

**SUPPORTING STATEMENT PART A**  
**U. S. Department of Commerce**  
**Automobile Parts Tariff Offset**  
**OMB Control No. 0625-0143**

**Justification (Questions and Responses)**

**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.**

On March 26, 2025, the President issued Proclamation 10908 (90 FR 14705), “Adjusting Imports of Automobiles and Automobile Parts Into the United States,” (Proclamation 10908) finding that imports of automobiles and certain automobile parts continue to threaten to impair the national security of the United States and imposing specified tariffs to adjust imports of automobiles and certain automobile parts so that such imports will not threaten to impair national security pursuant to Section 232 of the Trade Expansion Act of 1962 (“Section 232”). Section 232 authorizes the President to adjust the imports of an article and its derivatives that are being imported into the United States in such quantities or under such circumstances as to threaten to impair the national security of the United States so that such imports will not threaten to impair national security. Proclamation 10908 imposed a 25 percent tariff on certain imports of automobiles, effective April 3, 2025, and certain imports of automobile parts, effective May 3, 2025.

On April 29, 2025, the President issued Proclamation 10925 (90 FR 18899), which allowed for automobile manufacturers assembling automobiles in the United States to apply for an import adjustment offset amount, which would offset certain tariff liability under Proclamation 10908 on imports of automobile parts. Proclamation 10925 required that within 30 days of the date of the order the Secretary of the Department of Commerce (Commerce) shall establish a process by which automobile manufacturers could submit documentation supporting eligibility and a claim for an import adjustment offset amount. A prepared notice announces procedures for administration of the import adjustment offset amount program, including application, documentation, and certification requirements, eligibility conditions, and coordination with U.S. Customs and Border Protection (CBP).

On June 13, 2025, the International Trade Administration published a Notice titled “Procedures To Administer Import Adjustment Offset Amounts for Certain Imports of Automobile Parts Under Proclamation 10908, as Amended” (90 FR 25027), which established procedures for automobile manufacturers to apply for and use the import adjustment offset amount established by Presidential Proclamation 10925 of April 29, 2025 (90 FR 18899), “Amendments to Adjusting Imports of Automobiles and Automobile Parts Into the United States” (Proclamation 10925) to incentivize domestic automobile production and reduce American reliance on imports of foreign automobiles and their parts.

Proclamation 10984 of October 17, 2025, “Adjusting Imports of Medium- and Heavy-Duty Vehicles, Medium- and Heavy-Duty Vehicle Parts, and Buses Into the United States,”

(Proclamation 10984) took similar action to address the threat imports of Medium- and Heavy-Duty Vehicles (MHDV) and Medium- and Heavy-Duty Vehicle Parts (MHDVPs) pose to the national security of the United States; that Proclamation also amended the offset rules established by Proclamation 10925.

With the publication of the notice, ITA is requesting an emergency approval to meet the requirements of Proclamation 10925 as amended and Proclamation 10984. ITA is also announcing revisions to the process for automobile manufacturers with final production in the United States to submit documentation to request an import adjustment offset amount and announcing a process for MHDV manufacturers with final production in the United States to submit documentation to request an import adjustment offset. The import adjustment offset may only be used by importers of record authorized by that manufacturer, and the amount may only be used to offset tariff liability related to that manufacturer's automobile parts or MHDVP tariff liability under Proclamation 10908 or Proclamation 10984.

This notice establishes procedures for submission and review of such documentation by the Department of Commerce (Department), and the establishment of this notice has resulted in this new IC request. In accordance with 5 CFR Part 1320.13, ITA is seeking emergency review for this new IC request. ITA cannot reasonably comply with the normal clearance procedures because Proclamation 10925 (90 FR 18899), requires that within 30 days of the date of the order, which does not allow sufficient time to obtain PRA clearance using the standard ICR process, to comply with the President's directive to the Secretary of Commerce to establish a process by which automobile manufacturers can submit documentation supporting eligibility for an import adjustment offset amount. This directive is driven by urgent national security concerns, as the President has determined imports of automobiles, auto parts, MHDVs and MHDV parts threaten U.S. national security. Timely implementation of this process is critical to addressing this threat.

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**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.**

Manufacturers seeking an import adjustment offset amount must submit the following documentation for each period for which an import adjustment offset amount is sought:

- 1. Production Forecast:** The number of automobiles (i.e., passenger vehicles (sedans, sport utility vehicles, crossover utility vehicles, minivans, and cargo vans) and light trucks), and MHDVs projected to be produced in the United States by make and model and the plant locations where the projected automobiles and MHDVs will undergo final production during each reporting period.
- 2. MSRP or Aggregate Value:** For Automobiles: The aggregate MSRP value of all such automobiles (i.e., passenger vehicles (sedans, sport utility vehicles, crossover utility vehicles, minivans, and cargo vans) and light trucks) assembled in the United States

during each reporting period. For MHDVs: The aggregate value of all such MHDVs assembled in the United States during each reporting period; manufacturers must calculate this figure using whichever of the following three valuation methods they used in the ordinary course of trade prior to November 1, 2025: MSRP, Dealer Net Cost, or Factory List Price.

3. **Tariff Liability Estimate:** For Automobiles: Projected automobiles and automobile parts tariff liability under Proclamation 10908 or under clause 12 of Proclamation 10984, broken down by Proclamation 10908 and 10984 tariff costs the manufacturer will incur directly and Proclamation 10908 and 10984 tariff costs the manufacturer's suppliers will incur. For MHDVs: Projected MHDV and MHDVPs tariff liability under clauses 1, 7, and 12 of Proclamation 10984, broken down by Proclamation 10984 tariff costs the manufacturer will incur directly and Proclamation 10984 tariff costs the manufacturer's suppliers will incur.
4. **Offset Calculation:** For MHDVs and Automobiles: Requested total import adjustment offset amount for each reporting period, including details of how such amount was calculated.
5. **Importers of Record:** A list of authorized importers of record eligible to decrement against the manufacturer's import adjustment offset amount. This list must include the importer's Importer of Record number and the amount of the import adjustment offset amount allotted to each importer of record. Updates to this list may be submitted electronically to Commerce at [autooffset@trade.gov](mailto:autooffset@trade.gov) and [MHDV232USMCACContent@trade.gov](mailto:MHDV232USMCACContent@trade.gov). At its discretion, Commerce may update this list at other times during the program period.
6. **Certification:** A sworn statement from a senior officer of the manufacturer confirming that the submission is true, accurate, and complete to the best of the manufacturer's knowledge under penalty of perjury and confirming that the manufacturer has conducted reasonable diligence to verify the accuracy of the assertions and facts contained in its submissions.
7. **Additional Information:** Any other information the applicant feels is necessary to facilitate decision making.

The information collected will be used by Commerce staff to facilitate the Secretary's review of the applications and to make a determination of eligibility for the tariff offset on their imported parts.

The collection is voluntary, and the frequency will be ongoing with manufacturers submitting an initial request and amendments to their request as needed.

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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.**

Manufacturers may submit their applications electronically via e-mail to the addresses listed in the notice.

**The response to this question should be consistent with the information provided in field 13(b)(1) of the OMB 83-I form.**

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**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.**

There is no duplication of information within the DOC or another government entity. The information collected represents unique client information that is required by Commerce to efficiently and effectively perform the duties assigned to the Secretary by the President in Proclamation 10925.

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**5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.**

It is expected that all respondents will be major automobile and MHDV manufacturers with operations in the United States. None of these companies are known to be small businesses.

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**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 approval is not granted for use of these documents, this will hinder Commerce's ability to fulfill the directives of the President in Proclamation 10925. This directive is driven by urgent national security concerns, as the President has determined imports of automobiles, auto parts, MHDVs, and MHDV parts threaten U.S. national security. Timely implementation of this process is critical to addressing this threat.

Furthermore, the tariff offsets introduced in this Proclamation are intended to benefit U.S. automobile and MHDV manufacturers by providing manufacturers flexibility to meet the Proclamation's goals, which include to "strengthen United States vehicle assembly operations by encouraging companies to expand domestic production capacity, which is critical to a strong domestic defense industrial base."

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**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.

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

Under OMB's implementing regulations for the Paperwork Reduction Act at 5 CFR 1320.13(a), OMB has authorized emergency processing of this new submission of collection of information without public comment requirements for 90 days.

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**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.

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**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

All responses to this collection of information will be provided confidentiality to the extent allowed by law.

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**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.

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**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.**

**A) Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**

**B) Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

It is expected that 30 respondents from the Private Sector will complete submissions to be

considered for automobile, auto parts, MHDV and MHDV parts tariff offset treatment in connection with the Proclamation 10925 of April 29, 2025, “Amendments to Adjusting Imports of Automobiles and Automobile Parts into the United States” and “Adjusting Imports of Medium- and Heavy-Duty Vehicles, Medium- and Heavy-Duty Vehicle Parts, and Buses Into the United States,” (Proclamation 10984). Those submissions are estimated to take each respondent 40 hours to complete, twice a year, resulting in total estimated respondent burden hours of 2,400.

#### 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)
Automobile & MHDV Parts Tariff Offset Submissions	Private Sector	30	2	60	40	2,400
<b>Total</b>						<b>2,400</b>

**13. Provide estimates of 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 shown in items 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.**

Respondent Occupation	% of Client Pop.	Median Salary	Hourly Rate	Weighted Avg. Rate
Executive	27%	\$102,690.00	\$49.37	\$13.55
International Business Development	25%	\$52,649.00	\$25.31	\$6.43
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
In-house Legal Counsel	1%	\$143,307.00	\$68.90	\$0.78
Other	8%	\$59,039.00	\$28.38	\$2.21
Weighted Avg. Hourly Rate				\$30.19
		x 2,400 hours		\$72,456

**14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.**

It will take ITA staff approximately 4 hours to review and process each Tariff Preferential Treatment Submission. The total estimated cost would be approximately \$111,600 per year (60 submissions \* 3 staff at an average GS-14 salary (\$155/hr)<sup>1</sup> \* 4 hours each to review for each submission).

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**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.**

This is a new information collection.

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**16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.**

Not applicable.

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**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 agency plans to display the expiration date for OMB approval of the information collection on all instruments.

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**18. Explain each exception to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act."**

**A. Certification Statement**

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<sup>1</sup> 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.

The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I.