



Subject: Request for Non-substantive Change to eFile Beta Pilot

In the summer of 2022 CPSC Staff (Staff) drafted the FR Notice for the eFile Beta Pilot (OMB# 3041-0193). At the time Staff only considered one survey of participants at the end of the Beta Pilot. However, during preparation for the pilot in the summer of 2023, it became clear that multiple surveys will be needed for different points of the pilot. One short survey was sent at the start to establish expectations for CPSC Staff from participants. Staff seeks to send a second survey at the midpoint, and a third one at the end. Staff does not expect any increase in burden for participants to respond to the additional survey as each survey is shorter than the one-time survey originally envisioned. Staff expects that, collectively, the burden for all three surveys will be 2.2 hours, averaging 0.73 hours per survey.

The first survey, which was already sent out, asked about specific filing scenarios that participants may use, such as type of message set or entry type. The purpose of this survey was to prepare CPSC staff in providing support during the Beta Pilot. The second survey, which is intended to be sent out at the midpoint of the Beta Pilot, will ask qualitative questions. This survey is based on the qualitative survey of the Alpha Pilot, specifically question 1 regarding difficulty of each stage of participation and question 4 regarding difficulty of providing the mandatory data fields. For the Beta Pilot, the survey questions expand on specific features of the Product Registry, in addition to the mandatory data fields. The Product Registry for the Beta Pilot is more robust and has more features than the one created for the Alpha Pilot. The purpose of these questions is to better understand participants' abilities in using each feature and plan for improvements if needed. The third survey, which is intended to be sent out at the end of the Beta Pilot, will repeat the qualitative questions and several quantitative questions. By



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repeating the qualitative questions, improvements made in the second half of the Beta Pilot can be measured. The quantitative questions are based on the quantitative survey of the Alpha Pilot, specifically the questions prior to question 1 regarding filing and capital costs, question 2 regarding staff time and costs of stage and burden of participation, and question 4 regarding staff time and costs of providing the mandatory data fields. Similarly, the survey questions expand on specific features of the Product Registry and the eFiling system and were drafted to more precisely identify burden per feature, instead of overall burden. The purpose of these questions is to better understand burden of eFiling and inform rulemaking.

Staff seeks to increase the frequency of response from one survey to three which would be conducted in the intervals described. The net effect on burden from this change would be zero. Therefore Staff is requesting a non-substantive change to an existing Information Collection.