Supporting Statement
for
Enhanced Maritime Domain Awareness via Electronic Transmission of Vessel Transit Data

A. Justification

1. Circumstances that make the collection of information necessary.

As stated in *The National Strategy for Maritime Security* (September 2005)[1] (NSMS), a key national security requirement is the effective understanding of all activities, events, and trends within any relevant domain – air, land, sea, space, and cyberspace – that could threaten the safety, security, economy, or environment of the United States and its people. Awareness and threat knowledge are critical for securing the maritime domain[2] and the key to preventing adverse events. Knowledge of an adversary's capabilities, intentions, methods, objectives, goals, ideology, and organizational structure, plus factors that influence his behavior, are used to assess adversary strengths, vulnerabilities, and centers of gravity. Also, information on critical infrastructure and other potential targets of adverse events allows for their adequate protection and coordination of efforts to provide that protection. Such knowledge is essential to supporting decision-making for planning, identifying requirements, prioritizing resource allocation, and implementing maritime security operations. Domain awareness enables the early identification of potential threats and enhances appropriate responses, including interdiction at an optimal distance with capable prevention forces.

The Maritime Transportation Security Act of 2002 (MTSA) (Pub. L. 107-295, 46 U.S.C. 70115) mandates, consistent with international treaties, that the U.S. Coast Guard (delegated from the Secretary) "develop and implement a long-range automated vessel tracking system for all vessels in United States waters that are equipped with the Global Maritime Distress and Safety System [GMDSS] or equivalent satellite technology. The system shall be designed to provide the Secretary the capability of receiving information on vessel positions at interval positions appropriate to deter transportation security incidents. The Secretary may use existing maritime organizations to collect and monitor tracking information under the system." Recent amendments to the International Convention for the Safety of Life at Sea, 1974, as amended (SOLAS) implement the international regime for Long Range Identification and Tracking (LRIT) of Ships [SOLAS, Chapter V, Regulation 19-1 (SOLAS V/19-1)]. The U.S. implementing regulations are in 33 CFR 169 subpart C.

The collection of information also supports the following strategic goals:

---

[1] Found at -- http://www.whitehouse.gov/homeland/maritime-security.html.

[2] As defined in The National Strategy for Maritime Security, the "maritime domain" is all areas and things of, on, under, relating to, adjacent to, or bordering on a sea, ocean, or other navigable waterway, including all maritime-related activities, infrastructure, people, cargo, and vessels and other conveyances. Note: The maritime domain for the United States includes the Great Lakes and all navigable inland waterways such as the Mississippi River and the Intra-Coastal Waterway.

Department of Homeland Security

- Awareness – Identify and understand threats, assess vulnerabilities, determine potential impacts and disseminate timely information to our homeland security partners and the American public.
- Prevention – Detect, deter and mitigate threats to our homeland.
- Protection – Safeguard our people and their freedoms, critical infrastructure, property, the economy of our nation from acts of terrorism, natural disasters, or other emergencies.

United States Coast Guard

- Maritime Security – Protect the public, the environment, and U.S. economic interests – in the nation's ports and waterways, along the coast, on international waters, or in any maritime region as required to support national security.
- Maritime Safety – Protect our maritime borders from all intrusions by halting the flow of illegal drugs, aliens, and contraband into this country through maritime routes; preventing illegal fishing; and suppressing violations of federal law in the maritime region.
- Protection of Natural Resources – Eliminate environmental damage and natural resource degradation associated with all maritime activities, including transportation, commercial fishing, and recreational boating.
- National Defense – Defend the nation and enhance regional stability in support of the National Security Strategy.
- Maritime Mobility – facilitate maritime commerce, and reduce interruptions and impediments to the economic movement of goods and people, especially in Vessel Traffic Service areas.

Marine Safety, Security and Environmental Protection Directorate (CG-5)

- Maritime Security
- Maritime Safety
- Protection of Natural Resources

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

Whom: The United States Coast Guard plans to collect and retain vessel information that is broadcast via LRIT and other transponder-style equipment. This information would be used primarily by the USCG. However, the data, combined and correlated with other information may be shared with Federal, State, and local government agencies and foreign governments partnering with the Coast Guard in an effort to expand MDA; and, with other responsible maritime interest to enhance marine safety, security and environmental protection.

How: As discussed above, the MTSA mandates the Coast Guard require certain vessels to transmit vessel transit data. Data from the vessels transmitted by LRIT will be collected and compiled outside of the LRIT system to provide the Coast Guard with a near real-time common operating picture of the maritime environment. The Coast Guard would compile this data, correlate it with other sources the Coast Guard has

access to, and analyze this information to detect anomalies and, identify potential threats to the nation and the environment. The information will be included in the Coast Guard's Common Operational Picture (COP) for sharing and dissemination to decision-makers. The COP is the primary National Maritime system for sharing operational data among those who need it to perform or support Coast Guard roles and other national missions

For What Purpose: This information collection, storage, and analysis would greatly expand the breadth and depth of the Coast Guard's and our Nation's MDA. LRIT will enhance security by providing the United States with the identities and current location of vessels off our coastlines. The United States will then have sufficient time to evaluate the security risk posed by a vessel and then respond, if necessary, to reduce the risk of a possible security threat. In addition, there will also be an immediate safety benefit by enhancing the information available to SAR services. Accurate information on the location of a vessel in distress as well as vessels in the area that could lend assistance will save valuable response time to affect a timely rescue. The storage of vessel transit data will also allow for analysis in support of such needs as vessel movement trend analysis, anomaly detection, and increasing efficiencies in the performance of Coast Guard missions.

3. Consideration of the use of improved information technology.

Vessel information collection via LRIT and other transponder-style systems represents the best and most efficient use of technology available to the United States Coast Guard. Currently, vessel information is transmitted generally through voice radio broadcasts at regular or sporadic intervals depending on need. LRIT equipment transmits information automatically without the need for voice radio communications and represents a substantial improvement in terms of efficiency and technology over the use of other information reporting systems.

We estimate that when implemented, 100% of the reporting requirements will be done electronically.

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

There is no Federal, State, or local agency that requires this information collection. Therefore, there is no duplication of information collection efforts by the government. The information collected from this effort may be used by other agencies in support of their own goals.

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

We estimate approximately 450 U.S.-flag vessels are impacted by the LRIT requirements. However, with the use of generally existing installed GMDSS equipment, and the LRIT communications costs paid for by the U.S. government, the impact to any small entity will be minimal.

6. Consequences to the Federal program if collection were not done or conducted less frequently.

Under SOLAS V/19-1, ships are required to transmit LRIT information reports 4 times per day including U.S. flag ships for which the U.S. government must pay. If vessel transmissions were not collected, the Coast Guard would not avail itself of critical identification information on a large and diverse population transiting our maritime domain. This could significantly impact marine safety, security and environmental protection, limit the Coast Guard's ability to respond to a vessel emergency in a timely and efficient manner, and undermine our Maritime Domain Awareness.

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.

Opportunity for public comment was provided via the "Long Range Identification and Tracking of Ships" rulemaking [USCG-2005-22612; RIN 1625-AB00]. A Notice of Proposed Rulemaking was published on October 3, 2007 (72 FR 56600). No COI-related comments were received. A Final Rule was published on April 29, 2008 (73 FR 23310).

9. Explain any decision to provide 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.

No assurance of confidentiality is provided to respondents.

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

There are no issues of a sensitive nature involved in this information collection.

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

Burden Estimates to Industry

For LRIT, the **estimated number of respondents is 450** and the **number of responses is 450.**

The **estimated annual hour burden** to the industry is **150 hours**, and the **estimated annual cost burden** is **$15,300**.

FOR THE LRIT REPORTING AND RECORDKEEPING REQUIREMENTS—

The estimated number of respondents is 450 annually. We estimate the number of responses to be 450 annually.

We estimate that annually each respondent will have a 20 minute burden. This burden accounts for—

- a one-time GMDSS LRIT system initialization for each vessel,
- subsequent annual system check, and
- occasional logbook entries when a ship master switches off the LRIT equipment or the LRIT equipment fails to operation.

Once the LRIT equipment is on and initialized, no further action is necessary. Data transmission from the equipment will occur automatically.

Therefore, we estimate the **annual hour burden is 150 hours** for all vessels (450 U.S. ships x 1/3 hour = 150 hours). Assuming the Vessel's Master performs the required LRIT actions (at an hourly rate of $102/hour (Equivalent to a Coast Guard Commander (i.e., O-5) (out-of-government rate), per COMDTINST 7310.1K.), the **annual cost burden is $15,300** (150 hours X $102/hour).

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.

For LRIT, we estimate that the U.S. Government will incur data transmission costs of approximately $164,250 (450 vessels x 4 transmission per day/vessel x 365 days/year (or 657,000 transmissions) x $0.25 per transmission) annually from U.S. vessels.

15. Explain the reasons for the change in burden.

The change in burden is a PROGRAM CHANGE, as this is a new information collection.

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. Approval to not display expiration date.

There is no form associated with this collection.

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.