

SUPPORTING STATEMENT
Standard Numbering System
1625-0108

A. JUSTIFICATION:

1. Circumstances that make the collection of information necessary.

Subsection 12301(a) of Title 46, United States Code, requires undocumented vessels equipped with propulsion machinery of any kind to be numbered in the State where the vessel is principally operated. In 46 U.S.C. 12302(a), the statute authorizes the Secretary to prescribe, by regulation, a Standard Numbering System (SNS) that may be implemented by the States to perform this function on behalf of the Federal Government with systems approved by the Secretary. This authority has been delegated to the U.S. Coast Guard. The regulations requiring the numbering of undocumented vessels are in 33 CFR Part 173; regulations establishing the SNS for States to carry out this function are contained in Part 174.

In States that do not have an approved system, the Federal Government (U.S. Coast Guard) must administer the vessel numbering system. Currently, all 56 States and Territories have approved numbering systems. The approximate number of undocumented vessels registered by the States in 2006 was nearly 13 million.

2. By whom, how, and for what purpose the information is to be used.

The SNS collects information on undocumented vessels and vessel owners. States submit reports annually to the Coast Guard on the number, size, construction, etc., of vessels they have numbered. That information is used by the Coast Guard in 1) publication of an annual "Boating Statistics" report required by 46 U.S.C. 6102(b), and 2) for allocation of Federal funds to assist States in carrying out the Recreational Boating Safety (RBS) Program established by 46 U.S.C. Chapter 131.

On a daily basis or as warranted, Federal, State, and local law enforcement personnel use SNS information from the States' numbering systems for enforcement of boating laws or theft and fraud investigations. In addition, when encountering a vessel suspected of illegal activity, information from the SNS increases officer safety by assisting boarding officers in determining how best to approach a vessel. Since the September 11, 2001 terrorist attacks on the United States, the need has increased for identification of undocumented vessels and their owners for port security and other missions to safeguard the homeland, although the statutory requirement for numbering of vessels dates back to 1918.

3. Consideration of the use of improved information technology.

Although the Coast Guard created the SNS, and published regulatory requirements for information collected in State systems, implementation of the program in a State is not mandatory and the regulations do not prescribe how the States are to maintain the system. Each State creates and maintains its own system for numbering of undocumented vessels. Currently, there is no way to determine the percentage of registration documents submitted electronically or how much of the system in its entirety is electronic, although we are aware of an increasing number of States moving toward an electronic function for renewals.

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

The information required by the SNS is not available from any other source. The information collection meets the statutory requirement of 46 U.S.C. 12301 and 12302, as well as requirements for performing the homeland security mission, by providing identifying information on undocumented vessels.

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

The information required by the SNS is the minimum necessary to properly implement the statutory requirement for numbering of undocumented vessels propelled by machinery, and is applied uniformly to all owners. Small business operating as liveries for rental of recreational vessels provide the same information on their vessels as any individual owner. There is no burden on other small businesses unless they have been authorized by the States to voluntarily act as agents of the State to collect the information, e.g., a boat dealer provides the application to a new boat buyer and sends the application to the State for processing.

6. Consequences to the Federal program if the collection(s) was conducted less frequently.

As required by statute and the SNS regulations (46 U.S.C. 12304(a); 33 CFR 173.79 and 174.27), a vessel registration must be renewed at least once every three years. Each State has the option under the program to do so more frequently and some States require annual or biannual renewal. From a law enforcement/homeland security perspective, annual renewals would be preferable but cannot be required under current law.

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

There are no special circumstances.

8. Consultation.

A 60-day Notice was published in the *Federal Register* to obtain public comment on this collection. (See [USCG-2007-29070]; September 11, 2007; 72 FR 51826). The USCG has not received any comments on this information collection.

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

There are no payments or gifts to respondents.

10. Describe any assurance of confidentiality provided to respondents.

There are no assurances of confidentiality provided by the federal government to the respondents for this information collection.

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

No questions of a sensitive nature are involved.

12. Estimates of Annualized Burden Hours and Cost

The paperwork burden from the SNS program is based on a three-year registration cycle where approximately 2,250,000 boats will be initially registered and registrations for approximately 10,750,000 boats will be renewed. The initial registration figure is based on the nine-year average of estimated annual sales of vessels required to affix U.S. Coast Guard Maximum Capacities Labels, which we estimate at approximately 750,000 vessels annually. The registration renewal figure is based on the average of the registered vessel population over the last five years minus the initial registrations. The true number of registrations will vary according to actual growth in numbered vessels as reported by States. At .083% of an hour (5 minutes) to affix state registration numbers ($[2,250,000 * 5] / 60 = 187,500$ hours) and .0625% of an hour (3.75 minutes) to fill out each application or renewal for a number ($[10,750,000 * 3.75] / 60 = 671,875$), the total burden over the next three years is 859,375 hours ($187,500 + 671,875$). The annual burden will be approximately 286,458 hours each year.

Cost estimates are based on a GS-03 wage \$28 per hour and 5 minutes per initial registration and 3.75 minutes per re-registration. The total cost associated with 2,250,000 newly registered boats over three years is about \$24,107,142 or \$8,035,714 in each year. The total cost associated with 10,750,000 re-registered boats over three years is about \$86,383,929 or \$28,794,642 in each year. The total annual cost to initial issue and renewal of vessel registrations is \$36,830,356

13. Estimates of annualized capital and start-up costs.

There are no capital and start-up costs, record keeping costs or maintenance costs for the respondents

Each State's system is unique, so system costs vary from State to State. The cost to States is the cumulative cost associated with all State SNS systems and likely \$28,000,000 to \$56,000,000 for all 56 systems that cost in the range of \$500,000 to \$1,000,000 per system.

14. Estimates of annualized Federal Government costs.

There are no collection costs to the Federal Government for the SNS, because States implement the program.

15. Explain the reasons for the change in burden.

Upon further review of OMB 1625-0108, we have made appropriate adjustments to account for both initial issue and renewal of vessel registrations for which this information collection request applies. The previous collection only considered initial vessel registrations. This collection considers initial registrations and renewals, which occur every one to three years, depending on the state.

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

States report the number of vessels to the Coast Guard each year. These reports are compiled in the annual "Boating Statistics" report, and are used in the annual allocation of Federal financial assistance available for State boating safety programs.

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

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 STATISICAL METHODS

This information collection does not employ statistical methods.