Supporting Statement
Cost Submission
1651-0028

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 statue and regulation mandating or authorizing the collection of information.

The information collected on CBP Form 247, Cost Submission, is used by CBP to assist in correctly calculating the duty on imported merchandise. This form includes details on actual costs and helps CBP determine which costs are dutiable and which are not.

This collection of information is provided for by subheadings 9801.00.10, 9802.00.40, 9802.00.50, 9802.00.60 and 9802.00.80 of the Harmonized Tariff Schedule of the United States (HTSUS), and by 19 U.S.C. 1508 through 1509, 19 CFR 10.11-10.24, 19 CFR 141.88 and 19 CFR 152.106.
CBP Form 247 can be found at http://www.cbp.gov/xp/cgov/toolbox/forms/

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 provided on CBP Form 247 is used to substantiate actual costs that are necessary to establish the appraised value and assessment of duties by CBP.

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.

This form is a fillable form on CBP.gov. Electronic submission to the Automated Commercial Environment is available via the Document Image System (DIS).

Usability Testing:
Since no responses were received from end-users for CBP Form 247, the CBPX team provided input based on their expertise. Currently, all instructions are presented at the beginning, requiring users to flip back and forth while completing the form. Including the form title and number at the top of every page would

improve navigation and ensure users can identify the document easily. Providing relevant instructions next to the corresponding sections of the form would reduce confusion and make the process more intuitive. Also moving to an interactive digital format, such as a fillable PDF or web-based form, would make it convenient for end-users and reduce errors. Finally, providing brief examples or guidance for complex fields directly on the form would further improve usability. These updates would make CBP Form 247 more user-friendly and efficient for both users and CBP staff.

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.

This information is not duplicated in any other place or any other form.

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.

If the information were not collected, verification of compliance with CBP value laws could not be completed, thereby placing an additional burden on the importer during the time of audit.

7. Explain any special circumstances.

This information is collected in a manner consistent with the guidelines of 5 CFR 1320.5(d)(2).

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. The 60-day notice was published on September 19, 2024 (89 FR 76864) on which no comments were received, and a 30-day notice was published on November 27, 2024 (89 FR 93626) on which no comments have been received.

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.

PIA Coverage
DHS/CBP/PIA-003 (b) Automated Commercial Environment (ACE) which discusses the privacy risks with maintaining PII on trade documentation, and specifically mentions CBP Form 247 in Appendix B. In addition, the DHS/CBP/PIA-028 Regulatory Management Information System (RAMIS) discusses CBP uses to select audit candidates from ACE.

SORN Coverage
DHS/CBP-010 Persons Engaged in International Trade in Customs and Border Protections Licenses/Regulated Activities and the DHS/CBP-014 Regulatory Audit Archive System (RAAS) System of Records. Additional SORN coverage is provided by DHS/CBP-001 Import Information System (IIS) which covers ACE and general import trade data.

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.

INFORMATION COLLECTION	TOTAL ANNUAL BURDEN HOURS	NO. OF RESPONDENTS	NO. OF RESPONSES PER RESPONDENT	TOTAL RESPONSES	TIME PER RESPONSE
CBP Form 247	50,000	1,000	1	1,000	50 hours

*Respondents only submit to CBP upon request. CBP estimates that 10 percent of the forms that are prepared are actually submitted. A request for submission of this form usually occurs when a CBP import specialist needs more detailed information to verify the value of imported merchandise that an importer provides on CBP Form 7501.

Public Cost

The estimated cost to the respondents is $1,779,500. This is based on the estimated burden hours (50,000) multiplied by the average loaded hourly wage rate for exporters ($35.59). CBP calculated this loaded wage rate by first multiplying the Bureau of Labor Statistics' (BLS) 2023 median hourly wage rate for Cargo and Freight Agents ($23.24), which CBP assumes best represents the wage for exporters, by the ratio of BLS' Q4 2023 total compensation to wages and salaries for Office and Administrative Support occupations (1.4774), the assumed occupational group for exporters, to account for non-salary employee benefits.[1] CBP assumes an annual growth rate of 3.64% based on the prior year's change in the implicit price deflator, published by the Bureau of Economic Analysis.[2]

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

There are no record keeping, capital, start-up or maintenance costs associated with this information 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.

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1 Source of median wage rate: U.S. Bureau of Labor Statistics. Occupational Employment and Wage Statistics, "May 2023 National Occupational Employment and Wage Estimates United States." Updated April 3, 2024. Available at https://www.bls.gov/oes/2023/may/oes_nat.htm. Accessed June 4, 2024. The total compensation to wages and salaries ratio is equal to the total compensation cost per hour worked for Office and Administrative Support occupations ($33.98) divided by the wages and salaries cost per hour worked for the same occupation category ($23.00). See "Table 2. Employer Costs for Employee Compensation for civilian workers by occupational and industry group." Bureau of Labor Statistics, "Employer Costs for Employee Compensation – December 2023." Released March 13, 2024. Available at https://www.bls.gov/news.release/archives/ecec_03132024.pdf. Accessed June 4, 2024.

2 To adjust to 2024 dollars, multiply by the 2022-2023 percent change in the Bureau of Economic Analysis's Implicit Price Deflators for Gross Domestic Product (122.273/117.973-1). See "Table 1.1.9. Implicit Price Deflators for Gross Domestic Product," Line 1 Gross Domestic Product, annual. Bureau of Economic Analysis. Updated May 30, 2024. Available at https://apps.bea.gov/iTable/?reqid=19&step=2&isuri=1&categories=survey#eyJhcHBpZCI6MTksInN0ZXBzIjpbMSwyLDMsM10sImRhdGEiOltbImNhdGVnb3JpZXMiLCJTdXJ2ZXkiXSxbIk5JUEFfVGFibGVfTGlzdCIsIjEzIl0sWyJGaXJzdF9ZZWFyIiwiMjAxNiJdLFsiTGFzdF9ZZWFyIiwiMjAyNCJdLFsiU2NhbGUiLCIwIl0sWyJTZXJpZXMiLCJBIl1dfQ==. Accessed June 4, 2024.

The estimated annual cost to the Federal Government associated with the review of these records is $63,160. This is based on the number of responses that must be reviewed (1,000) multiplied by the time burden to review and process each response (1 hours) = 1,000 hours multiplied by the average hourly loaded rate for other CBP employees ($63.16)[3] = $63,160.

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

There has been no change in burden hours or to the information being collected.

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, explain the reasons that displaying the expiration date would be inappropriate.

CBP will display the expiration date for OMB approval of this information collection.

18. "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.

3 CBP bases this wage on the FY 2023 salary and benefits of the national average of other CBP positions, which is equal to a GS-9, Step 6. Source: Email correspondence with CBP's Office of Finance on June 17, 2024.