

**Supporting Statement**  
**Declaration of Unaccompanied Articles (CBP Form 255)**  
**1651-0030**

**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.**

CBP Form 255, Declaration of Unaccompanied Articles, is completed by travelers arriving in the United States either directly or indirectly from the U.S. Virgin Islands, American Samoa, Guam, and the Commonwealth of the Northern Mariana Islands who are declaring merchandise purchases while visiting these locations which are to be sent from these insular possessions at a later date. It is the only means whereby the CBP officer, when the traveler arrives, can apply the exemptions or 5 percent flat rate of duty to all of the traveler's purchases.

CBP Form 255 is authorized by 19 U.S.C. 1202 (Chapter 98, Subchapters IV and XVI) and provided for by 19 CFR 145.12, 145.43, 148.110, 148.113, 148.114, 148.115 and 148.116. A sample of this form can be viewed at <https://www.cbp.gov/newsroom/publications/forms?title=255&=Apply#>

- 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 form to ensure that mailed unaccompanied articles following travelers returning from the subject insular possessions are accorded the appropriate duty exemption and to ensure the safety and security of those operating the conveyance.

- 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.**

CBP Form 255 is completed by respondents (i.e., returning travelers) while they are in-transit on conveyances such as airplanes. Also, this

form is presented to the CBP officer at the port of arrival for verification and signature, and a copy is subsequently sent to the vendor who affixes it to the package prior to sending it to the traveler at her/his U.S. address. As such, the process would be difficult to automate.

**Usability Testing:**

While we did not receive responses from CBP staff for CBP Form 255 Declaration of Unaccompanied Articles, the CBPX team is providing suggestions based on their expertise and understanding of user needs. One of the key recommendations is to transition the PDF form into a web-based form to streamline the process and improve accessibility. Additionally, the form layout could be redesigned to clearly differentiate the traveler section from the Officer section, to reduce potential confusion. Adding a subheader to explain the purpose of the form would help users better understand its context, while moving the reference to different CFRs to the footer of the form. Separating the permanent address field into distinct fields for street address, city, state, and ZIP code can help with space issues and ensure accurate data entry. These updates would make the form more intuitive and user-friendly for both end-users and CBP Officers.

- 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 elsewhere.

- 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 this information were conducted less frequently, the traveling public would not receive the personal duty exemptions. Furthermore, CBP might not be aware if there were a potentially dangerous item or security threat being transported.

- 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 including a 60-day notice published on September 12, 2024 (89 FR 74281) on which no comments were received, and a 30-day notice 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 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

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.**

<b>INFORMATION COLLECTION</b>	<b>TOTAL ANNUAL BURDEN HOURS</b>	<b>NO. OF RESPONDENTS</b>	<b>NO. OF RESPONSES PER RESPONDENT</b>	<b>TOTAL RESPONSES</b>	<b>TIME PER RESPONSE</b>
CBP Form 255	1,250	7,500	2	15,000	5 minutes (.0833 hours)

**Public Cost**

The estimated cost to the respondents is \$82,113. This is based on the estimated burden hours (1,250) multiplied by the average hourly wage rate for all-purpose air travelers (\$65.69). CBP updated the U.S. Department of Transportation's (DOT) recommended hourly values of travel time savings for intercity, all-purpose travel by air modes by following DOT methodology.<sup>1</sup> CBP assumes a growth rate of 7.88% based on the percent change in the implicit price deflator from 2022 to 2024, published by the Bureau of Economic Analysis.<sup>2</sup>

**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.**

The estimated annual cost to the Federal Government associated with the review of this information collection is \$110,263. This is based on the number of responses that must be reviewed (15,000) multiplied by the time burden to review and process each response (5 minutes) = 1,250 hours multiplied by the average hourly loaded rate for a Supervisory CBP Officer (\$88.21)<sup>3</sup> = \$110,263.

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1 U.S. Department of Transportation, Office of Transportation Policy. *Benefit-Cost Analysis Guidance for Discretionary Grant Programs*, "Table A-2: Recommended Hourly Values of Travel Time Savings for Intercity, All-Purpose Travel by Surface." December 2022. Available at: <https://www.transportation.gov/sites/dot.gov/files/2023-12/Benefit%20Cost%20Analysis%20Guidance%202024%20Update.pdf>. Original DOT policy is available at <https://www.transportation.gov/sites/dot.gov/files/docs/2016%20Revised%20Value%20of%20Travel%20Time%20Guidance.pdf>. Accessed June 17, 2024.

All-purpose trips are calculated using weighted averages, using distributions of travel by trip purpose on various modes. Distribution for local travel by surface modes: 88.2% personal, 11.8% business. Distribution for intercity travel by conventional surface modes: 78.6% personal, 21.4% business. Distribution for intercity travel by air or high-speed rail: 59.4% personal, 40.6% business. This follows methodology from the U.S. Department of Transportation's "Benefit-Cost Analysis Guidance for Discretionary Grant Programs". Available at: <https://www.transportation.gov/sites/dot.gov/files/2023-12/Benefit%20Cost%20Analysis%20Guidance%202024%20Update.pdf>. Accessed: June 18, 2024

2 To adjust to 2024 dollars, multiply by the 2022 Q1 - 2024 Q1 percent change in the Bureau of Economic Analysis's Implicit Price Deflators for Gross Domestic Product (124.203/107.668-1). See "Table 1.1.9. Implicit Price Deflators for Gross Domestic Product," Line 1 Gross Domestic Product, quarterly. Bureau of Economic Analysis. Updated May 30, 2024. Available at [https://apps.bea.gov/iTable/?reqid=19&step=2&isuri=1&categories=survey&\\_gl=1\\*175tbc1\\*\\_ga\\*MTEyNTU1Nzc4Ny4xNzE3NTEyMTUw\\*\\_ga\\_J4698JNNFT\\*MTcxOTQzMDIwNS4xLjEuMTcxOTQzMDIzMi4zMy4wLjA.#eyJhcHBpZCI6MTkslnN0ZXBzIjpbMSwyLDNDLjJkYXRhIjpbWyJjYXRlZ29yaWVzIiwuU3Vydml0sWYJOSVBBX1RhYmxlX0xpc3QiLCIxMyJdXX0=](https://apps.bea.gov/iTable/?reqid=19&step=2&isuri=1&categories=survey&_gl=1*175tbc1*_ga*MTEyNTU1Nzc4Ny4xNzE3NTEyMTUw*_ga_J4698JNNFT*MTcxOTQzMDIwNS4xLjEuMTcxOTQzMDIzMi4zMy4wLjA.#eyJhcHBpZCI6MTkslnN0ZXBzIjpbMSwyLDNDLjJkYXRhIjpbWyJjYXRlZ29yaWVzIiwuU3Vydml0sWYJOSVBBX1RhYmxlX0xpc3QiLCIxMyJdXX0=) Accessed June 4, 2024.

3 CBP bases this wage on the FY 2024 salary and benefits of the national average of Supervisory CBP Officer positions, which is equal to a GS-13, Step 6. Source: Email correspondence with CBP's Office of Finance on June 17, 2024.

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

There has been no increase or decrease in the estimated annual burden hours previously reported for this information collection. There are no changes 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.