

**SUPPORTING STATEMENT
CERTIFICATION REQUIREMENTS FOR DISTRIBUTORS OF NOAA ELECTRONIC
NAVIGATIONAL CHARTS/NOAA HYDROGRAPHIC PRODUCTS OMB CONTROL
OMB CONTROL NO. 0648-0508**

A. JUSTIFICATION

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

Electronic navigational charts (ENCs) are one of NOAA's products under its Nautical Charting Program. Official NOAA ENCs which conform to International Hydrographic Organization (IHO) standards may be used in a type approved display system, such as an Electronic Chart Display and Information System (ECDIS), to comply with Federal nautical chart carriage requirements administered by the U.S. Coast Guard.

In 2005, NOAA established a certification program for the redistribution* of official NOAA ENCs (Final Rule 0648-0508 ([71 FR 52906](#))), codified in [15 CFR part 995](#), in order to ensure the quality and content of official NOAA ENCs remains intact throughout the redistribution process. The information collected allows NOAA to administer the regulation, and to better understand which ENCs are being distributed more often, resulting in products that meet the needs of the customer in a timely and efficient manner.

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 collected by NOAA's Office of Coast Survey (OCS) regarding the redistribution of official ENCs allows OCS to better allocate resources towards ENC production and product improvement. This information provides utility to the end-user, whereby OCS is continuously improving the quality of the ENC product that is distributed to the end-user, either by the Certified ENC distributor program or via the free downloads on the NOAA website.

In the original submission there were requirements for the certification process. NOAA certified eight distributors between 2005 and 2008, and does not anticipate further applications. The next renewal will include a re-certification burden, as the initial five-year certification period will have expired.

As part of a twice-yearly reporting process, the certified distributors are required to report to NOAA the following from their records, for all customers during the six-month period:

*Redistribution refers to the distribution of NOAA charts, by a non-Federal entity that includes or displays hydrographic data.

Distribution Customer
Vessel Name
ENC
Subscription type.

This allows NOAA to evaluate which particular product is in high demand and to adjust production schedules accordingly.

In addition, certified ENC distributors are required to report via email any error detected during the conversion process that apparently originates in the NOAA ENC files. This allows OCS to quickly make the correction and re-post the data for distribution via the web. A typical email consists of:

ENC Name
Error Type.

As explained in the preceding paragraphs, the information gathered has utility. NOAA OCS will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. See the answer to Question 10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Although the information collected is not expected to be disseminated directly to the public, results may be used in scientific, management, technical or general informational publications. Should NOAA OCS decide to disseminate the information, it will be subject to the quality control measures and 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.

Responses from the Certified ENC Distributors are all electronic and sent via email. All distributors have an Excel spreadsheet which they submit for the twice-yearly report.

4. Describe efforts to identify duplication.

The Office of Coast Survey is the only agency that produces official ENCs for the nation's coast. Therefore it is the only agency which manages a collection for the Certified ENC Distributors.

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

This collection does not involve small businesses or other small entities.

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

Without the reporting requirement from the distributors, OCS would be unable to better focus their production efforts to those products that are in high demand by the end-users.'

The reporting of errors found in our data during the conversion process is an invaluable aspect of quality control of the OCS ENC data. It is an established feedback mechanism that allows OCS to react quickly and repair data to ensure that the end-user ultimately receives data that is consistent and correct.

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

There are no special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

8. Provide information on 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 May 8, 2008 (73 FR 26082). No public comments were received.

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

No payments or gifts will be given to respondents.

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

15 CFR part 995.21 addresses a registry of data users for the distribution program. Within the CFR it states that "NOAA agrees to treat such information as proprietary."

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.

N/A.

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

Number of respondents: 8

Total annual responses expected: 16 semi-annual reports plus 208 error reports = 224.
Average response time: 1 hour per semiannual report and 1-2 hours (1.5) per error report.
Total annual hours: $(16 \times 1) + (208 \times 1.5) = 328$.
Hourly Labor Cost: \$25
Total Annual Labor cost: \$8,000.

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

The annual recordkeeping cost burden is \$0: all report information may be emailed to NOAA at no cost to the distributor. All other costs of equipment associated with producing the product are considered to be part of customary and usual business of private practices.

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

Annualized labor costs to the federal government are \$6,000. There are no costs above normal labor.

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

The reporting burden decreased by 208 hours. Adjustments are based on the following factors:

Negative adjustments:

- The previous estimates were based on 9, rather than 8, respondents. Since the burden per respondent was estimated at 60 hours per year, this removes 60 hours.
- No certification applications are expected in the next three years, removing another 16 hours/5 years for each of 8 respondents = 26 hours.
- Set-up and maintenance of data registries is no longer counted as burden, as it is a normal business practice, already in use by the respondents before certification (this burden was counted in error in the original submission), removing 198 hours.
- Routine checking for and reporting of corruption of data when downloading is also considered a normal business practice, removing 8 hours.
- No NOAA testing of respondents' compression/decompression and encryption/decryption software and documentation is needed, removing 2 hours.
- Reports which were formerly required quarterly are now required twice per year, and their hourly estimate has decreased from 1.5 hours to 1 hour, removing a total of 32 hours.
- Labeling of software to distinguish for customers what is and is not official NOAA ENC data has already been accomplished, removing 192 hours.

Subtotal of decreases due to adjustments: 518 hours.

Error reports were previously estimated at a total of 2 hours annually, while currently they are estimated at 312 hours, resulting in a positive adjustment of 310 hours.

The net decrease is thus 208 hours.

Cost adjustment: No costs estimated in the previous request are included, either because: 1) they were incorrectly counted as costs for this particular information collection, rather than as normal business costs, e.g. computer and software upgrades, or 2) they have been determined not to be applicable, e.g. cost of mailing labels for reports which are actually submitted electronically. Cost estimate for the next three years: \$0.

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

These results will not be published.

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.

N/A.

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

N/A.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.