

Supporting Statement  
for  
Offshore Supply Vessels – Title 46 CFR Subchapter L

A. Justification.

1. Circumstances which make the collection of information necessary.

Under the authority of the Secretary found in 46 USC 3301 *et seq.*, the Coast Guard must prescribe necessary regulations and conduct inspections of offshore supply vessels (OSVs) to secure the safety of individuals and property on board. The regulations include the design, construction, alteration, repair, and operation of these vessels, including requirements for lifesaving and firefighting equipment, inspections, and tests. Based upon this mandate, the regulations in 46 CFR Subchapter L, Offshore Supply Vessels, include reporting and posting requirements to ensure safe operation, prevent emergencies to the extent reasonably possible, and ensure proper reaction when emergencies do occur.

Title 46 USC 3301 and 3305 require that every offshore supply vessel (OSV) be inspected before it is put into service to determine its structural adequacy, that it has suitable accommodations, and generally that it is in full compliance with applicable marine safety regulations. Title 46 USC 3306 directs the Secretary to make appropriate regulations for inspections and tests to ensure that OSVs comply with standards for structural strength, propulsion and auxiliary machinery, construction materials, safety and lifesaving equipment, accommodations arrangement, vessel stability, cargo gear and structural fire protection. Title 46 USC 3307 and 3308 requires the Secretary to examine each vessel subject to inspection at proper times to ensure [continued] compliance with the laws and regulations. Presently, these examinations, are provided for in 46 CFR part 126. Title 46 CFR 126.530 provides ways of conducting re-inspection examinations of OSVs that are alternatives to re-inspection examinations conducted by Coast Guard marine inspectors. In place of Coast Guard examinations, examination reports from vessel masters or from other owner's representatives acceptable to the Coast Guard, are needed by the Coast Guard to determine whether eligible OSVs remain in satisfactory condition and continue to be reasonably fit for their intended route and service.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

Coast Guard

- Safety
- Protection of the Natural Resources

Prevention Directorate (G-P)

- Reduce crewmember deaths and injuries on U.S. commercial vessels
- Reduce the amount of oil discharged into the marine environment
- Reduce the amount of chemicals entering the environment

- Reduce the consequences of pollution incidents

2. Purpose for the information collection and consequences to the Federal program if the information was not collected.

First, the notification requirements are generally intended to ensure that the Coast Guard is aware when significant maintenance or repair work is done on offshore supply vessels. If necessary, attendance by a Coast Guard inspector may be scheduled. Also listed under 'reporting burden' are plan submittal requirements for significant modifications to existing vessels. These plans are required to be submitted for technical review prior to the modification of the vessel to ensure that the structure, arrangement, stability, and outfitting are satisfactory for the intended service. The costs and burdens estimated are strictly administrative (reproduction, handling, mailing), inasmuch as the engineering and handling would be performed whether or not the plans were submitted.

Second, the recordkeeping and posting requirements are necessary for several purposes. They make readily apparent to the crew, offshore workers, boarding officers and inspectors that the vessel is currently in compliance with various regulations and treaties. The markings and placards, which are required to be posted, provide instructions to those on board of actions to be taken to prevent or respond to an emergency. Recordkeeping requirements provide inspectors with a means to verify compliance with routine operating requirements, and with a reliable means of identifying the vessel's condition, and the number of persons on board in the event of a casualty.

Finally, the reporting requirements in 46 CFR 126.530 provide a mechanism for the owners and operators of OSVs based overseas to submit certified examination reports and statements to the Coast Guard as an alternative to Coast Guard re-inspection examinations. By providing an alternative examination procedure, the Coast Guard estimates there is a potential of cost saving to OSV owners/operators.

3. Consideration of the use of improved information technology.

Many of the requirements in Subchapter L may be satisfied by simple telephone calls or posting requirements.

For plan review-related requirements, the information is vessel specific: they are one-time or on occasion submissions and generally take the form of vessel or equipment plans or operating manuals. The Coast Guard Marine Safety Center (MSC) has a Web site that details how a respondent may submit plans electronically for review.

We estimate that 50% of the reporting and recordkeeping requirements could be done electronically. At this time, we estimate that 10% of all requirements are done in electronic format.

4. Efforts to identify duplication.

There are no other agencies with similar requirements for offshore supply vessels.

5. Methods used to minimize burden to small business if involved.

Owing to the nature of the industry, recordkeeping requirements for small entities are generally proportionately less because of the smaller number of operations performed. In order to minimize the burden on the public, only the minimum information necessary for the Coast Guard to fulfill its regulatory functions is required to be recorded.

6. Consequences to the Federal program if collections were conducted less frequently.

Markings are needed to clearly indicate to crewmembers and vessel personnel where emergency equipment and exits are located. Reducing the frequency of collection for logbook entries would hinder or degrade the administration of the marine safety rules. Since the Coast Guard uses the information in the log books to enforce the regulations, it is imperative that the information be recorded accurately and in a timely manner.

For the reporting/recordkeeping requirements of 46 CFR 126.530, if information was submitted or recorded less frequently, no assurance could be given that vessels are operating within the applicable requirements that ensure marine safety. If the reporting or recordkeeping requirements are decreased, the Coast Guard would not be fulfilling its obligation to enforce the regulations. If this information is not collected, the Coast Guard could not offer the proposed alternative reinspection program.

7. Special circumstances due to inconsistency with the guidelines in 5 CFR 1320.6.

Certain records and posting requirements are required to be maintained for the life of the vessel or of the equipment to which they pertain, which may range from one to fifteen years. (The effective service life of a vessel, whereby the vessel would be able to retain a Coast Guard issued Certificate of Inspection, was assumed to be between twelve to fifteen years.) These records relate to the construction, maintenance and technical details of the vessel and its equipment. They are necessary to ensure effective maintenance and measure deterioration over time. While the records are readily available when the vessel is built, they are frequently lost before the end of the vessel's service life and the information that they contain must be either regenerated or estimated.

The posting requirements are warning and information labels, signs and placards which provide safety related information valid for the life of the vessel or its equipment. The retention period of these posting requirements was estimated as the life of the vessel although in actuality they may be renewed during that time.

8. Efforts to consult with persons outside the agency.

A request for comment was published in the Federal Register on July 17, 2006, (71 FR 40525). No comments were received.

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

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

10. Assurances of confidentiality provided to respondents.

No particular assurance of confidentiality is provided to respondents.

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

There are no questions of a sensitive nature in this information collection.

12. Estimate of the burden hours and cost for the collection of information.

Annual reporting and recordkeeping burdens are estimated in Table 1. The requirements of Subchapter L affect approximately 799 vessels. It is estimated that 28 additional OSVs will be constructed annually. Table 1 reflects the collection items and the number of respondents and recordkeepers for each reporting or posting requirement. Based on the thirty-five required collection items required to ensure vessels are constructed correctly, marked clearly, and operated safely, there will be:

A burden of 6,169 hours annually on the 827 respondents.

For these 827 respondents, there will be 856 responses.

Cost burden of Subchapter L requirements.

The labor cost to the public per hour was estimated as \$43 to cover the wide distribution of personnel (from deckhand to owner) who would perform the reporting and posting requirements. The total annual public hours were estimated as 6,169 hours for the requirements in Table 1. Assuming an overhead cost of 25 percent, the annual cost to the public is:

$(6,169 \text{ hrs}) * (\$43/\text{hr}) * (1.25 \text{ overhead}) = \$331,605$

13. Estimate of annualized capital and start up costs.

There are no annualized capital and start-up costs.

14. Annualized cost to the Federal Government and to the respondents.

The cost to the Federal Government results largely from work-hours spent preparing, issuing, and evaluating documents and verifying posting requirements are met. Material costs are estimated to be less than 1 percent of the total cost, based on similar reporting requirements in other subchapters.

The total annual government hours were estimated as 206 hours for the requirements as shown in Table 2. Essentially, all of the Federal Government personnel involved are Coast Guard officers. An hourly rate of \$34 was used (as prescribed in COMDTINST 7310.II. "Standard Rates"). The annual cost to the Federal Government is then:

$$(206 \text{ hours}) * (\$34 \text{ per hour}) = \$6,990$$

15. Reasons for the change in burden.

The change in burden is an ADJUSTMENT due to a change in vessel population that is required to meet 46 CFR Subchapter L.

16. For collections of information whose results will be published.

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

17. Display of OMB reference number.

There are no forms associated with this collection.

18. Explain each exception to the certification statement.

There are no exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods

This information collection does not employ statistical methods.