

**Justification for Change Request**  
**Bureau of Industry and Security (BIS)**  
**Miscellaneous Licensing Responsibilities and Enforcement**  
**OMB Control No. 0694-0122**  
**Expiration Date: 06/30/2015**

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 is entitled "Revisions to the Export Administration Regulations: Initial Implementation of Export Control Reform" (RIN 0694-AF65).

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.

BIS anticipates that an increase in the number of export licenses will result in a corresponding increase in the number of certain miscellaneous licensing responsibilities and enforcement under the Export Administration Regulations (EAR). Accordingly, BIS is estimating increase to the following IC's, as lettered in ROCIS:

(c) Power of Attorney or Other Written Authorization. Of the expected 30,000 additional export licenses, one third of these, or 10,000, will be for routed exports. Since the average time to prepare the power of attorney or other written authorization is 15 minutes, the increased burden is therefore estimated to be 15 minutes x 10,000 = **2,500 hours**.

(f) Destination Control Statement and additional requirement for 600 series items (758.6 of the EAR). BIS expects 43,000 additional exports will require destination control statements and addition of the ECCN to the export control documents for 600 series items. BIS estimates that each will require 5 seconds to complete. The increase in burden is therefore estimated to be  $2 \times (43,000 \times 5/3,600) =$  **120 hours**.

(i) Responsibility of the Licensee. It is estimated to take about 10 minutes to communicate conditions to and from the licensee and the parties to whom they apply. Based on the additional 30,000 export licenses, the increase in burden is estimated to be 30,000 x 10 minutes = **5,000 hours**.

The burden estimates for the other IC's in this collection are not based on the number of export licenses and are therefore not expected to increase.

**The requested increases are 126,000 respondents/responses and 7,620 burden hours.**