

## SUPPORTING STATEMENT – PART A

### OMB Control Number 0704-0441 — Defense Federal Acquisition Regulation Supplement, Part 246, Quality Assurance, and Related Clauses in DFARS 252.246

#### Summary of Changes from Previously Approved Collection

- There is an increase in burden due to changes in contract data and an increase in the hourly rate due to the use of calendar year 2025 Office of Personnel Management rates for the Rest of the U.S.

#### 1. Need for the Information Collection

This justification supports renewal and revision of OMB Control Number 0704-0441, which pertains to all information that offerors or contractors must submit related to DFARS contract quality assurance programs. (See paragraph 4 below.) Specific circumstances requiring information collections under 0704-0441 are as follows:

- a. 252.246-7003, Notification of Potential Safety Issues, requires contractors to provide notification of (1) all nonconformances for parts identified as critical safety items acquired by the Government under the contract, and (2) all nonconformances or deficiencies that may result in a safety impact for systems, subsystems, assemblies, subassemblies, or parts integral to a system acquired by or serviced for the Government under the contract.
- b. 252.246-7005, Notice of Warranty Tracking of Serialized Items, requires an offeror to provide with its offer, for each contract line item number, warranty tracking information for each warranted item.
- c. 252.246-7006, Warranty Tracking of Serialized Items, requires contractors, for warranted items, to provide (1) the unique item identifier, and (2) the warranty repair source information and instructions.
- d. 252.246-7008, Sources of Electronic Parts, paragraph (c)(3)(ii) of the clause requires DoD contractors and subcontractors that are not the original manufacturer of or an authorized supplier for an electronic part to make available to the Government, upon request, the following information:
  - Documentation of traceability from the original manufacturer of electronic parts to acceptance by the Government; or
  - When traceability of electronic parts cannot be established, documentation of the inspection, testing, and authentication performed in accordance with industry standards.

In addition, in accordance with paragraph (b)(3)(ii) of the clause, DoD contractors and subcontractors are required to promptly notify the contracting officer in writing and make

available, upon request, documentation of inspection, testing, and authentication of an electronic part, if the contractor or subcontractor is unable to—

- Obtain an electronic part that is—
  - In production by the original manufacturer or an authorized aftermarket manufacturer;
  - Currently available in stock from the original manufacturer, an authorized supplier, or a supplier who obtains such parts exclusively from the original manufacturer or an authorized supplier of those parts; or
    - From a contractor-approved supplier where the contractor assumes responsibility for the authenticity of the part; or
      - Confirm that an electronic part is new or not previously used and that it has not been comingled in supplier new production or stock with used, refurbished, reclaimed, or returned parts.

## 2. Use of the Information

- a. 252.246-7003, Notification of Potential Safety Issues. Contracting officers require timely notification of potential safety defects so that (1) systems and equipment likely affected by the situation can be readily identified, and (2) appropriate engineering investigation and follow-on actions can be taken to establish and mitigate risk.
- b. 252.246-7005, Notice of Warranty Tracking of Serialized Items. The information provided by offerors under this provision alerts contracting officers in those cases where the offeror is proposing to provide a warranty for an individual contract line item for which DoD has not specified a warranty in the solicitation. The warranty notice will permit the Government to recognize and utilize any warranty after contract award.
- c. 252.246-7006, Warranty Tracking of Serialized Items, implements section 818 of the National Defense Authorization Act (NDAA) for Fiscal Year (FY) 2012 (Pub. L. 112-81 as amended by section 817 of the NDAA for FY 2015 (Pub. L. 113-291). The information provided by contractors allows DoD to track warranties for item unique identification (IUID) required items in the IUID registry to obtain maximum utility of warranties provided on contracted items. The identification and enforcement of warranties is essential to the effectiveness and efficiency of DoD's material readiness. Providing visibility and accountability of warranty data associated with acquired goods, from the identification of the requirement to the expiration date of the warranted item, significantly enhances DoD's ability to take full advantage of warranties, resulting in—
  - (1) Reduced costs;
  - (2) Ability to recognize benefits included at no additional cost;
  - (3) Ability to compare performance against Government-specified warranties; and
  - (4) Identification of sufficient durations for warranties for specific goods.

d. 252.246-7008, Sources of Electronic Parts. The notification and documentation requirements described in section 1 of this supporting statement are necessary to comply with statute. The contracting officer will use the information to ensure that the contractor performs traceability/tracking and the additional inspection, testing, and authentication required when an electronic part is not obtained from a trusted supplier. The Government may also use this information to more actively perform acceptance.

### **3. Use of Information Technology**

Information technology is used to the maximum extent practicable, and 100 percent of the responses are anticipated to be collected electronically. Contractors are required to submit their warranty data in electronic format that is accessible via the Product Data Reporting and Evaluation Program (PEDREP) to record the warranty and source of repair information. Use of the electronic PEDREP formats ensures that the data elements for warranty terms are effectively transmitted through various systems, such as Electronic Document Access, Procurement Integrated Enterprise Environment (PIEE) (formerly known as Wide Area WorkFlow), the Invoice, Receipt, Acceptance and Property Transfer module and the PEDREP Warranty Tracking database. Compliance documentation for electronic parts may also be submitted via electronic means.

### **4. Non-duplication**

As a matter of policy, DoD reviews the Federal Acquisition Regulation to determine if adequate language already exists. This request for information applies solely to DoD and does not duplicate any other requirement. DoD cannot obtain similar information for any other source.

### **5. Burden on Small Businesses**

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

### **6. Less Frequent Collection**

Since the nature of the reporting requirement is contract specific, similar information is not readily available elsewhere; therefore, collection is required on a case-by-case basis pursuant to the solicitation provision or contract clause requirements. The consequence of not collecting the information in this manner is the potential for safety repercussions or the loss of warranties for contracted items. For clause 252.246-7008, contractors will only make documentation regarding traceability and inspection, testing, and authentication, available upon request by the Government. In addition, the contractor is only required to notify the contracting officer if the contractor is unable to buy an electronic part from a trusted supplier. Also, if such notification is required for an electronic part to be used in a designated lot of assemblies to be acquired under a single contract, the contractor may submit one notification for the lot, providing identification of the assemblies containing the parts.

## 7. Paperwork Reduction Act Guidelines

This collection of information is consistent with the guidelines delineated in 5 CFR 1320.5(d) (2).

## 8. Consultation and Public Comments

### a. Public Notice

i. A 60-day notice for the collection was published in the *Federal Register* on Jul 21, 2025, at 90 FR 32246. No comments were received during the 60-day comment period.

ii. A 30-day notice for the collection was published in the *Federal Register* on Jan 06, 2026, at 91 FR 360. Per OMB guidance the following will be retroactively grant emergency extensions as a result of the 2025 furlough.

### b. Consultation

No additional consultation, apart from soliciting public comments through the *Federal Register*, was conducted for this submission.

## 9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection, other than remuneration to contractors under their contracts.

## 10. Confidentiality

This information is disclosed only to the extent consistent with prudent business practices and current regulatory, statutory, and Freedom of Information Act requirements. No assurance of confidentiality is provided to respondents. A Privacy Act Statement is not required for this collection because DoD is not requesting individuals to furnish personal information for a system of records. A System of Record Notice (SORN) is not required for this collection because records are not retrievable by personally identifiable information. A Privacy Impact Assessment is not required for this collection because personally identifiable information is not being collected electronically.

## 11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

## 12. Respondent Burden and its Labor Costs

### a. DFARS 252.246-7003

## 1. Estimation of Respondent Burden

DFARS 252.246-7003, Notification of Potential Safety Issues. While no centralized database exists for the reports contractors provide to the individual procuring contracting officer and the administrative contracting officer, the DCMA subject matter expert estimates contractors submit approximately 250 reports each year. One hour is a reasonable amount of time for contractor personnel to create a report that includes the following five required items:

- (1) A summary of the defect or nonconformance.
- (2) A chronology of pertinent events.
- (3) The identification of potentially affected items to the extent known.
- (4) A point of contact to coordinate problem analysis and resolution.
- (5) Any other relevant information.

Estimation of Respondent Burden Hours: 252.246-7003	
Number of respondents	250
Number of responses per respondent	1
Number of total annual responses	250
Hours per response	1
Annual respondent burden hours	250

## 2. Labor Cost of Respondent Burden

Note: The hourly rates were developed by using the 2025 Office of Personnel Management GS-12, step 5, rate for the Rest of the U.S. of  $\$48.13 \times 1.3625$  O/H rate =  $\$65.58$ .

Labor Cost of Respondent Burden: 252.246-7003	
Number of total annual responses	250
Hours per response	1
Cost per hour (hourly wage)	$\$65.58$
Labor burden per response	$\$65.58$
Annual Labor Burden	$\$16,395$

## b. DFARS 252.246-7005

### 1. Estimation of Respondent Burden

DFARS 252.246-7005, Notice of Warranty Tracking of Serialized Items. The solicitation provision at DFARS 252.246-7005 would be included in solicitations that also include the contract clause at DFARS 252.246-7006. A search of the Federal Procurement Data System (FPDS) showed 10,950 new contract awards to 2,741 unique entities on average per year for fiscal years 2022 through 2024 that included the clause at DFARS 252.246-7006. It is estimated that approximately 5 offers were received for each of the 10,950 awards, resulting in 54,750 solicitation responses provided in response to this provision. The response time of 30 minutes for each response totals 27,375 public burden hours for reporting.

Estimation of Respondent Burden Hours: 252.246-7005	
Number of respondents	54,750
Number of responses per respondent (54,750/2,741)	1
Number of total annual responses	54,750
Hours per response	0.5
Annual respondent burden hours	27,375

## 2. Labor Cost of Respondent Burden

The hourly rates were developed by using the 2025 Office of Personnel Management GS-12, step 5, rate for the Rest of the U.S. of \$48.13 x 1.3625 O/H rate = \$65.58.

Labor Cost of Respondent Burden: 252.246-7005	
Number of total annual responses	54,750
Hours per response	0.5
Cost per hour (hourly wage)	\$65.58
Labor burden per response	\$32.79
Annual Labor Burden	\$1,795,253

## c. DFARS 252.246-7006

### 1. Estimation of Respondent Burden

DFARS 252.246-7006, Warranty Tracking of Serialized Items. As noted above, there were 10,950 new contract awards in FPDS on average per year for fiscal years 2022 through 2024 that included this clause. The response time of 30 minutes for each response totals 5,475 total public burden hours for reporting.

Estimation of Respondent Burden Hours: 252.246-7006

Number of respondents	2,741
Number of responses per respondent (10,950/2,741)	4
Number of total annual responses	10,950
Hours per response	0.5
Annual respondent burden hours	5,475

## 2. Labor Cost of Respondent Burden

The hourly rates were developed by using the 2025 Office of Personnel Management GS-12, step 5, rate for the Rest of the U.S. of \$48.13 x 1.3625 O/H rate = \$65.58.

Labor Cost of Respondent Burden: 252.246-7006	
Number of total annual responses	10,950
Hours per response	.5
Cost per hour (hourly wage)	\$65.58
Labor burden per response	\$32.79
Annual Labor Burden	\$359,051

## d. DFARS 252.246-7008

### 1. Estimation of Respondent Burden

DFARS 252.246-7008, Sources of Electronic Parts.

In accordance with paragraph (c)(3)(ii) of the clause when the contractor is not the original manufacturer or authorized supplier for an electronic part, DoD contractors and subcontractors are required have risk-based processes in place and make available, upon request, documentation of traceability of the part including inspection, testing and acceptance of an electronic part. A search of FPDS-NG showed, on average per year for fiscal years 2022 through 2024, 178,150 new contracts that included Clause 252.246-7008 awarded to 7,761 unique contractors. DoD estimates that an average of approximately 2 subcontracts were awarded for each of the prime contracts resulting in 534,450 prime contracts and subcontracts, of which approximately 25 percent of these actions, i.e., 133,613, will require documentation of traceability from the original manufacturer be made available for examination. Recordkeepers will be required for the 534,450 prime contracts and subcontracts.

Additionally, the information collection in paragraph (b)(3)(ii) relates to a notification required when using other than a “trusted supplier,” which should be quite rare and is estimated at 10% of prime contractors, i.e., 776, and actions to include subcontractors (178,150 prime

contracts x 2 subcontractors for each prime =  $534,450 \times .10 = 53,445$ ), since it only occurs when an item is out of production, not currently available in stock, and not available from a contractor-approved supplier. As shown, the estimates include notifications that may be provided by a lower-tier subcontractor to the prime contractor. Respondents must maintain documentation regarding traceability or inspection, testing, and authentication, and make the documentation available to the Government upon request.

Estimation of Respondent Burden Hours: 252.246-7008	
Number of respondents	7,761
Number of responses per respondent $((133,613 + 53,445)/7,761)$	24
Number of total annual responses	187,058
Number of records	534,450
Hours per response	1
Hours per record	30
Annual respondent burden hours	187,058
Annual recordkeeping burden hours	16,033,500

## 2. Labor Cost of Respondent Burden

The hourly rates for respondents were developed by using the 2025 Office of Personnel Management GS-12, step 5, rate for the Rest of the U.S. of  $\$48.13 \times 1.3625$  O/H rate =  $\$65.58$ . The hourly rate for recordkeepers is based on the 2025 OPM GS-9, step 5, rate for the Rest of the U.S. of  $\$33.19 \times 1.3625$  O/H rate, for a total of  $\$45.22$ .

Labor Cost of Respondent Burden: 252.246-7008	
Number of total annual responses	187,058
Number of records	534,450
Hours per response	1
Hours per record	30
Cost per hour (hourly wage) for responses	$\$65.58$
Cost per hour for records	$\$45.22$
Labor burden per response	$\$65.58$
Labor burden per record	$\$1,357$
Annual Labor Burden	$\$12,267,264$
Annual Recordkeeping Burden	$\$725,248,650$

e. Total for 252.246-7003, 252.246-7005, 252.246-7006, and 252.246-7008

1. Total Submission Burden

The total estimated burden hours for DFARS 252.246-7003, 252.246-7005, 252.246-7006, and 252.246-7008 are provided in the following table. The respondents to the clause at DFARS 252.246-7006 are a subset of the respondents for the provision at 252.246-7005:

Estimation of Respondent Burden Hours: 0704-0441	
Total number of respondents	62,761
Total number of annual responses	253,008
Total number of records	534,450
Total burden hours	220,158
Total recordkeeping hours	16,033,500

2. Overall Labor Burden

The total estimated labor cost of the respondent burden for DFARS 252.246-7003, 252.246-7005, 252.246-7006, and 252.246-7008 is provided in the following table:

Labor Cost of Respondent Burden: 0704-0441	
Total number of annual responses	253,008
Total number of records	534,450
Annual Labor Burden	\$14,437,963
Annual Recordkeeping Burden	\$725,248,650

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

14. Cost to the Federal Government

a. Labor Cost to the Federal Government

1. DFARS 252.246-7003

The hourly rates were developed by using the 2025 Office of Personnel Management GS-12, step 5, rate for the Rest of the U.S. of  $\$48.13 \times 1.3625$  O/H rate =  $\$65.58$ .

Labor Cost to the Federal Government: 252.246-7003	
Number of total annual responses	250
Hours per response	1
Cost per hour (hourly wage)	\$65.58
Cost per response	\$65.58
Total cost	\$16,395

#### 2. DFARS 252.246-7005

Labor Cost to the Federal Government: 252.246-7005	
Number of total annual responses	54,750
Hours per response	.5
Cost per hour (hourly wage)	\$65.58
Cost per response	\$32.79
Total cost	\$1,795,253

#### 3. DFARS 252.246-7006

Labor Cost to the Federal Government: 252.246-7006	
Number of total annual responses	10,950
Hours per response	.5
Cost per hour (hourly wage)	\$65.58
Cost per response	\$32.79
Total cost	\$359,051

#### 4. DFARS 252.246-7008

Labor Cost to the Federal Government: 252.246-7008	
Number of total annual responses	187,058
Hours per response	10
Cost per hour (hourly wage)	\$65.58
Cost per response	\$655.80
Total cost	\$122,672,636

5. Total for 252.246-7003, 252.246-7005, 252.246-7006 and 252.246-7008

Overall Labor Burden to the Federal Government	
Total number of annual responses	253,008
Total Labor Burden	\$123,676,929

b. Operational and Maintenance Costs

There are no Government operational and maintenance costs associated with this information collection.

c. Total Cost to the Federal Government

Total labor burden	\$123,676,929
Total operational and maintenance costs	\$0
Total cost to the Federal Government	\$123,676,929

15. Reasons for Change in Burden

The burden has increased since the previous approval due primarily to changes in the data, which reflect more respondents and contract actions, giving rise to a significant increase in total annual responses. In particular, the number of contracts to which Clause 252.246-7008 applies increased significantly and out of proportion to the relevant increase in respondents.

Additionally, the cost per hour increased approximately 19% due to the use of the calendar year 2025 Office of Personnel Management rate for the Rest of the U.S.

0704-0441			
Change in Burden	2022	2025	Difference
Number of respondents	34,842	73,711	38,869
Total annual responses	54,137	253,008	198,871
Total Hours	39,075	202,372	163,297
Cost per hour	\$55.19	\$65.58	\$10.39
Total Cost	\$2,156,549	\$14,437,962	\$12,281,414

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

DoD is not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to “Certification for Paperwork Reduction Submissions”

DoD is not requesting any exemptions to the provisions stated in 5 CFR 1320.9.