

# 1 Supporting Statement A

Bird Banding and Recovery Reports.

**OMB Control Number 1028-0082**

**Terms of Clearance:** None

## **Justification**

### **1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

In accordance with the Migratory Bird Treaty Act, 16 U.S.C. 703-712, the trapping and marking of wild migratory birds by persons holding Federal permits must be monitored. The bird banding program is the responsibility of the U.S. Geological Survey (USGS) Bird Banding Laboratory (BBL). The primary role of the BBL is to support the use of banding and banding data by researchers and managers engaged in science, conservation, and management of birds, but it does not play a lead role in original research.

The BBL attempts to achieve the following three objectives related to this information collection:

1. Improve mechanisms to verify, accept, store, and manage bird banding data;
2. Maintain an automated, electronic system to efficiently verify, accept, store and manage data associated with individually marked or recaptured birds; and
3. Ensure through the permitting process that banders know how to safely handle birds, collect data accurately, and maintain birds in humane and healthful conditions.

The BBL collects information using three forms and one electronic database: 1) *Application for Federal Bird Banding or Marking Permit*, 2) *Federal Bird Banding or Marking Permit Renewal Form*, 3) *Reporting a Bird with a Federal Band or Color Marker (Recovery Report)*, and 4) *Bandit*. This program assists the U.S. Fish and Wildlife Service to fulfill its responsibilities designated by international migratory bird treaties with Canada, Mexico, Japan, and Russia.

### **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. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.**

The BBL has a critical role in storing and maintaining data on marked birds, particularly to facilitate coordination between banders and people who later encounter the marked birds, and to ensure the data are available for later analyses. The BBL works towards increasing the types and amounts of data that are being collected and stored while increasing the efficiency of data collection and storage to reduce overall costs.

The three forms and an electronic database described in this package are used for separate purposes. The *Application for Federal Bird Banding or Marking Permit* is used to identify individuals and evaluate their purpose, need, and qualifications to hold a permit. If a permit is granted, then the identifying information about the individual is entered into the database, a permit is issued, and the application is stored and maintained as a permanent record. The permit program is designed and carried out to protect birds covered by Federal statutes and to enhance research and management efforts. BBL has a regulatory responsibility (50 CFR 21) to ensure that birds are captured and marked in an ethical and safe manner. The permit system is consistent with legal regulations.

The *Federal Bird Banding or Marking Permit Renewal Form* is used by permitted banders to renew their Federal banding permits. It collects the same contact information as the original application and this information is also stored and maintained as a permanent record. This form is a part of the BBL permit program with the same regulatory responsibility as described in the preceding paragraph.

The *Recovery Report* is used by individuals that encounter a banded or marked bird to report the information to the BBL. All of the information on the bird and the person reporting the bird are stored in the BBL database. The information about these individuals is used to generate certificates of appreciation and may be used to contact them if any discrepancies are encountered with the reported information.

*Bandit* is an electronic database and the latest program assisting bird banders to manage and submit their banding data. *Bandit* is a data entry program used solely by individuals who were granted Federal banding permits upon submitting the Permit application form. The principal use of *Bandit* is to store and transfer to the BBL and the Canadian Bird Banding Office (BBO) data collected during bird banding operations. *Bandit* allows a bander to enter and edit data associated with bands issued to them by the BBL/BBO. Because banders collect a variety of data at the time of banding including information such as fat scores, biometrics, molt information, and breeding condition, these ancillary data can be used to verify core data fields (for example, determination of age and sex) and to research many issues relevant to bird conservation and management (for example, determining the quality of stopover locations based on rates of gain in body weight). The preservation of these data within *Bandit* is a high priority. *Bandit* may also be used to maintain data for banded birds recaptured during banding operations. Recapture data are valuable for estimating survival and other population parameters, such as dispersal rates, especially for songbirds for which very few recovery data are typically available. *Bandit* will serve as a repository for all recapture data that banders may eventually wish to submit to the BBL.

#### **A. Application for Federal Bird Banding or Marking Permit**

This application is submitted by those parties who wish to become bird banders. These “parties” include governmental agencies, businesses, universities, nongovernmental organizations and individuals. The data collected is used by the BBL to determine the applicant's qualifications for a Federal Bird Banding or Marking Permit. It is essential that the applicant be well qualified and has a valid research or management need for the permit.

The current version of this application is not a modifiable form. The applicant must print the form and return it by mail to the BBL office in Laurel MD.

New permittees must fill out all applicable sections of the application. If the permittee requires an

auxiliary marking authorization (colored leg bands, transmitters, etc.), they are required to attach a summary with the details for the requested authorization. The categories of inclusion are described at: <http://www.pwrc.usgs.gov/BBL/manual/aarequs.cfm>.

## **B. Federal Bird Banding or Marking Permit Renewal Form**

This form is completed by permitted bird banders when their banding permits need to be renewed. As set by regulations, most BBL permits are renewed every 3 years. This form is only available electronically at: <http://www.pwrc.usgs.gov/bbl/homepage/renewalform.cfm>. The banders fill out the required fields and the submission process provides an electronic signature for the form. This process is used only for permit renewals and no changes to authorizations on the banding permit can be made through this form.

## **C. Recovery Report**

This form is submitted by anyone who finds a banded bird and wishes to report the band number to the BBL. The data collected are used by Federal, Provincial, and State personnel and scientific cooperators to aid in the study of population size, mortality and survival rates, longevity, and migration patterns of birds. Band recovery information is also one of the most important tools used in the preparation of annual hunting regulations.

Recovery Reports can be submitted electronically (via the Internet) or by calling toll-free to 1-800-327-BAND (2263) from anywhere in Canada, the United States and most parts of the Caribbean. The same information is collected by both reporting methods.

The BBL sends electronic Certificates of Appreciation to everyone reporting a banded bird. Additional information such as email address is collected in case the BBL has questions concerning the band encounter. This form is available on the BBL website in:

- English at: <https://www.pwrc.usgs.gov/BBL/bblretrv/index.cfm>
- Spanish at: [https://www.pwrc.usgs.gov/BBL/bblretrv/index\\_v\\_sp.cfm](https://www.pwrc.usgs.gov/BBL/bblretrv/index_v_sp.cfm)
- French at: [https://www.pwrc.usgs.gov/BBL/bblretrv/index\\_v\\_fr.cfm](https://www.pwrc.usgs.gov/BBL/bblretrv/index_v_fr.cfm)

## **D. *Bandit***

The *Bandit* is a relational database replacing the paper version of the Bird Banding Schedule that is no longer accepted by the BBL. The principal use of *Bandit* is to store data obtained during banding operations and facilitate the transfer of banding data to the BBL and BBO. *Bandit* allows banders to enter and edit data associated with bands obtained from the BBL/BBO as well as data for recaptured birds. *Bandit* includes the ability to email the banding data directly to the BBL.

Users of *Bandit* must download (or request a free CD ROM) the software from the BBL website (<http://www.pwrc.usgs.gov/bbl/resources/bandit/Software/index.cfm>). The *Bandit* user manuals (<http://www.pwrc.usgs.gov/bbl/resources/bandit/Documentation/index.cfm>) are also available on the BBL website.

- 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 and specifically how this collection meets GPEA requirements.**

The Permit Application is currently available on the BBL web site (<http://www.pwrc.usgs.gov/BBL/>) as a printable pdf file that must be submitted on paper. The Permit Renewal Form, Recovery Report and *Bandit* data can be submitted electronically.

By converting to an entirely electronic renewal form, the same information is being collected with less effort because the banders do not have to deal with the preparation and submission of paper forms for this process.

- 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 efforts because banding activity in the United States is regulated only by the BBL. The information collected by the BBL is not being collected by any other Federal agency. The BBL is part of an international project, the North American Bird Banding Program, is run in cooperation with the Bird Banding Office Canada Wildlife Service (BBO). The BBL is gathering and storing data for both countries through an international agreement that, in turn, saves the BBO many operating costs.

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

Small businesses and small entities have not been a source of submissions and we will not impact them with this collection.

- 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.**

Without this information collection, the Department of the Interior could not meet its legal responsibilities under the Migratory Bird Treaty Act. The data collected are also essential to setting annual bird hunting/harvest regulations established by the U.S. Fish and Wildlife Service and as a basis for important research publications. The frequency of collection is that necessary to achieve the legal requirements and research objectives.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:
- \* requiring respondents to report information to the agency more often than quarterly;
  - \* requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
  - \* requiring respondents to submit more than an original and two copies of any document;
  - \* requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
  - \* in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;
  - \* requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
  - \* that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
  - \* requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no circumstances that require us to collect the information in a manner inconsistent with OMB guidelines. Recovery reports are filed most frequently during spring and fall as the result of hunting activities but at least some reports are received daily throughout the year.

- \*\*8. If applicable, provide a copy and identify the date and page number of 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 in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

**Describe 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.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be**

**circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

On September 29, 2015, we published a 60-day Federal Register notice (80 FR 58499) announcing that we would submit this ICR to OMB for approval. In that notice we solicited public comments for 60 days, ending December 1, 2015. We received one comment in response to that notice. This comment reflected concerns about the general practice of bird banding but made no comment about the impact completing the forms has on the public. The comment addresses concerns over the frequency birds are captured and banded and the potential impact this might have on the birds. It also brings up concerns related to controlling bird populations in which the BBL has no involvement. Because this comment was not relevant to this notice, the BBL has not taken any actions to respond to their concerns.

Each year, the BBL receives numerous comments from bird banders on the entire permit application process and the lab uses this feedback to improve its operations. The initiation of the electronic permit renewal form has been very favorably received by bird banders who consider this electronic form to be a vast improvement over the previous process of submitting a paper renewal application.

The current Recovery Reporting website was released in September 2012 and the BBL has received numerous comments about its operation. The comments have been wide-ranging though overall favorable and the volume of users has steadily increased annually.

Based on the experiences of a sample of banders, the average length of time required to complete the paper permit application is normally 25-35 minutes. Based on feedback from banders, the average time required to complete the electronic permit renewal page is 2 minutes. Completing the recovery reporting form over the internet requires 3 minutes on average, also based on user experience.

The amount of time required to submit data using *Bandit* varies with a number of factors, primarily with the number of banding records, the amount of data collected by the bander, and the use of time-saving features including bulk data uploads and automatic filling features in the software. In general, the manual entry of the basic banding data for a single submission file can be completed in 270 minutes, or 4.5 hours, but most users take advantage of software features that greatly reduce the data entry time.

In addition to our Federal Register notice, we attempted to solicit comments from individuals outside the agency to obtain their views on the functioning and the annual hour burden for the forms, recovery report, and *Bandit*. The individuals contacted are listed in Table 1 below. We incorporated their suggestions, edits, and comments in the final instruments. The respondents also agreed with our estimated burden time for both instruments.

Additional efforts to receive comments from individuals outside the BBL include suggestions from independent bird banders to improve *Bandit*. These suggestions are routinely incorporated into future versions of the software. As an example, users requested that they be able to manually enter the date bands are received rather than the system defaulting to the current date. Another example is that users needed additional status codes to describe birds upon release. These changes were incorporated into the newest version of *Bandit* released in 2016, v 4.0. The BBL Permit office has also contacted banders who have used the permit renewal form to document the actual burden time for this form.

**Table 1. Individuals Contacted**

Ryan Atwater 408 Dewey Decker Dr. Greenbay, WI 54313 Avocational Master Permittee	Craig Casias 21027 Blooming Valley Rd Meadville, PA 16335 Member of the public who used reportband.gov	Ken Hashagen 414 E Wapato Loop Sisters, OR 97759 Avocational Master Permittee
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**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

There is no monetary value associated with this collection. The BBL provides an electronic Certificate of Appreciation to people reporting bands to the BBL via the *Recovery Report* website.

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

This collection is covered by a System of Records, Interior, FWS-13 “United States Fish and Wildlife North American Breeding Bird Survey”. This SORN will be transferred to USGS in 2016. All forms have the BBL’s authorized Privacy Act Statement on them. To manage banding permits and sub permits issued by the BBL that authorizes bird banding activities in the United States and its Territories, and for other necessary actions required to manage and maintain the United States bird banding program within the intent of the authorizing legislation.

Contact information will be shared with Canadian, Federal and state agencies upon request. Contact information will be shared with the approved bird bander for the purpose of providing the bander the opportunity to obtain additional information if needed.

**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. 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.**

This collection does not ask for information of a sensitive nature.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

- \* 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.**

We estimate the total burden for this collection will be 19,533 hours, including time to read instructions, gather information, and complete the forms or enter information in the database. The burden estimates in this supporting statement are based on our prior experience with the permit application forms and permit renewal website; the known average time for submissions via the toll-free phone number and the recovery reporting page; our prior experience with *Bandit*; and the outreach described in item 8.

We expect to receive approximately 100 new permit applications requiring each respondent approximately 30 minutes to complete, totaling 50 burden hours. We expect to receive approximately 600 permit renewal forms annually requiring each bander 2 minutes to complete, totaling 20 burden hours. On average, we anticipate receiving approximately 43,900 recovery reports annually requiring approximately 2 minutes to complete, totaling 1,463 burden hours.

For *Bandit* data, we expect to receive 4,000 data files requiring an average of 4.5 hours to enter, totaling 18,000 annual burden hours. The completion time for data files varies from 40 minutes to 12 hours as discussed below. *Bandit* is a data entry program used solely by individuals who were granted Federal banding permits upon submitting the Permit application form.

- We estimate 500 annual schedules for game bird bands (each consisting of 800 records). Each schedule will take approximately 40 minutes. Most of the data collected are similar and the software allows for columns of repeated information to be auto-filled to expedite data entry. Following this process, banders should be able to enter 100 banding records in 5 minutes.
- We expect to receive 3,500 annual schedules averaging 300 records per response for birds other than game birds. Most banders make multiple data submissions annually and their submission files will contain fewer than 500 records. We estimate that each record can be entered in 0.5 minute and most files will require 4 hours or less to complete. A few banders may submit 1,000-2,000+ records per submission file, but many of these records contain similar data where the auto-fill process can expedite data entry. A maximum of 12 hours would be necessary to complete the largest submission files.

We estimate the dollar value of the annual burden hours to be \$642,567 (see Table 2). The hour cost is based on BLS news release USDL 15-1756 of September 9, 2015, for average full compensation per hour including benefits for private industry. The particular values utilized are:

- Private sector. Average hourly wage of \$31.39.
- States/tribal/local governments. Average hourly wage of \$44.22.

**Table 2. Estimated Dollar Value of Annual Burden Hours**

<i>Activity</i>	<i>Annual Number of Responses</i>	<i>Estimated Completion Time per Response</i>	<i>Total Annual Burden Hours</i>	<i>Dollar Value of Burden Hour Including Benefits</i>	<i>Total Dollar Value of Annual Burden Hours</i>
<b>Permit Application</b>					
Private Sector	90	30 minutes	45	\$31.39	\$1413
State/local/tribal govt	10	30 minutes	5	\$44.22	\$222
<b>Subtotal</b>	<b>100</b>		<b>50</b>		<b>\$1,635</b>
<b>Renewal Form</b>					
Private Sector	500	2 minutes	17	\$31.39	\$534
State/local/tribal govt.	100	2 minutes	3	\$44.22	\$148
<b>Subtotal</b>	<b>600</b>		<b>21</b>		<b>\$682</b>
<b>Recovery Report</b>					
Private Sector	42,900	2 minutes	1430	\$31.39	\$44,888
State/Local/Tribal	1,000	2 minutes	33	\$44.22	\$1,474
<b>Subtotal</b>	<b>43,900</b>		<b>1,462</b>		<b>\$46,362</b>
<b>Bandit (qualified group)</b>					
Private Sector	3,500	270 minutes	15,750	\$31.39	\$494,393
State/local/tribal govt	500	270 minutes	2,250	\$44.22	\$99,495
<b>Subtotal</b>	<b>4,000</b>		<b>18,000</b>		<b>\$593,888</b>
<b>TOTAL</b>	<b>48,600</b>		<b>19,534</b>		<b>\$642,567</b>

**13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)**

**\* 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 take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). 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 collection 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 is no non-hour cost burden to applicants under this collection. There is no fee for any permit application and the *Bandit* software is provided at no cost to the banders

**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.**

The total estimated cost to the Federal Government for processing and reviewing information received as a result of this collection is \$90,845 (Table 3). This total includes Federal employee salaries and benefits. The table below shows Federal staff and grade levels performing various tasks associated with this information collection. We used the Office of Personnel Management Salary <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/15Tables/html/DCB.aspx> ) to determine the hourly rate. We multiplied the hourly rate by 1.5 to account for benefits (as implied by the previously referenced BLS news release)

Approximately 100 new permit applications are currently processed annually by the BBL. The Application Examiner spends approximately one hour per form at \$38.16 per hour to assemble data and coordinate the permitting procedures (\$7,632). The BBL Chief spends approximately one-half hour per application at \$87.42 per hour to review the forms and contact applicants (\$4,371). Each wildlife biologist also spends approximately one-half hour reviewing and evaluating applicants at the rates indicated in Table 3 (\$9,333).

Approximately 600 existing banding permits are renewed annually by the BBL. The renewal process is the sole responsibility of the Application Examiner who currently spends approximately 10 minutes per renewal at \$38,16per hour (\$3,816).

For the Recovery Report, support for the BBL Band and Color Marker Reporting website requires approximately 80 hours of computer programming support each year (\$6,092) and 120 hours by a wildlife biologist who is responsible for the overall operation of this website (\$7,466).

For *Bandit*, new software versions are created at 3-4 year intervals. During most years when new versions are not created, the BBL programmer will spend approximately 80 hours annually fixing “bugs” and preparing minor upgrades to the system (\$6,092). The BBL also maintains a *Bandit* help desk to assist users with their questions and provide guidance on the use of the software. On average, a wildlife biologist spends approximately 5 hours per week in support of this help desk (\$10,171) and two BBL clerks each spends approximately 10 hours per week to support the help desk (\$39,686).

**Table 3. Federal Employee Salaries and Benefits**

Position	Grade/ Step	Hourly Rate	Hourly Rate incl. benefits (1.5 x hourly pay rate)	Estimated time per task	Annual Cost
<b>Permit Application</b>					
Application Examiner	GS-7/8	25.44	38.16	100 hrs	\$3,817
Chief, BBL	GS-14/5	58.28	87.42	50 hrs	\$4,371
3 Wildlife Biologists	GS-12/5	41.48	62.22	50 hrs (x3)	\$9,333
<b>Subtotal</b>					<b>\$17,521</b>
<b>Permit Renewal Form</b>					
Application Examiner	GS-7/8	25.44	38.16	100 hrs.	\$3,817
<b>Subtotal</b>					<b>\$3,817</b>
<b>Recovery Report</b>					
Annual maintenance for website (BBL programmer)	GS 13/6	50.77	76.15	80 hrs.	\$6,092
Wildlife Biologist	GS 12/5	41.48	62.22	120 hrs.	\$7,466
<b>Subtotal</b>					<b>\$13,558</b>
<b>Bandit</b>					
Annual maintenance for website (BBL Programmer)	GS 13/6	50.77	76.15	80 hrs	\$6,092
Wildlife Biologist	GS 9/2	26.08	39.12	260 hrs.	\$10,171
2 BBL Clerks	GS 7/8	25.44	38.16	520 hrs. (x2)	\$39,686
<b>Subtotal</b>					<b>\$55,949</b>
<b>Total</b>					<b>\$90,845</b>

**15. Explain the reasons for any program changes or adjustments in hour or cost burden.**

Since 2012 very little has changed in the BBL program with regard to the forms addressed in this document. Through improving the efficiency of the forms and increased understanding of bird banders and the public in how to use the forms we have seen a slight decrease in the burden hours between 2012 and 2015.

**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 data are utilized in at least two agency reports, the FWS Adaptive Harvest Management Report which is used to establish annual bird hunting regulations and the FWS Annual Waterfowl Status Report.

**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.**

We will display OMB's expiration date on all information collection instruments associated with this request, including the websites for the *Bandit* database and recovery report.

**18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."**

There are no exceptions to the certification statement.