**SUPPORTING STATEMENT**

**U.S. Department of Commerce**

**International Trade Administration**

**Survey of International Air Travelers**

**OMB Control No. 0625-0227**

**SUPPORTING STATEMENT PART A**

# Abstract

The *Survey of International Air Travelers* program provides source data required to: (1) estimate international travel and passenger fare exports, imports and the trade balance for the United States, (2) comply with the U.S. Travel Promotion Act of 2009 (Pub. L. 111-145), collect a one percent sample of inbound travelers, analyze and report information to government and industry stakeholders, and support the increase of U.S. exports, (3) to comply with travel and tourism related acts to collect and publish comprehensive international travel and tourism, statistics and other marketing information, and (4) support the continuation of the Travel & Tourism Satellite Accounts for the United States, which provide the only spending and employment figures for the industry, and (5) to support the goals of objectives of the 2022 National Travel & Tourism Strategy.

Scope:

The Survey program contains the core data that is collected monthly, via the survey instrument from passenger respondents departing from U.S. international gateway airports on randomly selected flights (U.S. or foreign national carriers).

Benefits:

Survey data are analyzed and communicated by NTTO with other government agencies, associations and businesses that share the same objective of increasing U.S. international travel exports. The Survey assists NTTO in assessing the economic impact of international travel on state and local economies, providing visitation estimates, key market intelligence, and identifying traveler and trip characteristics. The Survey program provides the only available estimates of nonresident visitation to the states and cities within the United States, as well as U.S. resident travel abroad.

# 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.**

The National Travel and Tourism Office (NTTO) is part of the U.S. Department of Commerce (DOC), International Trade Administration (ITA), Industry and Analysis Sector. NTTO’s efforts support the goals, mandates and mission of DOC (Strategic Plan “America is Open for Business”) making the Survey of International Air Travelers (SIAT) research program collection necessary.

The collection enables NTTO to identify and analyze international travel trends, for both government internal or external planning purposes. NTTO continues to actively provide leadership in international travel and tourism development activities by other public and private organizations of the U.S. travel industry. The data generated by this survey program, which have a high degree of reliability, validity, accuracy and precision, are required to facilitate and guide the development of the international travel market for the United States.

The data from the SIAT program support the purpose and mission of the International Trade Administration (ITA). ITA’s mission is: “To strengthen the competitiveness of U.S. industry, promote trade and investment, and ensures fair trade through the rigorous enforcement of U.S. trade laws and agreements.”  This mission is girded by an overarching vision: “ITA works to improve the global business environment and helps U.S. organizations compete at home and abroad.

It also supports the National Travel & Tourism Strategy released in 2022. The results of the SIAT data will be used to achieve the Strategies goal of “Conducting Research and measuring results. The SIAT will be used to provide some of the performance metrics and accountability measures that will be used to ensure continual progress on the important goals and strategies outlined in this National Strategy, including the goal to reach 90 million visitors in 2027.

The SIAT is a key data source, and an ITA organization priority whereby NTTO can:

* Be in accord with the 2022 National Travel & Tourism Strategy;
* Comply with mandated provisions of the Travel Promotion Act of 2009;
* Lead strong industry relations through the Travel & Tourism Advisory Board;
* Lead a strong promotional platform through the Corporation for Travel Promotion;
* Lead strong interagency work with the Tourism Policy Council;
* Promote a strong cross-team environment with the U.S. Commercial Service (Global Markets) Travel and Tourism Team;
* Define emerging travel and tourism markets; and

Collaborate with ITA/Industry and Analysis staff.

The Survey of International Air Travelers (SIAT) Research Program Supports U.S. Travel and Tourism Marketing Campaigns and Policy Initiatives

The SIAT contributes significantly to promotional and policy initiatives:

1. Provides the source data to comply with the U.S. Travel Promotion Act of 2009 (Pub. L. 111-145). The Travel Promotion Act of 2009 mandates (a) expanding the number of inbound air travelers sampled by the Commerce Department’s Survey of International Air Travelers to reach a one percent sample size; (b) revising the design and format of SIAT questionnaires to accommodate a new survey instrument; (c) improving response rates to at least double the number of states and cities with reliable international visitor estimates; and (d) improving market coverage (currently survey approximately 0.2 percent of international travelers).

<https://www.govinfo.gov/content/pkg/PLAW-111publ145/html/PLAW-111publ145.html>

a) In General. The NTTO shall expand and continue its research and development activities in connection with the promotion of international travel to the United

States, including--

(1) expanding access to data from the official Mexican travel surveys to provide the States with traveler characteristics and visitation estimates for targeted marketing programs;

(2) expanding the number of inbound air travelers sampled by the Commerce Department's Survey of International Travelers to reach a 1 percent sample size and revising the design and format of questionnaires to accommodate a new survey instrument, improve response rates to at least double the number of States and cities with reliable international visitor estimates and improve market coverage;

(3) developing estimates of international travel exports (expenditures) on a State-by-State basis to enable each State to compare its comparative position to national totals and other States;

(4) evaluate the success of the Corporation in achieving its objectives and carrying out the purposes of the Travel Promotion Act of 2009; and

(5) research to support the annual reports required by section 202(d) of this Act.

1. Provides the source data to analyze and report information to the Corporation for Travel Promotion (CTP)/Brand USA, Inc. <http://www.thebrandusa.com>
2. Provides the source data to support the National Export Initiative (NEI)-NEXT to double U.S. exports. The NEI mandates the Commerce Department to assist U.S. businesses in improving their competitiveness and effectiveness in the international travel market.

<http://trade.gov/neinext/>

1. Complies with the 1945, 1961, 1981 and 1996 travel and tourism related acts to collect and publish comprehensive international travel and tourism statistics and other marketing information. The Bretton Woods Agreements Act of 1945 requires the Commerce Department to provide export/import and Gross Product data for the United States. The National Tourism Organization Act of 1996 requires the U.S. Commerce Department to collect and publish comprehensive international travel and tourism statistics and other marketing information.

<http://www.gpo.gov/fdsys/pkg/PLAW-104publ288/pdf/PLAW-104publ288.pdf>

Interagency agreement with BEA. The SIAT research program has been the sole source of travel and passenger fare export and import data used by the DOC’s Bureau of Economic Analysis (BEA) to estimate the travel balance of trade and to configure the travel and tourism satellite accounts.

The SIAT is this country’s performance measure for international travel and passenger fare exports and imports, nationally and by country. NTTO provides the BEA data on exports and imports for this country and focuses on international travel’s contribution to the economy. To track U.S. economic performance and competitiveness, this country will require the continuation of the SIAT.

In 2011, BEA obtained approval to require credit card companies to provide their international transactions data (BE-150). BEA intended to use these /data to strengthen the travel and passenger fare export and import data. While this may have provided stronger estimates for travelers who use credit cards, NTTO is unsure how BEA would handle the cash spent by international travelers in the United States and the cash spent by U.S. travelers going abroad. After a trial period, BEA decided in 2014 to forgo substituting the BE-150 for SIAT data and have re-engaged with NTTO to use SIAT data.

According to B.E.A. estimations: In 2023, U.S. travel and tourism-related exports totaled $225.9 billion, positioning travel and tourism as the single largest services export for the United States. Moreover, U.S. travel and tourism exports now account for 22.0 percent of all U.S. services exports and 7.0 percent of all U.S. exports, goods and services alike. In fact, the United States has enjoyed a travel and tourism trade surplus for twenty-five consecutive years, until 2020 (covid-19). The trade surplus recovered in 2023 to $1.9 billion.

# 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.

* **What information will be collected - reported or recorded? (If there are pieces of information that are especially burdensome in the collection, a specific explanation should be provided.)**

International air passenger information as it pertains to the trip. Planning and information sources / Purpose of trip / Nights away / Destinations visited / Activities / Spending / Airline ratings / Demographics / Trip experience.

* **From whom will the information be collected? If there are different respondent categories (e.g., loan applicant versus a bank versus an appraiser), each should be described along with the type of collection activity that applies.**

All eligible travelers in the airport international departure gate areas of randomly selected flights who agree to respond.

* **How will the information be collected (e.g., forms, non-forms, electronically, face-to-face, over the phone, over the Internet)?**

Standard form (questionnaire), either paper or via personal electronic device (PED).

* **What will this information be used for - provide ALL uses?**

See below narrative.

* **Does the respondent have multiple options for providing the information? If so, what are they?**

The survey instrument is predominantly paper, however NTTO continues to test and evaluate PEDs as an effective data collection tool. NTTO also continues to test a shorter version of the questionnaire.

* **How frequently will the information be collected?**

Monthly on randomly selected nonstop international flights.

* **Will the information be shared with any other organizations inside or outside the Department of Commerce or the government?**

Yes, the Bureau of Economic Analysis (B.E.A.), International Trade Administration, Department of Homeland Security, U.S. states & cities, etc.

* **If this is an ongoing collection, how have the collection requirements changed over time?**

At the inception of the program data collection occurred on-board the flight. Now it is mostly collected in the airport at the departure gate area.

Again, the survey instrument is predominantly paper, however NTTO continues to test and evaluate PEDs as an effective data collection tool. NTTO also continues to test the impact of a shorter version of the questionnaire on the quantity of data collected.

The collected information is used by numerous public (including governments) and private stakeholders. The SIAT data are collected monthly to properly reflect seasonality of travel, however the processed data are consolidated into quarterly and annually reports. Both data tables (containing details) and aggregate level data are used continuously either from the digital (excel), printed guides and/or the NTTO website. The metrics provide stakeholders with performance data on international (overseas and Mexican) travelers to and from the U.S. including, true origin-destination, traveler characteristics, trip planning, demographics and spending data.

NTTO usage of SIAT Data:

NTTO management uses SIAT data to prepare scheduled and ad hoc briefings for the Secretary of Commerce, the Under Secretary (ITA), the Assistant Secretary (I&A) and members of the Travel &Tourism Advisory Board. Many of the briefings are in preparation for Congressional committee meetings and inquiries from the Congressional Budget Office.

The SIAT is the largest research program for NTTO, and the data obtained serves as a cornerstone for many other reports and programs. NTTO issues quarterly and annual summary and detail reports on International (non-resident) Inbound Air Travel to the United States, and U.S. Resident Outbound Air Travel to International Destinations.

Examples of SIAT data can be viewed, downloaded and printed from the NTTO web site:

<https://www.trade.gov/travel-and-tourism-research>

<https://www.trade.gov/survey-international-air-travelers-siat>

There are two complementary presentations:

1. On-line Monitors, for both “Inbound” and “Outbound” travel

2. Excel National reports, for both “Inbound and Outbound” travel

SIAT (non-resident) inbound data are the basis for creating ‘market profiles’ (volume, characteristics, spending) for over 100 countries, also organized into nine overseas regions (Africa, Asia, the Caribbean, Central America, Europe, the Middle East, Oceania, South America, as well as Canada and Mexico). Special sector profiles can be created on lodging, car rental, business/leisure, cultural heritage, visiting U.S. National Parks and visiting American Indian Communities. NTTO also produces reports on States (all 50), Cities/MSAs (110) and Regions for International Travelers to the United States. The increase in sample size, in addition to reliability assessment helps to comply with the provision of the Travel Promotion Act which calls for a doubling of the destinations visited and to expand market coverage beyond the 20 plus countries previously reported. An annual analysis of inbound travel is released in a newsletter, distributed to subscribers and posted to the NTTO website.

SIAT (U.S. Resident) Outbound data are used to create profiles of U.S. travel to most foreign countries, also organized by regions, i.e., Europe, Asia and South America. An annual analysis of outbound travel is released in a newsletter, distributed to subscribers and posted to the NTTO website.

‘Customized’ reports on both inbound and outbound data are developed for regular subscribers and the public. Regular subscribers are mostly destination management organizations (convention and visitors’ bureaus and state tourism offices) who use the SIAT data to assist in increasing non-resident visitation to the United States. ‘Customized’ reports are also sold to U.S. airports, airlines, regional travel associations, hotel companies, consultants, advertising firms, universities, foreign national tourism offices, and other travel related businesses. These reports are available in a print and/or Excel format

SIAT program data are used for NTTO presentations and informational materials distributed to states, cities, travel industry association meetings and travel trade shows, for example, the U.S. Travel Association IPW (formerly known as ‘POW WOW’) trade show, the Marketing Outlook Forum, and La Cita Latin travel trade show. SIAT data are also used at numerous trade shows supported by Department of Commerce Travel & Tourism Team (Team) members in the United States and in 80 posts around the world. The Team uses the SIAT data to deliver presentations at trade shows and to provide market intelligence to their clients. Reports from travel and tourism industry sector analyses or the industry market insights source the SIAT data. NTTO provides very detailed characteristics of international travelers to the industry in these and other presentations.

NTTO also responds to industry requests for research information by attending specific industry group meetings (i.e., National Tour Association and the American Hotel & Motel Association, etc.) and regional or state/city marketing conferences, U.S. Governors’ Conferences and seminars. NTTO provides the survey research data to the attendees through presentations and handout materials. These materials detail the international travelers’ characteristics specific to their USA travel industry, region or area. Over 20 major presentations were delivered in FY2023 including Africa Tourism, American Indian Conference, Visit USA committees, Go West Summit, Shop America, World Travel Monitor Forum, Governors’ Conferences, the Travel and Tourism Research Association and to the Air Transport Association.

Following is a list of entities (e.g., Federal agencies and travel industry groups) other than Commerce that ‘routinely’ utilize SIAT data:

Federal Agencies

* White House
* U.S. Department of Homeland Security
* U.S. Department of State
* U.S. Department of Transportation (FAA, Office of International Aviation, Scenic Byways Program)
* Bureau of Labor Statistics
* U.S. Department of Interior: U.S. National Park Service, Bureau of Indian Affairs and Fish & Wildlife Service
* Centers for Disease Control and Prevention

Travel Industry Groups

* Participating Airlines and Airlines 4 America trade association
* Airport Authorities
* Convention and Visitors Bureaus
* State Tourism Offices
* Regional Tourism Groups

Other Public and Private Sector Users

* Small and Medium-Sized Enterprises (SME’s)
* Large Corporations (Aircraft Manufacturers and Credit Card Companies)

An analysis of subscribers to the SIAT reports, or those accessing NTTO’s website was developed for this clearance package. The major users of the research data are: state and city tourism agencies, consulting firms/, trade associations, attractions, communication companies, foreign national tourism offices, travel cards/credit card companies, travel agents and tour operators.

1. **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.**

The SIAT survey instrument is primarily in paper form. Several pilot tests have been made and are continuing with a goal to substantially increase SIAT data collection in a digital or electronic form.

**E-Survey Pilot Tests**:  NTTO and its contractor (CIC Research, Inc.) have tested several different electronic approaches to the Survey with the intent of replacing the paper-based system when appropriate.

* **2008**: Several airlines and industry booking engines (Global Distribution Systems) participated. The e-Survey was divided into pre-trip and post-trip sections. After the booking of an international flight itinerary the booking engine or airline.com offered a ‘pop-up’ to the booker inquiring if he/she would like to complete the pre-trip portion. Upon completion of the pre-trip the booker was invited to participate in the post-trip section of the questionnaire after the trip was complete. The results were less than stellar. (results available).
* **2012**: NTTO/CIC partnered with Lufthansa Airlines on 13 of their flights departing from Dulles (IAD), Orlando (MCO) and San Francisco (SFO) during early August. An invitation card, containing a URL, was handed out to passengers in the boarding area and the lounge (IAD). Respondents were asked to access the URL (directing them to the e-version of the questionnaire in English or German) either during pre-departure, or while on-board the flight, or once having arrived at their destination. Respondents could use their personal electronic devices (PED). The results, while modest, do indicate this path is feasible and warrants further study as Wi-Fi technology improves. (results available) Note: This alternative required airlines’ participation.
* **2014**: NTTO/CIC partnered with JetBlue Airlines and several other international carriers at New York JFK Airport in October. As with the 2012 test an invitation card, containing a URL, was handed out to passengers in the boarding area. Respondents were asked to access the URL (directing them to the e-version of the questionnaire in English, German, French and Spanish) either during pre-departure, or while on-board the flight, or once having arrived at their destination. Respondents could use their personal electronic devices (PED). These data indicate that the number of responses were lower than in 2012. (results available)
* **2015: Passenger** respondents were asked to use hand-held tablets (android). This e-test was administered at the Los Angeles International Airport (LAX). Test results yielded approximately eight (8) completed responses per flight compared to the current, paper-based method, which produced 14 surveys per flight. The results do not warrant the immediate adoption of the tablet methodology as a replacement for the current approach. However, the results were positive enough to warrant additional testing of this method. The major caveats are that the tablet approach requires more field service interaction than the legacy (paper) method and appears to increase passenger response time. (results available)
* **2022:** During the Covid-19 pandemic airline passenger traffic practically came to a standstill in most markets. Consequently, most U.S. airport authorities restricted airport access to passengers, crew and employees only. SIAT field service staff could not conduct normal operations in most airports. Field staff were equipped with PPE (personal protective equipment … facial shields, gloves, smocks) Even with these precautions many passengers were reluctant to accept a paper survey. The time seemed appropriate to experiment with an alternative approach. The contractor developed an application using a ‘QR code’ which was scannable via the passenger’s personal electronic device (PED). The results were negligible.
* 2023 QR Test results showed that the QR produces significantly fewer completes per flight. QR is least effective at assessing U.S. expenditures. It also produces a lower response from non-U.S. residents, key information for the SIAT.
* NTTO is currently investigating the potential of a next level PED application so that the questionnaire is more user friendly and gamified (entertaining).

Although the current Survey questionnaire is paper-based, NTTO encourages its contractor to provide proven innovative solutions regarding the distribution and collection process by proposing state-of-the-art technological improvements to include, but not limited to, scan technologies, use of on-board entertainment systems, internet connections to personal display devices, and/or other electronic collection mechanisms.

One of the optional line items in the SIAT contract directs the contractor to identify and test new methodologies and innovative solutions. Specifically, the contractor is asked to research new methodologies for a feasible system to replace the existing SIAT paper and pencil data collection methodology. The goal is for the contractor to propose survey methodologies that will be technically feasible and cost efficient and would collect more responses with greater coverage of global origin markets and destinations. The proposed data collection method should result in respondent data that will be of better quality, increased quantity than the existing SIAT and at a lower per unit cost. To date, all tests conducted have not reduced the cost per complete. The paper survey method still collects more surveys per attempt than any of the electronic tests. At this time, paper produces: 1) a higher quality of data (the Canada panel found 40% errors in the flight information that was entered electronically); 2) Significantly higher non-U.S. resident response; 3) More complete data on U.S. expenditures; 4) Paper serves as an additional quality control tool to assess the validity of the data (handwriting that may indicate dry lab). Therefore, we are using the most efficient method available.

We are monitoring the state of the art regarding Wi-Fi availability in U.S airports and on-board aircraft.

NTTO and CIC Research, Inc. are planning to fund additional ‘e-tests’ during 2025. We will also continue to monitor the public’s growing concerns regarding cybersecurity and the fear of malicious access to their PEDs.

Note: The Travel & Tourism Advisory Board (TTAB), Data and Research Subcommittee, has recommended that NTTO review and assess different methodologies for data collection.

1. **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 Question 2**

NTTO and its contractor conducted a ‘whiteboard’ exercise attempting to identify various data sources that could replicate the scope of the SIAT data. In short, nothing duplicates the data, yet several sources are viewed to be complementary. A recent conversation with a principal at Aviation Week / ASM consulting indicated that SIAT has a standalone value to airline, airport and DMO officials when using source data to conduct route planning.

We have found no changes to the below three paragraphs, submitted in 2021.

NTTO reviewed the components of many private sector and U.S. Government data sources that were closely related to the SIAT program as part of our dialogue with the Corporation for Travel Promotion (CTP)/Brand USA, Inc. and NYC & Company, a private non-profit corporation that is the official tourism marketing organization for New York City. It was found there would be no duplication of NTTO efforts and all data sources were found to be deficient for NTTO needs because of their limited scope.

Although other travel surveys have similar basic questions about the traveler (e.g., age, gender, purpose of trip), there is no existing national survey that gathers the same information in terms of content, scope, and duration. We, and other industry users, have found this to be the case with credit card systems (Visa’s ‘VisaVue’, which is limited to details of spending.)

NTTO has over 30 annual subscribers to special SIAT ‘custom reports’ which are programmed to meet client informational requirements. Subscribers (U.S. states and city tourism offices, consultancies) are savvy and privy to all data sources that can be used but are not substitutable for SIAT data. One in particular, Pento Press / Aviation Week / ASM-Informa uses examples of SIAT data in their training course for airline/airport service development. SIAT data does not duplicate other sources but corroborates those such as U.S. Department of Transportation O&D. MIDT Booking data, cell phone usage monitoring, etc.

NTTO and other government agencies, party to the Tourism Policy Council (TPC), have conducted an inventory of all federal agency data collection efforts. No duplication or redundancies were noted.

The TTAB and TPC are tasked with determining how the federal travel and tourism data collection programs can be melded or integrated into a useful vehicle. This inventory is available upon request.

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

This collection does not involve small businesses or entities as respondents.

# 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.

1. The discontinuance of the SIAT collection would seriously impede BEA’s effort to estimate international travel and tourism services (Exports, Imports, Balance of Trade, as mandated by Congress). Visitor spending in the U.S. and various countries, and spending on air fares are estimated. As reported earlier (page 3), in 2014 BEA decided to re-engage usage of SIAT data after 1) their trial with credit card data and 2) their independent evaluation of the SIAT program.
2. We would be in violation of the Travel Promotion Act which:

Mandates “expanding the number of inbound air travelers sampled by the Commerce Department's *Survey of International Travelers* to reach a 1 percent sample size and revising the design and format of questionnaires to accommodate a new survey instrument, improve response rates to at least double the number of States and cities with reliable international visitor estimates and improve market coverage.”

1. NTTO will not have consistent reportable data for historical value and performance measures at a time when the travel and tourism industry has been identified as one of the top industries expected to successfully deliver on the President’s National Export Initiative.
2. NTTO will not have the capability to support the National Economic Council and the Jobs Council which have both focused on travel and tourism as a key instrument for economic recovery and an employment generator, for which the export value will contribute significantly.
3. The Corporation for Travel Promotion (CTP) d/b/a Brand USA, Inc.), established by the Travel Promotion Act, continuously develops their international travel promotion and marketing campaigns to stimulate this top services export. The Corporation is recognizing the value of the SIAT resource and the accompanying statistical system elements to guide their strategic direction and to measure their performance once their efforts are launched.
4. The SIAT data is used in the ongoing production of the Travel and Tourism Satellite Accounts (TTSAs) for which we pay $300,000 a year for BEA to produce. The government and industry rely upon the TTSA as the only measure of employment generated by travel and tourism exports, which are crucial to the President’s National Export Initiative.

If the SIAT were collected less frequently NTTO would be out of compliance with the Travel Promotion Act which requires an increase in collections. Also,

1. Collection of the SIAT data on a less frequent basis (less than monthly) would impede the purpose and reliability of the statistics generated from this program.

1. There are significant seasonal differences in the characteristics of international travelers. Like all travel, certain areas are more popular during different times of the year. There are also significant variances among the different countries that make up the international travel market. To maintain a representative sample of all overseas and Mexican travelers, the current collection process must be maintained.

# 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;**

This does not apply since any respondent would have a very low probability of being asked to respond again.

* **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

This does not apply since each respondent only answers questions on the survey instrument.

* **requiring respondents to submit more than an original and two copies of any document;**

This does not apply since only the original is requested back.

* **requiring respondents to retain records, other than health, medical, government contract, grant-in- aid, or tax records for more than three years;**

This does not apply since there are no record retention requirements from the respondent.

* **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;**

This does not apply since the SIAT is designed to produce valid and reliable results.

* **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

This does not apply since no classifications other than ‘random selection’, ‘cluster sample’, ‘stratification,’ ‘validity’ and ‘reliability’ are used.

* **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**

Pledge of confidentiality is not required of the respondent. NTTO and Contractor implement a policy of confidentiality as it pertains to a respondent and to subscriber data.

* **requiring respondents to submit proprietary trade secret, 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.**

NTTO has no such requirement.

# If applicable, provide a copy and identify the date and page number of publications 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.

A 60-day request for comments from the public was announced in the Federal Register on

Tuesday, May 21, 2024 (pg. 44634, Volume 89, Number 99). Four comments regarding information collection were received.

* **U.S. Bureau of Economic Analysis (B.E.A.)** – Dennis Fixler, Chief Economist

*Mr. Fixler stresses the importance of the SIAT to estimate international receipts and payments and gross domestic product “for which there is no substitute.” Also the SIAT is critical to determining the economic impact of travel and tourism to the U.S. economy and personal consumption expenditures. B.E.A. also requests select enhancements to the questionnaire (Question19) including wording changes and inclusion of spending categories. (Letter, dated Jun2, 2024 attached)*

* **TD/Cowen Securities, LLC** – Helane Becker, VP Airline Equity Analyst

*Ms. Becker articulates the importance of NTTO data (Includes SIAT) to analyzing the airline industry. (The estimation of airline earnings affects stock prices). (Email dated May 31, 2024, is attached)*

* **Air Insight, LLC** – Addison Schonland

*As an airline industry consultant, Mr. Schonland points out that only the SIAT provides consumer decision variables and demographics to give perspective to the traveler, the focus of ‘destinations and airlines. (Email dated July 12, 2024, is attached*)

* U.S. Citizen (Ron Erdmann)

*Mr. Erdmann points out that the SIAT program is necessary, accurate in its time burden assessments, and its unique data is made transparent to the public and is important to the U.S. travel industry. (Email and letter dated July 16, 2024, is attached)*

[Note: Messrs. Erdmann and Schonland are affiliated with NTTO’s contractor.]

As part of the SIAT re-compete process (for a new contract 2025 – 2029) NTTO performed outreach to several possible vendors via a Request for Information (RFI) to determine any possible alternative methods for collecting data. Companies included the Gallup organization.

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

Except for a short test, using $10.00 gift cards as a reward for response, no overt efforts for payments or remunerations to respondents.

# Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

The confidentiality of a respondent is assured in the opening statement of the SIAT questionnaire. Additionally, neither the names nor PII of respondents are solicited or recorded. The airline seat number is not recorded, which prevents any tracking of the respondent’s identity.

# And behavior or 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.

Question 33 asks of U.S. Residents their a) Ethnicity and b) Race. Recall that the Survey itself is voluntary as is the response to any specific question. Also, no PII is collected. Information on race and ethnicity is collected to inform U.S. policy makers the extent to which either/both are determinants in international travel.

The OMB Standards appear to be followed.

This question was inserted in the 2012 questionnaire revision in compliance with rules of the U.S. Census Bureau. Maintaining said questions seems to be in line with the spirit of the 2022 *National Travel & Tourism Strategy*, part III. Ensuring Diverse, Inclusive and Accessible Tourism Experiences.

NTTO will seek whether it would be appropriate to include ‘disability’ in future questionnaire revisions.

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

* **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. Instead, this cost should be included under ‘Annual Cost to Federal Government’.**

**Table - Estimated Annualized Respondent Burden Hours**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Information Collection Instrument** | **Type of Respondent (e.g., Occupational Title)** | **# of Respondents (a)** | **Annual # of Responses/ Respondent (b)** | **Total # of Annual Responses**  **(c) = (a) x (b)** | **Burden Hours/ Response (d)** | **Total Annual Burden Hours**  **(e) = (c) x (d)** |
| **0625-0227** | **Adult Traveler** | **300,000** | **1\*** | **300,000** | **15min** | **75,000hours** |
| **Total** |  | **300,000** |  | **300,000** |  | **75,000hours** |

Please note that the respondents reply to the questionnaire voluntarily.

Also, note that on average only 55 percent of respondents are U.S. citizens

\*Annual # of responses is substantially below ‘1’ since 300,000 are selected from a population of over 40.0 million air travelers. Therefore, the chance of responding more than once per year is minimal.

**Table - Estimated Annualized Respondent Costs**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Type of Respondent/ Occupational Title** | **# of Respondents** | **# of Responses per Respondent** | **Average Burden per Response** | **Hourly Wage Rate\*** | **Total Burden Costs** |
| Adult Traveler | 300,000 | 1 | 15/60 | $30 | 2,250,000 |
| **Total** | **--** | **--** | **--** | **--** | **$2,250,000** |

**\*Cite official source of hourly wage rate - The estimate of average burden per response is based on expert review of proposed questions. BLS’s *Occupational Outlook Handbook* - a good wage source.** [**https://www.bls.gov/bls/blswage.htm**](https://www.bls.gov/bls/blswage.htm%20-%20nothing%20on%20international....U.S)

**Table - Estimated Annualized Respondent Costs**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Type of Respondent/ Occupational Title** | **# of Respondents** | **# of Responses per Respondent** | **Average Burden per Response** | **Hourly Wage Rate\*** | **Total Burden Costs** |
| Adult Traveler | 300,000 | 1 | 15/60 | $40 | $3,000,000 |
| **Total** | **300,000** | **--** | **--** | **--** | **$3,000,000** |

**\*Cite official source of hourly wage rate - The estimate of average burden per response is based on expert review of proposed questions. SIAT reported household income Q.32.a.**

The $40 average hourly wage rate was calculated based on per person pro-rata of household income weighted by share of non-residents (45%) and U.S. residents (55%), divided by annual number of working hours (2,000)

Also note that actual #respondents in 2023 was 106,000. The 300,000 is aspirational based on goals mandated by the Travel Promotion Act. The total burden cost was $1,060,000.

# Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

* + **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 consider costs associated with generating, maintaining, and disclosing or providing the information. 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 collections 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.**

Survey respondents voluntarily answer the questionnaire while in the airport departure gate area or on-board the flight. Therefore, this is not appliable.

# 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.

**Agencies may also aggregate cost estimates from Question 12, 13, and 14 in a single table.**

# Table – Annualized Costs to the Federal Government (CY2024)

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Staff** | **Grade/Step** | **Salary** | **Fringe (if applicable** | **% of Effort** | **Total Annualized Cost to Gov’t** |
| **Federal Oversight** |  |  |  |  |  |
| DOC Project Oversight Officer \* | GS14-6 | $154,4288 |  | 65.0% | 100,378 |
| Contractor Cost (labor) |  | Hours |  |  |  |
| 19 in-house contractor staff |  | $34,996 |  |  |  |
| 28 field contractor staff |  | $30,465 |  |  |  |
| Contractor Cost (include-labor) |  |  |  |  |  |
| Operational Costs for Data Collection Activities –Printing, equipment, overhead) |  |  |  |  | $5,559,044 |
| Travel |  |  |  |  |  |
| Other Contractual costs for data collection (ADIS/I-94 processing |  |  |  |  | $217,427 |
| Training |  |  |  |  |  |
| Other (net sales client reports) |  |  |  |  | -$105,672 |
| Total Cost to the Government | (net) |  |  |  | $5,771,177 |
|  |  |  |  |  |  |

\*Program Manager & Contract Officer Representative (III)

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

There have been no changes to the information collection since the last OMB approval.

1. **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.**

NTTO data are published on its website and are produced as reports in Excel and Adobe. The only printed reports are the annual national reports, “Overseas Travelers to the United States” and “U.S. Travelers to Overseas Countries.”

Data/Reports are published monthly, quarterly and annually.

See ‘inbound’ and ‘outbound’ Monitors and Excel reports on the website:

<https://www.trade.gov/survey-international-air-travelers-siat>

Complex analytical techniques apply to:

* Weighting survey data with passenger travel (volume) numbers
* Reliability calculations, to determine standard errors and confidence intervals (95%) for 19 key attributes including destinations visited (Table 24)
* Random selection of airline flights (cluster sampling)
* Quality control checks

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

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

# Explain each exception to the certification statement identified in “Certification for Paperwork Reduction Act Submissions."

**Certification Statement for Paperwork Reduction Act Submissions**

**On behalf of this Federal agency, I certify that the collection of information encompassed by this request complies with** [**5 CFR 1320.9**](http://www.gpo.gov/fdsys/pkg/CFR-2014-title5-vol3/pdf/CFR-2014-title5-vol3-sec1320-9.pdf) **and the related provisions of** [**5 CFR 1320.8(b)(3)**](http://www.gpo.gov/fdsys/pkg/CFR-2014-title5-vol3/pdf/CFR-2014-title5-vol3-sec1320-8.pdf)**.**

**The following is a summary of the topics, regarding the proposed collection of information, that the certification covers:**

# If you are unable to certify compliance with any of these provisions, identify the item and explain the reason in Question 18 of the Supporting Statement.

**If there are not exceptions to the certification statement, the following response would apply:**

The agency certifies compliance with [5 CFR 1320.9](http://www.gpo.gov/fdsys/pkg/CFR-2014-title5-vol3/pdf/CFR-2014-title5-vol3-sec1320-9.pdf) and the related provisions of [5 CFR](http://www.gpo.gov/fdsys/pkg/CFR-2014-title5-vol3/pdf/CFR-2014-title5-vol3-sec1320-8.pdf) [1320.8(b)(3)](http://www.gpo.gov/fdsys/pkg/CFR-2014-title5-vol3/pdf/CFR-2014-title5-vol3-sec1320-8.pdf).