

**SUPPORTING STATEMENT
SOUTHEAST REGION DEALER AND INTERVIEW FAMILY OF FORMS
OMB CONTROL NO.: 0648-0013**

INTRODUCTION

This request for the Office of Management and Budget (OMB) review is for renewal of the existing reporting requirements that are currently approved under OMB Control No.: 0648-0013, Southeast Region Dealer Family of Forms, which expires on October 31, 2007. This family of forms includes the various reporting instruments and procedures that the National Marine Fisheries Service (NMFS) Southeast Fisheries Science Center (SEFSC) uses to collect landings statistics and quota monitoring data from commercial seafood dealers and to conduct interviews with fishermen for effort and fishing locations data.

Fishery statistics are collected by NMFS for a variety of reasons under several Federal statutes. The overall purposes for the data collection activities under this family have not changed significantly since the approval of this family of forms in 1995. It includes the same three methodologies that were included in the 1998, 2001 and the 2004 submissions. These methods include: (1) landings statistics, which include the general canvass statistics and the shrimp landings statistics; (2) mandatory dealer reporting for monitoring Federal fishery quotas; and (3) bioprofile data from the Trip Interview Program (TIP). The SEFSC employs several methods to collect the data. The following is a brief description of these procedures.

For the general canvass statistics, the SEFSC does not collect these data directly from the seafood dealers. The state fishery agencies in each of the states in the southeast region collect landings statistics under their individual state authority. The state agencies share these data with the SEFSC as part of formal cooperative agreements between the SEFSC and the states. These cooperative arrangements serve to both reduce the overall cost of data collection and avoid the possibility of duplicate effort.

Because more detailed information is required for the shrimp landings statistics than some states provide in the general canvass data, SEFSC employees collect these data directly from seafood dealers. The data that the SEFSC personnel collect are available from the sales receipts records maintained by the dealers as part of the routine accounting practices that are part of their normal business operations. The dealers are not asked nor required to keep any extra records, other than the sales receipts, which are used by the SEFSC personnel to record the shrimp landings statistics. Consequently, this data collection activity does not impose any reporting burden on the dealers.

The shrimp fishing effort information is collected directly from shrimp fishermen by personal interviews with them. The fishermen are not asked to complete a form; instead, SEFSC employees ask them for the information and record the data on work sheets for data entry.

To collect the data required to monitor the fishery quotas, the SEFSC has developed simple, easy to use forms that are to be completed by the dealers selected to report. Currently, there are 4 forms in use by the SEFSC to monitor the fishery quotas (Coastal fisheries, Mackerel dealers, mackerel gill net fisherman, and Wreckfish).

There are three other types of data included in OMB Control No.: 0648-0013 (rock shrimp dealer data, golden crab dealer data, and coral dealer data), but the SEFSC does not actively collect these data. As with the general canvass data, the state fishery agencies provide these data; however, a minimal number of hours is identified in the unlikely event the states cannot provide those data.

A. JUSTIFICATION

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

The data collected under the various programs included in OMB Control No.: 0648-0013 supports a wide variety of analytical and management functions performed by NMFS. These data are collected to support the stewardship role delegated to NMFS under various Federal regulations.

Under the Fish and Wildlife Act (FWA), modified by the Reorganization Plan No. 4 of 1970, and enhanced by the Magnuson Fishery Conservation and Management Act (renamed in 1996 as the Magnuson-Stevens Fishery Conservation and Management Act, and amended in 2006), the Secretary of Commerce (Secretary) has undertaken a set of objectives for the conservation and management of marine fishery resources. **Section 742(d) of the FWA** requires the Secretary to conduct continuing investigations, prepare and disseminate information, and make periodical reports to the public, to the President and to Congress on the status of marine resources. The Magnuson-Stevens Act requires that conservation and management measures in fishery management plans (FMP) must prevent overfishing while achieving, on a continuing basis, the optimum yield from each fishery. Such management measures must be based on the best available scientific information. The use of dealer reporting of landings purchased throughout the various regiments of the fishery is an essential ingredient in the management of fishery resources. Section 303 (a) (5) of the Magnuson-Stevens Act specifically identifies the kinds of data to be collected in support of FMPs. The following are specific regulations that authorize the collection of data in this family of forms:

Legal Citation	Description	Appropriate Section
50 CFR Part 600	General Provisions for Domestic Fisheries	600.705 Relation to other laws, 600.715 Recordkeeping and Reporting and 600.725 General Prohibitions.
50 CFR Part 622	Fisheries of the Caribbean, Gulf & South Atlantic	622.2 Definitions, 622.5 Recordkeeping and Reporting.

The mandatory dealer reporting is necessary to provide the NMFS with timely information to monitor the fishery quotas established in the respective fishery management plans. Without the direct reporting by the selected dealers, NMFS managers would not be able to determine when the quotas are reached and the fisheries need to be closed.

The bioprofile data (also referred to as the trip interview data) are necessary for size frequency and age at length keys. These data and relationships are essential parts of the scientific stock assessments prepared by NMFS scientists.

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.

The information provided by the data collection activities in OMB Control No.: 0648-0013 is used by several offices of NMFS, Fishery Management Council staffs, the U.S. Coast Guard, the Corp of Engineers, and state fishery agencies to develop, implement, and monitor fishery management regimes. NMFS, Fishery Management Councils, the Departments of State and Commerce, OMB, the fishing industry, congressional staff, and the public use summarizations and analyses of dealer data to answer questions about the nature of fisheries resources.

The primary use of the overall data collection, however, is to support the management of the fisheries resources under Federal jurisdiction. The landings data are used to determine the overall magnitude and trends in the fisheries. The Shrimp Interview and the TIP provide the most important data for stock assessments that directly support NMFS' stewardship responsibilities. There are two parts to the TIP data collection activity: 1) port agents select fishing trips and interview the captain or crew to collect information on the fishing trip, i.e., specific locations where the fishing occurred, the type and quantities of gear, and the amount of time that the various types of gear were fished: 2) port agents measure and weigh individual fish and collect hard-part and tissue samples either directly from the boats when the catch is being unloaded or from storage vats after the unloading has been completed. This size frequency and age data are used directly by stock assessment biologists to perform virtual population analyses for stock assessments. To assure that fishermen cooperate, Federal regulations require that fishermen make their fish available to authorized Federal port agents and provide the gear, area and effort information needed in conjunction with the size and weight data.

The SEFSC routinely performs four to six stock assessments per year (note, an assessment is not necessarily needed for each species every year, consequently some assessments are performed every 3 to 5 years). As an example, stock assessments for Gag Groupers, Red Groupers, Black Groupers, and Vermilion Snappers were done during 2006.

The SEFSC conducts an annual vessel inventory that is used to provide a count of the vessels (greater than 5 net tons) that are actively fishing in the southeast region. The data for this inventory is extracted from trip ticket data for some of the states; however, for other states the inventory is prepared by observation and data recorded from dealer records. There are only a small number of situations where it is necessary for the agents to actually contact the vessel owner/operator for specific information on the type or amount of gear used by the vessel.

Another major data collection activity in OMB Control No.: 0648-0013 is mandatory dealer reporting that is used to monitor the quotas that are promulgated under various Federal fishery management plans and amendments to those plans. The frequency of reporting is established in accordance with the nature of the respective fishery. For several of the fisheries, fishing effort and/or the biology of the fish require weekly submissions, but for other quotas, the frequency with which the fish are landed only requires reporting every two weeks or monthly. The following is a summary of the reporting frequencies for the four quota monitoring collections in OMB Control No.: 0648-0013.

Coastal Fisheries Dealers Reporting:

The coastal fisheries quota monitoring form includes fisheries managed under the Gulf of Mexico Reef Fish Fishery Management plan currently (5 species of deep water groupers, 8 species of shallow water groupers, greater Amberjack, gray triggerfish, and tilefish). This form also includes fisheries managed under the South Atlantic Fishery Management plan currently (Snowy grouper, greater Amberjack, Golden tilefish, Black Sea bass, Red porgy, and Vermilion Snapper). Dealers are required to submit this form twice per month.

Mackerel Dealers Reporting (gear types other than gill net):

Because king and Spanish mackerel are migratory and school in large numbers at specific times and areas, monitoring the landings for these species is only necessary for a limited time, i.e., during the open season. Thus, reporting by dealers may only be required for a couple of months or from as many as six months depending on availability of fish and fishing effort. There are 3 forms used for these quotas. One form is used for dealers that handle the quotas for all gear types other than gill net. Dealers are only required to submit this form monthly.

Mackerel Dealers Reporting (gill net):

Because of the efficiency of gill nets to catch fish, the quota for this fishery can be reached very quickly. Thus, those dealers and vessels that are selected to submit these two forms must do so weekly. Normally, the quota for this fishery is reached in a month or two and only 7 or 8 reports are required during a year.

Wreckfish Dealer Reporting:

Dealers that purchase wreckfish are required to report the total weight of these species purchased during a calendar month.

Miscellaneous Reporting:

Reporting requirements have been implemented for rock shrimp and golden crab dealers along the Atlantic coast and coral dealers in Puerto Rico. These regulations were promulgated as a safeguard in the event that the states failed to collect the necessary landings statistics. To date, the NMFS has not had to use this authority.

Summaries of the quota monitoring data will be made available to the general public to inform them of the ongoing status of the quota so fishermen can make the appropriate business decisions

regarding future fishing activities. NMFS/SEFSC will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with National Oceanic and Atmospheric Administration (NOAA) standards for confidentiality, privacy, and electronic information. See response to #10 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.

Currently, electronic reporting is not available for all dealers. However, several of the states in the southeast region are investigating possible methods for dealers to report electronically. A few dealers are using state approved electronic reporting and for those dealers, the data are provided to the SEFSC by the state and those dealers are not required to submit a separate quota monitoring report to the Center. The quota monitoring reporting forms for OMB Control No.: 0648-0013 are available on the Internet as a “.pdf” file that can be completed and sent via RapidFax or e-mail to the Center.

4. Describe efforts to identify duplication.

A requirement of the Magnuson Act Operational Guidelines is for each Fishery Management Council to evaluate existing state and federal laws governing the fisheries in question, and such findings are included in each FMP. Membership on each Fishery Management Council is composed of state and federal officials responsible for resource management in their respective states. These two circumstances identify other data collection activities that may be gathering the same or similar information. In addition, each FMP undergoes an extensive public comment period where potential applicants review the proposed rulemaking.

The NMFS has established cooperative statistics programs with the 8 coastal states in the southeast region of the U.S. The State/Federal Cooperative Statistics Program is comprehensive both geographically within the southeast region and with respect to the data that are collected. The federal and state reporting requirements are coordinated through the Cooperative Agreement. In addition, the location and responsibilities of the port agents are coordinated to avoid any duplication of effort, and contact with fishermen at the docks. As a result of both the Fishery Management Council process and the Cooperative Statistics Agreements, the NMFS/SEFSC is confident that it is aware of all similar data collection activities and that all duplications that can be avoided are avoided.

Quota monitoring is the only area where any duplication occurs and it is unavoidable for this data requirement. As a result of the restrictive quotas, the NMFS/SEFSC has had to establish data collection programs that provide landings data more timely than the state fishery agencies can provide them. It takes the states from 2 to 3 months to process the landings data and provide it to the SEFSC. Unfortunately, with this type of delay, many of the Federal quotas would be filled before any data could be provided by the states. Consequently, the SEFSC has had to implement a means of collecting landings data much more quickly.

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

Because almost all dealers and fishermen are considered small businesses, separate requirements based on the size of the business have not been developed. Only the minimum data to meet reporting objectives are required from the respondents. The data provided under OMB Control No.: 0648-0013 are summaries compiled from existing accounting information maintained by seafood dealers and processors in the normal course of their business operations. The dealers are not required, nor asked, to maintain any records other than the sales receipts that records the transactions between the dealer (purchaser) and the fishermen (seller). Thus, there is no additional recordkeeping burden on dealers due to the reporting requirements covered in this PRA.

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

It is essential that these collection activities are continued. They provide the data necessary for future stock assessments and the means of monitoring the fishery quotas that are currently promulgated to control fishing effort. Thus, if these collection activities were not available, the NMFS could not perform the stock assessments for the conservation and management of our fishery resources. Furthermore, without the mandatory dealer reporting, the SEFSC could not effectively monitor the quotas implemented by existing fishery management plans and therefore, reduce fishing mortality.

With respect to frequency, the collection of size frequency data must be an ongoing process. The dynamics of fishery biology, such as semi-annual spawning, seasonal migratory changes, growth and mortality rates, require a collection frequency that can detect these changes over time. In addition, weekly or monthly reporting frequencies, rather than quarterly or annual submissions, must be used to monitor in-season quota management.

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

No additional special circumstances beyond those described in the previous response are in conflict with OMB Guidelines for Information Collections.

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.

A Federal Register notice was published on 05/22/2007. No comments were received. As described above, the NMFS is part of a cooperative program to collect fishery statistics. As such, a Committee has been established to oversee the Program. This Committee meets at least

once a year to review and improve on the data collection procedures and activities conducted in the southeast.

The following is a list of the state coordinators and Council staffs that are members of the Southeast Cooperative Statistics Committee:

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

No payment or other remuneration are provided.

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

All data collected under this family of forms are handled in accordance with NOAA Administrative Order 216-100, Confidential Fisheries Statistics. Dealer reports are also considered confidential under the Trade Secrets Act.

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.

No questions of a sensitive nature are asked.

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

The total burden on the public for this PRA is estimated to be 1,835 hours. The following is a description of the estimated burden hours and costs of reporting for the individual reporting activities. The number of respondents and the estimated time per response for the individual data collection activities (forms) are summarized in Table 1.

General Canvass:

The reporting burden on seafood dealers for the landings (general canvass) statistics is zero. As described in the Introduction, these data are reported to the fishery agency for each state and the NMFS/SEFSC does not conduct this data collection activity. The respective state fishery

agencies perform the data processing and quality control on these data and provide them to the SEFSC.

Shrimp Dealers:

The reporting burden for the dealers that handle shrimp in the Gulf of Mexico is also zero. For the dealers located in some states in the southeast region, the landings statistics are collected by NMFS/SEFSC port agents who visit the dealers and record the data. The dealers are not required to record any additional information or maintain any additional information other than the information that is available on the sales receipts that are maintained as part of the company's accounting. The port agents record the information from the sales receipts maintained by the dealers. The dealers are only required to make the sales receipts available to the port agents.

Shrimp Interviews:

The burden to the public for shrimp interviews conducted in the Gulf of Mexico is estimated to be 538 hours. On average, about 3,229 interviews are conducted annually to collect fishing effort and area of catch information. It takes approximately 10 minutes to ask these questions. Thus, the total burden is $3,229 \times 0.167 \text{ hrs/schedule} = 538 \text{ hrs}$.

The decrease in the number of responses from the previous estimates is 271. The decrease in the burden hours from previous estimates is 46. This is a result of a sampling procedure adjustment in 2006, because participation in the shrimp fishery varies for a number of factors ranging from fuel and market prices to regional and local weather patterns. The average of the past 5 years was used to predict the annual burden estimate.

Trip Interview Program:

The reporting burden associated with interviews that are conducted to collect the fishing effort and location for the TIP is similar to the procedures for shrimp interviews. Because of the increasing effort to improve the stock assessments that the NMFS prepares, the numbers of TIP interviews have been increasing over the past several years. It is estimated that approximately 4,400 interviews are (will be) conducted annually to collect the gear, area and effort information for the TIP. The average time required to collect this effort information is 10 minutes. It should be noted that interviews are conducted from both commercial and recreational fishing trips. Most of the sampling effort for the TIP is directed at commercial fishing trips because of stock assessment requirements (roughly 85%); however, recreationally caught fish are sampled to provide length/weight information for aging analyzes. The total burden of this program is estimated to be 733 hours, i.e., $4,400 \times 10 \text{ minutes/interview} = 733$. For the TIP, the only burden to the fishermen (public) is the time it takes to respond to the questions on gear, area and effort, no separate reporting or recordkeeping is required.

The increase in the number of responses from the previous estimates is 199. The increase in the burden hours from previous estimates is 22. This is a result of a sampling procedure adjustment in 2006 because participation in the trip interview program varies slightly from year to year.

Coastal Fisheries Dealer Reporting:

In 2006, 158 dealers made bi-monthly reports used for the monitoring of coastal fisheries. These dealers submitted 1,595 reports with landings data and 1,478 reports in which they reported no purchases during 2006. The forms with landings information require an estimated 10 minutes to complete and the reporting burden is about 266 hours (i.e., 1,595 reports x 10 minutes/report = 266 hours). For the no-production reports, the reporting time is estimated to be 3 minutes and the total reporting burden is estimated to be 74 hours (i.e., 1,478 reports x 3 minutes/report = 74 hours). The total reporting burden is 340 hours for the combined 3,073 coastal fisheries quota monitoring reports received in 2006.

The decrease in the number of respondents from the previous estimates is 82. The decrease in the burden hours from previous estimates is 291. This is a result of a change in the program in 2006 in which a combined coastal fisheries quota monitoring form was developed: a combination of three previous forms (Gulf of Mexico grouper - tilefish, Gulf of Mexico red snapper, and the South Atlantic snapper-grouper complex) approved in Proposed Rules (PR) Regulation Identifier Number (RIN) 0648-AT75.

Mackerel Reporting:

The total burden hours to monitor the king and Spanish mackerel quotas are estimated to be 160:

During the past several years, about 95 dealers have reported each year in the Gulf of Mexico. Because the quotas are usually reached before the entire 12 month season is over, only about 7 monthly reports are actually submitted. The average time per report is less than 10 minutes per report because many dealers do not always purchase mackerel and when no purchases are made only a no-purchase report is required. The total burden hours is estimated to be 110 hours annually (i.e., 95 dealers x 7 reports/dealer x 10 minutes per report).

In the South Atlantic during 2006, there were a total of 21 dealers submitting 252 monthly reports. The average time per report is less than 10 minutes per report, resulting in an estimated burden of 42 hours annually (i.e., 21 dealers x 12 reports/dealer x 10 minutes per report = 42).

In addition to the monthly mackerel reports for the western Gulf of Mexico and the south Atlantic, weekly reporting had to be implemented for the southwest Florida area. A quota has been established for the runaround gill net fishery in this area. Because this type of gear can catch large quantities of fish with a single set, more frequent monitoring had to be implemented. Two forms are used, one for vessels to report and one for dealer reporting. Only 7 dealers reported the past year and they submitted 30 reports. There are between 12 to 15 vessels that use gill nets, but not all of the vessels fish each year. Because of the nature of the fishery they only submit 2 or 3 reports per year, and during 2003 (last year reliable data available, due to Gulf Storms in subsequent years), only 12 reports were received. The reporting burden is estimated at 10 minutes per form. The total burden is estimated at 7 hours (i.e., 42 reports x 10 minutes/report = 7 hrs.).

Total mackerel burden: $110 + 42 + 7 = 159$.

The increase in the estimated number of responses from the previous estimates is 252. The increase in the burden hours from previous estimate is 40. The increase in number of responses is due to an increase in the number of dealers landing significant quantities of mackerel so that more dealers had to be included in the survey.

Wreckfish Dealer Reporting:

A total of 40 dealers held wreckfish permits during 2006. There were 2 dealers that handled wreckfish during 2006, and each of them submitted monthly reports. The estimated time required for a dealer to complete a monthly report when fish were purchased is 10 minutes, and in 2006, 34 reports were received. The burden from these reports is 6 hours (34 reports x 10 minutes/report = 6). Dealers submitted 104 forms on which no purchases were reported. It is estimated to take about 3 minutes to complete these forms and the burden is estimated at 5 hours: 104 reports x 3 minutes/report = 5 hours). The total burden is estimated at 11 hours (6 + 5).

The increase in the number of responses from the previous estimates is 54. The increase in the burden hours from previous estimates is 2. This is a result of a sampling procedure adjustment in 2006 that can be attributed to more dealers being permitted to handle wreckfish.

Miscellaneous Reporting:

There are 4 miscellaneous reporting requirements that are included in this family of forms. The rock shrimp and golden crab dealer reporting requirements are not utilized, but an estimated burden of 15 hours is included in the event the state fishery agencies cannot provide the data (an estimate of 60 dealers is used at 15 minutes per form which equals 15 hours per fishery). Likewise, Federal regulations include reporting requirements for coral harvested in Puerto Rico. The burden for this reporting is estimated to be 16 hours (64 submissions at 15 minutes per report).

Vessel Inventory:

Lastly, hours are included for the annual vessel inventory that is conducted by the SEFSC. Only a small percent of the commercial vessels need to be interviewed and this number, on average, is about 100 vessels. It only takes about 5 minutes to collect the 3 pieces of information on the vessels, for a total burden of 8 hours per year.

Regulations in 50 CFR 622.5(c)(3)(i) and (iii) require dealers, which include cars and trucks, to maintain a record of the landings for at least one year. Since the submission in 1998, the State of Alabama has implemented a state law that meets this requirement. All other states in the Gulf of Mexico region already had such regulations. Consequently, there is no burden associated with this Federal regulation because dealers comply with it under applicable state regulations.

13. Provide an estimate of the total annual cost burden to the respondents or recordkeepers resulting from the collection (excluding the value of the burden hours in #12 above).

There are no anticipated postage costs. Dealers are provided with addressed, postage-paid envelopes that they can use to return the completed form. However, for the quota managed

fisheries -- Coastal fisheries, mackerel and wreckfish) -- the dealers are asked to fax their reports. There are an estimated 4170 forms that are submitted by these dealers. Assuming an average of \$0.10 per call, the total cost to the dealers is about \$417.

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

The cost to the Federal government is largely salaries of the port agents that are employed to transcribe the data onto the appropriate forms. Twenty-eight port agents are employed in the southeast, 25 of them are employed full-time in the collection of general canvass and shrimp statistics. The total salary cost of these employees is about \$600,000. In addition, area supervisors allocate about half of their time to supervising this data collection activity. This cost is about \$35,000. The remaining 3 port agents are employed full-time in TIP data collection at a cost of \$77,500. Printing and reproduction costs are about \$3,000 per year, which includes the cost of the postage-paid envelopes. The cost of data entry for the shrimp statistics and TIP data are included in the salaries of the port agents because they enter the data they collect. The data entry for the quota monitoring data is very small and is done by staff as part of their other duties. These costs are probably not more than \$1,000 to \$2,000 per year of those staffs' salaries. Total government costs: \$600,000 + \$35,000 + \$77,500 + \$3,000 = \$715,500.

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

There is a net decrease of 273 hours in the reporting burden for this PRA from the previous burden of 2,108 hours. This decrease is largely due to change in program of the coastal fisheries quota reporting form that resulted in 291 fewer burden hours. Additionally, 46 fewer burden hours are needed with the new sampling procedure adjustment to the shrimp interview program. The trip interview program, mackerel dealer quota program, and wreckfish dealer quota program saw slight increases of 22, 40 and 2 burden hours, respectively, due to minor adjustments in the estimated numbers of responses.

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

Results from the data collection using the forms in this PRA are not planned for publication.

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.

The OMB number and expiration number are displayed on each of the forms.

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

There are no exceptions to Item 19 of the OMB 83-I.

Table 1. Estimated number of respondents and total burden hours for dealer/interview family of forms.

Activity	# Respondents	# Responses	Time / Response	Total Burden
General Canvass	0	0	0	0
Shrimp Dealers**	713	0	0	0
Shrimp Interviews*	2,198 (est.)	3,229	10 minutes	538
Trip Interview Program*	2,895 (est.)	4,400	10 minutes	733
Coastal Fisheries Dealer * Reporting	158***	1,595	10 minutes	266
Coastal Fisheries Dealer No-purchase Reporting	158***	1,478	3 minutes	74
Mackerel Dealer Reporting* (non- gill net), Gulf of Mexico	95	665	10 minutes	110
Mackerel Dealer Reporting* (non- gill net), South Atlantic	21	252	10 minutes	42
Mackerel Dealer Reporting* (gill net)	7	30	10 minutes	5
Mackerel Vessel Reporting * (gill net)	6	12	10 minutes	2
Wreckfish Dealer Reporting*	40***	34	10 minutes	6
Wreckfish Dealer No- purchase Reporting	40***	104	3 minutes	5
Rock Shrimp**		60	15 minutes	15
Golden Grab Dealers**		60	15 minutes	15
Coral Dealers**		64	15 minutes	16
Vessel Operational Units**	7,634 (est.)	100	5 minutes	8
Total	13,767	12,083		1,835

*Based on estimates from number of respondents and responses from 2006.

** Minimal number of estimate hours reserved as a safeguard in the event that the states failed to collect the necessary landings statistics.

*** For both the Coastal Fisheries Dealers and Wreckfish Dealers, the same group of respondents is listed twice (once for reporting and once for no-purchase reporting). Therefore, the respondent total listed is lower than the actual column total.