

**Supporting Statement  
for  
Applications for Vessel Inspection, Waiver, and Continuous Synopsis Record**

**A. JUSTIFICATION**

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

This collection of information is comprised of three elements:

**a. Application for Inspection of U.S. Vessel (CG-3752):**

Title 46 U.S.C. 3306 and 3309, 46 CFR 31.01-15, 91.25-5, 126.420, 169.205, and 189.25-5 authorize this reporting requirement. The owner, operator, agent, or master of a vessel is required to make application in writing to the Coast Guard prior to the commencement of the inspection for certification. The application provides the Coast Guard with basic vessel information, which is necessary for the initial planning and scheduling of inspection. The application is submitted to the Officer in Charge of Marine Inspection in or nearest the port at which the inspection is to be made.

**b. Application for Waiver or Waiver Order (CG-2633):**

Title 46 CFR 6.01 and 33 CFR 19.01 authorizes this reporting requirement. The owner, operator, agent, or master of a vessel, or the representative of any interested U.S. Government agency is required to make application in writing when, in the interests of national defense, a waiver is desired from the requirements of navigation and vessel inspection laws and regulations. The application is made to the Coast Guard District Commander or his designated representative at the port or place where the vessel is located. Applications having general applicability must be submitted to the Commandant. In case of extreme urgency, the application may be made orally. The application provides the Coast Guard with information necessary to analyze the particular circumstances of the waiver being requested and determine if the waiver should be granted.

**c. Application for Continuous Synopsis Record (CG-6039):**

Title 33 CFR 101.115 and 104.297 authorize this reporting requirement. The owner, operator, agent or master of a vessel is required to make application in writing to the Coast Guard for issuance of a Continuous Synopsis Record (CSR) required by the International Convention for the Safety of Life at Sea, 1972 (SOLAS) Chapter XI-1, Regulation 5. The application provides the Coast Guard with basic vessel information necessary for the issuance of the Continuous Synopsis Record. The application is submitted to the National Vessel Documentation Center.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

Coast Guard

- Safety
- Maritime Security
- Protection of the Natural Resources
- Mobility
- National Defense

Prevention Directorate (CG-3P)

- 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.
- 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.**

a. The "Application for Inspection" is used by vessel owners, operators, agents, or masters to notify the Coast Guard that an inspection for certification is desired on a given vessel. The frequency of submission is annually, or pentennially depending upon the type of vessel. The information collected provides the Coast Guard with the information necessary to schedule and plan for inspections for certification, and minimizes the need for additional contact with the vessel representatives prior to the inspection. If the form is not used, any requests for inspection require additional follow-up to obtain necessary information. This would result in additional burdens being placed on vessel representatives and the Coast Guard.

b. The "Application for Waiver and Waiver Order" is used by vessel owners, operators, agents, masters, or interested U.S. Government representatives when waivers are required in the interest of national defense for a given vessel. This information collection provides the Coast Guard with the information necessary to analyze requests for waivers. Without the form, efficient administration of requests of this nature would not be realized, possibly resulting in unnecessary delays to vessels laden with vital national defense cargo.

c. The "Application for Continuous Synopsis Record" is used by vessel owners, operators, agents, masters to request the issuance of a Continuous Synopsis Record. The frequency of submission is once per vessel. The information collected provides the Coast Guard with the information necessary to issue a CSR. If the form is not used, incomplete and inaccurate formats of data may be submitted; this could delay the issuance of a Continuous Synopsis Record.

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

All application and forms are posted at [http://www.uscg.mil/ccs/cit/cim/forms1/form\\_cg.html](http://www.uscg.mil/ccs/cit/cim/forms1/form_cg.html).

At this time, we estimate that 10 percent of the responses are collected electronically.

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

There are no other forms or similar information available elsewhere for these purposes.

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

Consideration has been given to the burden imposed upon small businesses. The forms are designed to minimize the burden for both large and small businesses. It takes less than 15 minutes of the respondent's time to fill out and mail the "Application for Inspection: and 30 minutes to fill out the "Application for Waiver," and "Application for Continuous Synopsis Record."

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

a. This requirement is concerned with the safety of personnel, equipment, and the vessels on which they are found. It is designed to coincide with a particular event, i.e., the inspection for certification for which specific time intervals have been required by law. The reporting requirement is considered necessary to ensure the safety of lives and property. Any changes to the requirements would require a change to the law.

b. The reporting requirement is designed to coincide with a particular event, i.e., when a waiver is desired from inspection laws and regulations for which specific time intervals have been required by law. The reporting requirement is considered necessary to ensure the safety of lives and property. If this information were not required, there would be no available means for vessel owners, agents, masters, or interested U.S. Government agencies to request a waiver of inspection laws due to national defense requirements. As a result, there would be undue vessel delays and/or increased costs, either of which could be detrimental to national defense considerations.

c. The “Application for Continuous Synopsis Record” needs to be submitted once per vessel. Less frequent reporting would inhibit the issuance of a CSR.

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

The “Application for Waiver” is an event-specific form so that it may be filed as often or as sporadically as needed.

**8. Consultation.**

A 60-day Notice was published in the *Federal Register* to obtain public comment on this collection. (See [USCG-2007-27793]; April, 12, 2007; 72 FR 18483). The USCG has not received any comments on this information collection.

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

No compensation or gifts are provided to respondents.

**10. Describe any assurance of confidentiality provided to respondents.**

No assurance of confidentiality is provided.

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

There are no questions of a sensitive nature.

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

The annual reporting and recordkeeping hour and cost burden is reported in Table 12.1.

Table 12.1

	Number of Responses	Hour Burden per Response	Total Hour Burden	Hourly Rate	Total Cost Burden
Annual # of Applications for Inspection	3,369	0.25	842	\$67	\$56,414
Annual # of Applications for Waiver	8	0.5	4	\$67	\$268
Annual # of Applications for Continuous Synopsis Record	3	0.5	2	\$67	\$134
<b>GRAND TOTALS</b>	<b>3,380</b>		<b>848</b>		<b>\$56,816</b>
<b>ANNUAL NUMBER OF RESPONDENTS</b>	<b>3,369</b>				
<b>ANNUAL NUMBER OF RESPONSES</b>	<b>3,380</b>				
<b>ANNUAL HOUR BURDEN</b>			<b>848</b>		
<b>ANNUAL COST BURDEN</b>					<b>\$56,816</b>

The following paragraphs describe the methodology used for calculating this burden.

- All large passenger vessels and small passenger vessels carrying more than 12 passengers on international voyages are required to make an application for inspection annually. All other inspected vessels must submit an application for inspection once every five years. We therefore compute the number of applications by adding the number of vessels required to make an annual submission to one-fifth of the population of the others on a five year cycle.
- Applications for waivers are not submitted on a regular basis, and historically the Coast Guard receives eight per year.
- CSRs need only be submitted once per vessel. The annual number of responses in this category represents an annual average of newly constructed vessels subject to SOLAS (those engaged in international voyages.)
- The position of the industry personnel performing these activities is analogous to that of personnel between a Lieutenant (O-3) and a Lieutenant (Junior Grade) (O-2). The wage rate is therefore the average of these pay grades for “out government” contained in COMDTINST 7310.1(series).
- The annual number of respondents is equal to the annual number of Applications for Inspections. This is because Applications for Continuous Synopsis Records will be submitted in conjunction with a vessel’s initial Application for Inspection. Furthermore, it is reasonable that the majority of vessels owners seeking a waiver would do so in conjunction with their inspection for certification.

## 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.**

The cost to the Federal Government is contained in Table 14.1:

Table 12.1

	Number of Responses	Hour Burden per Response	Total Hour Burden	Hourly Rate	Total Cost Burden
Annual # of Applications for Inspection	3,369	0.25	842	\$46	\$38,732
Annual # of Applications for Waiver	8	0.5	4	\$46	\$184
Annual # of Applications for Continuous Synopsis Record	3	0.5	2	\$46	\$92
<b>GRAND TOTALS</b>	<b>3,380</b>		<b>848</b>		<b>\$39,008</b>

Approximately two-thirds of the Government’s effort to review these applications is made by personnel at the O-2/O-3 levels. The remaining effort is of a clerical nature, done by GS-4/5 personnel. This analysis uses the “In Government” wage rates from COMDTINST 7310.1(series).

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

The change in burden is an ADJUSTMENT. Now that the initial issuance of CSRs to the existing SOLAS vessel fleet has taken place, only new vessels subject to SOLAS will be required to submit an Application for Continuous Synopsis Record. Moving past the initial CSR issuance phase reduced the number of annual respondents.

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

There are no plans to publish information or for statistical use.

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

We are not seeking such approval. Upon approval of this collection of information, the new expiration date will be placed on each of the associated forms.

**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.