

**DEPARTMENT OF THE TREASURY**

**ALCOHOL AND TOBACCO TAX AND TRADE BUREAU**

**Supporting Statement -- Information Collection Request**

**OMB Control Number 1513-0039**

**Distilled Spirits Plants Warehousing Records (TTB REC 5110/02), and  
Monthly Report of Storage Operations.**

**Changes Since Last Approval**

Changes made to the Supporting Statement since this information collection's last approval:

- In Question 8, TTB is updating the 60-day notice publication information for this information collection.
- In Questions 12, 13, and 14, TTB is revising for this information collection, respectively, its estimated annual respondent burden and labor costs, non-labor costs, and costs to the Federal Government.
- In Question 15, TTB explains the reason for the estimated burden increase associated with this information collection.

**A. Justification**

*1. What are the circumstances that make this collection of information necessary, and what legal or administrative requirements necessitate the collection? Also align the information collection to TTB's Line of Business/Sub-function and IT Investment, if one is used.*

The Alcohol and Tobacco Tax and Trade Bureau (TTB) administers chapter 51 (distilled spirits, wine, and beer), chapter 52 (tobacco products, processed tobacco, and cigarette papers and tubes), and sections 4181-4182 (firearms and ammunition excise taxes) of the Internal Revenue Code of 1986 (IRC, 26 U.S.C.). TTB administers these IRC provisions pursuant to section 1111(d) of the Homeland Security Act of 2002, as codified at 6 U.S.C. 531(d). In addition, the Secretary of the Treasury (the Secretary) has delegated certain IRC administrative and enforcement authorities to TTB through Treasury Order 120-01.

In general, the IRC at 26 U.S.C. 5001 imposes Federal excise tax on each proof gallon of distilled spirits produced in or imported into the United States, and section 5005(c) of the IRC makes distilled spirits plant (DSP) proprietors liable for that tax on all spirits stored on the bonded premises of their DSPs. As such, verification of a DSP's storage operations is necessary to establish a proprietor's tax liability and adequacy of their bond coverage. To safeguard this revenue, the IRC at 26 U.S.C. 5207 requires DSP proprietors to keep records and submit reports of their production, storage, processing, and denaturation activities, in such form and manner the Secretary prescribes by regulation.

Issued under those IRC authorities, the TTB regulations regarding DSP operations are contained in 27 CFR Part 19, Distilled Spirits Plants. The regulations in Subpart V, Records

and Reports, at 27 CFR 19.571 through 19.576, 19.580, and 19.581, specify the general requirements for all DSP production, storage, processing, and denaturation account activity records, including their format, location, availability, retention, preservation, time for making entries, and required details.<sup>1</sup>

Unique to this information collection, the regulations in 27 CFR 19.590 through 19.593 prescribe records related to DSP storage and warehouse activities: § 19.590 requires daily records regarding the distilled spirits received into or withdrawn from a DSP's storage account and of the activities and operations within that account; § 19.591 requires summary records for each kind of spirits or wine in packages deposited in, withdrawn from, and remaining in the storage account; § 19.592 requires records of deposits into, withdrawals from, and balances remaining in each storage tank containing wine or spirits under 190° proof; and § 19.593 requires similar records for storage tanks containing wines or spirits at or above 190° proof. Sections 19.591, 19.592, and 19.593 also require DSP proprietors to keep separate storage account records for domestic spirits, imported spirits, Puerto Rican spirits, and U.S. Virgin Islands spirits.<sup>2</sup>

In addition, as required by 27 CFR 19.632, DSP proprietors must report their storage account activities to TTB on a monthly basis using form TTB F 5110.11, Monthly Report of Storage Operations. Compiled from the required storage account records, DSP proprietors use this report to summarize their daily storage and warehousing activities during the monthly reporting period.

This information collection is aligned with Line of Business/Sub-function: General Government/Taxation Management.

*2. How, by whom, and for what purpose is this information used?*

The DSP storage account records and monthly reports required under this information collection are necessary to protect the revenue, ensure industry compliance with Federal law and regulations, analyze industry trends, effectively allocate TTB field resources, and compile industry statistics. As noted above, under the IRC at 26 U.S.C. 5050(c), DSP proprietors are liable for the Federal excise tax on all distilled spirits stored on their premises, and, as such, it is necessary to establish their potential tax liability and adequacy of their bond coverage. To do so, TTB personnel examine TTB F 5110.11 for mathematical accuracy and indications of unusual activities. If discrepancies are found, a TTB specialist may resolve them by contacting the respondent or by initiating an investigation by TTB field personnel. During tax audits and compliance inspections, TTB field personnel may examine a proprietor's TTB F 5110.11 reports and the required supporting storage account records, and may verify the quantity and kind of distilled spirits and wine in storage at a DSP.

TTB also uses the information provided on TTB F 5110.11 to analyze trends within the distilled spirits industry and to effectively allocate TTB field personnel. Given the limited number of TTB field personnel in relation to the number of regulated industry members, information allowing Bureau managers to determine tax audit and compliance inspection

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<sup>1</sup> In addition to the DSP storage account records kept under this information collection, DSP proprietors keep production account records under recordkeeping requirement TTB REC 5110/01, approved under OMB No. 1513-0047; keep processing account records under TTB REC 5110/03, approved under OMB No. 1513-0041; and keep denaturation account records under TTB REC 5110/04, approved under OMB No. 1513-0049.

<sup>2</sup> Some data elements for the required storage account records are sourced from the DSP transaction records kept by DSP proprietors under TTB REC 5110/05, which is approved under OMB control number 1513-0056.

priorities is essential to effective tax administration and revenue protection. In addition, TTB personnel use the information provided on TTB F 5110.11 to compile statistical reports for use by TTB and by industry and other members of the public.

*3. To what extent does this collection of information involve the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology? What consideration is given to use information technology to reduce burden?*

Currently, the TTB regulations at §§ 19.572 and 19.573 provide that DSP proprietors may electronically keep DSP storage and other account activity records required under 27 CFR part 19 and that they may maintain those records at the DSP or a central recordkeeping location. As for the required storage and other operations reports required under part 19, the regulations at § 19.634 allow DSP proprietors to provide TTB with computer-generated reports without TTB's preapproval if the resulting document approximates the physical layout, matches each line, and contains the penalty of perjury statement of the displayed on the corresponding TTB report or form.

In addition, DSP proprietors may electronically complete and submit TTB F 5110.11 to TTB via the Federal Government's Pay.gov online system at <https://www.pay.gov/public/home>. TTB F 5110.11 also is available as a fillable-printable form on the TTB website at <https://www.ttb.gov/public-information/forms>. That webpage includes links to a presentation about, and detailed instructions for, completing that form.

*4. What efforts are used to identify duplication? Can similar information already available be used or modified for use for the purposes described in Item 2 above?*

This information collection contains information pertinent to each respondent and applicable to the specific issue of the respondent's DSP storage and warehousing activities. As far as TTB is able to determine, similar information is not available elsewhere.

*5. If this collection of information impacts small businesses or other small entities, what methods are used to minimize burden?*

The collection of information regarding DSP storage account activities is required by statute (see 26 U.S.C. 5207), and TTB has determined that this information collection is the minimum necessary to meet those statutory requirements. This collection of information consists of records documenting transactions within a DSP's storage account and a monthly summary report of those operations. As such, TTB expects a small business to have a lesser number of transactions to document in the required records and reports. In addition, the TTB regulations in 27 CFR part 19 allow for the use of electronic recordkeeping and reporting systems at the respondent's discretion.

*6. What consequences to Federal program or policy activities and what, if any, technical or legal obstacles to reducing burden will occur if this collection is not conducted or is conducted less frequently?*

The IRC imposes Federal excise tax on distilled spirits produced in or imported into the United States, places on DSP proprietors liability for that tax on all spirits stored on the bonded premises of their DSPs, and, to protect the revenue, requires all DSP proprietors to

keep records and make reports regarding their production, storage, processing, and denaturing activities as the Secretary prescribes by regulation.

Respondents keep and maintain the required DSP storage account activity records on a continuing basis, and, based on those records, they submit the required storage operations report a monthly basis. Not requiring such recordkeeping and reporting, or requiring such on a less frequent basis, would jeopardize the revenue. Additionally, if TTB did not conduct this collection or conducted it less frequently, it would have to rely more on field personnel to monitor compliance with the laws and regulations governing to DSP storage activities, which would require a larger number of TTB auditors and investigators, placing greater costs on TTB and creating a greater burden for industry members.

*7. Are there any special circumstances associated with this information collection that would require it to be conducted in a manner inconsistent with OMB guidelines? (See 5 CFR 1320.5(d)(2).)*

OMB guidelines consider requiring reporting on more than a quarterly basis to be a special circumstance. This information collection requires DSP proprietors to submit TTB F 5110.11 on a monthly basis. Given the substantial excise tax placed on distilled spirits, TTB believes that less frequent submission of this report would jeopardize the revenue and impair its ability to detect discrepancies affecting tax liability at DSPs and to respond to them in a timely manner.

*8. What effort was made to notify the general public about this collection of information? Summarize the public comments that were received and describe the action taken by the agency in response to those comments.*

To solicit comments from the public, TTB published a “60-day” comment request notice for this information collection in the Federal Register on January 30, 2026, at 91 FR 4180. TTB received no comments on this information collection in response.

*9. Was any payment or gift given to respondents, other than remuneration of contractors or grantees? If so, why?*

No payment or gift is associated with this collection.

*10. What assurance of confidentiality was provided to respondents, and what was the basis for the assurance in statute, regulations, or agency policy?*

TTB provides no specific assurance of confidentiality for the required DSP storage records, which proprietors maintain at their premises, or for the monthly storage operations report. However, Federal law at 5 U.S.C. 552 protects the confidentiality of proprietary information obtained by the Government from regulated businesses and individuals, and 26 U.S.C. 6103 prohibits disclosure of tax returns and related information unless disclosure is specifically authorized by law. TTB maintains these forms in secure file rooms with controlled access and in password-protected computer systems.

*11. What is the justification for questions of a sensitive nature? If personally identifiable information (PII) is being collected in an electronic system, identify the Privacy Impact*

Assessment (PIA) that has been conducted for the information collected under this request and/or the Privacy Act System of Records notice (SORN) issued for the electronic system in which the PII is being stored.

This information collection contains no questions of a sensitive nature. In addition, this collection does not collect personally identifiable information (PII) in an electronic system. Therefore, no Privacy and Civil Liberties Impact Assessment (PCLIA) or System of Records Notice (SORN) is required for this collection.

12. What is the estimated hour burden of this collection of information?

Respondent burden: Based on recent data, TTB estimates the respondent burden for this information collection as follows:

OMB No 1513–0039	Respondents	Responses Per Year	Annual Responses	Hours per Response	Total Annual Burden Hours
TTB REC 5110/02 (recordkeeping)	5,800	12 (once per month)	69,600	1 hour	69,600 hours
TTB F 5110.11 (reporting)				1 hour	69,600 hours
<b>TOTALS</b>	<b>5,800</b>	<b>12</b>	<b>69,000</b>	<b>2 hours</b>	<b>139,200 hours</b>

Estimated Respondent Labor Costs: TTB estimates the annual per-respondent and total respondent labor costs for this information collection as follows:

NAICS 312100 – Beverage Manufacturing – Compliance Officer Fully-loaded Labor Rate/Hour <sup>3</sup> = \$52.40					
Avg. Time / Response	Labor Cost / Response	Responses / Respondent	Labor Costs / Respondent	Total Respondents	Total Labor Costs
2 hours	\$104.80	12	\$1,257.60	5,800	\$7,294,080.00

\* Fully-loaded labor costs rounded to the nearest whole cent.

Respondent Record Retention: The TTB regulations in 27 CFR part 19 require DSP proprietors to keep the records required under that part, including copies of any reports submitted to TTB, for at least three years from the date of the record or the date of the last entry, whichever is later. In addition, DSP proprietors must make the required records available for TTB inspection during normal business hours. See 27 CFR 19.574, 19.575, and 19.632.

13. What is the estimated annual cost burden to respondents or record keepers resulting from this information collection request (excluding the value of the hour burden in Question 12 above)?

<sup>3</sup> The Fully-loaded Labor Rate = Hourly wage rate + benefit costs, which, for the private sector, is calculated as hourly wage x 1.44. Per the most recent U.S. Department of Labor, Bureau of Labor Statistics, data for National Industry-Specific Occupational Employment and Wage Estimates for NAICS 312100—Beverage Manufacturing, the average fully-loaded labor rate per hour for Compliance Officers (13–1041) is \$52.40, based on a mean hourly wage of \$36.39. see <https://data.bls.gov/oes/#/industry/312100>.

TTB believes there are no annualized capital, start-up, operational, or maintenance costs to respondents associated with this information collection, which generally consists of usual and customary distilled spirits storage and warehousing records kept during the normal course of business, as well as monthly submissions of distilled spirits production reports based on those records. As for the submission of the required monthly DSP denaturation reports, for the estimated 50 percent of respondents (2,900 of 5,800) who submit monthly reports via the Pay.gov website, there are no mailing costs. As for the remaining 50 percent of respondents (2,900 of 5,800) who submit their monthly production reports to TTB by mail, TTB estimates annual postage and mailing supply costs as follows: \$2.00 for each response, \$24.00 for each of the 2,900 respondents making 12 annual responses by mail, for a total of \$69,600.00 in such costs.

14. *What is the annualized cost to the Federal Government?*

TTB estimates that the annual costs to the Federal Government for this information collection are as follows:

Overhead costs: TTB estimates \$1.00 in overhead costs for each of the estimated 69,600 submissions of TTB F 5110.11, resulting in an annual total of \$69,600.00 in such costs. However, printing and distribution costs to the Federal government have decreased to \$0.00 in TTB’s cost estimate due to the availability of TTB forms to the public on the TTB website at <https://www.ttb.gov>.

Labor costs: TTB clerks process received mail and Pay.gov submissions, complete data entry, and image received reports, while TTB specialists review each submitted Monthly Report of Storage Operations for errors, unusual activities, and other factors. As such, TTB estimates its annual labor costs for this information collection as follows:

<b>Labor Costs for Personnel at TTB’s National Revenue Center in Cincinnati, Ohio, for OMB No. 1513–0039*</b>					
Position	Fully-loaded Labor Rate/Hour <sup>4</sup>	Processing Time per Response	Labor Costs per Response	Total Responses	Total TTB Labor Costs
GS–5, Step 5, Clerk	\$37.56	1 hour	\$37.56	69,600	\$2,614,176.00
GS–11, Step 5, Specialist	\$68.85	1 hour	\$68.85		\$4,791,960.00
<b>Totals</b>	<b>(\$53.205)</b>	<b>2 hours</b>	<b>\$106.41</b>	<b>69,600</b>	<b>\$7,406,136.00</b>

\* TTB labor costs rounded to the nearest whole cent unless otherwise noted.

Total costs: TTB estimates its total annual labor and non-labor costs for this information collection to be **\$7,475,736.00**.

<sup>4</sup> Federal Government Fully-loaded Labor Rate = Hourly wage rate x 1.63 to account for benefit costs. Per the most recent Office of Personnel Management (OPM) hourly wage data, the fully-loaded labor rates per hour for the Cincinnati, Ohio, wage area are: (1) GS–5, step 5, employee = \$37.56, based on an hourly wage of \$23.04; and (2) GS–11, step 5 = \$68.85, based on an hourly wage of \$42.24. See the OPM website at [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2026/CIN\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2026/CIN_h.pdf).

15. *What is the reason for any program changes or adjustments reported?*

Program Changes and Adjustments: There are no program changes associated with this collection. As for adjustments, due to changes in agency estimates resulting from continued growth in the number of DSPs in the United States (particularly small DSPs), TTB is increasing the estimated annual burden associated with this information collection. Specifically, TTB is increasing this collection's number of respondents from 4,800 to 5,800, its number of responses from 57,600 to 69,600, and its total annual burden hours from 115,200 to 139,200. There is no change to this collection's estimated per-response burden of 2 hours per response.

Form Revisions: While the data collected on form TTB F 5110.11 remains the same as previously reported, TTB is updating its mailing addresses shown in the form's instructions and its Paperwork Reduction Act to reflect current TTB postal addresses.

16. *Outline plans for tabulation and publication for collections of information whose results will be published.*

TTB will not publish the results of this information collection.

17. *If seeking approval to not display the expiration date for OMB approval of this information collection, what are the reasons that the display would be inappropriate?*

TTB will display the expiration date for OMB approval of this information collection request on form TTB F 5110.11. As for the recordkeeping portion of this information collection request, which consists of records kept by respondents at their premises, there is no medium for TTB to display the expiration date of its OMB approval.

18. *What are the exceptions to the certification statement?*

(c) See item 5 above.

(i) No statistics are involved.

**B. Collections of Information Employing Statistical Methods.**

This information collection does not employ statistical methods.