" to the smelt and cast fields; and updating the form and instructions for situations when multiple countries of melt and pour and/or smelt and cast are reported on the same Form 7501. One participant also suggested to reorganize the Form so the melt and pour and smelt and cast fields appeared vertically rather than horizontally on the Form. CBP examined the recommendations and updated the Form 7501 by adding the words "steel" and "aluminum" to the field names and included an option on the Form for multiple countries of melt and pour and/or smelt and cast through a "Multi" country option (in the same manner that other fields on the Form 7501 allow for multiple countries on the Form). The other recommendation was considered but not adopted in order to retain the existing horizontal orientation of the Form 7501 and minimize the overall changes to the Form.

These data fields have also been used by the trade community for over three years through pre-existing Commerce Department and CBP data requirements. Importers have been reporting the steel melt and pour country to the Commerce Department since October 13, 2020; and the aluminum smelt and cast countries to the Commerce Department since June 28, 2021; for steel and aluminum import license applications. Importers have also been reporting the aluminum smelt and cast countries to CBP in the electronic ACE data since May 10, 2023 (in accordance with the February 24, 2023 Presidential Proclamation noted above).

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.

As noted above, these data fields will substantially align the Form 7501 reporting requirements with the Commerce Department's existing reporting requirements for steel melt and pour and aluminum smelt and cast countries for steel and aluminum import license applications. The Commerce Department requests these data fields based on Commerce Department statutes and regulations, including the Census Act, as amended (13 U.S.C. 301(a) and 302), 19 CFR 360.103(c)(1) and 19 CFR 361.103(c)(1). These statutes and regulations do not provide for the sharing of this information with CBP. Therefore, CBP needs to add these steel and aluminum data fields to the Form 7501 to obtain this data for CBP purposes.

The February 24, 2023 Presidential Proclamation on Adjusting Imports of Aluminum Into the United States requires importers to provide to CBP information necessary to identify the countries where the primary aluminum used in the manufacture of certain imports of aluminum articles are smelted and information necessary to identify the countries where such aluminum articles imports are cast. This notice proposes to add the aluminum smelt and cast data fields to Form 7501 independently from the February 24, 2023 Proclamation so CBP does not have to exclusively rely on this Proclamation for authority to collect this important information.

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

This information collection does not have an impact on small businesses or other small entities.

6. Describe consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

CBP's ability to collect data on the proper amount of duties, applicable fees, taxes

and the protection of revenue could be significantly jeopardized if the CBP Form 7501 is not submitted as regulations prescribe.

7. Explain any special circumstances.

This information is collected in a manner consistent with the guidelines of 5 CFR 1320.6.

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 describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Public comments were solicited through two Federal Register notices, a 60-day notice published on April 19, 2023 (88, 24203) on which several public comments were received, and a 30-day notice published on March 25, 2024 (89 FR 20673) on which no comments have been received.

A summary of the public comments received during the 60-day notice and CBP response:

Comment:

The National Customs Brokers & Forwarders Association of America (NCBFAA), the Detroit Customs Brokers and Forwarders Association, and the New York New Jersey Foreign Freight Forwarders & Brokers Association urge CBP to reconsider and withdraw its proposed revisions requiring additional data elements for the CBP Form 7501. These groups contend that this proposed change to the 7501 is redundant information already being provided to the Commerce Department for the licensing requirements as mentioned in the Notice, and CBP should retrieve this information from the Commerce Department. They also note that for non-ABI transmissions, this information is available from the paper steel license, when such a license is required. They generally stress that the proposed rule does not align with the objectives of enhanced automation and streamlined processes without duplicative data, and the unnecessary duplication of data increases resource consumption for both the trade and Customs.

CBP Response:

CBP appreciates the concerns of the NCBFAA and the two regional customs brokers and forwarders association. As noted in the request for comments published in the Federal Register, CBP needs to add the steel melt and pour and aluminum smelt and cast data fields to the Form 7501 in order determine, when imports are entered for consumption, the proper amount of duties, applicable fees,

taxes, and imports subject to quota. The Commerce Department uses this data for monitoring of anticipated imports of certain aluminum and steel products into the United States. The Commerce Department requests these data fields based on Commerce Department statutes and regulations, including the Census Act, as amended (13 U.S.C. 301(a) and 302), 19 CFR 360.103(c)(1) and 19 CFR 361.103(c)(1). These statutes and regulations do not provide for the sharing of this information with CBP. Therefore, CBP needs to add these steel and aluminum data fields to the Form 7501 to obtain this data for CBP purposes.

In regards to the non-ABI paper steel license submissions, the small number of these submissions does not provide adequate melt and pour or smelt and cast data for CBP. While CBP does not know the number of non-ABI number of paper steel licenses received, the estimated annual number of paper Form 7501 received for all commodities, 9,303, is a small fraction of the estimated annual number of electronic Form 7501 submissions received, 23,133,408.

Comment:

The NCBFAA, the New York New Jersey Foreign Freight Forwarders & Brokers Association, and the Detroit Customs Brokers and Forwarders Association advocate that CBP should not continue to rely on the paper Form 7501 for Automated Broker Interface (ABI) entries and should fully transition to electronic submission methods. They contend that the paper-based approach is archaic and hinders the efficiency of importation processes.

CBP Response:

CBP takes note of these comments. However, this issue is outside the scope of this specific request for comments.

Comment:

The American Iron and Steel Institute (AISI), Specialty Steel Industry of North America (SSINA), Outokumpu Stainless USA, LLC (Outokumpu), Steel Dynamics, Inc. (SDI), and United States Steel Corporation (U.S. Steel), support the proposed revision to CBP Form 7501 to collect the steel melt and pour data. These associations and companies contend that the country of melt and pour information will be particularly valuable to enforce U.S. antidumping and countervailing duty laws and other trade measures, including measures imposed pursuant to Section 232 of the Trade Expansion Act of 1962. SDI specifies that this information will prevent circumvention of sanctions regimes and will be vital to enforcing any future agreement relating to greenhouse gas emissions from steel produced in foreign countries.

AISI, SSINA, and SDI note that requiring this information on CBP Form 7501 should greatly increase the ability of the U.S. government to ensure that accurate and complete country of melt and pour information is made available to the appropriate

authorities. They point out that failure of an importer to properly report the country of melt and pour on CBP Form 7501 would subject an importer to potential penalties and legal action under U.S. Customs laws, in contrast to the Commerce Department's more limited authority to ensure the proper reporting of this information for steel licensing purposes.

U.S. Steel and Outokumpu stress that the steel melt and pour information collected through Form 7501 would complement the pre-entry license information already collected by the Commerce Department. U.S. Steel further states that this additional data would facilitate the use of more accurate Census data on the Commerce Department's Melt and Pour Dashboard. U.S. Steel generally argues that proposed revision would support and leverage enhanced steel supply chain transparency and may reveal patterns of circumvention and/or evasion to enable swift and targeted enforcement by CBP.

Outokumpu believes the additional field for country of melt and pour will alleviate the need for CBP to manually review each steel license certificate, thus reducing CBP's workload. Additionally, the melt and pour information can be cross-checked automatically through CBP's Automated Commercial Environment (ACE), saving substantial administrative burdens.

CBP Response:

CBP agrees with AISI, SSINA, Outokumpu, SDI, and U.S. Steel that the steel melt and pour (as well as the aluminum smelt and cast) information collected through Form 7501 would enhance CBP's enforcement of trade laws and reduce CBP's administrative burdens through the electronic processing and targeting of this data in ACE and other CBP automated systems.

Comment:

U.S. Steel encourages CBP to mandate that all steel mill test reports explicitly state melt and pour country information for the underlying steel; or at a minimum, require the submission of the mill test report issued by the original melt and pour manufacturer of the steel used in each imported steel product with Form 7501, as authorized under 19 USC § 1484(d)(1). U.S. Steel encourages CBP to extend the proposed data revision to form 7501 by requiring importers to report the country in which any intermediate steel processing occurred.

CBP Response:

CBP takes note of these comments. CBP is not considering revising the steel mill test report requirements or extending the data revision to the country of intermediate steel processing at this time. As CBP gains experience with melt and pour data, CBP may revisit any additional information it needs to enforce U.S. trade laws.

Comment:

SSINA, SDI and U.S. Steel contend that the new data fields will not create any additional burden on U.S. importers, as they are already required to report country of melt and pour in their steel import license applications obtained from the U.S. Department of Commerce.

CBP Response:

CBP agrees that steel (and aluminum) importers already have access to the melt and pour (and smelt and cast) data because of the steel (and aluminum) import license requirements, and the new proposed data fields will not create a major burden on U.S. importers.

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

There is no offer of a monetary or material value for this information collection.

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

A PIA for the Automated Commercial Environment (ACE), dated July 31, 2015, and a SORN for IIS, dated July 26, 2016 (Vol. 81, Page 48826) will be included in this ICR. There are no assurances of confidentiality provided to the respondents of this information collection.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive nature.

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

FORM	Total Burden HOURS	NO. OF RESPONDENTS	RESPONSES PER RESPONDENT	TOTAL RESPONSES	TIME PER RESPONSE
7501- Formal Entry (Electronic submission)	1,920,073	2,336	9,903	23,133,408	5 minutes (.083 hours)

7501- Formal Entry (Paper submission)	92,336	28	9,903	277,284	20 minutes (.333 hours)
7501- Formal Entry with Softwood Lumber Act of 2008 * (Paper only)	266,433	210	1,905	400,050	40 minutes (.666 hours)
7501- Informal Entry (Electronic submission)	403,538	1,883	2,582	4,861,906	5 minutes (.083 hours)
7501- Informal Entry (Paper submission)	12,265	19	2,582	49,058	15 minutes (0.25 hours)
7501A- Document/Payment Transmittal (Paper only)	300	20	60	1,200	15 minutes (0.25 hours)
Exclusion approval information letter	250	5,000	1	5,000	3 minutes (0.05 hours)
TOTAL	2,695,195			28,727,906	

Public Cost

The estimated cost to the respondents is \$84,278,748. This is based on the estimated burden hours (2,695,195) multiplied by (x) the average loaded hourly wage rate for importers (\$31.27). CBP calculated this loaded wage rate by first multiplying the Bureau of Labor Statistics' (BLS) 2020 median hourly wage rate for Cargo and Freight Agents (\$21.03), which CBP assumes best represents the wage for importers, by the ratio of BLS' average 2020 total compensation to wages and salaries for Office and Administrative Support occupations (1.4762), the assumed occupational group for importers, to account for non-salary employee benefits.^{2,3} CBP then adjusted this figure, which was in 2017 U.S. dollars, to 2020 U.S. dollars

² Source: U.S. Bureau of Labor Statistics. Occupational Employment Statistics, "May 2016 National Occupational Employment and Wage Estimates, United States- Median Hourly Wage by Occupation Code." Updated March 31, 2017. Available at http://www.bls.gov/oes/2016/may/oes_nat.htm. Accessed June 20, 2017.

³ The total compensation to wages and salaries ratio is equal to the calculated average of the 2016 quarterly estimates (shown under Mar., June, Sep., Dec.) of the total compensation cost per hour worked for Office and Administrative Support occupations (\$25.3575) divided by the calculated average of the 2016 quarterly estimates (shown under Mar., June, Sep., Dec.) of wages and salaries cost per hour worked for the same occupation category (\$17.1775). Source of total compensation to wages and salaries ratio data: U.S. Bureau of Labor Statistics. Employer Costs for Employee Compensation. Employer Costs for Employee Compensation Historical Listing March 2004 – March 2017, "Table 3. Civilian workers, by occupational group: employer costs per hours worked for employee compensation and costs as a percentage of total compensation, 2004-2017 by respondent type." June 20, 2017. Available at <http://www.bls.gov/ncs/ect/sp/eccecqrtn.pdf>. Accessed June 20, 2017.

by applying a 1.0 percent annual growth rate to the figure, as recommended by the U.S. Department of Transportation's value of travel time guidance.⁴

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

There are no recordkeeping, capitalization start-up or maintenance costs associated with this collection.

14. Provide estimates of annualized cost to the Federal Government. Also provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The estimated annual cost to the Federal Government associated with the review of these records is \$352,893,597. This is based on the number of responses that must be reviewed (28,727,906) multiplied by (x) the time burden to review and process each response (.166 hours) = 4,768,832 hours multiplied by (x) the average hourly loaded rate for a CBP Trade and Revenue employee (\$74.00)⁵ = \$352,893,597.

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

No change in burden anticipated. The addition of these data elements does not provide enough of a burden to account for an increase.

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

This information collection will not be published for statistical purposes.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

CBP does not seek approval to not display the expiration date.

4 Source: U.S. Department of Transportation, Office of Transportation Policy. *The Value of Travel Time Savings: Departmental Guidance for Conducting Economic Evaluations Revision 2 (2015 Update)*, "Table 4 (Revision 2-corrected): Recommended Hourly Values of Travel Time Savings." April 29, 2015. <http://www.transportation.gov/sites/dot.gov/files/docs/Revised%20Departmental%20Guidance%20on%20Valuation%20of%20Travel%20Time%20in%20Economic%20Analysis.pdf>. Accessed June 20, 2017.

5 CBP bases this wage on the FY 2017 salary and benefits of the national average of CBP Trade and Revenue positions, which is equal to a GS-13, Step 3. Source: Email correspondence with CBP's Office of Finance on June 14, 2017.

18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions”.

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

B. Collection of Information Employing Statistical Methods

No statistical methods were employed.