

**Supporting Statement  
for  
Request for Designation and Exemption of  
Oceanographic Research Vessels**

**A. Justification**

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

This data collection is necessary for the designation of Oceanographic Research Vessels (ORV). According to 46 USC 2113, 46 CFR 3.10, and 46 CFR 14.403, oceanographic vessels may be exempted from the statute and regulations governing the shipment, discharge, payment and personal outfitting of merchant seamen.

Section 2113 of USC 46 also provides the Secretary of Homeland Security with the authority to exempt certain vessels from the inspection and manning requirements of law when vessels are engaged in oceanographic research. It also contains flexible exemption authority for regulation of ORVs.

According to 46 CFR Section 3.10-1, an individual can submit a written request to the Officer in Charge, Marine Inspection seeking a vessel be designated as an ORV. At a minimum, the following information must be submitted during the initial request: 1) a detailed description of the vessel, including its identification number, owner and charterer; 2) a specific operating plan stating precisely the intended use of the vessel; and 3) any additional information as may be requested by the Officer in Charge, Marine Inspection. According to 46 CFR Section 3.10-5, at least 60 days prior to the expiration date of the Letter of Designation or Certificate of Inspection, a request for renewal must be submitted in the same manner as above.

According to 46 CFR Section 14.403, certain requirements of 46 USC do not apply to the employment of merchant mariners on ORVs. Those requirements include concerns for the shipment and discharge of mariners, their pay and allotments, and the adequacy of their clothing. According to 46 CFR Section 14.405, an individual in charge of an ORV may submit a written request to the Officer in Charge, Marine Inspection seeking an exemption. The request must state: 1) any requirement of any section listed in 46 CFR 14.403(b) from which the applicant wishes an exemption; and 2) what business practices regarding, among other things, the shipment and discharge of merchant mariners, their pay and allotments, and the adequacy of their clothing would justify the exemption.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention

Coast Guard

- Maritime Safety

Marine Safety, Security and Environmental Protection Directorate (G-M)

- Safety: Reduce deaths, injuries, and property damage associated with commercial maritime operations.
- Economic Growth and Trade/Mobility: Reduce interruptions and impediments that restrict the economical movement of goods and people, while maximizing safe, effective, and efficient waterways for all users.

**2. By whom, how, and for what purpose the information is to be used.**

This information is used by the Officer in Charge, Marine Inspection to determine: 1) if a vessel can be designated as an ORV; and 2) can be exempted from specific inspection and/or manning requirements. [According to 46 CFR Section 3.05-3, an ORV is a vessel which the U.S. Coast Guard finds is employed

exclusively in one or more of the following: a) oceanographic instruction, b) limnologic instruction, c) oceanographic research, or d) limnologic research.]

An ORV may be inspected or uninspected. If uninspected, it receives a Letter of Designation; if inspected, its designation appears on its Certificate of Inspection. A Letter of Designation is valid for two years and a Certificate of Inspection is valid for five years. According to the Coast Guard's MISLE database, there are 93 uninspected ORVs with a current Letter of Designation and 22 inspected ORVs with a current Certificate of Inspection. Since uninspected ORVs' Letters of Designation expire after two years, on average half (46 vessels) will expire any given year. The ORV designation on inspected vessels must be renewed every five years, so on average, 20 percent (5 vessels) will need to seek re-designation in any given year.

3. Consideration of the use of improved information technology.

Respondents can either mail or fax their requests for the designation of ORV.

We estimate that 100% of the reporting requirements can be done electronically. At this time, we estimate that approximately 50% of the responses are collected electronically.

4. Efforts to identify duplication. Why similar information cannot be used.

The Coast Guard may hold information regarding the physical description of the vessels concerned. Consequently, if a vessel renews its Letter of Designation or Certificate of Inspection, it does not have to duplicate its physical description unless changes have been made.

With the partial exception of certain inspected vessels, the information necessary to allow designation of ORVs and their exemption(s) from certain requirements is not generated elsewhere.

5. Methods to minimize the burden to small businesses if involved.

To minimize the burden, the Coast Guard reduced the information required when a renewal is requested. If no substantive changes to the vessel have occurred, a brief request by letter is sufficient.

6. Consequences to the Federal program if collection were not done or conducted less frequently.

The initial written request for a vessel to receive the designation of ORV and corresponding exemptions is voluntary and relatively spontaneous. Once designated, an uninspected vessel, on average, must renew its designation every two years, an inspected vessel every five years.

7. Explain any special circumstances that would cause the information collection to be conducted in a manner inconsistent with guidelines.

There are no special circumstances causing information to be collected in a manner inconsistent with the guidelines.

8. Consultation.

A request for comment was published in the Federal Register on Jan 27, 2006, Volume 71, Number 18, page 4604, no comments were received.

9. Explain any decision to provide payment or gift to respondents.

Respondents do not receive any payments or gifts.

10. Describe any assurance of confidentiality provided to respondents.

No assurance of confidentiality is provided to respondents.

11. Additional justification for any questions of a sensitive nature.

There are no issues of a sensitive nature involved in this information collection

12. Estimates of reporting and recordkeeping hour and cost burdens of the collection of information.

- The estimated total number of respondents is 51.**
- The estimated total number of annual responses is 51.**
- The estimated annual hour burden is 51 hours.**
- The estimated annual cost burden is \$3,519.**

According to the Coast Guard's MSMS database, there are 22 ORVs that have a current Certificate of Inspection and 93 that have a current Letter of Designation. We estimate that 51 will request an ORV designation or Certificate of Inspection each year. We expect an average of 1 hour to complete the request for ORV designation or Certificate of Inspection. Consequently, we estimate an average of 51 hours to request ORV designation or Certificate of Inspection each year. According to Commandant Instruction 7310.1I, the average hourly wage for an owner of a vessel, equivalent to line officers/civilians/CWOs is \$69 per hour. Therefore, the total cost to owners to request ORV designation or certificate of inspection each year is estimated to be \$3,519. See Table 1.

**Table 1:** Hour and Cost Burden to Owners of Vessels Seeking ORV Designation/Certification

Number of ORV Designated or Certificated Vessels	Number of Designation or Certification Requests Per Year	Hour Burden Per Request	Total Hour Burden Per Year	Cost Per Hour	Total Cost Per Year
51	51	1	51	\$69	\$3,519

13. Estimates of annualized capital and start-up costs.

There are no annualized capital or start-up costs.

14. Estimates of annualized Federal Government costs.

The cost to the Government is the cost to the Officer in Charge, Marine Inspection to review the request of an ORV designation or certificate of inspection and determine its eligibility. Assuming it takes 0.5 hours to review and determine if the requesting vessel is eligible, and the average wage of Coast Guard personnel is \$56 per hour (the average pay of an O-2, O-3, W-2, W-3, W-4 and a GS-11 and 12), we estimate the annual cost to the Coast Guard is \$420 (\$1,428 = 25.5 requests/year x 0.5 hours/request x \$56/hour). See Table 2.

**Table 2:** Hour and Cost Burden to Federal Government

Number of OVR Designated or Certificated Vessels	Number of Designation or Certification Requests Per Year	Hour Burden Per Request	Total Hour Burden Per Year	Cost Per Hour	Total Cost Per Year
115	51	0.5	25.5	\$56	\$1,428

15. Explain the reasons for the change in burden.

The change in burden is an ADJUSTMENT due to a change in the vessel population.

16. For collections of information whose results are planned to be published for statistical use, outline plans for tabulation, statistical analysis and publication.

There is no plan to use statistical analysis or to publish this information.

17. Approval to not display expiration date.

We are not seeking such approval. The OMB Number will appear on appropriate PRA disclosure information.

18. Explain each exception to the certification statement.

There are no exceptions to the certification statement.

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

The collection of information does not employ statistical methods.