

**Supporting Statement**  
**Application for Exportation of Articles under Special Bond**  
**1651-0004**

**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 3495, *Application for Exportation of Articles Under Special Bond*, is an application for exportation of articles entered under temporary bond pursuant to 19 U.S.C. 1202, Chapter 98, subchapter XIII, Harmonized Tariff Schedule of the United States, and 19 CFR 10.38. CBP Form 3495 is used by importers to notify CBP that the importer intends to export goods that were subject to a duty exemption based on a temporary stay in this country. It also serves as a permit to export in order to satisfy the importer's obligation to export the same goods and thereby get a duty exemption. This form is accessible at:

<https://www.cbp.gov/newsroom/publications/forms?title=3495&=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 Form 3495 is used by importers to notify CBP that the importer intends to export goods that were subject to a duty exemption based on a temporary stay in the United States. It is used to identify the exported goods with respect to the original importation, and as a permit to export in order to satisfy the importer's obligation to export the same goods and thereby get a duty exemption.

- 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 3495 can be submitted into ACE using the Document Image System.

**Usability Testing:**

Since no responses were received from end-users for CBP Form 3495, the CBPX team conducted testing and provided input based on their expertise. A few recommendations include enabling tab navigation so users can move between fields using the tab key, provide some guidance on attachments,

improve spacing between fields and related sections to make the form clear and less overwhelming, provide visual cues (e.g. asterisk) to indicate required fields, provide preset formatting or examples (e.g. date, phone number) to reduce errors. We believe these suggestions will enhance the form's usability and clarity.

**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 collected in any other form, and therefore 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 is not collected, CBP could not determine eligibility for duty exemptions on temporary imports.

**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 published on September 19, 2024 (89 FR 76865) 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.**

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.

**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>
Form 3495	2,000	500	30	15,000	8 minutes (0.133333 hours)

**Public Cost**

The estimated cost to the respondents is \$71,180. This is based on the estimated burden hours (2,000) 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.<sup>1</sup> CBP assumes an annual growth rate of 3.64% based on the prior

<sup>1</sup> 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](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

year's change in the implicit price deflator, 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 \$68,913. 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, or .0833 hours) = 1,250 hours multiplied by the average hourly loaded rate for a CBP Trade and Revenue employee (\$55.13)<sup>3</sup> = \$68,913.

**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.

**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.

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for Employee Compensation – December 2023.” Released March 13, 2024. Available at [https://www.bls.gov/news.release/archives/ecec\\_03132024.pdf](https://www.bls.gov/news.release/archives/ecec_03132024.pdf). Accessed June 4, 2024.

<sup>2</sup> 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 [<sup>3</sup> 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.](https://apps.bea.gov/iTable/?reqid=19&step=2&isuri=1&categories=survey#eyJhcHBpZCI6MTksInN0ZXBzIjpbMSwyLDMsM10sImRhdGEiOltbImNhdGVnb3JpZXMiLCJTdXJ2ZXkiXSxbIk5JUEFfVGFibGVfTGZldCIscIsIjEzIl0sWyJGaXJzdF9ZZWFyIiwuMjAxNiJdLFsiTGZzdF9ZZWFyIiwuMjAxNiJdLFsiU2NhbgUiLCJwIl0sWyJ0ZXJpZXMiLCJBI11dfQ==. Accessed June 4, 2024.</p></div><div data-bbox=)

**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.