

SUPPORTING STATEMENT
U.S. Department of Commerce
International Trade Administration
Services Order Form
OMB CONTROL NO. 0625-0143

A. JUSTIFICATION

This is an information collection request to extend the Office of Management and Budget approval.

1. Explain the circumstances that make the collection of information necessary.

The Commercial Service (CS) offers a variety of services to enable clients to begin exporting or to expand existing exporting efforts. Before the CS can provide export-related 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 exporting goals and it enables clients to submit payment for export assistance services. Without these forms the CS is unable to provide services and clients are unable to request export assistance services.

The Commercial Service is implementing an initiative to standardize its client in-take and registration system, streamline the forms used by clients to request export assistance and populate select forms with previously collected client data by March 2012. The CS is evaluating the collections in this package to prepare for both the organizational standardization and streamlining launch in March 2012 and the package renewal due by March 2012. Prior to finalizing and submitting the renewal package, the CS would like to implement minor changes to:

- Create a new "International Participation Agreement for Events" that is based upon the current Participation Agreement for Events.
 - The CS would use the "International Participation Agreement for Events" for international clients
 - The CS would continue to use the currently approved "Participation Agreement for Events" for domestic clients
- Change the name of the currently approved "Customized Services Form" to the "Client Information Form" and make minor revisions so that it will collect appropriate information from clients and serve as a major component of the CS' standardization and streamlining initiative.
 - The Client Information Form is expected to replace or significantly streamline forms in this package (such as the "U.S. Commercial Service Company Questionnaire" which is used with the CS' most requested matchmaking service)

and in Internet Website forms 0625-0237 (such as the Preliminary Consultation Form).

The CS is proposing to make the following types of minor revisions to the forms:

- Addition of supplementary information and instructions
- Text revisions to improve clarity and appropriateness (such as revisions to make a form more appropriate for use by foreign firms)
- Translation of some English language forms into foreign languages
- Deletion of fields that are no longer needed
- Addition of limited new fields consistent with the intent of the approved form
- Moving the placement of questions to improve the organization and layout of a form

The CS would like to begin using the revised collections in mid-June to gain enough experience to finalize the renewal package by October 2011.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

CS Trade Specialists in domestic Export Assistance Centers and Commercial Specialists at overseas Posts use these forms to provide services to clients. These forms are used whenever a client requests a CS service. The information provides Trade and Commercial Specialists with the client's background data, special requests and service requirements. The forms are used to tailor standardized services to client needs and to enable the CS to provide customized services as needed. The forms are used internally and are not disseminated to the public.

Participation Agreement for Events (minor changes proposed)

A Participation Agreement (PA) for Events is the vehicle by which individual firms agree to participate in ITA's trade promotion programs, identify the products and/or services they intend to sell or promote, and record their required financial contribution to the Department of Commerce. The PA for Events asks clients to provide basic contact and company information so that CS staff have a basic understanding of the companies that will participate in specific trade promotion events and the ability to provide additional event information as appropriate. (A link for payment, 0625-0143, is associated with this collection and is used by clients to pay for the CS events they elect to participate in.)

The CS has been using the standard Participation Agreement (PA) for Events form for both domestic and foreign clients. The CS has found that minor changes to the PA for Events Form will make it easier to use and more applicable for foreign clients. Therefore the CS would like to use the currently approved Participation for Events Form for U.S. clients and an International Participation Agreement (PA) for Events for foreign clients. The minor changes are shown below.

Proposed Changes

Currently Approved Text	Proposed Changes	Explanation
State	Province	Text revision.
Zip Code*	Postal Code	Text revision. Field not mandatory.
Number of employees	*Number of employees	Mandatory field. Fee structure based on number of employees.
*Type of client	Type of client	Not mandatory.

Additionally, the CS plans to translate the International PA for Events Form into the following languages:

Arabic	French	Japanese	Spanish
Bulgarian	German	Korean	Thai
Chinese	Greek	Polish	Ukrainian
Croatian	Hebrew	Portuguese	Vietnamese
Czech	Hungarian	Romanian	Turkish
Dutch	Indonesian	Russian	
Finnish	Italian	Slovak	

Burden

There is no overall change in burden associated with the use of an International PA for Events form, as the number of foreign clients that use the International PA for Events form will be a subset of the clients using the currently approved version. The time to complete forms will remain unchanged at 5 minutes.

Client Information Form (minor changes proposed)

The CS proposes to make minor changes to the Customized Service form and rename it the Client Information Form. The Client Information Form solicits information about product/service details, expected outcomes and potential end users to enable CS staff to counsel clients, design export strategies and propose appropriate services.

The CS proposes to use the Client Information Form to follow-up with export-experienced firms that register on Export.gov. The Client Information Form will most often be completed by a CS Trade Specialist during discussions with the client, but in some instances portions may be completed electronically by the client.

The completed Client Information Form will be saved in the client's account and will be accessible to CS staff that is providing export assistance to the client. The form can therefore streamline or eliminate the need for some currently approved forms and reduce requests for

duplicative client data. The data collected on the form will be updated as appropriate by either CS staff during client discussions or by the client.

Proposed Changes

Currently Approved Text	Proposed Changes	Explanation
Customized Services Form	Client Information Form (CIF)	Change form name Add explanatory text.
	<p>About this Form: Upon completion of this document, you are ready for a Trade Specialist to assist your company with its exporting needs.</p> <p>Your company will be registered as a U.S. and Foreign Commercial Service (CS) client. Your company's information will be entered into our CS database and this document will be attached to the organization record. The records will only be made available to CS and International Trade Administration staff that may subsequently assist you.</p> <p>About Commercial Service Assistance: The goal of CS assistance is to help you achieve export success. We expect you to report to CS any export sales and related agreements resulting from CS assistance.</p>	
Street Address, City, State, 9-Digit Zip Code, Fax, Company Web-site Address, Number of Employees, Total Sales, % of Sales from Exporting		Delete. Will be captured on Export.gov Client Registration Form 0625-0237.
	Company Information	New heading
	Number of years in business	New field.
Total Years Exporting	Number of years exporting	Text revision.
Does your firm have an international marketing plan? If no, does your company need assistance developing one?	Does your company have an international marketing plan?	Text revision.
Firms' objective to export (choose all that apply):	Company's objective(s) to exporting (choose all that apply):	Text revision.
Product Information/Readiness	Product Information	Text revision.
Product or service you wish to export:	What is the product or service you wish to export:	Text revision.
	Your industry NAIC Code:	New field.
	Is this product or service currently being sold in the U.S.?	New field.
Describe your product/service's benefits and unique features:	Describe your product/service's benefits and unique features (including IPR, ISO 9000 Certification):	Text revision
If not the manufacturer, does your firm have documented export rights to the product?	If not the manufacturer, does your firm have documented sales or distribution authorization for the product?	Text revision
Is the company's product sourced/produced entirely in the United States?		Delete. (Covered in

If part of the product is sources/produced outside the United States, does U.S. content represent at least 51% of the value of the finished product?		supplemental document.)
Is your company willing to modify its product to meet foreign standards (i.e. metric system, CE mark compliance with foreign government regulatory agencies, etc.)?		Delete. Not needed.
Can the company fill any new export orders from its present inventory?		Delete. Not needed.
If your company is working towards certification, in what year will this be completed?		Delete. Not needed.
Export Objective/Resources	Export Information	Text revision.
Does the product require any special technical support or after-sales service?	Does the product/service to be exported require any special technical support or after-sales service? If yes, please explain:	Text revision.
Does the product have patent/trademark/copyright registration in the United States?	Discuss intellectual property (IP). a. Have you registered IP (trademark, patent, design, or copyright) in the U.S.?	Text revision.
Will patent/trademark/copyright protection abroad be necessary for the product?	b. Have you inquired about IP requirements in foreign markets? If yes, please explain.	
What methods do you use to export in current markets:		Delete. Not needed.
If currently exporting, what are your company's international channels of distribution?	Which international distribution channels does your company currently use:	Text revision.
What promotional methods does your company use overseas:	Which international promotional methods does your company currently use:	Text revision.
How would you describe your firm's top management commitment to supporting export activities?		Delete. Not needed.
Does your firm have a domestic marketing plan?		Delete. Not needed.
What are the company's international sales objectives for the next 3 years (as percentage of total sales)?		Delete. Not needed.
What prompted your company to export?		Delete. Not needed.
Distribution Channels		Delete heading.
What domestic channels of distribution does your company employ?		Delete. Not needed.
Promotional Methods		Delete heading.
What promotional methods does your company use domestically?		Delete. Not needed.
	What is the outcome or result you expect to accomplish by working with the Commercial Service?	New field.
Additional information the Commercial Service should be aware of to fully understand your company and its requirements.	Please provide additional information the Commercial Service should be aware of to fully understand your company and its requirements.	Text revision.
What questions or export marketing issues would your company like to discuss with an International Trade Specialist?	Are there specific export issues that you would like to discuss? If so, please describe.	Text revision.

Burden

There is no overall change in burden associated with the above revisions. The average time to complete the form will remain at 10 minutes and number of estimated annual respondents will stay at 3,120, therefore the burden will remain at 520 hours.

Company Questionnaire Form (no changes)

This form is used with two similar match-making services, the Gold Key Service (GKS) and the International Partner Search (IPS). The GKS and IPS services are similar with respect to the type of information we require from our clients. The IPS service identifies appropriate potential partners for clients, whereas the GKS service identifies appropriate potential partners and arranges meetings between the U.S. client and the potential foreign partners. The form asks clients about the requirements and criteria that for potential partners must meet, including: type of business contact the client is seeking, technical qualifications, servicing abilities, language ability, company size, market coverage and investment capacity.

International Company Profile Form (no changes)

This form is used in conjunction with our due diligence service. This form requests information about the U.S. company that is ordering the service, the U.S. company that is the end client and the foreign company to be investigated.

U.S. Supplier Search Form (no changes)

The U.S. Supplier Search which will be completed by a U.S. firm in response to a request from an importer interested in sourcing U.S. goods and services and/or interested in establishing a business relationship with a U.S. firm. The form solicits information regarding details about the U.S. product to be exported.

Participation Agreement (PA) and Trade Mission Application Package (no changes)

This collection includes an interest form, participation agreement for events, payment link and trade mission application. The forms enable clients to indicate interest in a particular export service or event and indicate and make payment for the services they have requested.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

The CS implemented an on-line ordering and payment system in January 2008, and CS staff use this on-line system to send the service order form to clients. Clients complete the form electronically and send it to CS staff via electronic means. The vast majority of CS clients complete the form electronically, but a hard copy form may be used in limited circumstances such as with clients who may not have access to the Internet.

4. Describe efforts to identify duplication.

There is no duplication of information within the DOC or another government entity. This form collects unique client information that is required by the CS to efficiently and effectively provide the very specific and tailored services support our clients' exporting goals.

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

The CS has conducted user acceptance testing methods with a select group of U.S. companies to ensure that this form is simple and easy to use. The use of a computerized on-line ordering and payment system also was designed to minimize the burden for all clients, including small businesses. Based on client feedback the CS has streamlined the International Company Profile form to make it easier to understand and complete. The CS routinely solicits client feedback on the service ordering forms and process and will request approval for revised service order forms when necessary.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

Without the use of the forms in this collection, the CS would be unable to effectively meet the needs of our clients, inhibiting our ability to provide appropriate and customized services to U.S. businesses seeking access to the international marketplace, helping them enter new markets, increase market share and compete effectively worldwide. We would be hindered in meeting the ITA vision of fostering economic growth and prosperity through global trade. The forms in this package are needed to enable the CS to support the President's National Export Initiative and double exports within five years.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

This collection will be conducted in a manner consistent with OMB guidelines.

8. Provide a copy of the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A Federal Register Notice was published on August 11, 2008 (Vol. 73, Number 155, page 45684) soliciting public comment by October 10, 2008. No comments were received.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

Not applicable.

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

Responses to this collection of information will be used internally. The CS has no plans to disseminate the information.

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.

No questions of a sensitive nature are asked.

12. Provide an estimate in hours of the burden of the collection of information.

It is estimated that 27,035 respondents will complete the forms in this package for a total burden of 2,505 hours as shown in the table below. The total burden is unchanged as the 2,000 estimated respondents for the International PA for Events will be offset by a reduction in 2,000 estimated respondents for the PA for Events.

CS Form	Estimated annual # of respondents	Annual burden hours	Previous Estimated number of respondents (2009)	Previous Estimated total burden hours (2009)
Company Questionnaire Form (used for IPS and GKS services)	3,250	542	3,250	542
International Company Profile Request Form	2,600	433	2,600	433

Customized Services form	3,120	520	3,120	520
U.S. Supplier Search Form	65	11	65	11
International Participation Agreement for Events	2,000	167	NA	NA
Participation Agreement and Trade Mission Application - Interest form - Participation Agreement for events - Payment link - Trade Mission Application	16,000	832	18,000	999
	27,035	2,505	27,035	2,505

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in #12 above).

14. Provide estimates of annualized cost to the Federal government.

It will take CS staff approximately 10 minutes to review each form and the total burden hours to review 27,035 forms will be 4,505 hours.

$$4,505 \text{ hours} \times \$25/\text{hour staff time} = \$112,625.$$

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

Changes due to program change: Please see details in question #2 of the Supporting Statement.

16. For collections whose results will be published, outline the plans for tabulation and publication.

Not applicable.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

Not applicable.

18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I.

Not applicable.

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