

SUPPORTING STATEMENT
U.S. Department of Commerce
International Trade Administration
Domestic and International Client Export Services and Customized Forms Renewal
OMB Control No. 0625-0143

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.

The International Trade Administration's (ITA) is mandated by Congress to broaden and deepen the U.S. exporter base and to attract inward foreign direct investment. It accomplishes this by providing counseling, programs and services to help U.S. organizations export and conduct business in overseas markets. This information collection package enables ITA to provide appropriate global trade services to U.S. businesses and international buyers.

ITA offers a variety of services to enable clients to begin exporting and global trade or to expand existing export and global trade efforts. Clients may learn about available services from business related entities such as the National Association of Manufacturers, Federal Express, State Economic Development offices, the internet or word of mouth. ITA provides a standard set of services to assist clients with identifying potential overseas partners, establishing meeting programs with appropriate overseas business contacts and providing due diligence reports on potential overseas business partners. ITA also provides other global trade related services considered to be of a "customized nature" because they do not fit into the standard set of services but are driven by unique business needs of individual clients.

The dissemination of international market information and potential business opportunities for U.S. companies interested and actively exporting and conducting business globally are critical components of the ITA's global trade assistance programs and services. U.S. companies are able to conveniently access and indicate their interest in services by completing the appropriate forms through various methods, including via a website (e.g. trade.gov), web-based survey or form links, or paper-based forms.

ITA works closely with clients to educate them about the exporting/importing process and to help prepare them for global trading opportunities. When a client is ready to begin the process the field staff provide counseling to assist in the development of a global trade strategy. ITA provides fee-based, global trade-related services designed to help a client's business presence internationally. The type of service that is offered to a client depends upon a client's business goals and where they are in the export/import process. Some clients are at the beginning of the process and require assistance with identifying potential distributors, whereas other clients may be ready to sign a contract with a potential distributor and require due diligence assistance.

Before ITA can provide global trade and export-related services to clients, such as assistance with identifying potential partners or providing due diligence, specific information is required to determine the client's business objectives and needs. For example, before ITA can provide a service to identify

potential business partners, information is needed regarding if the client would like a potential partner to have specific technical qualifications, coverage in a specific market, English or foreign language ability or warehousing requirements. This information collection is designed to elicit such data so that appropriate services can be proposed and conducted to most effectively meet the client's global trading goals. Without these forms ITA is unable to provide services when requested by clients.

The forms ask U.S. businesses standard questions about their company details, demographic information, export/import experience, information about the products or services they wish to export/import and their goals. A few questions are tailored to a specific program type and will vary slightly with each program. ITA staff use this information to gain an understanding of clients' needs and objectives so that they can provide appropriate and effective assistance tailored to each U.S. business' particular global trade requirements.

Additionally, this information collection includes questions associated with the [Proclamation 10908 of March 26, 2025, "Adjusting Imports of Automobiles and Automobile Parts Into the United States,"](https://www.whitehouse.gov/presidential-actions/2025/03/adjusting-imports-of-automobiles-and-automobile-parts-into-the-united-states/) where <https://www.whitehouse.gov/presidential-actions/2025/03/adjusting-imports-of-automobiles-and-automobile-parts-into-the-united-states/> the President imposed additional tariffs on imports of specified automobiles and automobile parts. That Proclamation also provided that for automobiles that qualify for preferential tariff treatment under the United States-Mexico-Canada Agreement (USMCA), importers of such automobiles may submit documentation to the Secretary of Commerce (Secretary) identifying the amount of U.S. content in each model imported into the United States. The Final Rule associated with this Proclamation establishes procedures for submission and review of such documentation by the Department of Commerce (Department).

Importers of automobiles qualifying for preferential treatment under the USMCA seeking preferential tariff treatment on the U.S. content of their automobiles may submit documentation, on a model line basis, identifying the value of U.S. content attributable to each model line imported into the United States. The Department will review each submission and may request supplemental documentation or clarification. Upon verification by the Department that a submission is consistent with this notice and upon a determination of the value of the U.S. content and non-U.S. content for the requested model line, the Department will inform the importer and U.S. Customs and Border Protection (CBP) of that determination and of the value of the non-U.S. content for each model line. The additional tariff will apply exclusively to the value of the non-U.S. content for the relevant model line.

The establishment of this Final Rule has resulted in a revision of the existing IC.

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.

Trade Specialists in domestic Export Assistance Centers and Commercial Specialists at overseas Posts are the main users of the information received from these collections. They use this information to customize forms relative to the services required by each client. These forms are used whenever a client requests a service. The information provides the specialists with the client's background data, special requests and service requirements.

The forms are used internally and are not disseminated to the public.

Additionally, U.S. companies that are interested in obtaining export assistance or participating in an

global trade-related program will provide ITA with information about:

- The programs and services that they wish to participate in
- Company background such as product/service to be exported, demographic information, industry, company size (fees, where applicable, are determined according to company size in accordance with OMB cost recovery requirements) global trade experience, company contact information, client name and contact information
- Global trade goals and objectives such as markets of interest, industries, potential end-users
- ITA relationships (e.g. U.S. Export Assistance Center(s)) previously contacted and ITA staff with whom the client may have previously worked

The collected information will be used by ITA staff in counseling and assisting domestic and international clients, and in fulfilling U.S. firms' requests for global trade assistance services and programs.

The collection is voluntary, and the frequency will be on-going and will depend upon the demand U.S. companies have for ITA services and programs. These forms are used by firms to indicate their interest in participating in a service or program; therefore, if a firm is not interested in obtaining an ITA service or participating in an export/import-related program, there is no need for the firm to complete a form. Companies can access these forms via ITA websites, and they may submit them electronically.

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.

One of the main way ITA registers its clients is through trade.gov. ITA is designing an environment to capture basic client contact information. Moreover, as the client expands their global trade needs, additional information will be collected and stored in a database in order to reduce client burden. With the new website the functionality for pre-populating forms becomes available and with the approval of this information collection, ITA will be able to begin the process design and start pre-populating forms once a client has registered on trade.gov. The trade.gov project is contingent on funding.

However, clients participating in ITA trade events can enjoy a simplified account creation through InEvent, allowing clients to enable single-sign-on (SSO) when registering for new events.

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 Question 2

There is no duplication of information within the DOC or another government entity. The information collected represents unique client information that is required by ITA to efficiently and effectively provide services to U.S. exporters and global trade companies to document the effectiveness of our services in creating international trade successes for U.S. businesses.

ITA maintains a central customer relationship management (CRM) system (Salesforce) that is accessible to domestic and internationally based ITA staff. Client information is stored in the CTS

and ITA staff can check to see whether we have the necessary information about a client's global trade needs and goals thereby eliminating duplication of information and ensuring that we do not ask clients to provide information that we already have.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

This information collection involves small businesses. ITA will consolidate existing currently approved questions to create an all-inclusive and flexible package to ensure that clients only provide the information needed and reduce client burden by utilizing pre-populated data. With increased forms creation flexibility and the ability to immediately ascertain key information, ITA can effectively aid U.S. organizations to achieve their exporting and global trade expansion goals. The minimal information will be collected to provide the best export/import services no matter the size of the organization.

Moreover, the majority of these forms have been in use by ITA for over five years and during this time we have not received any negative feedback from either clients or client-facing staff regarding the use of these forms.

6. Describe the consequence 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.

If the collection is not conducted or is conducted less frequently, the quality of service that ITA provides to private sector clients may drastically decrease and we may be hindered in meeting our customer's specific needs and requirements. Also, ITA is moving away from products to solutions and this shift in service delivery requires very specific and detailed information. This detailed client information allows ITA to deliver more effective and efficient services based on client specific requirements.

Also, if approval is not granted for use of these documents, ITA's ability to conduct its congressional mandate of broadening and deepening the export base may not be met.

These documents enable clients to request and obtain export and global trade-related services. Also, these instruments provide ITA with details about clients' products/services to enable ITA to provide clients with the assistance they require to successfully export/import their goods/services to international buyers.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

This collection will be conducted in a manner consistent with OMB guidelines.

8. If applicable, provide a copy and identify the date and page number of publications 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.

A Federal Register Notice soliciting public comment was published on July 16, 2025. One comment

was received asking whether ITA collects Employer Identification Numbers (EINs). The commenter also noted that if EINs were collected, their comment should be disregarded.

Upon review, ITA confirms that the collection of EINs is included in the approved questionnaire for this information collection, and the commenter has been notified of this. Accordingly, the comment does not raise any new or substantive issues for consideration, and no changes to the information collection are required as a result.

ITA staff consults with respondents and clients to determine areas where improvements to the application, form, questionnaire, or survey and its process can be made. ITA also provides opportunities in its applications, forms, questionnaires, and surveys for respondents to provide their feedback on how to improve the application, form, questionnaire, or survey.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Not applicable. Respondents will not receive payments or gifts.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

All responses to this collection of information will be provided confidentiality to the extent allowed by law. This assurance will be printed at the bottom of each form.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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.

No questions of a sensitive nature are asked.

12. Provide estimates of the hour burden of the collection of information.

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of**

contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under ‘Annual Cost to Federal Government’.

It is estimated that 50,000 domestic and 50,000 international clients will respond at least twice (100,000+100,000) for a total of 200,000 responses. The average time to complete a request is 5 for Contact information to 5 minutes for Organization and Events/Activities information (10 minutes is used for this request). The burden hours will be 33,333.

Additionally, it is expected to have 20 respondents from the Private Sector complete submissions to be considered for Tariff preferential treatment in connection with the [Proclamation 10908 of March 26, 2025, “Adjusting Imports of Automobiles and Automobile Parts Into the United States.”](#). Those submissions are estimated to take each respondent 20 hours to complete, resulting in burden hours of 800.

The total estimated respondent burden hours will be 34,133.

Estimated Respondent Burden Hours

Information Collection Instrument (i.e., Type of Response)	Type of Respondent / Occupational Title	Number of Respondents (a)	Number of Responses Per Respondent (b)	Total Number of Responses (c) = (a) x (b)	Burden Hours Per Response (d)	Total Burden Hours (e) = (c) x (d)
Combined Customer Survey Questions	Business or other for-profit organizations; Not-for-profit institutions;	100,000	2	200,000	.167	33,333
Tariff Preferential Treatment Submissions	Private Sector	20	2	40	20	800
Total						34,133

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

Based on the following customer makeup of ITA’s client population shown below, and median salary data taken from glassdoor.com, ITA estimates that the total annual to our respondents will be \$1,030,485 (estimated total burden time is 34,133 hours).

Respondent Occupation	% of Client Pop.	Median Salary	Hourly Rate	Weighted Avg. Rate
Executive	27%	\$102,690.00	\$49.37	\$13.55
International Business	25%	\$52,649.00	\$25.31	\$6.43

Development				
Sales	20%	\$24,809.00	\$11.93	\$2.39
Customer Service	9%	\$31,493.00	\$15.14	\$1.33
Government Relations	7%	\$79,168.00	\$38.06	\$2.60
Export Logistics	6%	\$50,612.00	\$24.33	\$1.43
Policy Director	3%	\$78,029.00	\$37.51	\$1.16
External Consultant/Legal Representative	1%	\$78,120.00	\$37.56	\$0.52
		\$143,307.00		
In-house Legal Counsel	1%	0	\$68.90	\$0.78
Other	8%	\$59,039.00	\$28.38	\$2.21
Weighted Avg. Hourly Rate				\$30.19
			x 34,133 hours	\$1,030,485

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.

Agencies may also aggregate cost estimates from Question 12, 13, and 14 in a single table. It will take ITA staff approximately 5 minutes to review each Combined Customer Survey response and the total burden hours to review the 200,000 responses will total 16,667 hours. 16,667 hours X \$30/hour staff time = \$500,000

It will take ITA staff approximately 2 hours to review and process each Tariff Preferential Treatment Submission. The total estimated cost would be approximately \$37,200 per year (40 submissions * 3 staff at an average GS-14 salary (\$155/hr)¹ * 2 hours each to review for each submission).

Total annualized cost to the Federal government: \$537,200.

15. Explain the reasons for any program changes or adjustments reported in ROCIS.

Updates have been made to the program's question list, which include removal of duplicate questions as well as the addition of questions that are being requested to be added to existing instruments.

Further updates include global trade related questions associated with the [Proclamation 10908 of March 26, 2025, "Adjusting Imports of Automobiles and Automobile Parts Into the United States,"](https://www.whitehouse.gov/presidential-actions/2025/03/adjusting-imports-of-automobiles-and-automobile-parts-into-the-united-states/) where <https://www.whitehouse.gov/presidential-actions/2025/03/adjusting-imports-of-automobiles-and-automobile-parts-into-the-united-states/> the President imposed additional tariffs on imports of specified automobiles and automobile parts. That Proclamation also provided that for automobiles that qualify for preferential tariff treatment under the United States-Mexico-Canada Agreement (USMCA), importers of such automobiles may submit documentation to the Secretary of Commerce

¹ This value is based on GS 14 step five employees in the Washington, DC locality area in 2025, and the wage rate is adjusted upward by 100% to account for overhead and benefits.

(Secretary) identifying the amount of U.S. content in each model imported into the United States.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The results will not be published.

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.

The expiration date will be displayed on the instruments.

18. Explain each exception to the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

The agency certifies compliance with 5 CFR 1320.9 and the related provisions of 5 CFR 1320.8(b)(3).

B. Collections of Information Employing Statistical Methods

This collection of information does not employ statistical methodologies.

LEGAL AUTHORITY: PUBLIC LAW 15 U.S.C. et seq and 15 U.S.C. 171 et seq.