

**SUPPORTING STATEMENT A FOR
PAPERWORK REDUCTION ACT SUBMISSION**

**NATIONAL PARK SERVICE CONCESSIONS, 36 CFR PART 51
OMB CONTROL NO. 1024-0029**

Terms of Clearance: None.

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

Private businesses under contract to the National Park Service (we, NPS) manage food, lodging, tours, whitewater rafting, boating, and many other recreational activities and amenities in more than 100 national parks. These services gross more than \$1 billion every year and provide jobs for more than 25,000 people during peak season.

The regulations at 36 CFR Part 51 primarily implement Title IV of the National Parks Omnibus Management Act of 1998 (54 USC, §101911 et seq, also referred to as Pub. L. 105-391), which provides legislative authority, policies, and requirements for the solicitation, award, and administration of NPS concession contracts.

Furthermore, 54 USC, §101911 et seq provides that “all proposed concession contracts shall be awarded by the Secretary to the person, corporation or other entity submitting the best proposal, as determined by the Secretary through a competitive selection process. Such competitive process shall include simplified procedures for small, individually-owned, concessions contracts.”

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.

We collect the following information associated with the administration of concessions:

- Description of how respondent will conduct operations to minimize disturbance to wildlife; protect park resources; and provide visitors with a high quality, safe, and enjoyable visitor experience.
- Organizational structure and history and experience with similar operations.
- Details on violations or infractions and how they were handled.
- Financial information and demonstration that respondent has credible, proven track record of meeting obligations.

CONCESSIONER ANNUAL FINANCIAL REPORT (Forms 10-356, 10-356A, and 10-356B)

The Concessioner Annual Financial Report provides concessioner financial information as required by each concession contract. This information is necessary to comply with the requirements placed on the Secretary of the Interior by Congress. Title IV, Section 407 of the National Parks Omnibus Management Act of 1998 (P.L. 105-391) requires that “a concessions contract shall provide for payment to the Government of a franchise fee or other such monetary consideration as determined by the Secretary, upon consideration of the probable value to the concessioner of the privileges granted by the particular contract involved. Such probable value shall be based upon a reasonable opportunity for net profit in relation to capital invested and the obligations of the contract.” 36 CFR Part 51, Subpart I requires that concession contracts “provide for payment to the Government of a franchise fee or other monetary consideration as determined by the Director upon consideration of the probable value to the concessioner of the privileges granted by the contract involved.” In order to verify the accuracy of the report and payments of franchise fees, concessioners with gross receipts of over \$1 million are required to have financial statements audited by an independent certified public accountant and have them express an opinion on the financial statements. Concessioners with gross receipts between \$500,000 and \$1 million must have a review opinion by an independent accountant, a lesser requirement and burden.

Form 10-356, “Concessioner Annual Financial Report”, is an accumulation of various financial statements commonly used by industry for reporting in conformance with generally accepted accounting principles. The information provides a comprehensive view of the concessioner’s financial situation at the end of its fiscal year and the concessioner’s activity over the preceding year. Careful analysis provides an effective tool in the decision making process and for the tracking of concessioner and Government contractual obligations for payments and maintenance and construction requirements. The financial information being collected is necessary to provide insight into and knowledge of the concessioner’s operation so that this authority can be exercised and franchise fees can be determined in a timely manner and without an undue burden on the concessioner. We collect the following information:

- Cover sheet provides identifying information and the concessioner’s certification as to the accuracy of the accompanying report.
- Schedule A is an income statement summarizing the financial activity (gross receipts, expenses, and net income) of the period being reported on.
- Schedule A-1 is a worksheet for calculating the comprehensive income.
- Schedule B is a worksheet for calculating the franchise fee.
- Schedule C is a balance sheet comparing the sources (liabilities and equity) with the uses (assets) of the capital of the company at the end of the fiscal year.
- Schedule D is a detail of the fixed assets reported on the balance sheet with a special listing of possessory interest or leasehold improvement assets (potential obligations of the Government).
- Schedule E is a statement of cash flows.
- Schedule F is space reserved for explanatory notes to the report.
- Schedule G is a breakdown of gross receipts by major departments.
- Schedule H is a detail of departmental income and expenses.
- Schedule I is a detail of general and administrative expenses.
- Schedule J lists ownership and compensation to officers and owners.
- Schedule K details the additions and disposals of fixed assets during the year.

- Schedule L is a supporting schedule for any amounts that need further explanation or detail.
- Schedule M contains various operational statistics commonplace for the major services provided in parks.
- Schedule P provides an accounting for those concessioners who have a contractual repair and maintenance reserve requirement.
- Schedule Q lists the projects from that reserve.

Form 10-356A, “Concessioner Annual Financial Report (For Concessioners with Gross Receipts Less than \$500,000)” - In an attempt to reduce administrative burden, concessioners with gross receipts under \$500,000 submit only a shorter report (Form 10-356A). This “short form” is a simplified income statement, balance sheet, and operation statistics. Concessioners with gross receipts under \$250,000 do not have to submit the balance sheet.

Form 10-356B, “Concessioner Annual Financial Report (For Concessioners with Special Accounts and Utility Add-ons)” - A limited number of concessioners have special accounts in lieu of franchise fees or rate add-ons to offset high costs for unique operations. To reduce administrative burden, additional schedules for reporting on these unique contract inclusions are provided in a separate form. The additional schedules include:

- Schedule N provides an accounting for those concessioners who have Special Accounts.
- Schedule O lists expenditures from Special Accounts.
- Schedule R provides an accounting for those concessioners who have approved rate add-ons.

PROPOSALS FOR CONCESSION OPPORTUNITIES

The public solicitation process begins with the issuance of a prospectus to invite the general public to submit proposals for the contract. The prospectus describes the terms and conditions of the concession contract to be awarded, the procedures to be followed in the selection of the best proposal, and the information that must be provided.

We collect the following information from every offeror.

- **Offeror’s Transmittal Letter.** This letter identifies the name of the entity offering a proposal to operate a concession contract and that entity’s contact information.
- **Certificate of Business Entity Offeror.** This form identifies the type of entity for the offeror, such as corporation, Limited Liability Company, partnership, etc.
- **Business Organization Information Form for Corporation, Limited Liability Company, Partnership or Joint Venture.** This
- **Business Organization Information Form for Individual or Sole Proprietorship.** This
- **Business History Information Form.** We request information about the offeror’s business history to understand any adverse history that could impact future operations under a concession contract.
- **Credit Report.** We request offerors submit a credit report so that we can understand the offeror’s credit history and any risks of contracting with the entity.

In addition to this standard information, we also collect additional information in narrative and form format. The amount of information or degree of detail requested varies widely, depending upon the size and scope of the business opportunity. For example, a much greater amount of detailed information

would be required for a multi-unit lodging and food service operation (such as that at Yellowstone), than would be required for a small firewood sales operation. This additional information includes the following which coincide with the five principal selection factors:

- Proposals to protect, conserve and preserve resources of the park. These proposals respond to specific resource management objectives and issues at the park and contract in question.
- Proposals to provide necessary and appropriate visitor services at reasonable rates. These proposals respond to specific visitor service questions at the park and contract in question.
- The experience and related background of the offeror, including past performance and expertise of the offeror in providing the same or similar visitor services as those to be provided under the draft concession contract.
- The financial capability of the offeror to carry out its proposal. In particular, we ask for projected financials including initial investments, startup expenses, income statement, operating assumptions, cash flow statement, recapture of investments, and all associated assumptions.
- The amount of the proposed minimum franchise fee and other forms of financial consideration.

We use all of the information provided to objectively evaluate offers received for a particular business opportunity, assure that the park resources will be adequately protected, and determine which offeror will provide the best service to visitors.

AMENDMENTS

In accordance with 36 CFR 51.15, an offeror may not amend or supplement a proposal after the submission date unless requested by the Director to do so and the Director provides all offerors that submitted proposals a similar opportunity to amend or supplement their proposals. Permitted amendments must be limited to modifying particular aspects of proposals resulting from a general failure of offerors to understand particular requirements of a prospectus or a general failure of offerors to submit particular information required by a prospectus.

In accordance with 36 CFR 51.32, if the Director determines that a proposal other than the responsive proposal submitted by a preferred offeror is the best proposal submitted for a qualified concession contract, then the Director must advise the preferred offeror of the better terms and conditions of the best proposal and permit the preferred offeror to amend its proposal to match them. An amended proposal must match the better terms and conditions of the best proposal. If the preferred offeror amends the proposal within the time period allowed, and the Director determines that the amended proposal matches the better terms and conditions of the best proposal, then the Director must select the preferred offeror for award of the contract.

APPEALS

Regulations at 36 CFR 51.47 state that any person may appeal to the Director, a determination that a concessioner is not a preferred offeror for the purposes of a right of preference in renewal and that the appeal must specify the grounds for the appeal. If the appellant does not identify the specific grounds on which it objects to the Director's initial preferred offeror determination, the Director could make a final determination without fully understanding the appellant's concerns or without taking into consideration important information the appellant may wish to submit in support of its position.

REQUEST TO CONSTRUCT A CAPITAL IMPROVEMENT

In accordance with 36 CFR 51.54, a request for approval to construct a capital improvement must include appropriate plans and specifications for the capital improvement. The request must also include an estimate of the total construction cost of the capital improvement. The estimate of the total construction cost must specify all elements of the cost in such detail as is necessary to permit the Director, NPS to determine that they are elements of construction cost. The approval requirements of this and other sections of 36 CFR part 51 also apply to any change orders to a capital improvement project and to any additions to a structure or replacement of fixtures.

CONSTRUCTION REPORT

In accordance with 36 CFR 51.55, a concessioner obtaining a leasehold surrender interest must submit a construction report to the NPS. The construction report must be supported by actual invoices of the capital improvement's construction cost together with, if requested by the NPS, a written certification from a certified public accountant (CPA). The construction report must document, and any requested certification by the certified public accountant must certify, that all components of the construction cost were incurred and capitalized by the concessioner in accordance with Generally Accepted Accounting Principles (GAAP), and that all components are eligible direct or indirect construction costs. Invoices for additional construction costs of elements of the project that were not completed as of the date of substantial completion may subsequently be submitted to the Director for inclusion in the project's construction cost.

APPLICATION TO SELL OR TRANSFER CONCESSION OPERATION

36 CFR part 51, Subpart J, provides that a concessioner must obtain NPS approval to assign, sell, convey, grant, contract for, or otherwise transfer: any concession contract; any rights to operate under or manage the performance of a concession contract as a sub-concessioner or otherwise; any controlling interest in a concessioner or concession contract; or any leasehold surrender interest or possessory interest obtained under a concession contract. The amount and type of information to be submitted varies with the type and complexity of the proposed transaction. Information includes, but is not limited to:

- Instruments proposed to implement the transaction.
- Narrative description of the proposed transaction.
- Opinion of counsel that the proposed transaction is lawful under all applicable Federal and State laws.
- Statement as to the existence and nature of any litigation relating to the proposed transaction.

- Description of the management qualifications, financial background, and financing and operational plans of any proposed transferee.
- Description of all financial aspects of the proposed transaction.
- Prospective financial statements (proformas).
- Schedule that allocates in detail the purchase price (or, in the case of a transaction other than an asset purchase, the valuation) of all assets assigned or encumbered. In addition, the applicant must provide a description of the basis for all allocations and ownership of all assets.

RECORDKEEPING

In accordance with 36 CFR 51.98, a concessioner (and any sub-concessioner) must keep and make available to NPS, records for the term of the concession contract and for 5 years after the termination or expiration of the concession contract.

- 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.**

Notice of the availability of the prospectus is advertised via the Internet at fedbizopps.gov, and we publish each prospectus on our Concessions Program web page. The forms associated with the prospectus are provided in either MS Word or Excel format.

The burden associated with the completion of the Concessioner Annual Financial Report (AFR) is essentially one of transcribing figures from the concessioner's financial records to our forms. In 2008, we began the use of the electronic AFR submission process. The electronic process utilizes an Excel file which tracks the paper forms and contains pop-up instructions for essentially every line. Once all data is entered into each worksheet of the AFR form, the report is submitted to the NPS and processed electronically. A concessioner with a MAC computer (not compatible with AFR forms) who does not have access to a PC will need to request permission from the park superintendent to submit a hard copy of the AFR.

At this time, the collection of information for the remaining information collection requirements is not available electronically, primarily due to the type of information requested (for example, plans and specifications, invoices, etc.), and the concessioner's ability to provide responses electronically. If the information is available electronically, we will accept electronic submissions.

- 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.**

The requested information is unique to the applicant and each business opportunity. No similar information pertaining to business opportunities on park lands is collected by other NPS offices or other Federal agencies.

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

We collect only the minimum information necessary to allow us to evaluate all offers received and determine which offer is the best. As indicated in 36 CFR 51.12, solicitations for large, complex operations may be issued in two phases (qualifications and proposal); while solicitations for concession contracts that are likely to be awarded to a sole proprietorship or are likely to have annual gross receipts of less than \$100,000 will incorporate simplified administrative requirements. For annual financial reports, the information collected is the minimal information necessary to determine appropriate fees. We developed the AFR short form (Form 10-365A) for use by small entities.

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.

54 U.S.C. § 101913 requires us to use a competitive selection process for concession contracts and to solicit proposals. That law also requires us to collect the categories of information described in item 2 above. For proposals, we collect information in response to a specific advertisement of a concession opportunity. If we did not collect the information, we would be unable to: (1) objectively evaluate offers received for a particular business opportunity, (2) assure that the park resources will be adequately protected, and (3) determine which offeror will provide the best service to visitors at reasonable rates and with the greatest overall return to the Government. Once we issue a concessions contract, we require minimal information to ensure that businesses operate in accordance with NPS policy.

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.

The only special circumstance that is inconsistent with OMB guidelines is the number of copies that we request. When the contract has a preferred offeror, we usually request two or three copies. For projects where we expect several offers, we request more copies to ensure sufficient copies for the reviewing panel. In a limited number of cases involving large construction projects, additional copies of some items for other submissions may be required.

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 November 10, 2015, we published in the Federal Register (80 FR 69695) a Notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on January 11, 2016. We received one comment in response to that Notice.

Comment received on January 11, 2016: Aubrie Loroña, VP Finance & Administration, Swan Mountain Companies

"My name is Aubrie Lorona and I am the General Manager of Swan Mountain Outfitters. We operate the horseback concession contract in Glacier National Park. As a concessioner that grosses over \$500,000 annually, we are required to have our financial statements reviewed by a qualified third party. While we understand the need for this kind of review, it does represent a business expense. What has been frustrating in the past is that we have paid an accountant to prepare these statements which do nothing other than to comply with a requirement because on top of that review I have personally had to enter the data into the AFR format which is very specific to NPS. It is such a waste of time and money to not be able to submit our statements using the format that our accountant prepares them in.

In an effort to reduce paperwork and to save money and time for all involved, I think it would make a lot more sense for you to provide a form up front that you want completed. Then, those concessioners that use an accountant could provide that form to the accountant who will then use it to prepare the statements. That way, once the accountant is done with their review, their deliverable is something that can be submitted directly to NPS instead of having to be worked into a proprietary system/form.

Thanks for the opportunity to provide feedback."

NPS Response/Action Taken:

We have historically provided the electronic forms on our website, and continue to do so. Some concessioners that work with accountants have their accountants submit the forms directly to the NPS, as the commenter suggested. This will continue to be allowed, so we will not take any action. In addition, in conjunction with updates to the forms, we are proposing to simplify the submission process by allowing concessioners or their accountants to email the electronic AFR form as an attachment.

In addition to the Federal Register notice, we contacted nine (9) concessioners and asked for comments on:

- whether or not the collection of information is necessary, including whether or not the information will have practical utility; whether there are any questions they felt were unnecessary.
- the accuracy of our estimate of the burden for this collection of information;
- ways to enhance the quality, utility, and clarity of the information to be collected; and
- ways to minimize the burden of the collection of information on respondents.

Responses were valuable in identifying several process improvements although none addressed any specific need to change the forms used for information collection.

We received comments from most of the concessioners we contacted that the proposed changes to the process for submitting AFR, including submitting forms and attachments by email, would be easier and would save time.

We received multiple comments about the general layout and organization of the forms in MS Excel format. One commenter asked about the types of corporate entities included and why B Corporation was an option but C Corporation was not. B Corporation is a new type of corporate entity and we added it to the available entities. To clarify that C Corporation was also an option, we changed the option for “Corporation” to “C Corporation”. Another comment suggested that the company name should be added to all headers. We made this change. Similarly, two commenters suggested that we should add language at the bottom of each schedule referencing the notes to the financial statements. We also made this change. A commenter also suggested that we auto calculate totals when possible, specifically for retained earnings and the cash flow reconciliation. We updated the forms so that all totals auto calculate when possible and reasonable. Lastly, we received a general comment that the pop-ups are annoying and make the forms difficult to use. In response, we have deleted the pop-ups.

We received multiple comments about schedules F and L, which are blank schedules available for financial notes or additional notes. We had proposed combining these schedules. One commenter suggested that combining the schedules is problematic because CPAs audit schedule F but not schedule L, and combining the schedules would necessitate a reduction in the overall detail provided on schedule L. In response, we will not combine the schedules, and will instead clarify the function and use of each schedule in the associated users guide provided to concessioners. Many commenters suggested adding more rows to both schedules, and we made this change.

We received multiple comments about schedule D and proposed changes. Some concessioners commented that a new accounting rule that prompted our proposed changes to schedule D would not apply, and one commenter responded that asking CPAs to specifically state their determination of the rule would increase the cost of a CPA audit or review. Another commenter suggested that the naming for possessory interest and leasehold surrender interest is confusing, while another commented that it’s difficult to determine which version of schedule D must be submitted. Yet another commenter suggested that it already submits a supplemental D-1 schedule for a unique reporting requirement at the park where it operates, so the additional proposed D-1 is problematic. We will make the following changes for our initial proposal to respond to all of these comments. First, the existing schedules D-PI and D-LSI will be combined in a schedule D-Fixed Assets. Second, the proposed Schedule D-1 will be named Schedule D-Intangibles. Third, we will incorporate proposed changes to Schedules D-PI and D-LSI

that would accommodate a new accounting rule in a new Schedule D-Financial Assets. This schedule will only need to be completed by concessioners that determine ASC Topic 853 applies to their contracts. In sum, there will be three Schedule Ds that will replace the existing two Schedule Ds: Schedule D-Fixed Assets, Schedule D-Intangibles, and Schedule D-Financial Assets.

We received multiple comments about schedule K. One commenter suggested adding a code at the bottom of schedule K for capital improvements that are not PI or LSI eligible. We made this change as suggested. One commenter recommended clarifying the title of the "Asset #" column to be "NPS Asset #". We made this change as requested. Lastly, multiple commenters suggested unlocking schedule K would save time and make it easier to submit schedule K as part of the normal AFR forms rather than as a separate attachment. We also made this change.

We received one comment related to schedule R, add-on reconciliation. The commenter stated that the proposed schedule R is duplicative with other reporting that must be sent directly to park staff, and as currently designed would be difficult to fill out and would not provide any information to the Service. We note that reporting utility add-on collections directly to parks vary based on the scope and complexity of the park. To the extent that the reporting is duplicative, the information required on the AFR will have already been calculated by concessioners for earlier reporting and the time burden will be low. With regard to the design of the form, we deleted drop-down boxes that would have constrained concessioner responses to provide more flexibility in this reporting at the overall operational level, and we will provide additional details for completing the form in the user's guide that accompanies the forms.

The last set of comments we received related to the repair and maintenance reserve and schedules P and Q. One commenter suggested that the repair and maintenance reserve may be accounted for on the balance sheet as an asset or a liability depending on how it is defined in a concession contract. We leave this determination to a concessioner and its CPA.

Another commenter suggested that the name of the RMR can't be changed as we proposed because the RMR is defined in the concession contract and the inconsistency will be problematic for auditors. The Service intends to amend concession contracts that specifically name the RMR. If an AFR is due before the amendments are signed, the Service will have a copy of the new AFR form available that refers to the RMR.

Despite multiple follow-up messages via email and phone calls, we were unable to obtain feedback from one concessioner. The individual sent us an email response that he would get back to us, but received no further communication from him.

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

No payments or gifts are provided to respondents.

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

Information is collected and protected in accordance with the Freedom of Information Act (5 U.S.C. 552) (FOIA). In accordance with the Freedom of Information Act, if respondents believe their proposal

contains trade secrets or confidential commercial or financial information exempt from disclosure under the Freedom of Information Act, the cover page, as well as each page containing such information is to be labeled. Information in a proposal identified as trade secret information or confidential commercial and financial information will be used by the Government only for the purpose of determining whether the proposed transaction should be approved, except that if the same information is obtained from another source without restriction, it may be used without restriction. The Annual Financial Reports are handled and maintained in accordance with the Privacy Act (Interior, NPS-14, Concessioner Financial Statement and Audit Report Files. (Published November 10, 1983, 48 FR 51701)

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.

We do not ask sensitive questions.

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 used the below listed rates in accordance with Bureau of Labor Statistics news release [USDL-16-1808](#), September 8, 2016, Employer Costs for Employee Compensation—June 2016, to calculate the total annual burden. Table 1 of the bulletin lists the hourly wage, plus benefits, for management, professional, and related workers as \$56.66 (covering the general manager, engineering technician, and accountant positions associated with the activities listed below).

We estimate that we will receive 1,382 annual responses totaling 159,892 burden hours. The total dollar value of the burden hours is approximately \$9,059,481 (rounded) (159,892 hours x \$56.66).

Activity	Total Annual Responses	Completion Time per Response	Total Annual Burden Hours
CONCESSIONER ANNUAL FINANCIAL REPORT			
Form 10-356 , "Concessioner Annual Financial Report"	150	15 hours	2,250
Form 10-356A , "Concessioner Annual Financial Report (For Concessioners with Gross Receipts Less than \$500,000)"	350	4 hours	1,400

Form 10-356B, "Concessioner Annual Financial Report (For Concessioners with Special Accounts and Utility Add-ons)"	30	2 hours	60
PROPOSALS FOR CONCESSION OPPORTUNITIES			
Large Concession	30	240 hours	7,200
Small Concession	60	80 hours	4,800
AMENDMENTS	1	1 hour	1
APPEALS	1	30 minutes	1
REQUEST TO CONTRUCT A CAPITAL IMPROVEMENT			
Large Projects	31	16 hours	496
Small Projects	89	8 hours	712
CONSTRUCTION REPORT			
Large Project	31	56 hours	1,736
Small Project	89	24 hours	2,136
APPLICATION TO SELL OR TRANSFER A CONCESSION OPERATION	20	80 hours	1,600
RECORDKEEPING			
Large Concessions	150	800 hours	120,000
Small Concessions	350	50 hours	17,500
TOTALS	1,382		159,892

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.

The total nonhour cost burden is \$425,000.

Proposals - \$420,000. We estimate that the average cost per respondent is \$3,000 for small operations and \$8,000 for large operations. These costs include, but are not limited to, expenses for printing, travel

for onsite visits, and professional fees. Costs will vary due to proximity to the proposed concession operation and the desired involvement of consultants and other professionals outside the company. There are no other costs associated with preparing and submitting an offer.

Application to Sell or Transfer Concession Operation - \$5,000. There are no other costs associated with preparing and submitting an application, other than expenses for printing, which is estimated to be approximately \$250 per application (x 20 applications). Costs for legal and accounting fees and onsite visits are inherent in the transaction even if NPS approval were not required, and are not included in this estimate.

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.

We estimate that the annual cost to the Federal Government to administer this information collection is \$1,667,152. This total represents salary costs for staff time to process and review applications are \$1,592,152 (rounded) and approximately \$75,000 for printing.

To determine hourly wage rates, we used the Office of Personnel Management Salary Table [2016-RUS](#) as an average nationwide rate. We used Bureau of Labor Statistics news release [USDL-16-1808](#), September 8, 2016, Employer Costs for Employee Compensation—June 2016, to calculate benefits by multiplying the hourly rates for government employees by 1.57 to obtain the fully burdened rates.

Position/Grade/Step	No. of Responses	Estimated Time per Response	Total Hours	Hourly Rate	Hourly Rate w/Benefits (Multiplier of 1.57)	Total Annual Cost
Proposals - Large Concession						
Supv. Concessions Specialist GS-13/5	30	40 hours	1,200	\$ 45.86	\$ 72.00	\$ 86,400.00
Concessions Specialist GS-11/5 (2 FTE)	30	80 hours	2,400	32.17	50.51	121,224.00
Lawyer GS-15/5	30	40 hours	1,200	63.74	100.08	120,096.00
Proposals - Small Concession						
Supv. Concessions Specialist GS-13/5	60	16 hours	960	45.86	72.00	69,120.00
Lawyer GS-15/5	60	16 hours	960	63.74	100.08	96,076.80
Amendments						
Supv. Concessions Specialist GS-13/5	1	4 hours	4	45.86	72.00	288.00
Lawyer GS-15/5	1	4 hours	4	63.74	100.08	400.32
Appeals						
Concessions Specialist GS-11/5	1	20 hours	20	32.17	50.51	1,010.20
Lawyer GS-15/5	1	20 hours	20	63.74	100.08	2,001.60
Request To Construct a Capital Improvement - Large Projects						
Supv. Concessions Specialist GS-13/5	31	16 hours	496	45.86	72.00	35,712.00
Concessions Specialist GS-11/5	31	16 hours	496	32.17	50.51	25,052.96

Request To Construct a Capital Improvement - Small Projects						
Supv. Concessions Specialist GS-13/5	89	8 hours	712	45.86	72.00	51,264.00
Concessions Specialist GS-11/5	89	8 hours	712	32.17	50.51	35,963.12
Construction Report - Large Projects						
Supv. Concessions Specialist GS-13/5	31	56 hours	1,736	45.86	72.00	124,992.00
Concessions Specialist GS-11/5	31	56 hours	1,736	32.17	50.51	87,685.36
Construction Report - Small Projects						
Supv. Concessions Specialist GS-13/5	89	24 hours	2,136	45.86	72.00	153,792.00
Concessions Specialist GS-11/5	89	24 hours	2,136	32.17	50.51	107,889.36
Application to Sell or Transfer Concession Operation						
Supv. Concessions Specialist GS-13/5	20	80 hours	1600	45.86	72.00	115,200.00
Lawyer GS-15/5	20	40 hours	800	63.74	100.08	80,064.00
Form 10-356						
Financial Analyst GS-13/5	150	16 hours	2,400	45.86	72.00	172,800.00
Form 10-356A						
Financial Analyst GS-13/5	350	4 hours	1,400	45.86	72.00	100,800.00
Form 10-356A						
Financial Analyst GS-13/5	30	2 hours	60	45.86	72.00	4,320.00
Total						\$1,592,151.72

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

We are reporting 1,382 annual responses totaling 159,892 burden hours and \$425,000 in nonhour burden costs. This is an increase of 30 responses and a decrease of 90 burden hours from our previous submission.

We are reporting as adjustments, a decrease in hours per response from 16 hours to 15 hours for Form 10-356. This decrease is expected to result from a simpler submission process and from moving two schedules to new form 10-356B.

We are reporting as a program change, an increase of 30 annual responses totaling 60 burden hours associated with the following information collection requirements in existing regulations, but not previously approved under the Paperwork Reduction Act:

Form 10-356B for special accounts and utility add-on reconciliations

Historically, we have collected information concerning special accounts on two schedules in Form 10-356. Very few concessioners still have special accounts, so we are moving these schedules to a supplemental Form 10-356B. Similarly, a small number of concessioners have contractually mandated utility add-ons.

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 and other actions.

We do not publish the results of this information collection.

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 the expiration date on all forms.

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.