2133-0537 Supporting Statement 2007

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION UNDER 5 CFR PART 1320 INFORMATION COLLECTION: 2133-0537

MARAD Maritime Operator Survey Concerning Mariner Availability

A. Justification

1 Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

Part of the stated statutory policy of the Merchant Marine Act, 1936, is to foster the development and maintenance of an adequate U.S.-flag merchant marine manned with a trained and efficient citizen personnel. In order to successfully meet this mandate, the Maritime Administration (MARAD) must determine whether a current or projected shortage of mariners exists and the possible impact of such a shortage on the merchant marine. MARAD believes that a survey is necessary at this time because it has received an abundance of anecdotal information indicating that there is a serious existing and projected mariner shortage in different market sectors.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The information will be used by MARAD to determine if a current and/ or projected shortage exist. If there is a projected shortage that appears to be more than short-term, MARAD will follow up with a more detailed survey to ascertain the best means to address the shortage.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology. Also describe any consideration of using information technology to reduce burden.

We believe that a mailed questionnaire will be the least burdensome to the respondents and produce the greatest response rate.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in item 2 above.

There is no similar information currently available.

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

The collection of information will not be burdensome to small businesses or other small entities as the survey will be conducted by mail and will only require an average of 20 minutes to complete.

6. **Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing the burden**.

If MARAD does not conduct the survey, it will not be able to assess manpower needs and thus determine if changes are necessary to federal programs and policies.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.5.

There are no special circumstances.

8. If applicable, provide a copy and identify the date and page number of publication in the <u>Federal Register</u> of the agency's notice required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe 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 record-keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

Notice was published in the <u>Federal Register</u> on April 16, 2007, page 19065, and a copy is attached. No comments were received in response to the Notice. There has not been consultation with persons outside the agency since the survey is quite brief and does not require any specific data.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Respondents are not provided with any payment or gift for this information collection.

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

By letter, the Maritime Administrator will assure the confidentiality of the responses. MARAD will follow the requirements of the Confidential Information Protection and Statistical Efficiency Act (CIPSEA) of 2002 in maintaining the confidentiality of responses. MARAD will release information on an aggregate basis. No individual responses will be released.

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. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The collection does not include any questions of a sensitive nature.

- 12. **Provide estimates of the hour burden of the collection of information. The statement should:**
 - Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated burden and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
 - If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in item 13 of OMB Form 83-I.
 - Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in item 14.

No. of Respondents = 830 Responses per Respondent = 1 Total responses annually = 830 (830 x 1) Hours per response= .3333 Total hours annually= 830 x .3333 = 277

There are approximately 830 vessel operators in the United States and MARAD intends to survey all of them. The total estimated time to complete the survey is 20 minutes total.

MARAD estimates that from the total sample of 830 operators, approximately 50 percent of the operators will respond because of the ease of the survey and that it is in their business interest to do so. MARAD will send follow-up reminders to encourage responses.

The estimated costs to the respondent are as follows:					
Completing and reviewing the survey – 20 minutes @ 50.00 per hour = 16.50					
Total Cost to Respondent \$16.50.					
Number of Respondents		Per Respondent		Total Cost Annually.	
830	Х	\$16.50	=	\$13,695.00	

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in items 12 and 14).

N/A other than 12 and 14.

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from items 12, 13, and 14 in a single table.

The total annual cost to the Federal Government for processing the collection is estimated as **\$8,700**. It is estimated that two employees will spend an average of 200 hours recording, assimilating, analyzing and reporting information submitted with each survey. Therefore, given the estimated hourly salary and overhead costs for each employee, the cost to the Government is estimated as follows:

Federal Government and Contractors Labor Costs

	Wage + Overhead	Project <u>Time (h)</u>	Total <u>Cost</u>
GS-14	\$66	50	\$3,300
GS-11	\$36	150	\$5,400
 Total			\$8,700

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

MARAD intends to survey all vessel operators in the United States.

16. For collections of information whose results are planned to be published for statistical use, outline plans for tabulation, statistical analysis, and publication. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates and other actions

N/A.

17. If seeking approval not to display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We are not seeking approval to not display the expiration date for OMB's approval of the collection.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

N/A