

SUPPORTING STATEMENT FOR eForm Access Request/User Registration

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.

Members of the public will use the eForm Access Request/User Registration to obtain access to the Bureau of Alcohol, Tobacco, Firearms, and Explosives' (ATF's) eForms platform, which is an electronic application filing system. The eForms system allows individuals to create a user identification (ID) and obtain a password to electronically file and submit for processing, multiple application forms for ATF's Firearms and Explosives Services Division (FESD) and National Firearms Act Division (NFAD):

- ATF Form 6 Part 1, Application and Permit for Importation of Firearms, Ammunition and Implements of War;
- ATF Form 6A, Release and Receipt of Firearms, Ammunition, and Implements of War;
- ATF Form 1, Application to Make and Register a Firearm;
- ATF Form 2, Notice of Firearms Manufactured or Imported;
- ATF Form 3, Application for Tax-Exempt Transfer of Firearm and Registration to Special (Occupational) Taxpayer (National Firearms Act);
- ATF Form 4, Application for Tax Paid Transfer and Registration of Firearm;
- ATF Form 5, Application for Tax Exempt Transfer and Registration of Firearm;
- ATF Form 9, Application and Permit for Permanent Exportation of Firearms;
- ATF Form 10, Application for Registration of Firearms Acquired by Certain Governmental Entities; and
- ATF Form 5300.11, Annual Firearms Manufacturing and Exportation Report

Although electronic filing of the afore mentioned forms is voluntary, registered eForms users must submit personally identifiable information (PII) to meet DOJ and ATF computer security requirements. PII will be used to associate registered eForms users with specific ATF-issued license(s), permit(s), registration(s), and/or application(s).

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.

ATF personnel will use the information provided on the eForm Access Request/User Registration to authenticate the identity of all end-users of the eForms system, so they can electronically file the following application:

- ATF Form 6 Part 1, Application and Permit for Importation of Firearms, Ammunition and Implements of War;
- ATF Form 6A, Release and Receipt of Firearms, Ammunition, and Implements of War;
- ATF Form 1, Application to Make and Register a Firearm, ATF Form 2; Notice of Firearms Manufactured or Imported;
- ATF Form 3, Application for Tax-Exempt Transfer of Firearm and Registration to Special (Occupational) Taxpayer (National Firearms Act);
- ATF Form 4, Application for Tax Paid Transfer and Registration of Firearm;
- ATF Form 5, Application for Tax Exempt Transfer and Registration of Firearm;
- ATF Form 9, Application and Permit for Permanent Exportation of Firearms;
- ATF Form 10, Application for Registration of Firearms Acquired by Certain Governmental Entities; and/or
- ATF Form 5300.11, Annual Firearms Manufacturing and Exportation Report;

The eForms system will authenticate end users by comparing information submitted on their eForm Access Request/User Registration, to previously collected records, including current full address information, which are stored in multiple, independently sourced databases. By checking multiple record sources, often with an overlapping scope of coverage, the verification engine will facilitate user authentication and reduce the possibility of fraud. The authentication process will also enable the creation of electronic signatures that will replace handwritten signatures on completed eForm applications, as outlined in the Electronic Signatures in Global and National Commerce Act. ATF will also use the eForm Access Request/User Registration to ensure that the information submitted by users (i.e., company name, current full address, and license number, etc.), correspond with previously sourced data contained in ATF databases. This will ensure accuracy in reporting data from electronically filed applications.

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.

The eForm Access Request/User Registration is available on ATF's eForms system and must be completed and submitted electronically. The information gathered from this form will be used to authenticate users of eForms. For security reasons, the email address provided by users will be used to create their user ID, and to confirm their registration. Registered users will be required to create a password as part of the electronic registration process for eForms.

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 A.2 above.

ATF uses a uniform subject classification system to identify duplication, and to ensure that any similar information already available cannot be used or modified for use for the purpose of this collection.

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

This collection has minimal impact on small businesses, although each business owner must complete the eForm Access Request/User Registration to gain access to eForms.

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.

Access to electronic completion, submission, processing, and approval of any of the above referenced applications on ATF's eForms system, is only possible if the respondent completes this information collection. Members of the public will be unable to obtain access credentials to eForms, without providing required PII.

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 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 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.**

There are no special circumstances associated with this collection. This collection is conducted 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.

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 3 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.

Both a 60-day and a 30-day notice will be published in the Federal Register to solicit public comments.

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

No payment or gift is associated with this collection.

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

The collected information is electronically maintained on a secure server located in a room in ATF's Data Center located in Martinsburg, West Virginia. 5 U.S.C. § 552 protects the information obtained by the government from release to unauthorized individuals. Confidentiality is not assured.

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.

Information of a sensitive nature is required. The Social Security Number, Employer Identification Number, date of birth, and mother's maiden name are requested in order to verify

the identity of individuals who complete eForm Access Request/User Registration process. The collected information will be compared to records in other ATF databases to authenticate the users.

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. General, 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.**
- **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 in Item 14.**

Estimated Annualized Respondent Cost and Hour Burden

Activity	Number of Respondents	Frequency	Total Annual Responses	Time Per Response	Total Annual Burden (Hours)	Hourly Rate*	Monetized Value of Respondent Time
OMB 1140-0087	390,000	1	390,000	2.24 min	2837		
Unduplicated Totals	390,000	1	390,000	2.24 min	2837		

Hourly rate source citation or you may enter a footnote:

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- **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 service component. The estimates should take into account 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 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.**

There are no public costs associated with this collection, which is completely electronic.

14. Provide estimates of the 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), any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 into a single table.

There are no Federal Government costs associated with this collection.

15. Explain the reasons for any program changes or adjustments.

There are no adjustments to this information collection.

16. For collections of information whose results will be published, outline plans for tabulations, 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 results of this collection will not be published.

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 are requesting no exemption.

18. Explain each exception to the certification statement.

This collection of information does not include any exceptions to the certificate statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS.

This collection does not contain statistical data.