

SUPPORTING STATEMENT A
U.S. Department of Commerce
U.S. Census Bureau
OMB Information Collection Request
Automated Export System (AES) Program
OMB Control No. 0607-0152

Abstract

Title 13, United States Code (U.S.C.), Chapter 9, Section 301 authorizes the U.S. Census Bureau (Census Bureau) to collect, compile and publish trade data. Title 15, Code of Federal Regulations (CFR), Part 30, known as the Foreign Trade Regulations (FTR), contains the regulatory provisions for preparing and filing Electronic Export Information (EEI) in the Automated Export System (AES). The Census Bureau uses the AES or successor system as the instrument for collecting export trade data from parties exporting commodities from the United States. In addition to the collection of data, the Census Bureau compiles these export data from the AES, and these data are the basis for the official U.S. trade statistics on exports of commodities. These statistics are used to determine the balance of international trade and are designated for use as a principal economic indicator. The Census Bureau releases these statistics monthly according to the U.S. International Trade in Goods and Services Press Release Schedule.

These data are used in the development of U.S. government economic and foreign trade policies, including export control purposes under Title 50, U.S.C. The Bureau of Industry (BIS) and Security, U.S. Customs and Border Protection (CBP), and other enforcement agencies use these data to detect and prevent the export of certain items by unauthorized parties to unauthorized destinations or end users. Additionally, the data enables U.S. businesses to develop practical export marketing strategies as well as provide a means for the assessment of the impact of exports on the domestic economy.

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 Census Bureau requires mandatory filing of all export information via the Automated Export System (AES). This requirement is mandated through Public Law 107-228 of the Foreign Trade Relations Act of 2003. This law authorizes the Secretary of Commerce with the concurrences of the Secretary of State and the Secretary of Homeland Security to require all persons who file export information according to Title 13, United States Code (U.S.C.), Chapter 9, to file such information through the AES.

The clearance under Office of Management and Budget (OMB) Number 0607-0152 covers the Automated Commercial Environment (ACE) AESDirect Record Formats (Attachment A) and related documents, including the AES Letter of Intent (Attachment B), ACE Exporter Account Application and Quick Reference Guide (Attachment C), AES Certification Statements (Attachment D), the ACE AESDirect User Guide (Attachment E), Preliminary Steel Report (Attachment F), and Public Comments (Attachment G). With this submission, the Census Bureau is requesting continued clearance of the AES program.

The AES is the primary instrument used for collecting export trade data, which are used by the Census Bureau for statistical purposes. Title 13, U.S.C., Chapter 9, Sections 301-307, mandates the collection of these data. The regulatory provisions for the collection of these data are contained in the Foreign Trade Regulations (FTR), Title 15, Code of Federal Regulations (CFR), Part 30. The official export statistics collected from these tools provide the basic component for the compilation of the U.S. position on merchandise trade. These data are an essential component of the monthly totals provided in the U.S. International Trade in Goods and Services (FT-900) Press Release, a principal federal economic indicator, and a primary component of the Gross Domestic Product. The published export data enable the private and public sectors to develop practical marketing strategies as well as provide a means to assess the impact of exports on the domestic economy. These data are used in the development of U.S. government economic and foreign trade policies, including export control purposes under the Export Control Reform Act of 2018, 50 U.S.C. §§ 4801-4852. The Bureau of Industry and Security (BIS), U.S. Customs and Border Protection (CBP), and other enforcement agencies use these data to detect and prevent the export of certain items by unauthorized parties to unauthorized destinations or end users. This information is noted in the ACE AESDirect User Guide located in Attachment E.

In order to publish accurate export trade statistics, the Census Bureau is responsible for maintaining the FTR, which implements the provisions for filing export information in the AES. In addition to the publication of the FT-900, the Census Bureau releases data on imports of steel mill products in advance of the regular monthly trade statistics release. This exception to the normal procedure was initially approved by the OMB in January 1999 and had been subsequently extended annually through means of a separately submitted memo. This exception permitted the public release of preliminary monthly data on imports of steel under the provisions of the OMB's Statistical Policy Directive No. 3 on the Compilation, Release and Evaluation of Principal Federal Economic Indicators. With the revision to the AES Program in 2019, the Census Bureau eliminated the need for an annual approval from OMB since it is included in the Information Collection Request (ICR). See Attachment F for the Preliminary Report on U.S. Imports for Consumption of Steel Products.

The Census Bureau recognizes that FTR revisions should maintain our ability to collect, compile, and deliver complete, accurate, and timely trade statistics while also supporting export control and enforcement efforts. To that end, on August 14, 2025, the Census Bureau issued a Final Rule titled, “Foreign Trade Regulations (FTR): Clarification of Filing Requirements Regarding In-transit Shipments and other FTR Provisions”. This final rule, clarified its regulations governing in-transit shipments from foreign countries through the United States that are subsequently exported to a foreign destination and revised several regulatory sections, including definitions, filing requirements, confidentiality protocols, penalty provisions, and voluntary self-disclosure processes to ensure greater clarity, accuracy, and consistency throughout the FTR.

Additionally, the Census Bureau intends to issue a Notice of Proposed Rulemaking (NPRM) to propose the addition of a conditional data element, country of origin for foreign origin commodities. The Census Bureau will also address the concerns raised in previous OMB Clearance Packages related to the collection of duplicative information in a future rule. The trade community recommended the State of Origin field be removed because it is duplicative information that is captured in the Address of Origin section. The Census Bureau acknowledges the duplicative nature of the State of Origin data element and intends to revisit.

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 information collected via the AES conveys what is being exported (description and commodity classification number); how much is exported (quantity, shipping weight, and value); how it is exported (method of transport, exporting carrier, and whether containerized); who the parties to the transaction are (USPPI, authorized agent, and intermediate and ultimate consignees); from where (state of origin and port of export); to where (port of unloading and country of ultimate destination); and when a commodity is exported (date of exportation). Profile information on the USPPI and the authorized agent provides a contact for verification of the information.

The data collected from the AES serves as the official record of export transactions and is used by the U.S. Federal Government and the private sector. The Federal Government uses every data element in the AES. The mandatory filing requirement of the export information in AES enables the Federal Government to produce more complete, accurate and timely export statistics. The Census Bureau delegated authority to enforce the FTR to the BIS’s Office of Export Enforcement along with the Department of Homeland Security’s CBP and Homeland Security Investigations (HSI). The mandatory use of the AES also facilitates the enforcement by the BIS of the Export Administration Regulations for the detection and prevention of exports of national security sensitive commodities to unauthorized destinations; the enforcement by the CBP of the U.S. Department of State’s International Traffic in Arms Regulations for the exports of defense articles; the validation by the Census Bureau of the Kimberly Process Certificate for the exports of rough diamonds; and enforcement and compliance by other federal agencies (i.e., Environmental

Protection Agency, Drug Enforcement Agency, etc.) of regulations pertaining to export requirements.

Other Federal agencies use these data to develop the components of the merchandise trade figures used in the calculations for the balance of payments and Gross Domestic Product accounts to evaluate the effects of the value of U.S. exports; and to prepare for and assist in trade negotiations under the General Agreement on Tariffs and Trade. Collection of these data also eliminates the need to conduct additional surveys for the collection of information because the AES shows the relationship of the parties to the export transaction (as required by the Bureau of Economic Analysis (BEA). The Bureau of Labor Statistics also uses the AES data as a source for developing the export price index and by the U.S. Department of Transportation for administering the negotiation of reciprocal arrangements for transportation facilities between the U.S. and other countries.

The International Trade Administration relies heavily on the preliminary import statistics of steel mill products provided by the Census Bureau. As a part of the Government's steel initiative, the Department of Commerce was instructed by the Administration to monitor steel imports. The early release of preliminary statistics on steel mill imports allows the steel industry to identify trends and potential shifts in trade patterns and take appropriate action. A variety of parties, including government officials and the public with an interest in imports of steel products continue to use this monitoring system heavily. The FTR, Subpart F, addresses the general requirements for filing import entries with CBP in the ACE in accordance with 19 CFR, which is the source of the import data on steel mill products.

Export statistics collected from the AES aid private sector companies, financial institutions, and transportation entities in conducting market analysis and market penetration studies for the development of new markets and market-share strategies. Port authorities, steamship lines, airlines, aircraft manufacturers, and air transport associations use these data for measuring the volume and effect of air or vessel shipments and the need for additional or new types of facilities. Therefore, information quality is integral to both the pre-dissemination review of Census Bureau information (described in the Bureau's Information Quality Guidelines) and to information collections, where it's incorporated into the Paperwork Reduction Act clearance process.

- 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.**

The AES was developed jointly by the Census Bureau and CBP to provide a paperless method for reporting export information. AES is an information gateway for both the Census Bureau and CBP to improve the timeliness and accuracy of export trade statistics, improve customer service, and ensure compliance with and enforcement of export laws.

AES submissions represented an average of 1,397,343 export records monthly which is 100 percent of non-Canadian export transactions. AES filers are not required to submit AES records for exports to Canada, except for shipments that are license-controlled, contain rough diamonds, used self-propelled vehicles as defined and required by CBP, or are enroute through Canada destined for a third country. Under the terms of a Memorandum of Understanding (MOU) with Canada, the Census Bureau uses Canadian import data as a replacement for U.S. export information. Including automated Canadian data, the Census Bureau receives all of its information from electronic sources. The AES improves the completeness, accuracy and timeliness of processing trade statistics. In the AES, system edits prohibit invalid and impossible data entry and AES filers must make corrections before these data are accepted and processed. As a result, AES records have less than two tenths of a percentage error rate.

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.

Executive Order 13659, Streamlining the Export/Import Process for America's Businesses, was issued on February 19, 2014, to prevent duplication through the development of the International Trade Data System (ITDS). The ITDS allows AES filers to electronically transmit data required by federal agencies for imports and exports through the ACE, the single portal system, "single window." In 2014, the AES was migrated to the ACE, to update the system's technology and platform while complying with Executive Order 13659.

Additionally, CBP continues to develop the ability to receive advance export manifest data, which will improve the accuracy of transportation data elements in the EEI filing and reduce updates to shipment information. CBP issued a NPRM titled "Automated Commercial Environment (ACE) Electronic Export Manifest for Rail Cargo" on January 13, 2025 (RIN 1651-AB52) for Rail Cargo and continues to work on air, truck, and ocean cargo. Operational guidance and implementation of each mode is still under development from CBP. The Census Bureau continues evaluating the collection of data from the electronic export rail and vessel manifest for filings received in the pilot program. The evaluation has proven that transportation data provided by the carrier is more accurate than transportation data estimated by the USPPI and authorized agent. The Census Bureau's evaluation of the data quality from the electronic export rail manifest included the data elements: method of transportation, date of export, port of export, carrier identification and carrier name and foreign port of unloading.

To prevent duplication, the Census Bureau maintains ongoing contact with other federal agencies involved in collecting information on export or export control functions. The Census Bureau has representatives on various advisory committees and working groups to ensure that export data collected by the Census Bureau are not duplicated by other agencies and that the agencies who use the export data collected in the AES adhere to the Census Bureau's statutory and regulatory guidelines on access, use, release, and confidentiality. For example, the Census Bureau is working with CBP as they develop the EEM. In doing so, the Census Bureau and CBP are ensuring that transportation elements (such as port of export, date of export, carrier identification, method of transportation and foreign port of unloading) are filed by the party with the most knowledge of

those data elements. In addition, the Census Bureau monitors policy and regulatory changes made by other federal agencies to ensure that they comply with the guidelines listed above and do not duplicate information collected by the Census Bureau.

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

The AES is accessible via a free Internet application, called ACE AESDirect. The ACE AESDirect provides online registration (ACE Exporter Account Application) and a user guide which aids users in filing export information electronically. ACE AESDirect also provides users with the capability to recall a previous record for use as a template to create subsequent records. The Census Bureau has developed numerous resources to help educate users through webinars, training, and online videos.

The data fields from the AES are edited up-front to provide complete, timely, and accurate export information and transportation data for use by the Census Bureau, CBP and other federal agencies through ACE. For example, if an AES filer reports information in the AES and encounters a fatal error, the AES filer must correct the fatal error immediately, otherwise the AES will not accept the transaction and not issue proof of filing citation back to the AES filer. Through ACE, the export trade community may also access the data they submitted or had submitted on their behalf to AES to audit and conduct data reviews to measure compliance with export laws and regulations.

Several agencies including the Census Bureau, CBP, BIS, and the State Department are involved in extensive outreach and educational efforts to ensure that the export trade community is aware of the export filing requirements to improve reporting compliance. The Census Bureau also works closely with private organizations and trade associations to provide additional educational opportunities to those involved in the export process. Additionally, the Census Bureau has ongoing efforts to inform the export trade community about new system updates and regulatory changes that can affect business operation practices. As a result of these efforts, the following tools are made available: (1) the Global Reach blog; (2) webinars/seminars, which provide training on new regulations, changes to filing requirements, and commodity classification; and (3) updated user guides which detail proper procedures for creating, transmitting, printing and deleting the AES record, and retrieving the AES record to verify and/or update export information. The Census Bureau engages in extensive outreach to increase compliance and improve the quality of information filed in the AES. Currently, 94.09% of AES filers have a compliance rate of 95% or higher.

Additionally, the Census Bureau eliminates the filing of over 12 million AES records annually through a MOU with Canada. The MOU is signed by the Census Bureau, CBP, Statistics Canada, and Canada Border Services Agency and authorizes the Census Bureau to use Canadian import data as its U.S. export information to Canada in exchange for U.S. import data that Canada uses as its Canadian export information to the United States.

6. Describe the 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.

Less frequent collection of export statistics would result in the loss of data that is currently released monthly. This would adversely affect the release of the monthly U.S. International Trade in Goods and Services Report (including U.S. trade balance figures) and the release of the monthly Advance Economic Indicators report that contains international trade in goods statistics. This would also impact the BEA's Advance Estimate of Gross Domestic Product (GDP).

The Census Bureau currently releases the official export statistics approximately 35 calendar days after the month of export. A delay in this release could greatly impact the publication of the merchandise trade balance, produced by the Federal Government, which is one of the most sensitive and closely watched of the principal federal economic indicators. The Council of Economic Advisors, Congress, the Trade Policy Agencies, the press, and financial markets focus great attention on the monthly release. Slight movements in the trade balance affect public policy, financial decisions, Congressional actions, and market movements. The overall trade deficit and deficits with major trading partners are some of the most important economic issues in recent years.

In addition, BEA uses merchandise trade figures in their advance GDP estimate. The GDP measures the value of goods and services produced in the U.S. economy and is critical to the Federal Reserve, businesses, and policymakers around the world. Under coverage of exports will reduce the accuracy of the advanced GDP and lead to greater revisions to the second and third estimates of GDP. Separating the AES record from the actual export movement of a shipment would disallow the use of the AES record as a tool to be used for export control purposes by the CBP, HSI, BIS, the State Department, and any other federal agency utilizing the information for detecting and preventing the export of regulated sensitive commodities to unauthorized destinations.

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

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in- aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in**

- statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

The collection of these data is consistent with each of the Office of Budget and Management guidelines above, except that the response is required more frequently than on a quarterly basis. The USPPI or the authorized agent must present the AES proof of filing citation, postdeparture filing citation, AES downtime citation, an exemption or exclusion citation to the exporting carrier prior to export for annotation on the carrier's outward manifest (19 U.S.C.). However, for shipments between the United States and Puerto Rico, the AES proof of filing citation, postdeparture filing citation, AES downtime citation, exemption or exclusion citation must be presented to the carrier prior to arrival of the shipment at the port of unloading.

- 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.**

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The Census Bureau has an established email list of more than 152,000 individuals and businesses that export. We inform these contacts of any developments or changes within the AES program and frequently receive feedback in person, by email, telephone, or in writing from these entities. The Census Bureau maintains a website (found at <https://www.census.gov/foreign-trade>) and Global Reach blogs (found at <https://www.census.gov/newsroom/blogs/global-reach.html>) that provide up-to-date information on all major developments relating to the AES, FTR, filing requirements, and trade data. The export trade community uses these sites and other federal agency websites extensively to keep informed on current export trade policies as they pertain to developments regarding the preparation and filing of exports.

The Census Bureau regularly participates in seminars and conferences sponsored by various trade organizations and other government agencies. These seminars and conferences educate the export trade community on the AES filing requirements as they pertain to the FTR, Title 15 CFR, Part 30. These seminars and conferences address numerous topics such as how to maintain compliance with the U.S. export regulations, accurately preparing and filing the AES record, and classifying commodities. Although these programs are not specifically designed to elicit public response, the seminars do provide a means of obtaining the public's views on statistical regulations

governing exports. Comments received at these various conferences and seminars are on an individual basis, informal in nature and not for building a consensus. Participation in these conferences enables the Census Bureau to keep the export trade community informed of current regulatory policy decisions and allow for the exchange of information.

The Census Bureau published a Federal Register notice on September 11, 2025 (90 FR 44003-44005) inviting public comments. We received one anonymous comment that asserted that AES filings take an average of 10 minutes based on their survey of AES-Direct users, citing various factors such as authentication wait times, multiple filings per session, number of HTS lines, use of templates, and PGA exposure that can affect filing duration. The Census Bureau's estimate of three minutes (0.05 hours) per electronic AES submission is based on extensive historical data and analysis of electronic submissions across the AES-Direct user base, representing a more comprehensive universe. The AES-Direct users' transactions range from very simple to highly complex, and our three-minute estimate represents an average across this spectrum with many simple filings using saved templates which take considerably less than three minutes, while complex filings involving multiple HTS lines or PGA requirements may take longer. Approximately one-quarter to one-third of AES information is repetitious and can be automatically inserted or saved as a template, and many automated filers extract information from existing databases, eliminating duplicate data entry and significantly reducing filing time. Additionally, 87% of all AES filings have two-line items or less. The Census Bureau maintains that the three-minute estimate is accurate based on our comprehensive analysis; however, we remain open to conducting additional research to further validate the burden estimate.

The Census Bureau received a comment from the U.S. Department of Commerce, Bureau of Economic Analysis (BEA) supporting continued AES data collection. BEA emphasized that this data is crucial to for U.S. merchandise trade statistics and trade in services statistics covering transportation. These statistics are components of the U.S. International Transactions Accounts, which are used to measure U.S. gross domestic product and prepare the nation's input-output accounts. BEA also supports adding the country of origin data element for exports of foreign-origin goods and evaluating data elements related to advance export rail and vessel manifest data. These additions help improve the clarity and accuracy of U.S. international and national accounts statistics. The Census Bureau appreciates BEA's feedback and support for the AES Program.

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

The Census Bureau does not pay respondents to provide the AES information.

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 System of Records Notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

The AES record is exempt from public disclosure by statute, Title 13, U.S.C., Chapter 9, Section 301(g), and exemptions in the Freedom of Information Act, Title 5, U.S.C., Sections 552 (b)(3) and

(b)(4). Public Law 96-275 amended Section 301 by adding Paragraph (g) to provide that "Shipper's Export Declarations (or any successor document), wherever located, shall be exempt from public disclosure unless the Secretary determines that such exemption would be contrary to the national interest." Department Organization Order 35-2A, Section 3.01a, delegated the authority to make the national interest determination to the Director of the Census Bureau. The statutory responsibility to protect information filed in the AES is implemented in the FTR, Part 30.60.

During the AES registration process, filers must certify that all statements made, and information provided is true and correct and understand that penalties for violations of the U.S. laws related to exportation may be imposed (referenced in the FTR, Subpart H - Penalties). In addition, the filing of complete, accurate and timely export information via the AES is mandatory under Chapter 9, Title 13, U.S.C.

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.

The AES records do not contain any questions of a sensitive nature.

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' (Item #14).

The following table shows the total annual responses, and the time required to collect information and to complete the AES record. The hours per response also include time required for record keeping.

AES Annual Responses X Hours Per Response = Total Hours

16,768,118	.05	838,406
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The estimate of approximately three minutes (.05 hours) per electronic AES submission is based on historical records and an examination of an electronic submission. The Census Bureau estimates that approximately one quarter to one third of the information reported in the AES is repetitious and can be automatically inserted on each electronic submission. An example of such repetitious information is the name, address, and Employer Identification Number of the USPPI. Many automated filing respondents extract preexisting information from their electronic databases eliminating the need to repeatedly enter duplicate information. Additionally, the estimate represents an average time and accounts for a wide variety of circumstances.

Burden Hours	X	Mean Hourly Wage	=	Respondent Cost/AES Record
838,406		\$26.64/ Hour		\$22,335,136

The estimate of \$26.64 per hour is based on the mean wages of the cargo and freight agents responsible for preparing and filing the AES record. The estimate was derived from the U.S. Department of Labor's occupational employment statistics.

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).

The Census Bureau expects that varying costs will be incurred for respondents submitting the AES records. For respondents that use the ACE AESDirect, the only cost involved is a personal computer and access to the Internet. Since this investment would be used for more than AES purposes, the cost of this investment would be minimal.

Respondents that prefer to develop or purchase software that connects to the AES, must submit a Letter of Intent (Attachment B) to the Census Bureau to participate in the AES. Typically, there is an initial cost in developing software that interfaces with AES. For respondents who purchase pre-developed software packages, the AES filer will incur a cost to the software vendor.

Some filers may also interface AES with their existing programs, which is generally less expensive than purchasing or developing new software. Further, purchasing of outside freight forwarder services, if utilized by respondents, is part of usual and customary business practices and not specifically required for this information collection. The data supports the decrease in cost because the growth of non-ACE AESDirect filers has drastically decreased. Filers are more likely to use the free, ACE AESDirect system to file.

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 Census Bureau bears the primary federal cost of maintaining ACE AESDirect. Since the collection of export data is an integrated program, detailed costs are not available for each individual AES record. The export statistics program in the Economic Management Division is estimated to cost \$7.7 million for FY2026. The costs include survey design, data collection, data processing, outreach, promotion, and overhead costs. We expect this cost to remain relatively constant for FY2026 and FY2027.

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

The Census Bureau performed an analysis of the AES records submitted from 2022 to 2024, the most complete dataset available for this period. The analysis showed a downward trend in the number of AES records submitted during that timeframe. Therefore, we have adjusted the burden hours downward from 851,261 in 2022 to 838,406 in 2024.

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 Census Bureau processes export data reported on the AES record for publication in categories outlined in the regular foreign trade statistics program. These data are collected and published monthly, approximately 26-28 calendar days after the reference month for the advance international trade in goods and 34-38 calendar days after the reference month for the U.S. International Trade in Goods and Services report.

The Preliminary U.S. Imports for Consumption of Steel Products report is an exception to the monthly press release schedule. The preliminary import steel report is published between 24 and 27 days after the close of the statistical month. Publication of some notices may be delayed when there is a temporary lapse in government funding. As soon as the delayed release is rescheduled we will post to the press release schedule found at https://www.census.gov/foreign-trade/reference/release_schedule.html

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.

We do not wish to display an expiration date within the AES because AES software is

developed by CBP and interfaces to the AES are vendor developed. To include an expiration date within AES-based software would impose extensive and costly changes on AES software vendors and filers.

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).