SUPPORTING
STATEMENT
U.S. Department of Commerce
International Trade Administration
Domestic and International Client Global Trade Services and Customized Forms
OMB Control No. 0625-0143

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 International Trade Administration (ITA) is mandated by Congress to broaden and deepen the U.S. exporter base and to attract inward foreign direct investment. ITA accomplishes this by providing counseling, programs and services to help U.S. organizations conduct business in global markets and to expand into overseas markets. This information collection package enables ITA to provide appropriate services to U.S. businesses and international buyers.

ITA offers a variety of services to enable clients to conduct and expand their existing global trade efforts. Before ITA can provide these services to clients, such as assistance with identifying potential partners or providing due diligence, specific information is required to determine the client's business objectives and needs. This information collection is designed to elicit such data so that appropriate services can be proposed and conducted to most effectively meet the client's global trade goals. Without these forms ITA is unable to provide services when requested by clients.

The dissemination of international market information and potential business opportunities for U.S. companies interested and actively exporting and conducting business globally are critical components of the ITA's global trade assistance programs and services. U.S. companies are able to conveniently access and indicate their interest in services by completing the appropriate forms through various methods, including via a website (e.g. trade.gov), web-based survey or form links, or paper-based forms.

ITA works closely with clients to educate them about global trade processes and to help prepare them for international opportunities. When a client is ready to begin the process the field staff provide counseling to assist in the development of a global trade strategy. ITA provides fee-based, global trade-related services designed to grow a client's business presence internationally. The type of service that is offered to a client depends upon a client's business goals and where they are in the global trade process. Some clients are at the beginning of the process and require assistance with identifying potential distributors, whereas other clients may be ready to sign a contract with a potential distributor and require due diligence assistance.

Before ITA can provide global trade services to clients, such as assistance with identifying potential partners or providing due diligence, specific information is required to determine the client's business objectives and needs. For example, before ITA can provide a service to identify potential business partners, information is needed which can include if the client prefers a potential partner to have

specific technical qualifications, coverage in a specific market, English or foreign language ability or warehousing requirements, and much more. This information collection is designed to elicit such data so that appropriate services can be proposed and conducted to most effectively meet the client's international business goals. Without these forms ITA is unable to provide services when requested by clients.

The forms ask U.S. businesses standard questions about their company details, demographic information, export/import experience, information about the products or services they wish to export/import and their goals, trade mission and event details, and more. A few questions are tailored to a specific program type and will vary slightly with each program. ITA staff use this information to gain an understanding of clients' needs and objectives so that they can provide appropriate and effective assistance tailored to each U.S. business' particular global trade requirements.

Additionally, this information collection includes questions associated with the Proclamation 10908 of March 26, 2025, "Adjusting Imports of Automobiles and Automobile Parts Into the United States," and Proclamation 10984 of October 17, 2025, "Adjusting Imports on Medium- and Heavy-Duty Vehicles, Medium- and Heavy-Duty Vehicle Parts, and Buses Into the United States," where the President imposed additional tariffs on imports of automobiles and Medium- and Heavy-Duty Vehicles (MHDVs) and their parts. That Proclamation also provided that for automobiles and MHDVs that qualify for preferential tariff treatment under the United States-Mexico-Canada Agreement (USMCA), importers of such automobiles and MHDVs may submit documentation to the Secretary of Commerce (Secretary) identifying the amount of U.S. content in each model imported into the United States. The Final Rule associated with these Proclamations established procedures for submission and review of such documentation by the Department of Commerce (Department).

Importers of automobiles and MHDVs qualifying for preferential treatment under the USMCA seeking preferential tariff treatment on the U.S. content of their automobiles and MHDVs may submit documentation, on a model line basis, identifying the value of U.S. content attributable to each model line imported into the United States. The Department will review each submission and may request supplemental documentation or clarification. Upon verification by the Department that a submission is consistent with this notice and upon a determination of the value of the U.S. content and non-U.S. content for the requested model line, the Department will inform the importer and U.S. Customs and Border Protection (CBP) of that determination and of the value of the non-U.S. content for each model line. The additional tariff will apply exclusively to the value of the non-U.S. content for the relevant model line.

ITA requests revision of this collection to streamline the question bank by eliminating duplicate and outdated questions, updating existing questions for accuracy and relevance, and adding new questions where gaps exist.

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.

Trade Specialists in domestic Export Assistance Centers and Commercial Specialists at overseas Posts are the main users of the information received from these collections. They use this information to customize forms relative to the services required by each client. These forms are used whenever a client requests a service. The information provides the specialists with the client's background data, special requests and service requirements.

Additionally, U.S. companies that are interested in obtaining export assistance or participating in a global trade-related program will provide ITA with information about:

- The programs and services that they wish to participate in
- Company background such as product/service to be exported, demographic information, industry, company size (fees, where applicable, are determined according to company size in accordance with OMB cost recovery requirements) global trade experience, company contact information, client name and contact information
- Global trade goals and objectives such as markets of interest, industries, potential end-users
- ITA relationships (e.g. U.S. Export Assistance Center(s)) previously contacted and ITA staff with whom the client may have previously worked

The collected information will be used by ITA staff in counseling and assisting domestic and international clients, and in fulfilling U.S. firms' requests for global trade assistance services and programs.

The collection is voluntary, and the frequency will be on-going and will depend upon the demand U.S. companies have for ITA services and programs. These forms are used by firms to indicate their interest in participating in a service or program; therefore, if a firm is not interested in obtaining an ITA service or participating in an global trade-related program, there is no need for the firm to complete a form. Companies can access these forms via ITA websites, and they may submit them electronically.

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 to adopt this means of collection. Also, describe any consideration of using information technology to reduce burden.

One of the main ways ITA registers its clients is through trade.gov. ITA is designing an environment to capture basic client contact information. Moreover, as the client expands their global trade needs, additional information will be collected and stored in a database in order to reduce client burden. With the new website the functionality for pre-populating forms becomes available and with the approval of this information collection, ITA will be continue the process design and start pre-populating forms once a client has registered on trade.gov. The trade.gov project continues to be contingent on funding.

Another option that these forms are made available is through Microsoft Forms, which allows clients to easily submit their responses electronically.

And clients participating in ITA trade events can enjoy a simplified account creation through InEvent, allowing clients to enable single-sign-on (SSO) when registering for new events.

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

There is no duplication of information within the DOC or another government entity. The information collected represents unique client information that is required by ITA to efficiently and effectively provide services to U.S. exporters and global trade companies to document the effectiveness of our

services in creating international trade successes for U.S. businesses.

ITA maintains a central customer relationship management (CRM) system (Salesforce) that is accessible to domestic and internationally based ITA staff. Client information is stored in the CTS and ITA staff can check to see whether we have the necessary information about a client's global trade needs and goals thereby eliminating duplication of information and ensuring that we do not ask clients to provide information that we already have.

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

This information collection involves small businesses. ITA will consolidate existing currently approved questions to create an all-inclusive and flexible package to ensure that clients only provide the information needed and reduce client burden by utilizing pre-populated data where possible. With increased form creation flexibility and the ability to immediately ascertain key information, ITA can effectively aid U.S. organizations to achieve their exporting and global trade expansion goals. Minimal information will be collected to provide the best services no matter the size of the organization.

Moreover, the majority of these forms have been in use by ITA for over five years and during this time negative feedback has not been received from either clients or client-facing staff regarding the use of these forms.

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 the collection is not conducted or is conducted less frequently, the quality of service that ITA provides to private sector clients may drastically decrease and we may be hindered in meeting our customer's specific needs and requirements. Also, ITA has moved away from products to solutions and this shift in service delivery requires very specific and detailed information. This detailed client information allows ITA to deliver more effective and efficient services based on client specific requirements.

Also, if approval is not granted for use of these documents, ITA's ability to conduct its congressional mandate of broadening and deepening the export base may not be met.

These documents enable clients to request and obtain export and global trade-related services. Also, these instruments provide ITA with details about clients' products/services to enable ITA to provide clients with the assistance they require to successfully trade their goods and services globally.

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.

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.

A Federal Register Notice soliciting public comment was published on August 27, 2026. No comments were received.

ITA staff consults with respondents and clients to determine areas where improvements to the instruments and their processes can be made. ITA also provides opportunities in its instruments for respondents to provide their feedback on how to improve the collection and its process.

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

Respondents will not receive payments or gifts.

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 systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

All responses to this collection of information will be provided confidentiality to the extent allowed by law. This assurance will be printed at the bottom of each form.

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.

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

It is estimated that 50,000 domestic and 50,000 international clients will respond at least twice (100,000+100,000) for a total of 200,000 responses. The average time to complete a request is 5 minutes for Contact information to 5 minutes for Organization and Events/Activities information (10 minutes in total). The burden hours will be 33,333.

Additionally, it is expected to have 20 respondents from the Private Sector complete submissions to be considered for Tariff preferential treatment in connection with the Proclamation 10908 of March 26, 2025, "Adjusting Imports of Automobiles and Automobile Parts Into the United States," and Proclamation 10984 of October 17, 2025, "Adjusting Imports on Medium- and Heavy-Duty Vehicles, Medium- and Heavy-Duty Vehicle Parts, and Buses Into the United States," Those submissions are estimated to take each respondent 20 hours to complete, resulting in burden hours of 800.

The total estimated respondent burden hours will be 34,133.

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)
Combined Customer Survey Questions	Business or other for-profit organizations; Not-for-profit institutions;	100,000	2	200,000	.167	33,333
Tariff Preferential Treatment Submissions	Private Sector	20	2	40	20	800
Total				**200,040**		**34,133**

Based on the following customer makeup of ITA's client population shown below, and median salary data taken from glassdoor.com, ITA estimates that the total annual to our respondents will be $1,030,485 (estimated total burden time is 34,133 hours).

Respondent Occupation	% of Client Pop.	Median Salary	Hourly Rate	Weighted Avg. Rate
Executive	27%	$102,690	$49.37	$13.55
International Business Development	25%	$52,649	$25.31	$6.43
Sales	20%	$24,809	$11.93	$2.39
Customer Service	9%	$31,493	$15.14	$1.33
Government Relations	7%	$79,168	$38.06	$2.60
Export Logistics	6%	$50,612	$24.33	$1.43
Policy Director	3%	$78,029	$37.51	$1.16

External Consultant/Legal Representative	1%	$78,120	$37.56	$0.52
In-house Legal Counsel	1%	$143,307	$68.90	$0.78
Other	8%	$59,039	$28.38	$2.21
Weighted Avg. Hourly Rate				$30.19
			x 34,133 hours	$1,030,485

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 cost estimate 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. The estimates should consider costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

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.

Agencies may also aggregate cost estimates from Question 12, 13, and 14 in a single table.

It will take ITA staff approximately 5 minutes to review each Combined Customer Survey response and the total burden hours to review the 200,000 responses will total 16,667 hours.

16,667 hours X $45/hour staff time = $750,015.

It will take ITA staff approximately 2 hours to review and process each Tariff Preferential Treatment Submission. The total estimated cost would be approximately $37,200 per year (40 submissions * 3 staff at an average GS-14 salary ($155/hr)[1] * 2 hours each to review for each submission).

Total annualized cost to the Federal government: $787,215.

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

Updates have been made to the program's question list, which include eliminating duplicate and outdated questions, updating existing questions for accuracy and relevance, and adding new questions where gaps exist.

Further updates include increasing the hourly rate for the processing of the Combined Customer Survey responses from $30/hr to $45/hr (GS-11). This update increased the cost estimate from $500,00/yr to $750,015/yr for the Combined Customer Surveys.

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 results will not be published.

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 expiration date will be displayed on the instruments.

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).

B. Collections of Information Employing Statistical Methods

This collection of information does not employ statistical methodologies.

LEGAL AUTHORITY: PUBLIC LAW 15 U.S.C. et seq and 15 U.S.C. 171 et seq.

[1] 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.