

SUPPORTING STATEMENT
FOR

CG-2554 Private Aids to Navigation Application. CG-4143 Application for Class I Private Aids to Navigation Artificial Islands/Fixed Structures

JUSTIFICATION

1. Circumstances which make the collection of information necessary.

Under the provision of 33 U.S.C. 409, the Secretary of Homeland Security is mandated to prescribe rules and regulations for governing the marking of sunken vessels. This authority has been delegated to the Coast Guard who, in 33 CFR 64.11, requires owners of sunken vessels to promptly report information about the sunken vessel to the appropriate District Commander. Also, to establish or change ownership in a private aid to navigation, we require in 33 CFR 66.01-5 that people complete form CG-2554, and for 33 CFR 67.35-1 you are required to complete either CG-2554 or CG-4143. Section 67.35-5 describes the contents of the applications.

The information on these private aid applications (CG-2554 and CG-4143) provides the Coast Guard with vital information about private aids to navigation and is essential for safe marine navigation. These forms are required under 33 CFR 66 and 67. The information is processed to ensure the private aid is in compliance with current regulations. Additionally, these forms provide the Coast Guard with information which can be distributed to the public to advise of new, or changes to private aids to navigation.

This information collection supports the following strategic goals:

Department of Homeland Security

- Safety
- Mobility

Coast Guard

- Safety
- Mobility
- Protection of natural resources

2. Purpose of the Information Collection

The information is provided to the Coast Guard in a written format, using private aid applications (CG-2554 and CG-4143) from owners of sunken vessels. The information on these private aids to navigation applications is collected in the interest of marine safety. If this information was not collected from the public, other mariners would not be aware of new, or changed, private aids to navigation and this could adversely affect the decisions they make when navigating our waterways.

This information is used by the Coast Guard to:

- 1) Determine if the private aid is effective for navigational purposes.
 - 2) Notify the public and navigational community of the date, time, location and characteristics of the private aids.
3. Consideration of the use of improved information technology to reduce the burden.

The use of improved information technology has been considered and it has been determined that it will reduce the burden of information collection. At this time, on an experimental basis, about 1% of the respondents use electronic forms for private aids to navigation (PATON) applications. The Coast Guard expects to transition to 100% electronic collection PATON application within the next renewal date.

4. Efforts to identify duplication.

There is no other Federal agency with similar programs concerning private aid to navigation over navigable waters of the United States. There is no similar information available, which could be used or modified for this purpose. Each collection is specific and unique.

Depending on the type of private aid to navigation the applicant plans to establish, modify or remove, the applicant would complete either one form or the other. Each contains necessary information for processing by the Coast Guard. These private aid forms need to be submitted only when a private aid to navigation is established, modified, moved, removed or ownership is changed.

5. Methods used to minimize the burdens to small business.

The burden upon small businesses is minimized because these applications need only be submitted when establishing, modifying, moving, removing or changing ownership of a private aid to navigation.

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

The information is already collected on an “as needed” basis. Current requirements do not lend themselves to collecting this information less frequently. If these forms were submitted less frequently or not at all, the Coast Guard would not be able to ensure that private aids to navigation is appropriate, nor would the Coast Guard be able to ensure that the public is advised of new or changed private aids to navigation, hence compromising safety.

7. Special circumstances that require collection to be conducted in an inconsistent manner.

This information collection is conducted in manner consistent with the guidelines in 5CFR 1320.5(d)(2).

8. Solicitation of Comments.

A 60 day Notice was published in the Federal Register to obtain public comment on this collection. (See [USCG-2008-0263], May 8, 2008, 73 FR 26125). The USCG has not received any comments on this information collection.

9. Provide any payment or gift to respondents.

There is no offer of monetary or material value for this information collection.

10. Assurances of confidentiality provided to respondents.

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

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

There are no questions of sensitive language.

12. Estimate of annual hour and cost burden.

Nationwide, there are approximately 50,000 private aids to navigation. Annually about 3000 new requests are submitted of which approximately one-third using form CG-2554 and the remaining using form CG-4143. The type of form used depends on the type of private aid to navigation the applicant wishes, or is required to establish, modify, move, remove or change ownership.

We estimate that it would take someone familiar with both private aids to navigation regulations (33 CFR part 66) and with marine navigation, equivalent to a (GS-12), approximately one hour, which includes time needed to initially report the incident by phone or in person, to complete CG-2554. Since approximately 1,000 CG-2554s are submitted annually, we estimate the public burden for that form at 1,000 hours. Using a labor cost of \$57 per hour (COMDTINST 7310.IJ), we estimate that cost to the public at approximately \$57 per individual form and \$57,000 in aggregate.

We estimate that it would take a person familiar with both private aids to navigation regulations (33 CFR part 67) and with marine navigation, equivalent to (GS-12), approximately one hour, which includes time needed to initially report the incident by phone or in person, to complete CG-4143. Since approximately 2000 CG-4143s are submitted annually, we estimate the public burden for that form at 2000 hours. Using a labor cost of \$57 per hour (COMDTINST 7310.IH), we estimate that the public spends approximately \$57 per individual form and \$114,000 in aggregate.

Therefore, we estimate that the average annual cost to prepare both forms would be \$171,000, as described below:

PERSONNEL	FORM	PER REQUEST			TOTAL (PER YEAR)		
		Hourly Rate*	Hours	Total	# of Requests	Hours	Cost
Equivalent to (GS-12)	CG-4143	\$57	1	\$57	2000	2000	\$114,000
Equivalent to (GS-12)	CG-2554	\$57	1	\$57	1000	1000	\$57,000
TOTALS			1	\$57	3,000	3,000	\$171,000

*Based on hourly rates for government personnel in Enclosure (3) to COMDTINST 7310.1J

13. Provide an estimate of the annualized capital/start-up costs to respondents.

There are no record keeping, capital, start-up or maintenance costs associated with this information collection.

14. Estimates of annualized cost to the Federal Government.

We estimate it takes the Coast Guard approximately 1 hour to completely process a CG-4143. Form processing includes: (1) review of proposed aid characteristics, (2) review of aid location, (3) distributing information to the public, (4) notifying owner of private aid status, and (5) filing. Since approximately 2,000 CG-4143's are submitted annually, we estimate the Coast Guard's burden to be 2,000 hours.

We estimate it takes the Coast Guard approximately 4 hours to completely process a CG-2554. Form processing includes: (1) review of proposed aid characteristics, (2) review of aid location, (3) distributing information to the public, (4) notifying owner of private aid status, and (5) filing. Since approximately 1,000 CG-2554s are submitted annually, we estimate the Coast Guard's burden to be 4,000 hours.

Thus, the estimated annual costs to the Coast Guard for processing 3000 forms are \$342,000, as described below:

PERSONNEL	FORM	PER REQUEST			TOTAL (PER YEAR)		
		Hourly Rate*	Hours	Total	# of Requests	Hours	Cost
GS-12	CG-4143	\$57	1	\$57	2000	2000	\$114,000
GS-12	CG-2554	\$57	4	\$228	1000	4000	\$228,000
TOTALS			5	\$285	3000	6000	\$342,000

*Based on hourly rates for government personnel in Enclosure (3) to COMDTINST 7310.1J

15. Reason for changes or adjustments in the burden.

There has been no increase or decrease in the estimated annual burden hours previously reported for this information collection.

16. Plans for tabulation, statistical analysis and publication.

This information collection will not be published for statistical purposes.

17. Approval for not to explain the OMB expiration date.

USCG will display the expiration date for OMB approval of this information collection.

18. Exception to the certification statement.

USCG does not request an exception to the certification of this information collection.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This information is not collected through the use of statistical methods.