

Justification for non-substantive change request:

The Commission is requesting increased burden allotments for the remaining one year on the clearance. The Commission underestimated the projected annual amounts in original ICR summary of burden table. The Commission based its original projected annual amounts on the caseload of the prior three years and the projected increase in future caseload. The number and complexity of investigations are a reflection of the petitions filed with the Commission, and are outside the agency's control. Compared to the previous years used for the Commission's projections, the agency's more recent caseload has increased (in terms of the sheer volume of petitions) and shifted toward products with less concentrated industries and markets (such as agricultural products and consumer goods). Moreover, since these estimates were prepared, there have been two proceedings under the safeguard provision, which had not used for more than 10 years. For these reasons, the Commission is requesting a revision to its existing burden limits as detailed in the following tabulation.

	Original average annual burden	Additional annual burden (July 2019-June 2020)	Revised average annual burden
Burden hours	192,998	95,584	288,582
Respondents	6,789	3,303	10,092