

**SUPPORTING STATEMENT
ATLANTIC SEA SCALLOPS AMENDMENT 10 DATA COLLECTION
OMB CONTROL NO.: 0648-0491**

A. JUSTIFICATION

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

NMFS Northeast Region manages the Atlantic sea scallop (scallop) fishery of the Exclusive Economic Zone (EEZ) off the east coast under the Atlantic Sea Scallop Fishery Management Plan (FMP) developed in accordance with the Magnuson-Stevens Fishery Conservation and Management Act (MSA), as amended in 2006. The regulations implementing the FMP are at **50 CFR Part 648**. To successfully implement and administer components of the FMP, 0648-0491 includes the following information collections:

1. Vessel monitoring system (VMS) requirements for occasional scallop vessels that wish to participate in the access area program;
2. VMS requirements for general category 1B scallop vessels. Category 1B vessels are authorized to land up to 40 lb of scallops;
3. Access area broken trip notification requirements;
4. Access area trip exchange application procedures;
5. Increased VMS polling frequency to one-half hour from one hour.

1. Vessel monitoring system (VMS) requirements for occasional scallop vessels that wish to participate in the access area program: VMS serves as an important enforcement tool. While VMS use is required of full-time and part-time scallop vessels harvesting scallops in access areas, this program extended the requirement to occasional scallop vessels. In addition to installing VMS, vessel operators must submit a VMS declaration via VMS prior to embarking on a scallop trip. Enforcement officials utilize VMS data to enforce management measures and monitor their activity and landing levels.

2. VMS requirements for General Category 1B scallop vessels: Scallop vessels that possess or land more than 40 lb. of scallop meats (or five US bushels of in-shell scallops) for commercial sale in any trip must have an operational VMS unit. VMS is required to be fully automatic and operational at all times, unless exempted under the power-down provision. In addition to installing a VMS and sending a confirmation signal, vessel operators must submit a VMS declaration via VMS prior to embarking on a scallop trip. VMS requirements are necessary for NMFS to enhance monitoring and enforcement of the 400 lb. scallop possession limit for the general category 1B fishery.

3. Access area broken trip notification requirements: If a trip is terminated before a vessel retains their possession limit (a so-called broken trip), a vessel owner may request from the Regional Administrator authorization to take an additional trip (a compensation trip) to retain the remainder of the possession limit. To do so, vessels are required to submit the VMS trip termination form prior to leaving the access area, submit a broken trip adjustment sheet upon returning to port, and submit a compensation trip ID VMS form upon departing on the compensation trip. The VMS trip termination form requires

the vessel operator to provide estimated scallop meat weight on board, estimated landing time and the reason the vessel “broke” the trip. The broken trip adjustment sheet requires the vessel owner’s name, vessel name, permit #, United States Coast Guard (USCG) documentation #, vessel operator name, date and time of incident, date of VMS notification, pounds of scallops landed, access area fished, nature of the incident, trip departure date, landing date, and signature. The compensation trip ID is entered into the compensation trip ID VMS form prior to departing on the compensation trip. The costs of these forms are estimated to be minimal, and be outweighed by the benefits of the broken trip program.

4. Access area trip exchange application requirements: The one-for-one access area trip exchange program provides flexibility to scallop vessels about where they may fish. The participants need to send an access area trip exchange application to NMFS with the following information: Vessel name and permit number, owner name and signature, specification of the areas involved in the exchange. Both vessels involved in the exchange are required to submit forms for cross verification. This measure is expected to provide flexibility to vessels regarding which areas to fish, thereby reducing the possibility of revenue loss to those vessels that are unable to access some distant areas due to vessel capacity constraints. Although there will be some transaction costs associated with the exchange of access area trips, the net result will likely be a reduction in overall costs of fishing. Administrative and enforcement costs associated with the exchange of controlled access trip authorizations are modest when compared with the potential improvement in controlled access allocation programs and reduced economic cost to industry.

5. Increased VMS polling frequency to one-half hour from one hour: The increased polling frequency applied to all vessels with a VMS unit, regardless of whether the vessel is a participant of the area access program. The increased polling frequency enhances the monitoring capability to catch violators fishing in the closed areas. Since the average polling increased from 30 minutes from 1 hour, there is a 50% chance of detecting entries into the closed areas of more than 15 minutes. This requirement applies to the 344 limited access vessels (which includes occasional scallop vessels) as well as to the 980 Category 1B scallop vessels.

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.

Several offices of NMFS, the U.S. Coast Guard and the Fishery Management Councils will utilize the information. Data collected through these programs will be incorporated into the NMFS database. Aggregated summaries of the collected information will be used to evaluate the management program and future management proposals.

As explained in Question #1, the information gathered has utility. National Oceanic and Atmospheric Administration (NOAA), NMFS will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for 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.

These collections primarily utilize VMS technology to minimize reporting burdens. Many VMS form items are collected automatically, minimizing data entry by the vessel operator. Vessel owners may also download broken trip adjustment sheets and access area trip exchange applications from the Regional Office website. Vessel owners may fax broken trip adjustment forms and access area trip exchange applications.

4. Describe efforts to identify duplication.

The broken trip reporting requirements require vessel owners to submit some duplicate information twice. Vessels are required to submit a VMS trip termination form to NMFS prior to leaving an access area. Such notification includes estimated meat weight on board, estimated landing time and the reason the vessel “broke” the trip. Once back at port, vessel owners or operators are required to submit a broken trip adjustment sheet within 30 days of landing. Duplicative information on the broken trip adjustment sheet includes the reason the trip was broken. The initial notification allows the Office of Law Enforcement (OLE) to ensure these notices are consistent with actual conditions at sea and on the vessel. The broken trip adjustment sheet provides information, such as landed scallop weight, that allows for the issuance of broken trip compensation authorization letters.

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

All of the respondents are considered small businesses. Only the minimum data needed to monitor compliance with regulations are requested from respondents. VMS transmissions automate much of the required information. Broken trip and trip exchange forms are available to be downloaded off the internet. Vessel owners may fax broken trip adjustment forms and access area trip exchange applications.

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

These collections are critical to the effective and timely implementation and oversight of the FMP.

To monitor compliance with access area trip allocations for occasional vessels and the general category fleet, VMS transmissions are required. This data is collected at a rate deemed necessary to ensure scallop fleet activities comply with FMP requirements. The increased polling frequency enhances monitoring capability to catch violators fishing in closed areas.

The broken trip and trip exchange programs promote industry cost effectiveness and flexibility. Without the broken trip and trip exchange program collections, these programs could not be administered. Without proper administration and oversight, these programs could not function, and industry would lose these beneficial programs.

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

Respondents are required to submit information more often than quarterly in the following scenarios:

- a) An occasional vessel allocated and taking more than one trip in access area in one quarter will need to submit a trip declaration code for each trip. This reporting requirement is necessary to monitor and enforce access area trip allocations;
- b) A general category 1B vessel taking more than one scallop trip in a quarter will need to submit a trip declaration code for each trip. This reporting requirement is necessary to monitor and enforce general category scallop fishing regulations; which include access area trip allocations, area closures, and landing restrictions;
- c) A vessel breaking a trip is required to submit a VMS trip termination form, complete the broken trip adjustment sheet within 30 days of returning to port, and submit the compensation trip ID via VMS prior to departing on the compensation trip. The VMS form is necessary to enforce broken trip regulations and the adjustment sheet is necessary to obtain sufficient information that allows for the issuance of a compensation trip letter of authorization.
- d) All scallop vessels required to have VMS must have their VMS polled at least once every half hour. VMS' are polled automatically. Since the average polling increased from 30 minutes from 1 hour the monitoring capability to catch violators fishing in the closed areas has been enhanced.

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.

Office of Management and Budget (OMB) Control No.: 0648-0491 now encompasses requirements of four other collections (OMB Control No.: 0648-0416, OMB Control No.: 0648-0509, OMB Control No.: 0648-0529, and OMB Control No.: 0648-0541).

Trip exchange procedures and two of the three broken trip procedures were implemented through Amendment 10 (initially OMB Control No.: 0648-0491) to the FMP, which was developed over the course of three years and received extensive public discussion in Council, committee and industry advisory meetings. Specifically, the Council held 60 policy-meeting days, 47 scientific and technical meeting-days during the development of Amendment 10. The Council also held 11 public hearing meetings, 4 Scoping meetings during 2000-2002, and 7 public hearing meetings on Draft Supplemental Environmental Impact Statement (DSEIS) in May 2003, at which there

were public discussion of the monitoring requirements (see Table 146 in Section 8.1.1 of Amendment 10 for further information). Interested parties were provided the opportunity to submit written comments at the public hearings and during the 90-day comment period following the submission of the Draft Amendment document in April 2003. The Council selected the final alternatives in August and September 2003 based on public comment and scientific advice. Frameworks 14 and 15 (initially OMB Control No.: 0648-0416) included provisions that occasional scallop vessels have VMS prior to participating in the access area program. Other collections included increasing the polling frequency to one half hour from one hour for all scallop vessels and two pre-trip Observer Program notification requirements. This action was approved through the Council process, which incorporated public comment during the development of the frameworks. In addition, the agency provided for public comment on these measures through the Federal rule making process. On March 2, 2003, a notice was published in the Federal Register to solicit comment from the public on the proposed and/or continuing information collections concerning this action. The comment period ended on September 2, 2003. No comments were received.

Framework 16 (initially OMB Control No.: 0648-0509) included provisions that general category vessels must have a VMS to participate in the Access Area Program. With the implementation of Framework 17, and the creation of the 1B permit category, general category vessels that fish in open areas or access areas must have VMS. Therefore, this collection was effectively absorbed by OMB Control No.: 0648-0529, and does not add to the overall collection burden.

The new general category 1B permit that requires VMS was created through Framework 17 (initially OMB Control No.: 0648-0529) to the FMP. The specific requirements of Framework 17 were developed during the period October 2004 through February 2005 and were discussed at four public scallop meetings. Interested parties were provided the opportunity to submit written comments at these meetings, which are included in Section 8 of Framework 17.

The compensation ID VMS form was implemented through Framework 18 (initially OMB Control No.: 0648-0541), with opportunity for public input during four Scallop Oversight Committee meetings and three Council meetings between June, 2005 and November, 2005. A final rule, Regulation Identifier Number (RIN) 0648-AT25 Fisheries of the Northeastern United States; Atlantic Sea Scallop Fishery; Framework Adjustment 18, was published in the Federal Register in June 2006.

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

No payment or gift will be made to respondents.

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

All data will be kept confidential as required by Section 402(b) of the Magnuson-Stevens Act, as amended in 2007, will be maintained in accordance with NOAA Administrative Order 216-100, Confidentiality of Fisheries Statistics, and will not be released for public use except in aggregate statistical form (and without identifying the source of data, i.e. vessel name, owner, etc.)

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.

There are no questions of a sensitive nature.

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

OMB Control No.: 0648-0491 has been updated in this renewal to reflect more recent information. In addition, three additional scallop Paperwork Reduction Act (PRA) collections have recently been merged into this collection (OMB Control No.: 0648-0416, OMB Control No.: 0648-0529, and OMB Control No.: 0648-0541), thereby increasing the overall burden. Table 1 summarizes the time burden of these reporting requirements. For the purposes of this analysis, the labor cost has been set at \$15/hour.

The average number of broken trips per year in 2005 and 2006 was 272. Average response time to complete and submit the VMS trip termination form is estimated to be two minutes, for a total burden of 9.1 hours ($272 \times 2 \text{ minutes} = 544/60 = 9.1 \text{ hours}$). Average time to complete the broken trip adjustment sheet is estimated to be 10 minutes, for a total burden of 45.3 hours ($272 \times 10 \text{ minutes} = 2720/60 = 45.3 \text{ hours}$). Average response time to complete the VMS compensation trip ID form is estimated to be two minutes, for a total burden of 9.1 hours ($272 \times 2 \text{ minutes} = 544/60 = 9.1 \text{ hours}$). For all of the entities to complete all of these requirements, the estimated total time burden is 63.5 hours ($9.1 + 9.1 + 45.3$).

The average number of trip exchanges in 2006 was 90 exchanges (very few, if any, additional trip exchange applications are expected in 2007). Since each exchange involves two vessels, the number of entities affected is estimated to be 180. Average response time to complete the trip exchange application has been estimated to be 15 minutes, for a total burden of 45 hours ($15 / 60 \times 180 = 45.0 \text{ hours}$).

Newly permitted vessels are required to verify their VMS is operational before a permit will be issued once. It is estimated that it takes 2 minutes to verify the VMS unit is functioning properly, two minutes to send a declaration code and two minutes to send a power down code. Since there will be no new occasional scallop vessels, there will be no VMS verification time burden for this category of vessels. It is estimated that there will be approximately 20 new general category 1B scallop vessels each year, so there will be 20 VMS verifications, for a time burden of 40 minutes ($2 \times 20 = 40 \text{ minutes}$).

Vessels must submit a trip declaration code each time they sail, and general category vessels may send a power down code at the conclusion of each trip. Occasional vessels will take two trips in a fishing year (one access area, one day-at-sea trip), for a total VMS trip declaration time burden of four minutes ($2 \times 2 = \text{four minutes}$). It is estimated that the 980 general category vessels take 120 trips on average per year, for a total of 117,600 trips. Therefore, the total trip declaration and power down time burden for the general category 1B fleet is estimated to be 7,840 hours ($(2 \text{ minutes} \times 117,600 \text{ declaration codes}) + (2 \text{ minutes} \times 117,600 \text{ power down codes}) = 470,400 / 60 = 7,840 \text{ hours}$).

Total annual time burden hours are 7,949 and labor costs to respondents are \$119,238.50 (see Table 1).

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).

Recordkeeping and reporting costs to respondents resulting from the broken trip program collections include transmitting the VMS trip termination form, submitting the broken trip adjustment sheet, transmitting the compensation trip ID form, and printing and stationary costs. It is estimated that each VMS form costs \$0.79 to transmit, therefore total transmission costs for both the VMS trip termination form and compensation trip ID form are \$429.76 ($2 \times 272 \times 0.79 = \429.76). Each broken trip adjustment sheet costs \$0.41 to mail, therefore total mailing costs are \$111.52 ($0.41 \times 272 = \111.52). An additional \$10 has been included to cover printing and stationary costs. Thus, the total costs for broken trip collections are \$551.28.

Additional costs to respondents resulting from the trip exchange program include application mailing costs, and printing and stationary costs. Each application costs \$0.41 to mail, therefore total mailing costs are \$73.80 ($180 \times 0.41 = \73.80). An additional \$10 has been included to cover printing and stationary costs. Therefore, total costs are \$83.80.

Additional costs to respondents resulting from the VMS requirements for occasional and general category scallop vessels include VMS purchase, installation and annual operational costs, trip declaration requirements and power down provisions. Since the cost of VMS is reimbursed to general category 1B permit holders and there will be no new occasional permit holders, there is no cost associated with VMS purchase. The average VMS installation cost is \$340. It is estimated there will be 20 new general category 1B permit holders each year, therefore total installation costs will be approximately \$6,800 ($20 \times \$340 = \$6,800$).

Annual dues paid by VMS users are determined by polling frequency. The annual average cost of operating a VMS at a polling rate of once every half hour is \$953.70. The total annual cost to both limited access and general category 1B vessels is \$1,262,698.80 ($(344 + 980) \times \$953.70 = \$1,262,698.80$).

It is estimated that each trip declaration costs \$0.79 to transmit, therefore total transmission costs for occasional scallop vessels will be \$1.58 ($2 \times \$0.79 = \1.58). Total transmission costs of trip declaration codes and power down codes for general category 1B scallop vessels will be \$185,808.00 ($2 \times 117,600 = 235,200 \times 0.79 = \$185,808.00$).

Total annual costs excluding time burden to respondents are \$1,455,945.14 (see Table 2).

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

Costs incurred by the government as a result of these collections, as summarized in Table 3, includes processing compensation trip requests, and processing access area trip exchange applications. Wage costs have been calculated based on \$25/hour. It takes approximately 1 minute to process each VMS trip termination form and compensation trip ID form, and 30

minutes to process each broken trip adjustment sheet, for a time burden cost of \$3,626.67 $((1 / 60 \times 272) + (1 / 60 \times 272) + (30 / 60 \times 272) \times \$25 = \$3,626.67)$. In addition, mailing cost notifying the applicant of the determination of the compensation trip request is \$111.52 $(\$0.41 \times 272 = \$111.52)$. It takes approximately 15 minutes to process each trip exchange application, for a time burden cost of \$562.50 $(15 / 60 \times 90 = \$562.50)$. In addition, mailing cost notifying the applicant of the determination of the trip exchange application is \$36.90 $(\$0.41 \times 90 = \$36.90)$. Total costs to the government are \$4,337.59.

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

OMB Control No.: 0648-0491 burden and costs have increased by net amounts of approximately 7591 hours and \$1,454,000 since the initial PRA request. This collection has been modified significantly since it was created in 2004. Framework Adjustments 14, 15, 16, 17 and 18 of the FMP were recently merged with this collection, Amendment 10. Adjustments have also been made to the burden and cost estimates of the original reporting requirements, as well as to the merged requirements; e.g. since Framework 17 was approved, the number of affected vessels has grown from 223 to 980. Adjustments based on this increase in respondents account for the difference in burden and cost from those on record at OMB as of the last of the mergers.

Adjustments (decreases) to the burden and cost burden for the original reporting requirements under OMB Collection No.: 0648-0491 are **323 hours** and **\$9,248.25**. The Observer Program notification requirements are now accounted for under OMB Collection No.: 0648-0546, the Cooperative Industry Survey no longer exists, and there are fewer broken trips than initially anticipated. Additional adjustments – **a decrease of 65 hours and an increase of \$163,714** – are due to miscellaneous changes in responses and costs.

Framework Adjustments 14 and 15 required Occasional scallop vessels that participate in the Area Access Program to install a vessel monitoring system (VMS) unit: 20 vessels x \$340). In addition, this collection increased the VMS polling frequency from one half hour to 1 hour. This doubled the polling cost and thus increased the 0491 collection budget by **\$164,037** (no associated burden hours).

Framework Adjustment 16 required the installation of VMS units on general category scallop vessels participating in the access area program. These vessels are required to declare an access area trip prior to departure. The costs of this collection were absorbed by additional general category scallop regulations contained in Amendment 17. Therefore, this merger did not increase the overall collection.

Framework Adjustment 17 extended the VMS reporting requirements to include the general category vessels that possess or land more than 40 lb. of scallop meats. The VMS is required to be fully automatic and operational at all time, unless exempted under the power-down exemption. These vessels may also declare a power down code upon returning to port. These vessels are required to declare a trip prior to departure. This merger, and the addition of 757 vessels to which the requirements now apply, have increased the 0491 collection hourly burden by a total of **7,840 hours** (powerdown provision and trip declaration burden hours for 980 vessels are \$3,920 hours each) and costs by **\$1,126,034** (installation costs for 20 vessels are \$6,800; polling (operation) costs are \$934,626; trip declaration and powerdown provision costs

are \$92,904 each). The portions of burden and cost attributed to the additional 757 vessels would be approximately 2,661 hours and \$749,248.

Framework Adjustment 18 required vessels taking broken trip compensation trips to enter a unique trip identification code into their VMS units prior to departure. The burden of this requirement is an additional **9 hours** and **\$215.00**.

The collection, after completion of the mergers described above, showed an estimated total of 5,611 hours and \$716,000. In preparing this renewal request, additional burden and cost associated with the increase in vessels more recently affected by Framework 17 were added, and the decrease in burden and cost for the original requirements under OMB Control No.: 0648-0491 was calculated. Therefore, only the changes since the last approved request (merger of OMB Control No.: 0648-0416 into this collection) are shown on the 83-I and are counted as adjustments: **a net increase in burden of 2,338 hours and \$740,000** (2,661 – 323 hours and \$749,248 - \$9,248).

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

Results from this collection may be used in scientific, management, technical or general informational publications such as Fisheries of the United States, which follows prescribed statistical tabulations and summary table formats. Data are available to the general public on request in summary form only. Data are available to NMFS employees in detailed form on a need-to-know basis only.

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.

We request that forms not be required to display the OMB Control Number and Expiration Date due to VMS technical issues. Vessel Monitoring System (VMS) forms are in electronic media format only. There is limited space in this format to provide a PRA statement. Additionally, one of the approved VMS vendors (Boatracs, Inc) has a limit of 50 lines of text per macro or VMS form, and is also limited to a total of 600 lines of text for all macros. As VMS requirements become more complex with changing Northeast regulations, the macros are approaching these limits. Including the PRA text will negatively impact NMFS' ability to expand the macros within the current limits to comply with regulatory changes.

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

There are no exceptions.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

No statistical methods are employed in the information collection procedures; the requirements are mandatory for participants in the Atlantic sea scallop fishery.

TABLE 1: Estimated Respondent Time Burden and Labor Costs

Requirement	Annual responses	Time per Response	Total Burden	Wages and Salaries
VMS trip termination form	272	2 minutes	9.1 hours	\$ 136.50
Broken trip adjustment sheet	272	10 minutes	45.3 hours	\$ 679.50
Compensation trip ID VMS form	272	2 minutes	9.1 hours	\$ 136.50
Access area trip exchange application	180	15 minutes	45.0 hours	\$ 675.00
Occasional scallop permit VMS trip declaration	2	2 minutes	4 minutes	\$ 1.00
General category 1B scallop permit VMS installation verification	20	2 minutes	40 minutes	\$ 10.00
General category 1B scallop permit powerdown provision	117,600	2 minutes	3,920 hours	\$ 58,800.00
General category 1B scallop permit VMS trip declaration	117,600	2 minutes	3,920 hours	\$ 58,800.00
TOTAL	236,218		7,949.20 hours	\$ 119,238.50

TABLE 2: Estimated Respondent Recordkeeping/Reporting Costs

Requirement	Annual Responses	Cost per Response	Total Cost
VMS trip termination form	272	\$0.79	\$ 214.88
Broken trip adjustment sheet	272	\$0.45	\$ 122.40
Compensation trip ID VMS form	272	\$0.79	\$ 214.88
Access area trip exchange application	180	\$0.47	\$ 84.60
Limited access VMS polling fees	344	\$953.70	\$ 328,072.80
Occasional scallop permit VMS trip declaration	2	\$0.79	\$ 1.58
General category 1B scallop permit VMS installation	20	\$340	\$ 6,800.00
General category 1B polling fees	980	\$953.70	\$ 934,626.00
General category 1B scallop permit powerdown provision	117,600	\$0.79	\$ 92,904.00
General category 1B scallop permit VMS trip declaration	117,600	\$0.79	\$ 92,904.00
TOTAL			\$ 1,455,945.14

TABLE 3: Estimated Government Costs

Requirement	Annual responses	Time per Response	Burden Hours	Wages and Salaries	Miscellaneous Cost	Total Cost
VMS trip termination form	272	1 minute	4.53	\$ 113.33	\$ -	\$ 113.33
Broken trip adjustment sheet	272	30 minutes	136.00	\$ 3,400.00	\$ 106.08	\$ 3,506.08
Compensation trip ID VMS form	272	1 minute	4.53	\$ 113.33	\$ -	\$ 113.33