

**Supporting Statement
Lien Notice
1651-0012**

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.**

Section 564, Tariff Act of 19, as amended (19 U.S.C. 1564) provides that the claimant of a lien for freight can notify Customs and Border Protection (CBP) in writing of the existence of a lien, and CBP shall not permit delivery of the merchandise from a public store or a bonded warehouse until the lien is satisfied or discharged. The claimant shall file the notification of a lien on CBP Form 3485, *Lien Notice*. This form is usually prepared and submitted to CBP by carriers, cartmen and similar persons or firms. The data collected on this form is used by CBP to ensure that liens have been satisfied or discharged before delivery of the freight from public stores or bonded warehouses, and to ensure that proceeds from public auction sales are duly distributed to the lienholder. CBP Form 3485 is provided for by 19 CFR 141.112, and is accessible at <https://www.cbp.gov/newsroom/publications/forms?title=3485&=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 .**

The data collected on form 3485 is used by CBP to ensure that liens have been satisfied or discharged before delivery of the freight from public stores or bonded warehouses, and to ensure that proceeds from public auction sales are duly distributed to the lienholder.

- 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 the CBP website at: <https://www.cbp.gov/newsroom/publications/forms?title=3485&=Apply>. This document is provided to the local director of the Port.

Usability Testing:

CBP Customer Experience (CBPX) team evaluated the form based on CX best practices. To increase usability, as some fields are not editable in PDF format, the form should be transformed into a web-based form for improved accessibility. Using plain language instead of technical terms to make the form more accessible. Adjust the layout to group related information and improve readability. Include brief instructions to guide users through the process. Additionally, to improve overall comprehension, especially for new users, the form should include a description of its purpose and impact at the top.

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 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, as well as any technical or legal obstacles to reducing burden.**

There would be no consequence to the Federal program or policy if this information was collected less frequently. This information is collected for the benefit of the claimant.

7. **Explain any special circumstances.**

This information is collected in a manner consistent with the guidelines of 5 CFR 1320.6.

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 June 13, 2025 (90 FR 25064) on which no comments were received, and a 30-day notice on November 24, 2025(90 FR 52989) 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 ACE, dated July 31, 2015, and a SORN for Import Information System, dated July 26, 2016 (81 FR 48826), will be included in this ICR. No assurances of confidentiality are provided to respondents.

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
Form 3485	28,000	112,000	1	112,000	15 minutes (.25 hours)

Public Cost

The estimated cost to the respondents is \$1,023,960. This is based on the estimated burden hours (28,000) multiplied by the average loaded hourly wage rate for importers (\$36.57). CBP calculated this loaded wage rate by first multiplying the Bureau of Labor Statistics' (BLS) 2024 median hourly wage rate for Cargo and Freight Agents (\$23.99), which CBP assumes best represents the wage for importers, by the ratio of BLS' Q4 2024 total compensation to wages and salaries for Office and Administrative Support occupations (1.4886), the assumed occupational group for importers, to account for non-salary employee benefits.¹

¹ Source of median wage rate: U.S. Bureau of Labor Statistics. Occupational Employment and Wage Statistics, "May 2024 National Occupational Employment and Wage Estimates United States." Updated April 2, 2025. Available at

CBP uses an annual growth rate of 2.42% 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 recordkeepers resulting from the collection of information.

There are no recordkeeping, capitalization or start-up costs associated with this 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 \$785,559. This is based on the number of responses that must be reviewed (112,000) multiplied by the time burden to review and process each response (5 minutes or .083 hours) = 9,333 hours multiplied by the average hourly loaded rate for a CBP Trade and Revenue employee (\$84.17)³ = \$785,559.

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

No changes to the annual burden hours previously reported for this information collection and no change to the collection of information or method of 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.

https://www.bls.gov/oes/2024/may/oes_nat.htm. Accessed June 17, 2025. The total compensation to wages and salaries ratio is equal to the total compensation cost per hour worked for Office and Administrative Support occupations (\$35.86) divided by the wages and salaries cost per hour worked for the same occupation category (\$24.09). 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 2024.” Released March 14, 2025. Available at https://www.bls.gov/news.release/archives/eccec_03142024.pdf. Accessed June 17, 2025.

2 To adjust to 2025 dollars, multiply by the 2023-2024 percent change in the Bureau of Economic Analysis's Implicit Price Deflators for Gross Domestic Product (125.230/122.273-1). 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, 2025. Available at <https://apps.bea.gov/iTable/?reqid=19&step=2&isuri=1&categories=survey%3DeyJhcHBpZCI6MTkzLnN0ZXBzIjpbMSwyLDMzM10sImRhdGEiOltblmNh dGVnb3 JpZXMiLCJTdXJ2ZXkiXSxbIk5JUEFvGfBgVFTGlzdCBlsljEzIl0sWwYjaXJzdF9ZWFiylwiMjAxNiJdL FsiTGFzdF9ZWFiylwiMAyNCJldFsiU2NhbgUiLCJwIl0sWwVjTZXJpZXMiLCJBIml0fQ==>. Accessed June 17, 2025.

3 CBP bases this wage on the FY 2024 salary and benefits of the national average of CBP Trade and Revenue positions. Source: Email correspondence with CBP's Office of Finance on July 15, 2025.

- 17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

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

- 18. Explain each exception to the certification statement identified in Item 19,**
a. "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.