

**Supporting Statement**  
**Application-Permit-Special License Unlading-Lading-Overtime**  
**Services**  
**1651-0005**

**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.**

The Application-Permit-Special License Unlading-Lading-Overtime Services (U.S. Customs and Border Protection (CBP) Form 3171) is used by commercial carriers and importers as a request for permission to unlade imported merchandise, baggage, or passengers. It is also used to request overtime services from CBP officers in connection with lading or unlading of merchandise, or the entry or clearance of a vessel, including the boarding of a vessel for preliminary supplies, ship's stores, sea stores, or equipment not to be re-laden. CBP Form 3171 is provided for by 19 CFR 4.10, 4.30, 4.39, 4.91, 10.60, 24.16, 122.38, 123.8, 146.32 and 146.34.

This form is accessible at: <http://www.cbp.gov/newsroom/publications/forms?title=3171>

This form is being utilized as part of the Vessel Entrance and Clearance System Public Test which has been very successful. CBP is pending regulatory change to move the test into a requirement.

- 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 collected on CBP Form 3171 helps CBP supervise the lading and unlading of carriers. This supervision provides a means of accounting for merchandise imported into the United States and preventing the exportation of merchandise normally prohibited or restricted, such as arms, munitions, and radioactive materials.

This application for a permit or special license also provides CBP with information to show that a bond is in effect to secure payment of duty and taxes on imported merchandise, as well as payment of any overtime charges incurred.

This form is anticipated to be replaced as part of the maritime forms automation

project otherwise known as the Vessel Entrance and Clearance System (VECS) which will eliminate the need for any paper submission of any vessel entrance or clearance requirements under the above referenced statutes and regulations. VECS will still collect and maintain the same data, but will automate the capture of data to reduce or eliminate redundancy with other data collected by CBP.

- 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.**

This information collection is part of the Maritime Forms Automation Project that is currently being developed. Completion of the project will reformat this as an automated data collection process and eliminate the need for hard copy forms.

CBP-OFO has built and is internally testing a system, known as the Vessel Entrance and Clearance System (VECS), for the electronic submission, review, and processing of this CBP form. Currently, CBP is developing a public facing portal, with recent DHS and CBP prioritization of VECS, the plan is to have an initial public portal by 2022. A new Account type within ACE for Vessel Agencies will act as the public portal to VECS, operating as the pass-through from ACE to VECS. However, even with an initial portal, CBP will still need to perform testing and run a public pilot with a small universe of stakeholders, before nationwide roll out.

- 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 duplicated in any other place or any other form.

- 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.**

The consequence to the Federal program if the collection of information was conducted less frequently would be a loss of revenue and payment of overtime charges incurred due to supervision of lading or unloading operations.

**7. Explain any special circumstances.**

This information is collected in a manner consistent with the guidelines of 5 CFR 1320.5(d)(2).

**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 two Federal Register notices published on September 29, 2025 (90 FR 46619) on which no comments were received, and on May 6, 2026 (91 FR 24559) 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.**

All data submitted and entered into ACE is subject to and protected by the Trade Secrets Act (18 U.S.C. 1905) and is considered confidential, except to the extent as otherwise provided by law. A PIA for ACE, dated July 31, 2015, and a SORN for Import Information System, dated July 26, 2016 (Vol. 81, Page 48826), will be included in this ICR. No assurances of confidentiality are provided to respondents.

**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.**

INFORMATION COLLECTION	TOTAL ANNUAL BURDEN HOURS	NO. OF RESPONDENTS	NO. OF RESPONSES PER RESPONDENT	TOTAL RESPONSES	TIME PER RESPONSE
Form 3171	11,879	1,591	56	89,096	8 minutes

CBP is working on completing the Vessel Entrance Clearance System (VECS), that will replace CBP Form 3171. At this time, the paper form is still being accepted until full nationwide implementation of VECS and regulation changes.

### Public Cost

The estimated cost to the respondents is \$434,415. This is based on the estimated burden hours (11,879) multiplied by the average loaded hourly wage rate for importers (\$36.57). CBP calculated this loaded wage rate by first multiplying the Bureau of Labor Statistics' (BLS) 2024 median hourly wage rate for Cargo and Freight Agents (\$23.99), which CBP assumes best represents the wage for importers, by the ratio of BLS' Q4 2024 total compensation to wages and salaries for Office and Administrative Support occupations (1.4886), the assumed occupational group for importers, to account for non-salary employee benefits.<sup>1</sup> CBP uses an annual growth rate of 2.42% based on the prior year's change in the implicit price deflator, published by the Bureau of Economic Analysis.<sup>2</sup>

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

There are no record keeping, capital, start-up or maintenance costs associated with this information collection.

<sup>1</sup> Source of median wage rate: U.S. Bureau of Labor Statistics. Occupational Employment and Wage Statistics, "May 2024 National Occupational Employment and Wage Estimates United States." Updated April 2, 2025. Available at [https://www.bls.gov/oes/2024/may/oes\\_nat.htm](https://www.bls.gov/oes/2024/may/oes_nat.htm). Accessed June 17, 2025. The total compensation to wages and salaries ratio is equal to the total compensation cost per hour worked for Office and Administrative Support occupations (\$35.86) divided by the wages and salaries cost per hour worked for the same occupation category (\$24.09). See "Table 2. Employer Costs for Employee Compensation for civilian workers by occupational and industry group." Bureau of Labor Statistics, "Employer Costs for Employee Compensation – December 2024." Released March 14, 2025. Available at [https://www.bls.gov/news.release/archives/ecec\\_03142024.pdf](https://www.bls.gov/news.release/archives/ecec_03142024.pdf). Accessed June 17, 2025.

<sup>2</sup> To adjust to 2025 dollars, multiply by the 2023-2024 percent change in the Bureau of Economic Analysis's Implicit Price Deflators for Gross Domestic Product (125.230/122.273-1). See "Table 1.1.9. Implicit Price Deflators for Gross Domestic Product," Line 1 Gross Domestic Product, annual. Bureau of Economic Analysis. Updated May 30, 2025. Available at <https://apps.bea.gov/iTable/?reqid=19&step=2&isuri=1&categories=survey#eyJhcHBpZCI6MTksInN0ZXBzIjpbMSwyLDMsM10sImRhGEiOltbImNhdGVnb3JpZXMiLCJlCjRtdXJ2ZXkiXSxbIk5JUEFfVGFibGVfTGZdCiIsIjEzIi0sWyJGaXJzdF9ZZWYyIiwiaXNlJdLlFsiTGFzdF9ZZWYyIiwiaXNlJdLlFsiU2NhbgUuLCIwIl0sWyJlCjRtdXJ2ZXkiLCJlCjB1I1dfQ==>. Accessed June 17, 2025.

- 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 estimated annual cost to the Federal Government associated with the review of this information collection is \$1,180,390. This is based on the number of responses that must be reviewed (89,096) multiplied by the time burden to review and process each response (0.166 hours) = 14,790 hours multiplied by the average hourly loaded rate for a CBP Officer (\$79.81)<sup>3</sup> = \$1,180,390.

- 15. Explain the reasons for any program changes or adjustments reported in Items 12 or 13.**

There has been a decrease in the previously reported burden for this information collection. The annual burdens hours decreased from 25,190 to 11,879 (reduction of 13,311 hours), due to a decrease in the number of respondents from 2,624 to 1,591 (reduction of 1,033) and responses received from 72 to 56 ( a reduction of 16). This reflects current trends and not a change in the information collected or method of collection.

- 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, explain the reasons that displaying the expiration date would be inappropriate.**

CBP will display the expiration date for OMB approval of this information collection.

- 18. “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.

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<sup>3</sup> CBP bases this wage on the FY 2025 salary and benefits of the national average of CBP Officer Positions. Source: Email correspondence with CBP’s Office of Finance on July 15, 2025.