



## SOCIETY FOR AMERICAN ARCHAEOLOGY

May 31, 2011

Desk Officer  
Department of Interior  
OMB-OIRA  
Via email: [OIRA\\_DOCKET@OMB.eop.gov](mailto:OIRA_DOCKET@OMB.eop.gov)

RE: Information Collection Request for ARPA and AA Permit Applications Process

To Whom It May Concern:

The Society for American Archaeology (SAA) is pleased to provide the following comments on the National Park Service's (NPS) proposed Information Collection Request (ICR), currently pending before the Office of Management and Budget (OMB), for permit applications under the Archaeological Resources Protection Act (ARPA) and Antiquities Act (AA) implementing regulations (43 CFR Part 7 and 43 CFR Part 3, respectively).

SAA is an international organization that, since its founding in 1934, has been dedicated to the research about and interpretation and protection of the archaeological heritage of the Americas. With more than 7,000 members, SAA represents professional archaeologists in colleges and universities, museums, government agencies, and the private sector. SAA has members in all 50 states as well as many other nations around the world.

In its Federal Register Notice of April 29, 2011, NPS indicated that it was seeking comment on four specific issues regarding the proposed ICR:

1. *Whether or not the collection of information is necessary, including whether or not the information will have practical utility.*

SAA strongly supports NPS' collection of the information required by the implementing regulations of ARPA and AA, and believes that they are absolutely necessary for the proper and scientific investigation, documentation, mitigation (if necessary) and stewardship of archaeological resources. Without such information, the practical utility of the activities conducted may be seriously compromised, and conservation of the archaeological record undermined.

2. *The accuracy of our estimate of the burden for this collection of information.*

NPS' time estimate for the completion of a permit application could be too conservative. SAA does not possess definitive data on the median time required to finish the process. Informal feedback from members, however, indicated that the procedure sometimes took longer than 2.5 hours, often because

of coordinating issues with the pertinent land management agency. SAA is willing to work with NPS to determine a clearer picture on this matter.

3. *Ways to enhance the quality, utility, and clarity of the information to be collected.*

SAA does not have any comments. We believe the information is appropriate, useful, and clear.

4. *Ways to minimize the burden of the collection of information on respondents.*

SAA does not have any specific suggestions. If NPS decides to discuss the issue of the permit application time estimate with archaeologists, however, it may want to consider using that forum to explore possible methods of easing the information collection burden.

Again, SAA appreciates this opportunity to express its views on this issue.

Sincerely,

A handwritten signature in blue ink that reads "William F. Limp". The signature is written in a cursive style with a large, stylized initial "W".

William F. Limp  
President