

SOUTHEAST REGION PERMIT FAMILY OF FORMS

OMB CONTROL NO.: 0648-0205

JUSTIFICATION FOR CHANGE

We are requesting to add two items to the Federal Permit Application for Fishing in the Exclusive Economic Zone (multiple fishery application):

1) For those whose vessel's state registration does not list all vessel owners, another piece of documentation listing all owners will be required.

To these existing directions on page 1 of the application form: "REMEMBER TO SEND A COPY of your current (not expired) United States Coast Guard (USCG) Certificate of Documentation; or, if the vessel is not documented, your state vessel registration must accompany this application or be on file with our office. Do not send your original. We cannot accept a bill of sale", this sentence will be added: If your vessel's state registration does not list all owners of the vessel, also provide a copy of the vessel's title, or other documentation from the appropriate state agency that identifies all vessel owners.

When the Southeast Regional Office Permits Division issues a vessel permit, the permit holders are by definition all of the entities (individual people or businesses) that own (or lease) the vessel. If there is more than one owner of the vessel, all permits issued to that boat will be issued in all parties names -- as they are all equal 'owners' of the permit. Previously, this information was available from the state registration or USCG documentation.

Unfortunately, some states (for example Texas) no longer print the names of all vessel owners on their state registrations. This change has occurred within the last year. Therefore, for these states, the only way the Permits Division will know to issue a permit with more than one permit holder is if applicants provide supplemental information documenting that the vessel has more owners than are displayed on the state registration.

Considering the emphasis placed on permit and landing history, which can only be determined if the Southeast Regional Office knows exactly who possessed what permits (and therefore contributed to which landings) for various fish for different periods of time, it is imperative that permit is issued to all owners of the vessel, not just the one individual named on the state registration."

2) The Permits office will ask applicants already possessing limited access/moratorium permits to provide those permit numbers (page 2 of application).

The Southeast Regional Office Permits Division receives applications to transfer a permit but applicants frequently fail to provide the original permit. The Permits Division will not approve the request without submission of the signed, original permit. However, if the permit number is

known, the Permit Division would be able to create the request in the database, and send meaningful customized responses to the applicant describing what is needed. In essence, having the applicants write the permit numbers (generally two to four numbers) down will make it easier and more efficient to process their requests.

For these two changes, we are estimating an additional maximum of five minutes per application. For an estimated annual 3,294 of these permit requests, this would add a total of 275 hours, changing the currently approved hours for OMB Control No. 0648-0205 from 15,671 to 15,946.