

**Supporting Statement
for
Certificates of Compliance, Boiler/Pressure Vessel Repairs,
Cargo Gear Records, and Shipping Papers**

A. Justification

1. Circumstances that make the collection necessary.

The requirement for reporting Boiler and Pressure Vessel Repairs, and the requirements for maintaining Cargo Gear Records, Shipping Papers, and the Certificate of Compliance (CG-3585), are a part of the Coast Guard's Marine Safety Program of Title 46, Code of Federal Regulations. They are prescribed or authorized by one or all of the following laws: 46 USC 3301, 3305, 3306, 3702, 3703, 3711 and 3714.

These requirements provide the marine inspector with information regarding the condition of a vessel and its equipment, a list of the type and amount of cargo that has been or is being carried on a vessel, plus information about the owner of the vessel. Each of these requirements relate to the promotion of safety of life at sea and protection of the marine environment.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

Coast Guard

- Maritime Safety
- Protection of the Natural Resources

Marine Safety, Security and Stewardship Directorate (CG-5)

- Safety: Eliminate deaths, injuries, and property damage associated with commercial maritime operations.
- Human and Natural Environment: Eliminate environmental damage associated with maritime transportation and operations on and around the nation's waterways.

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

Cargo Gear Records (46 CFR 31.10-16, 71.25-25, & 91.25-25). Cargo gear records are a recordkeeping requirement and are maintained to ensure the availability of unique vessel information that is needed by Coast Guard boarding personnel. Cargo gear records must be maintained by tank vessels carrying combustible or liquid cargo in bulk (Subchapter D), passenger vessels greater than 100 gross tons (Subchapter H), and cargo and miscellaneous vessels (Subchapter I). The owners of these vessels must provide all registers of cargo gear upon request to the Officer in Charge, Marine Inspection.

Shipping Papers (46 CFR 35.01-10). Shipping Papers are a recordkeeping requirement and are maintained by tank vessels to ensure the availability of unique vessel information that is needed by Coast Guard boarding personnel. Each loaded tank vessel shall have on

board a bill of lading, manifest, or shipping document giving the name of the consignee and the location of the delivery point, the kind, grades, and approximate quantity of each kind and grade of cargo, and for whose account the cargo is being handled. In the case of unmanned barges where shipping papers are not available, an entry in the logbook of the towing vessel is sufficient.

Certificate of Compliance (46 CFR 30-40, 153 & 154). Certificates of Compliance (CG-3585) are issued by the Coast Guard and maintained by foreign vessel owners to ensure the availability of unique vessel information that is needed by Coast Guard boarding personnel. A foreign vessel owner may apply for a Certificate by submitting information to the Commanding Officer at the Marine Safety Center (§154.22(a)). A Certificate of Compliance is issued by the Coast Guard to document a foreign flag vessel has been examined and found to comply with the regulations. Certificates of Compliance must be renewed every 2 years.

Boiler/Pressure Vessel Repairs (46 CFR 35.25-5, 78.33-1, & 97.30-1). The purpose of the reporting requirement regarding boiler and pressure vessel repairs is to ensure that work completed on these Coast Guard certified devices has been properly accomplished without compromising safety. Before making any repairs to boilers or unfired pressure vessels, the chief engineer shall notify the Officer in Charge, Marine Inspection, at the nearest port where the repairs are to be made. Repair records must be maintained by tank vessels carrying combustible or liquid cargo in bulk (subchapter D), passenger vessels greater than 100 gross tons (subchapter H), and cargo and miscellaneous vessels (subchapter I).

If these above requirements were no longer permitted, many items critical to the safety of personnel, their vessels, our ports, and the marine environment would be jeopardized.

3. Consideration of the use of improved information technology.

Cargo Gear Records and Shipping Papers are recordkeeping requirements, and are not restricted to written form. Electronic files are allowed and would reduce the physical volume of records on the vessel. We estimate that many vessels employ an electronic database for their records.

Certificates of Compliance must be maintained on board the vessel for use by the vessel operators and enforcement personnel. Posting of these documents is not amenable to electronic technology.

Before making any repairs to boilers or unfired pressure vessels, the vessel must notify the local Officer in Charge, Marine Inspection, or the nearest port. A phone call will suffice for notification. The repair records are not restricted to written form. Electronic files are allowed and would reduce the physical volume of records on the vessel.

We estimate that over 90% of the reporting and recordkeeping requirements can be done electronically.

4. Efforts to identify duplication.

The Coast Guard monitors state and local regulatory activity in the field. To date no equivalent state and local programs have been identified that require equivalent information, and no other Federal agencies have similar or equivalent regulatory requirements.

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

This information collection is directed primarily to large, ocean-going vessels. Although some of the affected vessels are individually incorporated and may be considered a small entity, it is the usual case that they are wholly-owned subsidiaries of larger corporations. In the case of smaller vessels, such as tank barges, which are required to maintain shipping papers, this information is an integral part of the business transaction. Therefore, the Coast Guard has determined that this information collection does not adversely impact a significant percentage of small businesses, nor give an unfair advantage to one entity over another.

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

The availability of the information required for cargo gear testing, shipping papers, and Certificates of Compliance, along with reporting requirements for boiler and pressure and vessel repairs are all elements of the Coast Guard's marine safety program. The protection of life and property, our ports and the marine environment would be seriously hindered by the loss of these requirements.

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

Information is collected in manner that is consistent with the guidelines.

8. Consultation.

A 60 day Notice was published in the Federal Register to obtain public comment on this collection. (See [USCG-2008-0178], April 8, 2008, 73 FR 19082). The USCG has not received any comments on this information collection.

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

No payments or gifts of any kind are provided to respondents.

10. Describe any assurance of confidentiality provided to respondents.

There are no assurances of confidentiality.

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

The information collected is not sensitive.

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

The estimated burden varies with the reporting or recordkeeping requirement. The total respondents, responses, and burden hours are detailed below:

- A. Boiler and Pressure Vessel Repairs. This requirement dictates that the vessel owners report and record any repairs. The numbers represent the number of boiler and pressure vessel repair deficiencies resolved during the corresponding year by ship type. The average time spent per response was assumed to not have changed from the previous analysis, and therefore was used in this updated analysis. This figure corresponds .16 hours per response, and indicated below. The data was available for years 2004, and 2005 in Marine Information for Safety and Law Enforcement (MISLE). The number of respondents and the number of responses are the same in the “Average Number of Respondents per Year Column” and “Average Number of Responses per Year Column”. This is due to the query being done on an annual basis, which is more accurate than having an aggregate estimate over a given number of years then estimating a yearly rate. Actual annual data is available and was used in this analysis.

Table 1. Boiler and Pressure Vessel Repairs

Respondents	2004 Number Responses	2005 Number Responses	Average Number of Respondents Per Year	Avg. Time Spent per Response (Hrs.)	2004 Total Annual Time (Hrs.)	2005 Total Annual Time (Hrs.)	Average Number of Responses Per Year	Average Annual Time Per Year (Hrs.)
Tank Ships	1	0	1	0.16	1	0	1	1
Passenger Ships	0	0	0	0.16	0	0	0	-
Cargo Ships	0	1	1	0.16	0	1	1	1
Research Ships	0	0	0	0.16	0	0	0	0
School Ships	0	0	0	0.16	0	0	0	0
Total	1	1	2	0.16	1	1	2	2

- B. Cargo Gear Records. Cargo gear records are a recordkeeping requirement and are maintained to ensure the availability of unique vessel information that is needed by Coast Guard boarding personnel. The number of cargo gear records for this analysis was estimated using MISLE and the corresponding query for this estimate used distinct vessel arrivals into the United States. We assume that all these distinct arrivals keep the required records. The average time spent per response was assumed to be the same as the last COI analysis. This figure corresponds to .16 hours per response, and indicated below. The analysis was estimated using years 2004-2006 in MISLE. The number of respondents and the number of responses are the same in the “Average Number of Respondents per Year Column” and “Average Number of Responses per Year Column”. This is due to the query being done on an annual basis, which is more accurate

than having an aggregate estimate over a given number of years then estimating a yearly rate. Actual annual data is available and was used in this analysis.

Table 2. Cargo Gear Records

Respondents	2004 Number Responses	2005 Number Responses	2006 Number Responses	Average Number of Respondents Per Year	Avg. Time Spent per Response (Hrs.)	2004 Total Annual Time (Hrs.)	2005 Total Annual Time (Hrs.)	2006 Total Annual Time (Hrs.)	Average Number of Responses Per Year	Average Annual Time Per Year
Tank Ships (United States)	83	79	77	80	0.16	13	13	13	80	13
Tank Ships (Foreign)	1,818	1,945	1,753	1,839	0.16	291	311	280	1,839	294
Passenger Ships (United States)	21	26	24	24	0.16	3	4	4	24	4
Passenger Ships (Foreign)	146	164	175	162	0.16	23	26	28	162	26
Cargo Ships (United States)	257	260	239	252	0.16	41	42	38	252	40
Cargo Ships (Foreign)	5,167	5,118	5,022	5,102	0.16	827	818	804	5,102	816
Research Ships (United States)	18	21	20	20	0.16	3	3	3	20	3
Research Ships (Foreign)	46	45	36	42	0.16	7	7	6	42	7
School Ships (United States)	3	4	6	4	0.16	1	1	1	4	1
School Ships (Foreign)	9	9	8	9	0.16	1	1	1	9	.1
Total United States	382	390	366	379	0.16	61	62	59	379	61
Total Foreign	7,186	7,281	6,994	7,154	0.16	1,150	1,165	1,119	7,154	1,145
Grand Total	7,568	7,671	7,360	7,533	0.16	1,211	1,227	1,178	7,533	1,206

C. *Shipping Papers*. Shipping papers represent a recordkeeping requirement and the below figures were calculated based on distinct arrivals and bounces. Distinct arrivals were used to determine the number of respondents and bounces to determine the number of responses. Distinct US arrivals, both foreign and United States ships, and bounces for U.S and Foreign were used for these calculations. We assume that all arrivals processed the appropriate shipping paper recordkeeping requirement.

Table 3. Shipping Papers (Vessel Arrivals-In Bounces)

Respondents	Total Respondents for 2004,2005, 2006	2004 Number Responses	2005 Number Responses	2006 Number Responses	Average Annual Respondents Per Year	Avg. Time Spent per Response (Hrs.)	2004 Total Annual Time (Hrs.)	2005 Total Annual Time (Hrs.)	2006 Total Annual Time (Hrs.)	Average Number of Responses Per Year	Average Annual Time Per Year
Tank Ships (United States)	237	2,668	3,206	4,345	79	0.5	1,334	1,603	2,173	3,406	1,703
Tank Barges (US)	898	2,733	2,787	1,324	299	0.5	1,367	1,394	662	2,281	1,150
Tank Ships (Foreign)	5,521	23,331	26,321	27,588	1,840	0.5	11,666	13,161	13,794	25,747	12,874
Tank Barges (Foreign)	16	202	10	11	5	0.5	101	5	6	74	37
Total United States	1,135	5,401	5,993	5,669	378	0.5	2,701	2,997	2,835	5,688	2,844
Total Foreign	5,537	23,533	26,331	27,599	1,846	0.5	11,767	13,166	13,800	25,821	12,911
Grand Total	6,672	28,934	32,324	33,268	2,224	0.5	14,467	16,162	16,634	31,509	15,755

D. *Certificates of Compliance* are issued once every two years. The number of foreign vessels issued Certificates of Compliance was estimated using MISLE and the corresponding query for this estimate used “Compliance” as the search word for the query. The average time spent per response was assumed to be the same as the last COI analysis. This figure corresponds to .16 hours per response, and indicated below. The analysis was estimated using years 2004-2006 in MISLE. The number of respondents and the number of responses are the same in the “Average Number of Respondents per Year Column” and “Average Number of Responses per Year Column”. This is due to the query being done on an annual basis, which is more accurate than having an aggregate estimate over a given number of years then estimating a yearly rate. Actual annual data is available and was used in this analysis.

Table 4. Certificates of Compliance

Respondents	2004 Number of Responses	2005 Number of Responses	2006 Number of Responses	Average Number of Respondents Per Year	Avg Time Spent per response	2004 Time Spent per Response (Hrs.)	2005 Time Spent per Response (Hrs.)	2006 Time Spent per Response (Hrs.)	Average Number of Responses Per Year	Average Annual Time Per Year
Towing Vessel	8	7	5	7	0.16	1	1	1	7	1
Passenger >6	50	80	113	81	0.16	8	13	18	81	13
Unclassified	3	2	1	2	0.16	1	1	1	2	1
Commercial Fishing Vessel	0	0	0	0	0.16	0	0	0	0	0
Industrial Vessel	2	4	7	4	0.16	1	1	1	4	1
Tank Barge	4	5	9	6	0.16	1	1	1	6	1
Research Vessel	7	3	5	5	0.16	1	1	1	5	1
Mobile Offshore Drilling Unit	41	51	59	50	0.16	7	8	9	50	8
Offshore Supply Vessel	7	8	13	9	0.16	1	1	2	9	1
Tank Ship	844	1,308	1,615	1,256	0.16	135	209	201	1,256	182
Passenger < 6	1	1	4	2	0.16	1	1	1	2	1
Recreational	1	1	1	1	0.16	1	1	1	1	.1
Freight Ship	787	756	702	748	0.16	126	121	112	748	120
Total	1,755	2,226	2,534	2,171		284	359	349	2,171	331

Therefore, the total burden to the public is depicted in the following table 5.

Table 5. Total Burden to Public

Respondents	Average Number of Respondents Per Year	Average Number of Responses Per Year	Yearly Average Annual Time (Hrs.)
Boiler & Pressure Vessel Repairs	2	2	2
Cargo Gear Records	7,533	7,533	1,206
Shipping Papers	2,224	31,509	15,755
Certificate of Compliance	2,171	2,171	311
Total	11,930	41,215	17,294

Assuming an average salary of \$41/hour (COMDTINST 7310.1K), which is equivalent to GS-9, the annual cost of the reporting and recordkeeping requirements would be **\$709,054**.

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.

Cargo Gear Records and Shipping Papers are vessel recordkeeping requirements. Therefore, there is no review or collection required of the Coast Guard unless it is necessary to board the vessel. Certificates of Compliance are the forms that require Coast Guard review. Using a salary estimate of \$62/hour (equivalent to O-3; COMDTINST 7310.1K), the annualized cost to the Federal Government would be **\$20,522**.

Table 6. Federal Government Burden

Respondents	Average Number of Responses Per Year	Avg. Time Spent per Response (Hrs.)	Average Annual Time Per Year (Hrs.)
Certificates of Compliance	2,171	0.16	331
<i>Total Annual Burden</i>	<i>2,171</i>		<i>331</i>

15. Explain the reasons for the change in burden.

The change in hour burden is an ADJUSTMENT due to a change in population estimates/activity levels.

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

There is no plan to use statistical analysis or to publish this information.

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

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 Statistical Methods.

This information collection does not employ statistical methods.