

**Supporting Statement
Entry of Articles for Exhibition
1651-0037**

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.**

Goods entered for the purpose of exhibit at fairs, or for use in constructing, installing, or maintaining foreign exhibits at a fair may be free of duty under 19 U.S.C. 1752. In order to substantiate that goods qualify for duty-free treatment, the consignee of the merchandise must provide information to CBP about the imported goods, which is specified in 19 CFR 147.11(c). Without the required information CBP will not be able to determine if the goods qualify for duty free treatment. A trade fair entry allows for duty-free entry of imported articles intended for exhibitions or for articles that will be used in the construction, installation or maintenance of foreign exhibits at trade fairs. These importations do not require the payment of any taxes or fees except for the Harbor Maintenance Fee (HMF). Trade Fair entries are not exempt from Harbor Maintenance Fee (HMF) pursuant to 19 CFR 24.24(c). "The collection of information is made upon arrival at the port of the fair on a special form of entry, 19 CFR 147.11(c)."

- 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 .**

CBP uses this information to verify that the goods are eligible for duty-free treatment. The Secretary of Commerce reviews, approves or disapproves each request for Trade Fair status. The Secretary also designates the name of the fair, the place where the fair will be held, the date when the fair will open and close, and the name of the operator. If the request is approved, the Secretary notifies the Commissioner of CBP, authorizing the designation of the Trade Fair, and naming the operator of the Trade Fair prior to Trade Fair entries being filed. This Trade Fair Notification from Commerce is an additional element available to 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 .

ACE allows CBP to add the entry type 24 as Non-ABI lineless ACE trade fair entry summary. CBP entry personnel will manually create a Non-ABI lineless Trade Fair entry summary in ACE and input lineless type 24 entry summaries with header data information only, the supporting documentation is submitted into DIS. There is only an annual average of 125 responses submitted annually, so it would not be cost effective to automate this submission. Document Image System (DIS) System Enhancement, June 13, 2024. For all document submissions: Three review status options will be available to CBP (“accepted,” “rejected,” and “under review”). With this change, CBP will have the ability to send review statuses and responds to all DIS submissions.

Usability Testing:

Due to the difficulty of finding trade users in the field to test, usability testing was conducted on the general population from volunteers of the CX department at CBP. According to 19 CFR 147.11(c), articles intended for exhibition at a trade fair must be entered upon arrival at the port of the fair using a special form of entry. This regulation provides a template that includes fields for entry number, port of entry, transportation details, etc. While this template captures the necessary information, it may not be user-friendly for the end-users. Although there’s only an average of 125 submissions annually, enhancing usability could still provide significant value. Suggested improvements include clear instructions for each section, plain language to replace technical terms, sample entries for fields like “Package and contents,” and a logical flow of fields.”

- 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.**

The consequence to the Federal program if this information were not collected would cause a loss of control over the imported merchandise, inhibiting CBP’s mission to protect American people and facilitate trade and travel. This information is collected and used by CBP to substantiate that the goods imported for exhibit have been approved for entry by the Department of Commerce under

the legal authority of the Tariff Schedules of the United States (19 U.S.C. 1752) and under the administrative procedures of 19 CFR 147.11(c).

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, a 60-day notice published on July 7, 2024 (89 FR 59921) on which no comments were received, and on November 22, 2024 (89 FR 92698) 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.

PIA coverage for this information collection is provided by DHS/CBP/PIA-003(b) Automated Commercial Environment (ACE) (July 31, 2015), and available at: <https://www.dhs.gov/privacy-impact-assessments>.

SORN coverage for this information collection is provided by the DHS/CBP-001 Import Information System (IIS) (July 26, 2016) (81 FR 48826), and available at: <https://www.dhs.gov/system-records-notices-sorns>.

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
Articles for Exhibition	833	50	50	2,500	20 minutes (.333 hours)

Approximately 5 percent (125) of these responses are actually submitted to CBP. CBP requests submission only in cases in which additional documentation is needed to verify duty-free treatment.

Public Cost

The estimated cost to the respondents is \$29,611. This is based on the estimated burden hours (832) multiplied by the average loaded hourly wage rate for importers (\$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 importers, 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 importers, 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

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#eyJhcHBpZCI6MTksInN0ZXBzIjpbMSwYLDMsM10sImRhdGEiOltbImNhdGVnb3JpZXMlLCJtdXJ2ZXkiXSxbIks5JUEFfVGFibGVFTGlzdCIsIjEzIl0sWyJGaXJzdF9ZZWYyIiwiaXNjJdLFsiTGZzdF9ZZWYyIiwiaXNjJdLFsiU2Nhbk5UeUJ2ZXJpZXMlLCJBIl1dfQ==. Accessed June 4, 2024.

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.

The estimated annual cost to the Federal Government associated with the review of these records is \$1,158. This is based on the number of responses that must be reviewed (125) multiplied by the time burden to review and process each response (10 minutes or 0.166 hours) = 21 hours multiplied by the average hourly loaded rate for a CBP Trade and Revenue employee (\$55.13)³ = \$1,158.

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

There are no increases or decreases to the burden hours and no changes to the information collected. No changes to the information 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 CBP Trade and Revenue positions, which is equal to a GS-11, Step 1. Source: Email correspondence with CBP’s Office of Finance on June 17, 2024.