

July 21, 2017

OMB Desk Officer for Customs and Border Protection,
Department of Homeland Security
Office of Information and Regulatory Affairs
Office of Management and Budget

Delivered via electronic mail: dhsdeskofficer@omb.eop.gov

**RE: AGENCY INFORMATION COLLECTION ACTIVITIES: GENERAL DECLARATION, FORM 7507,
OMB NUMBER 1651-0002**

The National Air Transportation Association (NATA) is the public policy group representing the interests of aviation businesses before Congress, federal agencies and state and local governments. NATA's nearly 2,300 member companies are a vital prerequisite for a vibrant general aviation sector providing fuel, aircraft maintenance, parts sales, storage, rental, airline servicing, flight training, fractional aircraft program management and Part 135 on-demand air charter. Our members providing Part 135 on-demand commercial air transportation are required by regulation to file the General Declaration (Form 7507) with U.S. Customs and Border Protection (CBP). We therefore appreciate the opportunity to submit comments on the request to extend the existing information request.

The General Declaration is utilized as an entrance and clearance requirement for commercial aircraft arriving and departing the United States. The CBP rule requiring the filing of Form 7507 (19 CFR 122.43), has existed for many years but has been superseded by newer regulatory mandates.

NATA believes that Form 7507 no longer remains necessary for on-demand passenger carriers. There are other mandatory CBP data collections of the same or similar information, which are supplied by electronic means. We believe that OMB should require CBP to rely upon these electronic collection methods rather than continuing to impose unnecessary and duplicative collection burdens on operators.

Specifically, passenger carrying operators required to file the General Declaration Form 7507 must also electronically submit detailed passenger, crew, aircraft and carrier information to CBP (*see* 19 CFR 122.75a and 122.75b) when departing and arriving in the U.S. For the on-demand

carriers represented by NATA, the CBP Electronic Advance Passenger Information System (eAPIS) is typically utilized to complete the required submissions. The data collected by eAPIS largely duplicates and exceeds the information collected on Form 7507.

The only Form 7507 section for passenger carriers without a comparable eAPIS entry is the "Declaration of Health." However, Form 7507 notes that the health section, "is to be completed only as directed by the U.S. Centers for Disease Control and Prevention (CDC) in the event of a public health emergency." NATA suggests CBP could include this data in eAPIS or maintain it as a paper form only utilized when a health emergency occurs.

We appreciate your review and consideration of the burden imposed upon businesses by mandatory information collections and your efforts to remove or minimize that burden. NATA is prepared to provide additional information on this matter if desired.

Sincerely,

A handwritten signature in blue ink, appearing to read "John McGraw", with a stylized flourish at the end.

John McGraw
Director, Regulatory Affairs