

Example from Alpha Pilot. Actual Beta Pilot survey may vary from this, but expects the length and the questions will be similar.

Participant Name:

1 Questionnaire Regarding Burden for Importers in the eFiling Alpha Pilot (Pilot)

If CPSC proceeds to conduct a larger-scale pilot, the Beta Pilot, we will need to estimate the burden (time and costs) for participants to create, maintain, and provide data for eFiling, and for the government to process and review such data, to meet the requirements of the Paperwork Reduction Act (PRA). CPSC will need to provide such estimates to the Office of Management and Budget (OMB) and receive an OMB control number for the collection of information. The information you provide below will assist CPSC in considering the framework for a Beta Pilot and estimating the burden for submission to OMB.

Total number of products entered into the Product Registry

Total number of products for which PGA data was filed at entry

Total number of entry lines with PGA data submitted in the Pilot

Total estimated average cost to file CPSC PGA data in the Pilot per product \$ _____ ; and per entry line \$ _____ .

Did you incur any capital, operating, or maintenance costs beyond staff time that were necessary to participate in the Pilot? If so, please identify the nature and cost of such expenditures.

1.1 Stage of Participation

1. Please select the way you submitted PGA data:

Product Registry with reference number

Full PGA Message Set

Both

2. Please estimate the burden of participation in the Pilot by Staff Time, Employee Compensation Costs, and Other Costs (please describe nature of other costs). *(If this stage is not applicable to your experience, select N/A)*

2.	STAGE AND BURDEN OF PARTICIPATION IN PILOT	N/A	Staff Time (hours)	Total Compensation Costs	Other Costs
	EXAMPLE		3 hours	\$300.00	\$500 hardware upgrade

A	Onboarding: Understanding CPSC's expectations and directions, including: Kick-Off meeting, CATAIR Implementation Guide, and Business Rules documents		Registry: Full PGA:	Registry: Full PGA:	Registry: Full PGA:
B	Internal planning to approach the project		Registry: Full PGA:	Registry: Full PGA:	Registry: Full PGA:
C	Internally gathering and organizing electronic product data (for either the Reference or Full PGA Message Sets) per product		Registry: Full PGA:	Registry: Full PGA:	Registry: Full PGA:
D	Manually entering data in the Registry per product, or providing Full PGA data to your broker. If you used Full PGA, please describe what method you used to transfer PGA data to your broker.		Registry: Full PGA:	Registry: Full PGA:	Registry: Full PGA:
E	Coordinating with your broker to prepare for project to go live. Please describe any tasks that you believe fall within this category.		Registry: Full PGA:	Registry: Full PGA:	Registry: Full PGA:
F	Coordinating with your broker to sync ACE Cargo Release entry data with Product Registry reference numbers		Registry: Full PGA:	Registry: Full PGA:	Registry: Full PGA:
G	Understanding the CBP warning/rejection messages and working with CPSC to resolve those issues		Registry: Full PGA:	Registry: Full PGA:	Registry: Full PGA:
H	Providing PGA data on an ongoing/recurring basis throughout the pilot		Registry: Full PGA:	Registry: Full PGA:	Registry: Full PGA:
I	Other:		Registry:	Registry:	Registry:

			Full PGA:	Full PGA:	Full PGA:
			Product Registry:	Product Registry:	Product Registry:
		TOTAL	Full PGA:	Full PGA:	Full PGA:

3. If you were to participate in this same Pilot project, but it kicked off 1 year later (July 2017), using a steady-state ACE system and a formalized PGA Message Set approach within ACE, do you believe your internal planning, time, and cost would remain the same or be reduced? Please explain.

1.2 Data

4. How long did it take for you to gather information for each of the data fields and either place the information in the Product Registry or provide it to your broker? A list of data fields appears in the chart below. If the burden for each field is the same, in the space provided below, please estimate the average Staff Time and Total Compensation Cost to provide each data field per product. If the burden to gather information varied by data field, you can use the **optional** chart below to help estimate the average cost to gather data per product by field.

	DATA FIELDS	N/A	Staff Time (Hours)	Total Compensation Cost
A	Product Name and a Unique Product Identifier: <ul style="list-style-type: none"> • GS1 Global Trade Item Number (GTIN), or • Universal Product Code (UPC), or • Model Number, or • Serial Number, or • Registered Number 		Registry: Full PGA:	Registry: Full PGA:
B	Place of manufacture, including the Foreign Manufacturer Name and Address		Registry: Full PGA:	Registry: Full PGA:

C	Testing Party (Laboratory) Name and Address		Registry: Full PGA:	Registry: Full PGA:
D	Rule(s) to which the finished product has been certified		Registry: Full PGA:	Registry: Full PGA:
E	Certificate check box indicating that a required certificate currently exists for the finished product		Registry: Full PGA:	Registry: Full PGA:
	TOTAL		Registry: Full PGA:	Registry: Full PGA:

5. If some data fields were more burdensome than others, what about providing this data made the data field more burdensome?

6. Are there any additional unique product identifiers (in addition to model, UPC, etc.) you would like to include in a future pilot? Why? Please estimate the time and cost associated with providing such a data field on a per-product basis.

7. Should CPSC include additional data elements that were not included in this Pilot in a future pilot? Should such data fields be mandatory or optional? Please estimate the time and cost associated with providing such additional fields on a per-product basis.

8. Are you (or someone on your behalf) separately maintaining the 5 eFiling data elements once such data has been uploaded into the Product Registry or provided to your broker?

Yes

No

If you selected yes, what is the estimated total average cost per year to maintain the eFiling data elements? \$.
Does the cost of maintaining the eFiling data elements depend on the number of products or entries made per year, or is this a static cost?

9. Would eFiling all data elements from a certificate, instead of select data elements from a certificate, be:

More burdensome

Less burdensome

Equally burdensome

Unknown

No Basis

Please explain the basis for your answer, including any increase or decrease in time and cost difference per product.

10. Are you (or someone on your behalf) separately maintaining the 5 eFiling data elements, in addition to maintaining all data for a certificate?

Yes

No

What is the estimated total average cost per year to maintain certificate data? \$

Does the cost of maintaining certificate data depend on the number of products or entries made per year, or is this a static cost?

1.3 Burden

11. On average, how many distinct children's products that are subject to CPSC's third party testing and certification requirements do you import per year?

12. On average, how many distinct non-children's products that are subject to CPSC's general certificate of conformity requirement do you import per year?

13. On average, how many distinct SPH-listed products (children's draw strings, electric handheld hairdryers, holiday lights, extension cords) do you import per year?

14. On average, how many entry lines per year are associated with each of the following?

Importation of a regulated children's product

Importation of a regulated non-children's product

Importation of an SPH-listed product

15. CPSC provided a web services option to upload data into the Product Registry. No participants used this option in the Alpha Pilot. Why did your firm choose manual entry into the Product Registry during the Pilot? Would you use a web services option in a future pilot?

16. If burden was an issue in using web services, can you estimate the average time and compensation costs, and any capital or one-time costs, associated with using web services initially and on an ongoing basis?

17. In a future pilot, would the web services option decrease the burden of providing product data? If so, by how much per product and on an ongoing basis?

18. What, if any, impact did eFiling have on your broker costs to file entry data? Can you estimate the cost per product, per line?

1.4 General Questions

19. Do you have any other comments/feedback on the time, costs, or burden to participate in the eFiling Alpha Pilot that will assist us in estimating the burden to participate in a Beta Pilot?

20. How much time did it take for you to complete this Questionnaire?

Broker Name:

2 Questionnaire for Brokers Regarding Burden in the eFiling Alpha Pilot (Pilot)

If CPSC proceeds to conduct a larger scale pilot, the Beta Pilot, we will need to estimate the burden (time and costs) for participants to create, maintain, and provide data for eFiling, and for the government to process and review such data, to meet the requirements of the Paperwork Reduction Act (PRA). CPSC will need to provide such estimates to the Office of Management and Budget (OMB) and receive an OMB control number for the collection of information. The information you provide below will assist CPSC in considering the framework for a Beta Pilot and estimating the burden for submission to OMB.

Total number of products entered into the Product Registry

Total number of products for which PGA data was filed at entry

Total number of entry lines with PGA data submitted in the Pilot

Total estimated average cost to file PGA data in the Pilot per product \$ _____ ; and per entry line \$ _____ .

Did you incur any capital, operating, or maintenance costs beyond staff time that were necessary to participate in the Pilot? If so, please identify the nature and cost of such expenditures.

1. Please select the way you submitted data in ACE:

Reference PGA Message Set (Product Registry Reference Number)

Full PGA Message Set

Both

2. Please estimate the burden of participation in the Pilot by Time, Employee Compensation Costs, and Other Costs (please describe nature of other costs). *(If this stage is not applicable to your experience, select N/A)*

	STAGE AND BURDEN OF PARTICIPATION IN PILOT	N/A	Staff Time (hours)	Total Compensation Costs	Other Costs
	EXAMPLE		3 hours	\$300.00	\$500 hardware upgrade
A	Onboarding: Understanding CPSC's expectations and directions including: Kick-Off meeting, CATAIR Implementation Guide, and Business Rules documents		Registry: Full PGA:	Registry: Full PGA:	Registry: Full PGA:
B	Internal planning to approach the project		Registry: Full PGA:	Registry: Full PGA:	Registry: Full PGA:
C	Application software changes to code the Reference PGA Message Set		Registry: Full PGA:	Registry: Full PGA:	Registry: Full PGA:
D	Application software changes to code the Full PGA Message Set		Registry: Full PGA:	Registry: Full PGA:	Registry: Full PGA:
E	Coordinating with the Importer(s) to sync ACE Cargo Release entry data with product reference numbers		Registry: Full PGA:	Registry: Full PGA:	Registry: Full PGA:
F	Understanding the CBP warning/rejection messages and working with CPSC to resolve those issues		Registry: Full PGA:	Registry: Full PGA:	Registry: Full PGA:
G	Providing PGA data on an ongoing/recurring basis throughout the pilot		Registry: Full PGA:	Registry: Full PGA:	Registry: Full PGA:

H	Other:		Registry: Full PGA:	Registry: Full PGA:	Registry: Full PGA:
		TOTAL			

2.1 Burden

3. What impact, if any, did eFiling have on the cost to file for participating clients, on a per-product and a per entry line basis? Were those costs passed on to participants? If eFiling did not impact costs for the Alpha Pilot, what impact do you anticipate that it will have on a per-product and per entry line basis in a Beta Pilot? What impact, if any, do you anticipate that it will have on a per-product and per entry line basis if eFiling is implemented for all regulated consumer products?

4. What, if any, one-time costs were associated with hardware, software, and training upgrades to accommodate participation in the eFiling Alpha Pilot? If training costs are not included in the chart above, please estimate the average number of hours of staff time and total compensation costs to train employees.

5. Once filed in a PGA Message Set, are you maintaining the reference PGA number or the 5 eFiling data elements?

Yes

No

Is there any additional cost (over and above the costs related to data you currently maintain for each client) associated with maintaining this data? If your answer is yes, please provide the estimated total average cost per year to maintain this data. \$

Does the cost of maintaining this data depend on the number of products or entries made per year, or is this a static cost?

6. If you were to participate in this same eFiling Alpha Pilot project, but it kicked off one year later (July 2017) using a steady state ACE system and a formalized PGA Message Set approach within ACE, do you believe your internal planning, time, and cost would remain the same, or be reduced?

7. How much time did it take for you to complete this Questionnaire?