

**SUPPORTING STATEMENT
NORTH PACIFIC GROUND FISH OBSERVER PROGRAM
VESSEL/PLANT OPERATOR COMMENT FORM
OMB CONTROL NO.: 0648-xxxx**

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

The Fisheries Monitoring and Analysis (FMA) Division at the Alaska Fisheries Science Center (AFSC), National Marine Fisheries Service, National Oceanic and Atmospheric Administration (NOAA), Department of Commerce (DOC) manage the North Pacific Groundfish Observer Program (NPGOP). Five service provider companies provide observer services. Vessels/plants contract for observers directly through these service provider companies. The NPGOP establishes training procedures, which are performed in part by NPGOP staff and in part by staff from the University of Alaska Anchorage's Observer Training Center. Upon successful completion of this training, each observer receives a certificate that enables him or her to serve as an observer on fishing vessels/plants operating in the north Pacific. NPGOP observers will observe aboard commercial fishing vessels/plants involved in Federal fisheries, as required by Fisheries Management Plans and court mandates and through legislation such as the [Magnuson Stevens Act \(Section 403\)](#) and the [Marine Mammal Protection Act \(16 U.S.C.1387\)](#).

Approximately 400 observers spend 36,000 days at sea (or at plants) annually. Additional information about the program is provided at:

<http://www.afsc.noaa.gov/refm/observers/default.htm>

The Comment Form will help NPGOP assess observer performance, ensure higher data quality, and provide the vessel/plant operators with a direct line of communication to the program management. Improved communication and outreach is a priority for the NPGOP. It is important to get the fishermen's opinions about the program and have a method for them to report their concerns regarding, and evaluations of, the program.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

Every observer will leave a copy of this Comment Form on the vessel (or at the plant) at the completion of each trip, unless the vessel/plant operator already has one and does not wish to have another. Extra copies will be made available at the plants and at our field stations. The Comment Form will also be made available electronically on our FMA website at:

<http://www.afsc.noaa.gov/refm/observers/default.htm>

Hard copies of the Comment Form will also be made available at Fisheries Management Council Meetings and other outreach events along with active solicitation regarding their return. The Comment Forms may also be distributed by the various fishing organizations to their members. Each Comment Form will be accompanied by a postage-paid, self-addressed envelope.

The Form's heading information includes the vessel operator's name, the vessel name, the date submitted, the observer name, the company name of the observer provider, and the dates the observer was onboard. There are two sections: I) questions referring to the observer, II) questions referring to the NPGOP. The first section contains 10 yes/no questions relating to how the specific observer carried out his/her duties. Each question box contains a blank area to record comments if desired. The second section contains 5 yes/no questions relating to observers and the program in general. Each question box contains a blank area to record comments if desired.

We will also use a Non-response Follow-up Form. This follow-up will be performed either in person or by phone. This Form's heading information also includes the vessel operator's name, the vessel name, the date submitted, the observer name, the company name of the observer provider, and the dates the observer was onboard. This Form asks three questions regarding responding to the forms, one regarding whether they were satisfied with the observer, one regarding whether they were satisfied with the Observer Program, and provides space for comments about their observer, the Program, and anything in general.

The number of surveys will be counted and the responses for each question will be counted and summarized. We will also present the number of trips that observers were on, the number of different vessels/plants on which they deployed, and the number of different vessels/plants that responded to the survey. The summaries will be produced annually. The summaries will be posted on the FMA website listed above. Vessel/plant names and person's names will be held confidential and will not be released outside of NPGOP staff. Two members of the FMA Division will read survey responses in a timely manner so that problem areas can be addressed and requested information responded to promptly.

As explained in the preceding paragraphs, the information gathered has utility. NOAA Fisheries will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards of confidentiality, privacy, and electronic information. See response #10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Prior to dissemination, the information will be subjected to quality control measures and a pre-dissemination review pursuant to Section 515 of Public Law 106-554.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

In addition to hard copies, the comment form will also be made available electronically on our FMA website at: <http://www.afsc.noaa.gov/refm/observers/default.htm>. The non-response follow-up form will be completed in person or by telephone.

4. Describe efforts to identify duplication.

The government is currently collecting no such information from vessels operating neither in Federal waters off Alaska nor in plants receiving fish from vessels operating in Federal waters off Alaska.

5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

The number of questions was restricted to only the most important issues related to the performance of the observer and the program.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

Without this comment form, the government will not receive direct feedback from the fishermen. If there are complaints about observers onboard fishing vessels or at plants or the way, the program is administered, the program will not have any formal knowledge of them without this collection of information. The program would like to get real time information about the performance of observers and collection of scientific data directly from fishermen and address any complaints in order to improve the program, education, training, and/or outreach.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

Not applicable.

8. Provide a copy of the PRA Federal Register notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the 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.

No public comments were received.

The Comment Form was developed by three members of our staff with a combined work experience of over 60 years working with observer programs. The questions on the comment form relate to areas most commonly criticized by fishermen, program reviews, NMFS enforcement agents, and observer program employees. To be fair to the observers, this form also allows for positive comments regarding the work performed by observers. Information on potential program shortfalls has been conveyed informally through conversations with fishermen on the docks and at Council meetings and other gatherings of fishermen and NPGOP staff. Prior to sending this form through the Paperwork Reduction process, proposed contents of the form were made available to members of the North Pacific Council's Observer Oversight Committee, which includes members of industry, enforcement, the observer community, and the observer providers. Further, input was solicited from a member of the Enforcement Division in Anchorage and a member of the AFSC's Socio-Economics group.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

Not applicable.

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

Vessel/plant names and person's names will be held confidential and will not be released outside of NPGOP staff. Section 402(b) of the Magnuson-Stevens Conservation and Management Act, NOAA Administrative Order 216-100, and Section 118 of the Marine Mammal Protection Act are the statutory authorities for confidentiality.

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.

Not applicable.

12. Provide an estimate in hours of the burden of the collection of information.

Public reporting burden for this collection of information is estimated to average 30 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

Vessels/plants may carry several observers or the same observer on several trips throughout the year. Due to extensive outreach, availability of the Comment Form, and ease of completion and return (either via postage paid mail or the internet), we expect 75% of the vessel/plant operators to fill out the Comment Card. It is expected that NPGOP may observe 400 different vessels/plants a year. The average number of times a vessel/plant is observed per year is three, for an average yearly total of 1200 observations. At a 75% return rate, we expect to receive 900 Comment Forms per year. With an average of 30 minutes to complete a Comment Form, the estimated total number of annual hours would be 450.

We will also use a Non-response Follow-up Form. This follow-up will be performed either in person or by phone. We expect to use 300 of these forms per year. With an average of 10 minutes to complete this alternate form, the estimated total number of additional hours would be 50, for an overall total of 500 hours, annually.

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in #12 above).

There is \$0.00 total annual cost burden to the public.

14. Provide estimates of annualized cost to the Federal government.

It is estimated that it would cost the program \$625.00 in copying costs and \$625.00 in postage and envelopes per year.

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

New collection.

16. For collections whose results will be published, outline the plans for tabulation and publication.

We do not intend to extrapolate the survey responses. The number of surveys will be counted and the responses for each question will be counted and summarized. We will also present the number of trips that observers were on, the number of different vessels/plants on which they deployed, and the number of different vessels/plants that responded to the survey. The summaries will be produced annually. The summaries will be posted on the FMA website listed above. Vessel/plant names and person's names will be held confidential and will not be released outside of NPGOP staff. Two members of the FMA Division will read survey responses in a timely manner so that problem areas can be addressed and requested information responded to promptly.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

Not applicable.

18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I.

Not applicable.