Justification for Change Request
Bureau of Industry and Security (BIS)
Five-Year Records Retention Requirement
for Export Transactions and Boycott Actions
OMB CONTROL NO. 0694-0096
Expiration Date: 04/30/2014

BIS is requesting an increase in respondents/responses and burden hours in order to support publication of a final rule implementing the first phase of the President's Export Control Reform (ECR) initiative. This final rule, entitled "Revisions to the Export Administration Regulations: Initial Implementation of Export Control Reform" (RIN 0694-AF65), is anticipated will be published in October of 2012.

BIS believes the ECR initiative, once fully implemented, will increase export license applications under Commerce jurisdiction (OMB Control No. 0694-0088) by 30,000 annually to 55,093 or an increase of 120%.

BIS anticipates that an increase in the number of export licenses will result in a corresponding increase in the Five-Year Records Retention Requirement for Export Transactions and Boycott Actions under the Export Administration Regulations (EAR). Accordingly, BIS is estimating that the Five-Year Records Retention Requirement for Export Transactions under the EAR will also increase by 120%, from 84,000,000 to 184,800,000. The number of Boycott Actions should not be affected since this is not impacted by the number of export licenses under Commerce jurisdiction.

The requested increases are 100,800,000 respondents/responses and 280 burden hours.