

**Supporting Statement
for
Plan Approval and Records for Subdivision and
Stability Regulations -- Title 46 Subchapter S**

A. Justification.

1) Circumstances that make the collection of information necessary.

Under the authority of the Secretary in the department in which the U. S. Coast Guard is operating, the Coast Guard administers and enforces the laws and regulations promoting the safety of life and property in marine transportation. Title 46 USC 3301 and 3305 require that every freight, seagoing motor, and steam vessel, and every seagoing barge, including a mobile offshore drilling unit be inspected to determine that it is in full compliance with applicable marine safety regulations. Title 46 USC 3306 directs the Secretary to make appropriate regulations, including standards for vessel stability. Title 46 USC 3703 directs the Secretary to prescribe additional regulations for vessels which carry liquid bulk dangerous cargoes. In addition, certain vessels must meet the standards of the Safety of Life at Sea Convention (SOLAS). Plan and vessel characteristics submissions by builders/designers and logging requirements by owners/operators are needed to assure the regulations are met.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

Coast Guard

- Safety
- Protection of the Natural Resources

Prevention Directorate (CG-3P)

- Safety: Eliminate deaths, injuries, and property damage associated with commercial maritime operations.
- 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.

Requirements for the submission of plans, technical information, or operating instructions: This information is required by the Coast Guard in order to assure that a vessel meets the applicable stability standards. Plans and other information submitted are normally developed by the shipyard, designer, or manufacturer to assure the construction and safe operation of a vessel. The material and information required is not solely for Coast Guard use, although the material does contain the information necessary to meet Coast Guard regulations. Part of the submissions are nonrecurring; they are made only once at or prior to vessel construction or alteration. Resubmission of plans is not required when more than one vessel is constructed to the same

plans, nor is a stability generally test required. In this case, only a certification of sistership status by an authorized officer of the shipbuilding company is needed. Operators may elect to have a classification society, the American Bureau of Shipping (ABS), review their plans on the Coast Guard's behalf.

Requirements for the stability information to be available to vessel operating personnel and for the logging of stability verification: These requirements are necessary to help ensure the safe operation of each vessel. There are specific requirements for the content of the stability booklet and operating manuals; however, the format will vary with vessel type. Many vessel operators provide manuals to their vessels which meet or exceed any requirements of the Coast Guard. Most, though not all of the information, is reviewed by the Coast Guard. The required operating information is required to be on board the vessel as long as the vessel remains subject to inspection. Recordkeeping requirements will vary for each vessel type and operation and are required by the Coast Guard in order to determine if a vessel meets the appropriate stability and subdivision requirements.

3) Consideration of the use of improved information technology .

We estimate that 100% of the reporting requirements can be done electronically. At this time, we estimate that approximately 25% of the responses are collected electronically. The information may be e-mailed to the Coast Guard's Marine Safety Center (MSC) at the following link msc@uscg.mil. Amplifying information on this capability may be found at the MSC pages on the Coast Guard's "Homeport" internet portal, at the following link: <http://homeport.uscg.mil/mycg/portal/ep/home.do>.

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

The Coast Guard monitors State and local regulatory activity in this field. To date no equivalent State and local programs have been identified that require equivalent information, and no other federal agencies have similar or equivalent regulatory requirements.

5) Methods to minimize the burden to small business if involved.

It is likely that some of the companies in question would be considered small entities, however the overall impact of the requirement is minimal. Small businesses, such as independent naval architects, vessel owners and small shipyards, are favorably affected by these regulations. Subchapter S consolidates standards for all types of vessels into one set of regulations. In addition, these regulations provide clarifications to and interpretations of the previous regulations, as well as policy statements made by the Coast Guard relating to stability standards for specific vessel types, and new stability standards set by SOLAS¹. This enables smaller firms, such as independent naval architects, vessel owners, and smaller shipyards, to better prepare stability plans because they will have a better knowledge and understanding of the requirements. Smaller firms will also be better informed of Coast Guard policy and regulation interpretations, in the absence of the large staffs available to major organizations.

¹ SOLAS -- International Convention for Safety of Life at Sea, 1974.

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

If information was submitted or recorded less frequently, no assurance could be given that vessels are 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 manner that is consistent with the guidelines.

8) Consultation.

A 60-day Notice was published in the *Federal Register* to obtain public comment on this collection. (See USCG-2006-26741; January 9, 2007; 72 FR 970). The USCG has not received any comments on this information collection.

9) Explain any decision to provide any 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.

The U.S. Coast Guard Marine Safety Center (MSC) maintains two databases to track plan review information: "MASCOT (for internal work done at the MSC) and PRAS (for work done by classification societies on behalf of the Coast Guard). Except where otherwise noted, the information that follows was derived from these two databases.

Last calendar year, MSC and ABS (operating under Coast Guard authority) collectively reviewed **1,469** plans and technical documents that were submitted to meet the requirements under 46 CFR Subchapter S (1,270 were reviewed by MSC and 199 by ABS.) This does not include submittals to ABS under the Alternative Compliance Program, for which the collection burden is accounted for in ICN 1625-0081. The total number of different respondents (submitting the 1,469 documents) is estimated to be **207**, based on the known number of respondents submitting to MSC as captured in MASCOT, 179, plus 28, an estimate of plans submitted to ABS. This number is derived by applying historical ratios of plans submitted to each.

To determine the time required to submit plans and technical documents, a percentage of the time to develop such plans is used. This is because most of the documents required by the Coast Guard for stability review are prepared by the vessel designer or builder as part of the shipbuilding process. However, some changes and additions are necessary to comply with the Coast Guard requirements. It is estimated that it takes approximately three hours of the respondent's time per document in order to satisfy the additional requirements of the Coast Guard.

In order to develop the recordkeeping burden, we estimate an additional three percent of plan development hours. The industry personnel performing these operations is a senior technical expert (equivalent to a Captain (O-6)), for which the standard rate is \$120 per hour, in accordance with COMDTINST 7310.1I. Table 12.1 depicts the burden associated with this collection.

Table 12.1

# Plans submitted to MSC	1,270
# Respondents submitting to MSC	179
# Plans submitted to ABS	199
# Respondents submitting to ABS	28
Burden hours per plan for development	3
Hourly wage rate	\$120
TOTAL # of Plans (# Responses)	1,469
TOTAL Burden Hours for development	4,407
TOTAL Cost for development	\$528,840
TOTAL Burden Hours for recordkeeping	132
TOTAL Burden Cost for recordkeeping	\$15,840

GRAND TOTAL BURDEN HOURS	4,539
GRAND TOTAL BURDEN COST	\$544,680
GRAND TOTAL NUMBER OF RESPONDENTS	207
GRAND TOTAL NUMBER OF RESPONSES	1,469

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 Federal burden 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 technical review for current Subchapter S submittals has been calculated by estimating the total number of hours of technical time required for the stability review of each vessel and multiplying it by the cost per hour of technical time, as depicted in Table 12.1. The wage rates are taken from Commandant Instruction 7310.1I for a Lieutenant (O-3).

14) Estimates of annualized Federal Government costs (cont'd).

Table 14.1

# Plans review by MSC	1,270
# MSC Hours per review	1
Hourly wage rate	\$61
TOTAL GOV'T HOURS	1,270
TOTAL GOV'T COST	\$77,470

15) Explain the reasons for the change in burden.

The change in burden, for both hour burden and the number of responses, is an ADJUSTMENT due to an approximately 30 percent decrease in the annual number of Subchapter S plans and calculations submitted for stability review.

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) Explain the reasons for seeking not to display the expiration date for OMB approval of the information collection.

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 information collection does not employ statistical methods.