

**Supporting Statement for Paperwork Reduction Act Submissions
30 CFR Part 206—Product Valuation, Subpart J—Indian Coal,
Forms MMS-4292, Coal Washing Allowance Report,
and MMS-4293, Coal Transportation Allowance Report
OMB Control Number 1010-0074
Current Expiration Date: October 31, 2004**

General Instructions

The Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 of the OMB Form 83-I is checked “Yes,” Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

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.

General Background

This information collection request (ICR) is now titled 30 CFR Part 206—Product Valuation, Subpart J—Indian Coal (Forms MMS-4292, Coal Washing Allowance Report, and MMS-4293, Coal Transportation Allowance Report). We changed the title of this ICR to clarify the regulatory language we are covering under 30 CFR Part 206. The previous title was “Coal Washing and Transportation Allowances (Forms MMS-4292 and MMS-4293).”

The Secretary of the U.S. Department of the Interior (DOI) is responsible for collecting royalties from lessees who produce minerals from leased Federal and Indian lands. The Secretary is required by various laws to manage mineral resources production on Federal and Indian lands, collect the royalties due, and distribute the funds in accordance with those laws. The Secretary also has an Indian trust responsibility to manage Indian lands and seek advice and information from Indian beneficiaries. The Minerals Management Service (MMS) performs the royalty management functions and assists the Secretary in carrying out the Department’s Indian trust responsibility.

Minerals produced from Federal and Indian leases vary greatly in the nature of occurrence, production and processing methods, and markets served. Also, lease terms, statutory requirements, and regulations vary significantly among the different solid minerals.

When a company or an individual enters into a lease to explore, develop, produce, and dispose of minerals from Federal or Indian lands, that company or individual agrees to pay the lessor a share (royalty) of the value received from production from the leased lands. The lease creates a business relationship between the lessor and the lessee. The lessee is required to report various kinds of information to the lessor relative to the disposition of the leased minerals. Such information is similar to data reported to private and public mineral interest owners and is generally available within the records of the lessee or others involved in developing, extracting, transporting, processing, purchasing, or selling of such minerals. The information collected includes data necessary to ensure that the royalties are paid appropriately.

Specific ICR Information

This ICR provides for the collection of coal washing and transportation information for Indian leases. The information collected is essential for the royalty valuation process. Applicable citations include 25 U.S.C. 396d and the Indian Mineral Development Act of 1982 (25 U.S.C. 2103) (Attachment 1) pertaining to Indian lands on which solid minerals are produced. The product valuation and allowance determination process is essential to assure that the Indians receive payment on the full value of the minerals removed.

In order to determine whether the amount of royalty paid is correct, the value of the coal being sold or disposed of in some other manner (for example, used by the lessee) must be established. Under some circumstances the lessee may be authorized to deduct certain costs in the calculation of royalties due. The total of these authorized deductible costs is known as an allowance. An allowance may be granted to compensate the lessee for the reasonable actual cost of washing the portion of the coal on which royalty is due. Also, when the sales point is not in the immediate vicinity of a lease or mine area, an allowance may be granted to compensate the lessee for the reasonable actual cost of transporting the royalty portion of the coal to a sales point not on the lease or mine area.

We developed Form MMS-4292, Coal Washing Allowance Report, and Form MMS-4293, Coal Transportation Allowance Report (Attachment 2), for industry to use when reporting or requesting a washing or transportation allowance. Historically, the lessee requested approval of royalty deductions by submitting a letter, which provided information enabling the Department to evaluate the reasonableness of the deductions. Under the product valuation regulations at 30 CFR 206—Product Valuation, Subpart J—Indian Coal (Attachment 3), we normally accept costs incurred under arm's-length contracts for transporting and/or washing coal. (An arm's-length contract is a contract or an agreement that has been arrived at in the marketplace between independent, nonaffiliated persons with opposing economic interest regarding that contract.) The regulations further provide that we normally accept the gross proceeds accruing to the lessee pursuant to their arm's-length contract as being representative of value for ad valorem leases [see 30 CFR 206.456(b)(1)].

In those instances when Indian royalty coal is washed or transported under non-arm's-length conditions, it is necessary for us to obtain cost data. This cost data enables us to accurately determine if the lessee correctly computed the coal value and the gross proceeds for royalty calculation purposes.

Not collecting this information would limit the Secretary's ability to discharge fiduciary duties and may also result in the inability to confirm the accurate royalty value. The information collected under this ICR is essential for the royalty valuation process.

We are renewing this information collection request because of the possibility of 10 or more respondents in the future. The MMS has had no respondents for this information collection since the previous renewal; however, we are basing our calculations of the burden hours on 1 respondent, as we did for the previous renewal.

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.]

The MMS, acting for the Secretary, uses the information collected to assure that royalties reported and paid are based upon correct product valuation. The MMS uses the collected information, as do other Federal Government and State entities, for audit purposes and to evaluate the reasonableness of product valuation or allowance claims submitted by lessees. The determination of the appropriate product value or allowance rate directly affects the royalties due. Failure to collect such data would prevent the Secretary from accomplishing statutory and trust responsibilities.

Coal Washing Allowances

Regulations at 30 CFR 206.457 and 206.458 provide that, in determining coal value for royalty purposes, a lessee may take a deduction for the reasonable actual costs incurred to wash the coal. For washing costs incurred by a lessee under an arm's-length contract, the allowance is the reasonable costs incurred for washing the coal under that contract. The MMS's approval is not required to take the allowance. However, the Indian lessee must submit page 1 of Form MMS-4292, not later than the same month the washing allowance is first reported on Form MMS-4430, Solid Minerals Production and Royalty Report (OMB Control Number 1010-0120, expires September 30, 2004, extension pending), estimating the tons of coal washed, rate per ton, and allowance to be taken during the allowance period.

The washing allowance is effective for a 12-month period or until the washing contract terminates, whichever comes first, at which time the lessee must resubmit page 1 of Form MMS-4292 reporting actual tons washed, rate per ton, and allowance taken during the period. Information required includes the lessee's name and address, the payor code and product code as reported on Form MMS-4430, estimated or actual production, and the allowance claimed.

If the lessee has a non-arm's-length washing contract or has no contract, the washing allowance

is based on the lessee's reasonable, actual costs. The MMS's approval is not required to take the allowance. However, the lessee must submit the entire Form MMS-4292 to provide estimated washing costs the same month the washing allowance is reported on Form MMS-4430. The allowance is effective for a 12-month period, at the end of which the lessee must resubmit a completed Form MMS-4292 with actual washing costs. The MMS must receive the form within 90 days after the end of the previous reporting period, unless MMS approves a longer period. Thus, Form MMS-4292 is used to report both an estimated allowance to be used for a new 12-month period and an actual royalty washing allowance rate based on the lessee's portion of the actual plant operating, maintenance, and overhead expenditures for the prior 12-month reporting period.

Coal Transportation Allowances

Regulations at 30 CFR 206.460 and 206.461 provide that, where the royalty value of the coal has been determined at a point remote from the lease or the mine, MMS will allow a deduction for the reasonable, actual costs incurred to transport the coal to a sales point or to a washing facility remote from the mine area or lease. As with the washing allowance, MMS's approval is not required to deduct transportation costs; however, under arm's-length contracts, an Indian lessee must submit page 1 of Form MMS-4293 with estimated costs no later than the same month the allowance is reported on Form MMS-4430. Under a non-arm's-length contract, the lessee must complete the entire form providing estimated transportation, operating, maintenance, and overhead expenses. The allowance is effective for a 12-month period or until the transportation contract terminates. After the initial reporting period, the lessee must resubmit Form MMS-4293 in its entirety for non-arm's-length contracts, or page 1 of the form for arm's-length contracts, providing actual costs incurred during the previous reporting period. The MMS must receive the form within 90 days after the end of the previous reporting period, unless MMS approves a longer period.

Coal transportation allowance reporting may be straightforward and simple or may be quite complex. In some cases, coal may be transported from point-to-point using a single mode of transportation such as truck, rail system, conveyor belt, pipeline, slurry-line, barge or ship. In other instances, coal may travel over several segments of a route using multiple transport methods during the same trip. The reporting can be further complicated through the use of combinations of lessee-owned transport systems and other systems under non-arm's-length and/or arm's-length contracts, or both. Each segment must be considered separately and evaluated for the reasonableness of cost.

The MMS is requesting OMB's approval for Forms MMS-4292 and MMS-4293 to continue to collect this information. These forms are compatible with Form MMS-4430.

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].

The MMS Minerals Revenue Management (MRM) program is moving to fully implement the Government Paperwork Elimination Act with their reengineered business processes. Forms MMS-4292 and MMS-4293 are not automated because we receive only limited submissions of each form each year and designing a computer system to process such a limited number of forms was not cost effective. These forms are available on the MMS Web site at http://www.mrm.mms.gov/Laws_R_D/InfoColl/InfoColCom.htm. The MMS will accept submissions as an email attachment.

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.

In most cases, the information collected is unique and site specific to each operation. With respect to washing and transportation costs, MMS found that no other Federal or State agency collects the same or similar information. Other adequate information is not available to make appropriate product valuations or to determine the reasonableness of coal washing or transportation allowances.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

This collection of information does not have a significant economic effect on a substantial number of small entities because there are very few submissions of Forms MMS-4292 and MMS-4293. Although small organizations are among the potential respondents, MMS has carefully analyzed its requirements to ensure that the information requested is the minimum necessary and places the least possible burden on industry. We provide toll-free telephone assistance and schedule annual training free of charge in various geographic areas to assist reporters in complying with valuation and reporting requirements.

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.

If we did not collect the information, MMS could not carry out the mandates of 30 CFR 206.457, 206.458, 206.459, 206.460, and 206.461. The format of Forms MMS-4292 and MMS-4293 is essential for reporting coal washing and transportation allowances. It allows MMS to fulfill its mission to collect and verify mineral revenues generated from solid minerals located on Indian lands. Annual submission coincides with industry's business practices.

Although some coal sales prices are publicly available from other sources, those prices are not current and do not reflect all monies received from the sale of Indian coal. Also, such information does not meet the rigid standard that prices for non-arm's-length contracts be within the range of other arm's-length contract prices for like-quality coal sold at about the same time in the same area. Therefore, other sales data are not appropriate and cannot be substituted or modified for product valuation purposes.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

(a) requiring respondents to report information to the agency more often than quarterly.

The 30 CFR Part 206, Subpart J, requires that the respondent submit Forms MMS-4292 and MMS-4293 annually. Respondents may submit these allowance forms more often than quarterly if washing or transportation costs increase or decrease sufficiently to require a recalculation of the unit cost.

(b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.

Not applicable in this collection.

(c) requiring respondents to submit more than an original and two copies of any document.

Not applicable in this collection.

(d) requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than 3 years.

In accordance with 30 U.S.C. 1713(b), Indian oil and gas records must be maintained for 6 years after the records are generated unless the Secretary notifies the record holder that such records must be maintained for a longer period due to an ongoing audit or investigation. Respondents are required by 30 CFR 212.200 to maintain records for 6 years or for longer periods if notified in writing. When an audit or investigation is underway, records must be maintained until released by written notice.

(e) 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.

Not applicable in this collection.

(f) requiring the use of statistical data classification that has been reviewed and approved by OMB.

There are no special circumstances with respect to 5 CFR 1320.5(d)(2)(v) through (viii) as the collection is not a statistical survey and does not use statistical data classification.

(g) 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.

This collection does not include a pledge of confidentiality not supported by statute or regulation.

(h) 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.

This collection does not require proprietary, trade secret, or other confidential information not protected by agency procedures. Standard agency procedures provide strict security measures to control the use, storage, and access to such information.

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 3 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. [Please list the names, titles, addresses, and phone numbers of persons contacted.] Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 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.

As required in 5 CFR 1320.8(d), MMS published a 60-day review and comment notice in the *Federal Register* on March 26, 2004 (69 FR 15897) (Attachment 4). We did not receive any comments in response to this notice. We have not contacted any companies during this information collection renewal because we have had no respondents since the previous renewal.

MMS continues to meet with lessees, collectively and individually, to discuss requirements and implementation strategies.

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

We will not provide any payment or gift to respondents in this collection.

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

Commercial or financial information provided to MMS relative to minerals removed from Federal and Indian leases may be proprietary. Trade secrets, proprietary and other information

are protected in accordance with standards established by the Federal Oil and Gas Royalty Management Act of 1982, as amended (30 U.S.C. 1733), the Freedom of Information Act (5 U.S.C. 552(b)(4)), and Department regulations (43 CFR 2). The Indian Mineral Development Act of 1982 (25 U.S.C. 2103) provides that all information related to any Indian minerals agreement covered by the Act in the possession of DOI shall be held as privileged proprietary information. Storage of proprietary information and access to it are controlled by strict security measures.

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.

The collection does not include sensitive or private questions.

12. Provide estimates of the hour burden of the collection of information. The statement should:

(a) 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.

(b) If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

(c) 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. Instead, this cost should be included in Item 14.

Although there is a possibility of 10 or more respondents in the future, we are basing our current calculation on a reasonable expectation of two responses (one for the Form MMS-4292 and one for the Form MMS-4293) from one Indian lessee, as we did for the previous renewal. We estimate the total annual burden is 4 reporting hours due to the MMS's historical data. The burden estimates include the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. There are no recordkeeping burden hours. Responses are generally on an annual basis.

The lessee submits Form MMS-4292 to provide annual coal washing costs. The annual reporting burden to prepare and submit Form MMS-4292 is 2 hours. The lessee also submits Form MMS-4293 for one lease to provide an annual estimate of transportation costs and report prior period actual costs. The annual reporting burden to prepare and submit the Form MMS-4293 is 2 hours.

Based on a cost factor of \$50 per hour, we estimate the total annual cost to industry is \$200 (\$50 x 4 hours = \$200). There are no additional recordkeeping costs. The following chart shows the estimated burden hours by CFR section and paragraph.

SECTION A.12 BURDEN BREAKDOWN

Citation 30 CFR Subpart J	Reporting Requirement	Hour Burden	Average No. Annual Responses	Annual Burden Hours
Form MMS-4292, Coal Washing Allowance Report				
206.458 (a)(1), (b)(1), (c)(1)(i) and (iii), (c)(2)(i) and (iii)	<p>Determination of washing allowances.</p> <p>(a) <i>Arm's-length contracts.</i> (1) * * * However, before any deduction may be taken, the lessee must submit a completed page one of Form MMS-4292, Coal Washing Allowance Report * * *.</p> <p>(b) <i>Non-arm's-length or no contract.</i> (1) * * * However, before any estimated or actual deduction may be taken, the lessee must submit a completed Form MMS-4292 * * *.</p> <p>(c) <i>Reporting requirements.</i> (1) <i>Arm's-length contracts.</i> (i) * * * the lessee shall submit page one of the initial Form MMS-4292 prior to, or at the same time, as the washing allowance determined pursuant to an arm's-length contract is reported on Form MMS-4430, Solid Minerals Production and Royalty Report. * * *</p> <p>(iii) After the initial reporting period and for succeeding reporting periods, lessees must submit page one of Form MMS-4292 * * *.</p> <p>(2) <i>Non-arm's-length or no contract.</i> (i) * * * the lessee shall submit an initial Form MMS-4292 prior to, or at the same time as, the washing allowance determined pursuant to a non-arm's-length contract or no contract situation is reported on Form MMS-4430, Solid Minerals Production and Royalty Report. * * *</p> <p>(iii) For calendar-year reporting periods succeeding the initial reporting period, the lessee shall submit a completed Form MMS-4292 containing the actual costs for the previous</p>	2	1	2

Citation 30 CFR Subpart J	Reporting Requirement	Hour Burden	Average No. Annual Responses	Annual Burden Hours
	reporting period. If coal washing is continuing, the lessee shall include on Form MMS-4292 its estimated costs for the next calendar year. * * *			
Form MMS-4293, Coal Transportation Allowance Report				
206.461 (a)(1), (b)(1), (c)(1)(i) and (iii), (c)(2)(i) and (iii)	<p>Determination of transportation allowances.</p> <p>(a) <i>Arm's-length contracts.</i> (1) * * * However, before any deduction may be taken, the lessee must submit a completed page one of Form MMS-4293, Coal Transportation Allowance Report * * *.</p> <p>(b) <i>Non-arm's-length or no contract.</i> (1) * * * However, before any estimated or actual deduction may be taken, the lessee must submit a completed Form MMS-4293 * * *.</p> <p>(c) <i>Reporting requirements.</i> (1) <i>Arm's-length contracts.</i> (i) * * * the lessee shall submit page one of the initial Form MMS-4293 prior to, or at the same time as, the transportation allowance determined pursuant to an arm's-length contract is reported on Form MMS-4430, Solid Minerals Production and Royalty Report. * * * (iii) After the initial reporting period and for succeeding reporting periods, lessees must submit page one of Form MMS-4293 * * *.</p> <p>(2) <i>Non-arm's-length or no contract.</i> (i) * * * the lessee shall submit an initial Form MMS-4293 prior to, or at the same time as, the transportation allowance determined pursuant to a non-arm's-length contract or no contract situation is reported on Form MMS-4430, Solid Minerals Production and Royalty Report. * * * (iii) For calendar-year reporting periods succeeding the initial reporting period, the lessee shall submit a completed Form MMS-4293 containing the actual costs for the previous reporting period. * * *</p>	2	1	2
TOTAL BURDEN			2	4

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 shown in Items 12 and 14).

(a) The cost estimate should be split into two components: (1) a total capital and start-up cost component (annualized over its expected useful life) and (2) 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]. 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.

(b) If cost estimates are expected to vary widely, agencies should present ranges of cost burden 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.

(c) 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.

We have identified no paperwork cost burdens for this collection of information.

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. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

To analyze and review the information, the Government spends an average of 1/4 hour (15 minutes) for each response. The total estimated Government time is 1/2 hour (15 minutes x 2 responses). Based on a cost factor of \$50 per hour, the total annual estimated burden on the Government is \$25 (1/2 hour x \$50 = \$25).

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the Form OMB 83-I.

Item 13, Form OMB 83-I

The current OMB inventory includes 4 burden hours in Item 13 of Form OMB 83-I for this collection of information. There are no program changes or adjustments to the burden hours.

Item 14, Form OMB 83-I

There is no cost burden to report in Item 14 of Form OMB 83-I.

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 ending dates of the collection of information, completion of report, publication dates, and other actions.

The MMS will not publish the data.

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.

The MMS will display the OMB approval expiration date on Forms MMS-4292 and MMS-4293.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of Form OMB 83-I.

To the extent that the topics apply to this collection of information, we are not making any exceptions to the "Certification for Paperwork Reduction Act Submissions."

B. Collection of Information Employing Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on the Form OMB 83-I is checked "Yes," the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed.

This section is not applicable for this collection. We will not employ statistical methods in this information collection.