

**Supporting Statement  
for  
Plan Approval and Records for Tank, Passenger, Cargo and Miscellaneous  
Vessels, Mobile Offshore Drilling Units, Nautical School Vessels,  
Oceanographic Research Vessels and Electrical Engineering – 46 CFR  
Subchapters D, H, I, I-A, J, R, and U**

**A. Justification.**

**1. Circumstances that make the collection of information necessary.**

The Coast Guard enforces regulations promoting the safety of life and property in marine transportation, authorized under 46 USC 3301 and 3306. These statutes subject freight, nautical school, passenger, tank, steam and seagoing motor vessels and barges to plan review and inspection before being certified for their intended service. This is to ensure structural adequacy, suitable accommodations, and generally, that each vessel is in full compliance with applicable marine safety regulations. The regulations include standards for structural strength, propulsion and equipment, accommodation arrangement, vessel stability, cargo gear, structural fire protection, and vapor control systems. In addition, certain vessels must meet the standards of the International Safety of Life at Sea (SOLAS) Convention. Designers, manufacturers and vessel builders normally develop both plans and manuals as a standard business practice.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

Coast Guard

- Maritime Safety
- Maritime Security
- Protection of Natural Resources

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

- Safety: Eliminate deaths, injuries, and property damage associated with commercial maritime operations.
- Security: Eliminate marine transportation and coastal security vulnerability.
- Human and Natural Environment: Eliminate environmental damage associated with maritime transportation and operations on and around the nation's waterways.

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

a. Requirements for the submission of plans, technical information, and operating manuals: This information is required by the Coast Guard in order to determine if the vessel's construction, arrangement and equipment meet applicable regulations. The plans submitted to the Coast Guard are those normally developed by a shipyard, designer or manufacturer for the construction of the vessel. They are not developed solely for submission to the Coast Guard.

Compliance with most of the standards could be determined by examining the vessel after its completion, however, it is much more efficient and cost effective to the public to review the plans prior to construction. By reviewing the plans prior to construction, a vessel owner or builder can be assured that the vessel is designed in accordance with regulatory standards. Submissions are nonrecurring. They are made once, prior to the vessel's construction or alteration. Duplicate plans are not required to be submitted when more than one vessel is constructed to the same plans. Plans must be submitted either to the Commanding Officer, U.S. Coast Guard Marine Safety Center (MSC), 1900 Half Street S.W., Suite 1000, Room 525, Washington, DC 20024 or to the Officer in Charge, Marine Inspection (OCMI) at or nearest the place where the vessel is to be built.

b. Requirements for information to be available to vessel operating personnel: These requirements are intended to ensure that sufficient information is provided to the vessel's personnel for the safe and proper operation of the vessel. No format and generally no specific content are required in the manuals. Vessel operators develop and specify their own procedures for the safe and proper operation of the vessel's systems and equipment. Many vessel operators provide manuals to their vessels that exceed the minimum requirements of the Coast Guard. The Coast Guard subsequently reviews this information when it is submitted. The operating information is required to be on board the vessel as long as the vessel remains subject to the regulations.

### **3. Consideration of the use of improved information technology.**

The Coast Guard Marine Safety Center (MSC) established a Web site that details the procedure for submitting electrical plans via electronic formats. Due to convenience and speed, the majority of electronic submissions are submitted via e-mail. However, CDs, floppy disks, and zip disks are also acceptable alternatives. Electronic submission is voluntary.

We estimate that 100% of the reporting requirements can be done electronically. At this time, we estimate that approximately 15% of the responses are collected electronically.

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

There are no other Federal agencies with similar programs. However, there are areas where the Coast Guard's standards parallel those of the American Bureau of Shipping (ABS), a vessel classification society. To eliminate duplication in these areas, the Coast Guard and ABS cooperate under the provisions of a Memorandum of Understanding which gives ABS authority to act on behalf of the Coast Guard in many areas of plan review and inspection of vessels under construction and the tonnage measurement of vessels. Implementing policies and procedures are published in Navigation and Vessel Inspection Circular No. 10-82, Change 2, "Acceptance of Plan Review and Inspection Tasks Performed by the American Bureau of Shipping for New Construction or Major Modifications of U.S. Flag Vessels". Under these procedures, the Coast Guard accepts ABS approval of plans for hull structure and certain engineering systems, on those vessels that the vessel owner/operator chooses to classify with ABS.

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

This collection of information will not significantly affect small businesses.

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

If information was submitted or recorded less frequently, no assurance could be given that vessels submissions are made once, prior to the vessels construction or alteration operating within the applicable stability requirements that ensure marine safety.

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

Information is collected in a manner that is consistent with the guidelines.

**8. Consultation.**

The requirements of this information collection were presented for public comment in accordance with the Administrative Procedure Act.

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

No payments or gifts of any kind are provided to respondents.

**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.**

Owners, designers, or manufacturers of vessels desiring to obtain a Certificate of Inspection are required to obtain approved vessel design plans calculations. There are no forms or other collection instruments used; owners submit these drawings and calculation in the manner they deem most appropriate. Respondents may submit this information directly to the Coast Guard. In order to expedite the process, some may elect to submit the information to the Coast Guard via the American Bureau of Shipping (ABS) or via a Professional Engineer, under Navigation and Inspection Circulars (NVICs) 10-82 and 10-92, respectively. These NVICs do not request or require any additional data and therefore do not constitute additional Collections of Information; they merely provide the public with additional means to comply with the regulations contained in Title 46 CFR requiring the plans and technical data.

In 2005, the Coast Guard received 7,786 plans and technical submissions directly from respondents for the year in compliance with Subchapters D, H, I, I-A, J, R, and U. These plans were submitted according to the following breakdown (by 46 CFR Subchapter for vessel certification):

<u>Subchapter</u>	<u>% of Total</u>	<u>No. of Plans</u>
D	7.0	545
H	20.5	1,596
I	43.3	3,372
I-A	3.6	280
J	23.7	1,845
R	0.3	24
U	<u>1.6</u>	<u>124</u>
<b>2005 Total</b>	<b>100%</b>	<b>7,786</b>

**Respondent Cost:** This cost is mostly administrative (reproduction, handling, mailing) since the engineering and drafting would be performed whether or not plans or other information were submitted to the Coast Guard. The submission of technical information is required when a vessel is first constructed or undergoes major repair or alterations that affect the vessel design or the operation of a system for which there is a regulatory standard.

In addition, 4,394 plans were submitted to the Coast Guard through ABS.

The estimate of the burden is based upon the Coast Guard's experience with plan review and approval, estimate of annual new construction, number of vessels built to identical plans, and the number of plans required to be submitted per vessel. The estimates are based upon submissions to the Coast Guard directly and those submitted via ABS. The burden hours required for the submissions are listed below:

For plans submitted directly to the MSC or via ABS, each plan requires about 25 minutes (.41 hours) of preparation time for copying and mailing to the Coast Guard. This results in a total of 4,810 hours (11,731 plans x 0.41 hours). 449 plans (approximately 3.7 percent) are submitted to the Coast Guard through a Professional Engineer, each requiring 20 hours of preparation time each for development, copying and mailing, resulting in a requirement of 8,920 hours (449 x 20 hours = 8,980 hours). The total hour burden is therefore 13,790 hours.

The cost estimated by the Coast Guard to prepare a plan is about \$120 per response, which is the hourly wage equivalent to a Captain. The total cost would be \$1,461,600 (12,180 plans x \$120/response). We estimate that the average respondent will submit 100 plans; therefore, the number of respondents is about 122.

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

There are no annualized capital and start-up costs.

#### 14. Estimates of annualized Federal Government costs.

Virtually all federal burden of items covered by this supporting statement is borne by the Coast Guard's Marine Safety Center. This office is responsible for the review and processing of vessel plans and technical submissions. The cost of a technical review is calculated by estimating the total number of hours required for the review of each vessel times the cost per hour of technical time. The equivalent of a Lieutenant will review each plan. The average hourly wage of a Lieutenant is \$71 (per *Commandant Instruction 73101.1I*). Each review takes approximately 2.5 hours. Thus, the burden is 7,786 plans  $(7,337 + 449) \times 2.5 \text{ hours} = 19,465 \text{ hours}$  at a cost of **\$1,382,015**  $(19,465 \text{ hours} \times \$71)$

We estimate it takes an average of 3 minutes (or 0.05 hours) of clerical work per review. With 7,786 reviews, the total number of hours of clerical work is 389 hours per year  $(7,786 \text{ reviews} \times 0.05 \text{ hours/review} = 389 \text{ hours})$ . The average hourly wage of a clerical worker is \$32, which is equivalent to an E-4 (per *Commandant Instruction 73101.1I*). The total annual cost for clerical work is **\$12,448**  $(389 \text{ hours} \times \$32/\text{hour} = \$12,448)$ .

Table 1: Annual Cost to Federal Government

Type of Work	Number of Reviews	Hours Per Review	Total Hours	Cost per Hour	Total Cost
Technical	7,786	2.50	19,465	\$71	\$1,382,015
Clerical	7,786	0.05	389	\$32	\$12,448
<b>Total</b>	<b>7,786</b>		<b>19,854</b>		<b>\$1,394,463</b>

#### 15. Explain the reasons for the change in burden.

The change in burden is an ADJUSTMENT. This was largely due to the increase in NVIC 10-92 submittals, which were incorrectly listed as NVIC 10-82 submittals in the 2002 Supporting Statement.

#### 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.**

This collection does not employ statistical methods.