Public Comments Received in response to 60-Day Notice for Renewal of OMB Control No. FMC-3072-0018

1. FMC Compliance Services – Received Date: 09/25/2026(ID FMC-2026-0298-0011)

Response:

We have reviewed the public comment to 3072-0018 from FMC Compliance Services. The commenter supports the updates to the collection, including the proposed modernization. The comment was broken into four sections.

- Section 1 Necessity and Utility of the Information Collection. The commenter agreed that the current information is necessary but proposed adding information to the "qualification" and "compliance" information collected under Part 515 so that new OTI licensees and/or replacement Qualifying Individuals are required to prove competency in these areas in ways other than job history and personal referrals. The suggestion is beyond the current scope of the collection. The proposed changes would require an FMC rulemaking.
- Section 2 Enhancing Quality, Utility, and Clarity. The commenter stated that the burden estimate appeared reasonable but recommended that the FMC monitor the burden impact to the public throughout the duration of the collection. All FMC information collections are continuously monitored, and the burden re-evaluated at each renewal, or more frequently if needed.
- Section 3 Enhancing Quality, Utility, and Clarity. The commenter supported the FMC's plans to auto-populate data. The commenter requested that FMC: provide "brief, embedded instructions or tooltips within ServiceNow forms" ; "automate validation of required information such as bonds, bond amounts, surety name, license or ORG numbers" and maintain "a simple, accessible change log for updates to forms or system behavior". These suggestions current features of the modernized systems.
- Section 4 Use of Automated Collection Techniques. The commenter supported the automation included in this renewal and encouraged the continued exploration of other potential automation opportunities, such as pre-submission completeness checks, automated reminders for triennial renewals, API-based data retrieval for large OTI organization, and

automated enforcement measures. Pre-submission completeness checks and automated reminders for triennial renewals are current features of the modernized systems. While API-based data retrieval is a welcome suggestion, external data retrieval is more suitable for systems outside of the current scope of this collection. The suggestion for automated enforcement measures would require further clarification for consideration.

2. Kalé Info Solutions USA – Received Date: 10/12/2026 (ID FMC-2026-0298-0012)

Response:

We have reviewed the public comment to 3072-0018 from Kalé Info Solutions USA. The commenter supported the Commission's automation and modernization efforts but encouraged the Commission to implement "true digital regulatory processes" as opposed to simply converting paper processes into electronic forms. The commenter specifically suggested that the Commission: adopt a "submit once, reuse when appropriate" principle, expand automated validation, enable secure system-to system information exchange, promote interoperability and common data standards, and explore trusted data exchange through port and cargo community systems. FMC's information collection addresses several of Kalé's immediate concerns, particularly browser modernization, reuse of vetted information, and electronic submission. Some recommendations, while valuable, are outside the scope of 46 CFR part 515.