

Supporting Statement
Accreditation of Commercial Testing Laboratories and Approval of Commercial Gaugers
1651-0053

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.**

Commercial laboratories seeking to become a Customs and Border Protection (CBP) Accredited Laboratory and commercial gaugers seeking to become a CBP Approved Gauger must submit the information specified in 19 CFR 151.12 and 19 CFR 151.13, respectively, to CBP on CBP Form 6478. After the initial accreditation and/or approval, a private company may apply to include additional facilities under its accreditation and/or approval by submitting a formal written request to CBP. This application process is authorized by Section 613 of Public Law 103-182 (NAFTA Implementation Act), codified at 19 U.S.C. 1499, which directs CBP to establish a procedure to accredit privately owned testing laboratories. The information collected is used by CBP in deciding whether to approve individuals or businesses desiring to measure bulk products or to analyze importations. Instructions for completing these applications are accessible at:

<http://www.cbp.gov/about/labs-scientific/commercial-gaugers-and-laboratories>.

CBP Form 6478 is accessible at:

http://www.cbp.gov/sites/default/files/documents/CBP%20Form%206478_0.pdf.

- 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.**

This collection of information is used by CBP in assessing whether to or not to approve individuals or businesses desiring to measure bulk products or to analyze importations for customs purposes.

- 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.**

A supplemental application that was submitted electronically was used

from 2021-2025, but it did not assist with our review in the application process.

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 in any other place or any other form.

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.**

The collection of the information is critical in establishing the applicant's credentials so CBP can decide whether the applicant is qualified to test and analyze importations.

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. A 60 day notice published on September 12, 2025 (90 FR 44206) and a 30 day notice on November 26, 2025 (90 FR 54347) 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.

No assurances of confidentiality are provided to respondents. Page 4 of the application (Privacy Act Statement) details CBP's use of the information on the application.

- 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 ANNUAL RESPONSES	TIME PER RESPONSE
Application	5	4	1	4	75 minutes (1.25 hours)

Public Cost

The estimated cost to the respondents is \$374. This is based on the estimated burden hours (5) multiplied by the average loaded hourly wage rate for warehouse operators (\$74.88). CBP calculated this loaded wage rate by first multiplying the Bureau of Labor Statistics' (BLS) 2024 median hourly wage rate for Transportation, Storage, and Distribution Managers (\$49.05), which CBP assumes best represents the wage for warehouse operators, by the ratio of BLS' Q4 2024 total compensation to wages and salaries for Management, business, and financial occupations (1.4905), the assumed occupational group for warehouse operators, to account for non-salary employee benefits.¹ CBP

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 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 Management, business, and financial occupations (\$86.66) divided by the wages and salaries cost per hour worked for the same occupation category (\$58.14). 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/ecec_03142025.pdf. Accessed June 17, 2025.

assumes 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 record keepers resulting from the collection of information.

There is an application fee of \$375 for laboratory accreditation and \$200 for gauger approval. To simplify the estimate, the assumption was made that the commercial facility is both a lab (19 CFR 151.12) and gauger (151.13). Most (75%) commercial facilities are both a lab and a gauger. The combined fee of \$575 multiplied (x) the number of respondents (4) = \$2300.

The total annual cost burden is estimated to be \$2300.

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 \$673. This is based on the number of responses that must be reviewed (4) multiplied by the time burden to review and process each response (2 hours) = 8 hours multiplied by the average hourly loaded rate for a CBP Trade and Revenue employee (\$84.17)³ = \$673.

However, the Application fees cover the cost to the government.

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

There has been a decrease in the previously reported annual burden; the reduction is due to adjusting numbers to reflect current usage.

16. For collection of information whose results will be published, outline plans

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#eyJhcHBpZCI6MTksInN0ZXBzIjpjbMSwyLDMsM10slmRhdGEiOiJlbmNhZGVnb3JpZXMiLCJTdXJ2XSkxSXBk5JUEFfVGFibGVfTGldZCIsIjEzIl0sWyJGaXJzdF9ZWYyLiwiMjAxNiJdLFsiTGZkdF9ZWYyLiwiMjA5NCJdLFsiU2NhbgUiLCFwIl0sWyJ0ZXJpZXMtLjBjIl1dfQ==

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.

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.