

**Supporting Statement
Entry Summary
1651-0022**

A. Justification:

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

CBP Form 7501, *Entry Summary*, is used to identify merchandise entering the commerce of the United States, and to document the amount of duty and/or tax paid. CBP Form 7501 is submitted by the importer, or the importer's agent, for each import transaction. The data on this form is used by CBP as a record of the import transaction; to collect the proper duty, taxes, certifications and enforcement information; and to provide data to the U.S. Census Bureau for statistical purposes. CBP Form 7501 must be filed within 10 working days from the time of entry of merchandise into the United States. Collection of the data on this form is authorized by 19 U.S.C. 1484 and provided for by 19 CFR 142.11 and CFR 141.61. CBP Form 7501 and accompanying instructions can be found at <https://www.cbp.gov/newsroom/publications/forms?title=7501&=Apply>

Non-Substantive Changes Requested:

Change one: CBP is submitting this Non Substantive Change to OMB to reflect a change in the Harmonized Tariff Schedule (HTS) which is maintained by the U.S. International Trade Commission (USITC). HTS data is provided to CBP at entry. Effective February 7, 2018, the following changes to the Harmonized Tariff Schedule for units of quantity reporting will take effect:

- For HTS 8450.90.20 and 8450.90.60, certain parts of washing machines, the new unit of quantity will be "No." instead of "X".
- For HTS 8541.40.6030, solar cells, a second unit of quantity, "W" (for total wattage), will be added.
- For statistical reporting purposes under subheading 8541.40.6030, importers should report the total watts at maximum power based on standard test conditions according to the latest revision of International Electrotechnical Commission (IEC) 60904, "Photovoltaic Devices."
- These modifications will take effect as announced in Presidential Proclamations 9693 (83 FR 3541) and 9694 (83 FR 3553), of January 23, 2018.

For additional information regarding the HTS please follow this link:

<https://hts.usitc.gov/current>

Change two: CBP is submitting this Non Substantive change to reflect an adjustment in Entry Summary due to U.S. Department of Commerce Bureau of

Industry and Security (BIS) for Procedures for Submitting Requests for Exclusions from the Section 232 National Security Adjustments of Imports of Steel and Aluminum information collection. Importers who have submitted for exclusion from Section 232 shall submit the BIS exclusion number in the additional importer declaration field. This collection is authorized by 15 CFR 705, <https://www.gpo.gov/fdsys/pkg/CFR-2016-title15-vol2/pdf/CFR-2016-title15-vol2-part705.pdf>

The public exclusion process cannot include importer of record numbers, as these are confidential information. Instead, the exclusion requester only provides BIS with the name and address of the importer. The requester receives an exclusion number to submit to CBP on entries of specific merchandise. The entry summary will contain the exclusion number and the importer of record number. In order to verify that the exclusion was indeed granted to the importer for the subject merchandise at the time of entry, CBP must match the name and address of the importer to the importer record number and exclusion number. Therefore, CBP is requesting that the importer provide the importer number associated with the exclusion before submitting the exclusion number on any entry summaries of imported goods.

- 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.**

The information on CBP Form 7501 is vital to CBP in carrying out the regulatory requirements associated with the import transaction documentation.

Most entry summaries are filed electronically and payments for duties are made using the Automated Clearinghouse (ACH). However, if a supplemental payment is necessary after the initial ACH payment, this may be in the form of a check or cash. CBP Form 7501A Document/Payment Transmittal is used to reconcile a presented payment with the associated entry so the respondent's account is properly credited.

- 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.**

Approximately 99 percent of 7501 data is submitted electronically through the Automated Broker Interface (ABI).

CBP Form 7501A Document/Payment Transmittal is not submitted electronically because it is used to transmit information and documents to CBP that are not electronic, such as check or cash payments. However, it is available electronically

on the CBP website, <https://www.cbp.gov/newsroom/publications/forms?title=7501&=Apply>

- 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.**

This information is not collected in any other form, and therefore is not duplicated elsewhere.

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

This information collection does not have an impact on small businesses or other small entities.

- 6. Describe consequences 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.**

CBP's ability to collect of the proper amount of duties, applicable fees, and taxes could be significantly jeopardized if the CBP Form 7501 is not submitted as regulations prescribe.

- 7. Explain any special circumstances.**

This information is collected in a manner consistent with the guidelines of 5 CFR 1320.6.

- 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 describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

Public comments were solicited through a Federal Register notice published on June 22, 2017 (Volume 82, Page 28506) on which no comments were received, and on August 29, 2017 (Volume 82, Page 41041) on which no comments have been received.

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

There is no offer of a monetary or material value for this information collection.

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

A PIA for the Automated Commercial Environment (ACE), dated July 31, 2015, and a SORN for IIS, dated July 26, 2016 (Vol. 81, Page 48826) will be included in this ICR. There are no assurances of confidentiality provided to the respondents of this information collection.

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.

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information.

FORM	Total Burden HOURS	NO. OF RESPONDENTS	RESPONSES PER RESPONDENT	TOTAL RESPONSES	TIME PER RESPONSE
7501- Formal Entry (Electronic submission)	1,920,072.86	2,336	9,903	23,133,408	5 minutes (.083 hours)
7501- Formal Entry (Paper submission)	92,335.57	28	9,903	277,284	20 minutes (.333 hours)
7501- Formal Entry with Softwood Lumber Act of 2008 * (Paper only)	266,433	210	1,905	400,050	40 minutes (.666 hours)
7501- Informal Entry (Electronic submission)	403,538.19	1,883	2,582	4,861,906	5 minutes (.083 hours)
7501- Informal Entry (Paper submission)	12,264.5	19	2,582	49,058	15 minutes (0.25 hours)
7501A- Document/ Payment	300	20	60	1,200	15 minutes (0.25 hours)

Transmittal (Paper only)					hours)
Exclusion approval information letter	250	5,000	1	5,000	3 minutes (0.05 hours)
TOTAL	2,695,194.1 3			28,727,906	

Public Cost

The estimated cost to the respondents is \$80,963,631. This is based on the estimated burden hours (2,695,194.13) multiplied by (x) the average loaded hourly wage rate for importers (\$30.04). CBP calculated this loaded wage rate by first multiplying the Bureau of Labor Statistics' (BLS) 2016 median hourly wage rate for Cargo and Freight Agents (\$20.15), which CBP assumes best represents the wage for importers, by the ratio of BLS' average 2016 total compensation to wages and salaries for Office and Administrative Support occupations (1.4762), the assumed occupational group for importers, to account for non-salary employee benefits.^{1,2} CBP then adjusted this figure, which was in 2015 U.S. dollars, to 2017 U.S. dollars by applying a 1.0 percent annual growth rate to the figure, as recommended by the U.S. Department of Transportation's value of travel time guidance.³

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

There are no recordkeeping, capitalization start-up or maintenance costs associated with this collection.

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

¹ Source: U.S. Bureau of Labor Statistics. Occupational Employment Statistics, "May 2016 National Occupational Employment and Wage Estimates, United States- Median Hourly Wage by Occupation Code." Updated March 31, 2017. Available at http://www.bls.gov/oes/2016/may/oes_nat.htm. Accessed June 20, 2017.

² The total compensation to wages and salaries ratio is equal to the calculated average of the 2016 quarterly estimates (shown under Mar., June, Sep., Dec.) of the total compensation cost per hour worked for Office and Administrative Support occupations (\$25.3575) divided by the calculated average of the 2016 quarterly estimates (shown under Mar., June, Sep., Dec.) of wages and salaries cost per hour worked for the same occupation category (\$17.1775). Source of total compensation to wages and salaries ratio data: U.S. Bureau of Labor Statistics. Employer Costs for Employee Compensation. Employer Costs for Employee Compensation Historical Listing March 2004 – March 2017, "Table 3. Civilian workers, by occupational group: employer costs per hours worked for employee compensation and costs as a percentage of total compensation, 2004-2017 by respondent type." June 20, 2017. Available at <http://www.bls.gov/ncs/ect/sp/ececqrtn.pdf>. Accessed June 20, 2017.

³ Source: U.S. Department of Transportation, Office of Transportation Policy. *The Value of Travel Time Savings: Departmental Guidance for Conducting Economic Evaluations Revision 2 (2015 Update)*, "Table 4 (Revision 2-corrected): Recommended Hourly Values of Travel Time Savings." April 29, 2015.

<http://www.transportation.gov/sites/dot.gov/files/docs/Revised%20Departmental%20Guidance%20on%20Valuation%20of%20Travel%20Time%20in%20Economic%20Analysis.pdf>. Accessed June 20, 2017.

have been incurred without this collection of information.

The estimated annual cost to the Federal Government associated with the review of these records is \$294,523,064. This is based on the number of responses that must be reviewed (28,727,906) multiplied by (x) the time burden to review and process each response (.166 hours) = 4,768,832 hours multiplied by (x) the average hourly loaded rate for a CBP Trade and Revenue employee (\$61.76)⁴ = \$294,523,064

This number has increased, however, in ROCIS the federal government cost section is blocked from change during a non-substantive change request. Please note the increased number shown above

15. Explain the reasons for any program changes or adjustments reported in Items 12 or 13 of this Statement.

There is an increase in the burden hours due to the addition of the Exclusion approval information letter.

16. For collection of information whose results will be published, outline plans for tabulation, and publication.

This information collection will not be published for statistical purposes.

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.

CBP does not seek approval to not display the expiration date.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions".

CBP does not request an exception to the certification of this information collection.

B. Collection of Information Employing Statistical Methods

No statistical methods were employed.

⁴ CBP bases this wage on the FY 2017 salary and benefits of the national average of CBP Trade and Revenue positions, which is equal to a GS-13, Step 3. Source: Email correspondence with CBP's Office of Finance on June 14, 2017.