SUPPORTING STATEMENT
ANNUAL ECONOMIC SURVEY OF FEDERAL SOUTH ATLANTIC SHRIMP PERMIT HOLDERS
OMB CONTROL NO. 0648-xxxx

INTRODUCTION

This is a request for a new collection of information.

Economic data will be collected from shrimp vessel owners who operate in federal waters of the South Atlantic. These fishermen are required to have a federal permit for the commercial catch of penaeid shrimp, or one of two different permits for the catch of rock shrimp. A collection of economic information from fishermen affected by the management of federal commercial fisheries is needed to ensure that national goals, objectives, and requirements of the Magnuson-Stevens Fishery Conservation and Management Act (MFCMA) and other laws are met. This information is vital in assessing the economic and social effects of management decisions and regulations on individual fishing enterprises, fishing communities, and the nation as a whole.

At present, owners of South Atlantic penaeid and rock shrimp permits are not required to provide economic data to the National Marine Fisheries Service (NMFS). Very limited historical information on vessel costs and profitability is available for the South Atlantic shrimp fishery as a whole or certain components thereof, such as the rock shrimp fishery. NMFS attempted to voluntarily collect information on South Atlantic shrimp vessel costs and net revenues in 2005 (Office of Management and Budget (OMB) Control No. 0648-0369). The in-person interview-based implementation of the data collection effort encountered difficulties. Gaining acceptance among reluctant shrimp fishermen proved problematic even in light of major outreach efforts (documented in prior supporting statements). The survey had a very low response rate due in part to an imperfect sampling frame and further due to contact avoidance and outright refusal by the "respondents". The contractor has summarized the findings and recommended some changes. Time and limited resources were used inefficiently as a result, not only the agencies, but that of industry participants that cooperated with the survey as well.

Similar problems were encountered in the Gulf of Mexico (Gulf) shrimp fisheries at the time. The central conclusion was that a fundamentally new approach was needed if this type of data is to be collected at all. In response, NMFS initiated a new data collection for the Gulf shrimp federal fishery in 2007 (a revision of OMB Control No. 0648-0476). All changes aimed to reduce and simplify the information collected and to substantially lower the burden to each respondent and the public as a whole. The survey collected only the absolute minimum information necessary for basic economic analyses of the fishery; thereby reducing a 20+ page survey to just two pages. We made the submission of this information a requirement for permit renewal for the fishermen who are sampled. Further, to simplify contacting fishermen, increase convenience of response, and in line with the general data collection developments in this fishery, we switched to a self-administered, mail-based survey. This data collection has twice been implemented very successfully, fully achieving its intentions, with a response rate above 90%.

The herein proposed new economic data collection is intended to be an extension of the successful Gulf survey to the South Atlantic population with no content-related changes. The two data collections will be implemented together (continuation of OMB Control No. 0648-0476 and new South Atlantic collection) by the Southeast Fisheries Science Center (SEFSC). The strong link and similarities between the South Atlantic and Gulf fleets are exemplified by the large number of vessels holding permits for both fisheries. Of the 694 vessels with South Atlantic shrimp permits, 293 vessels also possess a Gulf shrimp permit.

A. JUSTIFICATION

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

A collection of economic information from fishermen and fishing businesses affected by the management of federal commercial fisheries in the South Atlantic is needed to ensure that national goals, objectives, and requirements of the MFCMA, National Environmental Policy Act (NEPA), Regulatory Flexibility Act (RFA) and Executive Order 12866 (EO 12866) are met. This information is vital in assessing the economic and social effects of fishery management decisions and regulations on individual fishing enterprises, fishing communities, and the nation as a whole. As a result of the recent large increases in fuel price and decreases in the price of shrimp, historical data and models can no longer be used for valid analysis, and up-to-date economic information is urgently needed.

Economic information on commercial fishing enterprises is vital to the optimum yield (OY) management of marine fishery resources as mandated under the MFCMA (16 U.S.C. 1802 MS Act § 3). The term "optimum" is defined under section 104-297 (28) of the Act, as: (A) will provide the greatest overall benefit to the Nation, particularly with respect to food production and recreational opportunities, and taking into account the protection of marine ecosystems; (B) is prescribed as such on the basis of the maximum sustainable yield from the fishery, as reduced by any relevant economic, social, or ecological factors; and (C) in the case of an over-fished fishery, provides for the rebuilding to a level consistent with producing the maximum sustainable yield in such a fishery.

The central goal of this project is to collect up-to-date cost data for the South Atlantic commercial shrimp fishery in federal waters. National Standard Guidelines for social and economic information needs are mandated in 50 CFR 600. In the past, legal decisions have gone against Department of Commerce (DOC), National Oceanic and Atmospheric Administration (NOAA), and NMFS based on the lack of social and economic information or the inadequate analysis of existing data. Thus, it is imperative that these data be collected to accurately assess the economic and social impacts on individual shrimp fishing entities as imposed by shrimp fishery management plans and regulations.

The data collection effort will be an ongoing annual survey effort. Regular surveying is necessary to capture critical cost data that fluctuate from year to year. Fluctuations are generally due to annual fluctuations in shrimp abundance caused by environmental factors, input and output price variability and adaptations to these. This study will be conducted by the Social Science Research Group of the SEFSC in collaboration with the Social Science Branch of the Southeast Regional Office (SERO) of NMFS.

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.

Combined with data from existing collections, the information is used by NMFS economists and social scientists to create, develop, and update economic and social models and descriptive reports of this important fishery. The results support the management of the shrimp fishery by the South Atlantic Fisheries Management Council and NMFS. Foremost, the data are used to evaluate the economic health of the sector and the potential economic impact of proposed regulations. The data is also used by the academic community studying South Atlantic fisheries.

It is anticipated that the results of this survey (summary statistics) will be disseminated to the public (such as through an annual economic report) or used to support other publicly disseminated information. An example annual report for the Gulf shrimp fishery, based on the previously implemented, equivalent survey, is attached at the end as Table 2. Data may be reported for various groups of fishermen (by vessel size, State, etc.). This will allow vessel owners to compare and evaluate their operations relative to others in the same group in terms of ability to generate revenues, cost efficiency, and profitability.

Statistical models that predict or forecast various characteristics, such as fleet size, fishing activity or effort, cost versus benefits of fishing, market activity, and efficiencies of proposed fishing regulations will be just a few of the benefits and uses of these data. Gross revenues and costs can vary across time and geographic areas as a result of changes in a number of different factors, including fishery management regulations (e.g. gear modifications, time/area closures, etc.), fluctuations in abundance (due to changes in various environmental factors), market conditions (such as fuel or seafood prices), and behavioral responses by fishermen.

The following is a detailed description of justifications for the collection of these data. In general, the survey instrument asks questions pertaining to the annual total of variable costs, fixed costs, and other financial and production factors. This data is necessary to generate cost, profit, input demand, and production functions. Such functions and the results generated from their estimation are typically used in financial analyses (used to determine a business' cost efficiency and profitability), economic impact analyses (used to determine the economic value of a particular activity to a particular locale, community, or region), bio-economic models (used to predict how the biological and economic components of a fishery will respond to exogenous shocks, such as policy changes), cost-benefit analyses (used, in part, to determine the net economic benefits of a particular action), and behavioral models (such as those that explain or predict exit or entry decisions and decisions regarding spatial or temporal allocation of effort). These data can also be used to determine the relative efficiency of the various participating vessels in a fishery and thus whether the aggregate harvesting costs are in fact being minimized. Such models and analyses are critical to guiding fisheries management decisions whose general purpose is to maximize net national benefits and optimally distribute those benefits.

The survey is divided into three parts. It starts on page 1 with a pre-filled header section that serves to identify the respondent. The second section, also on page 1, collects information on

annual financial expenditures ("cash costs"). These should correspond to receipts and invoices and the associated payments and should be readily available from regular business accounting ("the books"). Page 1 is set up to add up to the total financial expenditures of one calendar year. This should reduce the cognitive load and enhance internal consistency.

Expenditures do not fully reflect the economic concepts of costs (and hence profit); therefore, in order to facilitate economic analysis, further information is necessary, and this is collected on page 2. For example, loan principal payments are real financial transfers but do not constitute a cost in the economic sense. Depreciation charges are an example of the reverse, where real economic costs produce no corresponding financial transaction. Please see the attached survey instrument and its instructions for an in-depth explanation of the intent of each question.

Header: Vessel information
This pre-filled section lists and verifies the identity of the respondent, including owner name, permit number, vessel name, and vessel registration number. Respondents are requested to make any changes if there is an error. This information will allow NOAA Fisheries to link this vessel's responses with other pertinent data, such as permit, revenue, vessel and gear, and catch information, located in other datasets.

Total YEAR Expenses (Page 1)
The first 9 questions elicit total annual expenditures associated with the vessel. They are arranged into three blocks corresponding to variable costs (questions 1 to 6), fixed costs (questions 7 and 8) and a check for completeness (question 9). These questions can generally be used to construct input demand function, cost functions, and production functions, all of which are needed to conduct the types of analyses mentioned previously. Distinguishing between variable and fixed costs is necessary for conducting analyses with different time horizons.

Questions 1 to 6 - Annual Variable Costs
These questions ask for total annual expenditures for labor inputs (crew and captain) and non-labor inputs (fuel and other trip expenditures). The categories are chosen as they each reflect a substantial part of the costs in this industry. Since these expenditures vary directly with the annual number of trips taken, they are generally related to, or a function of, the annual level of fishing effort, and hence variable costs in the economic sense.

Question 1 to 3 are meant to obtain total annual payments to the crew and captain. Labor is a major input to the production function and hence economic models. Further, these payments represent the flow of annual income to the crew members and captains associated with the vessel. From the captain and crew's perspective, their share of the vessel revenues determines the incomes of their respective households. Changes in annual income received can affect the captain's and crew members' decisions to continue working in this particular fishery, and/or in fishing as a vocation. These data will allow analysts to determine how various factors, such as changes in regulations, may affect the incomes of crew. Question 3 seeks to elicit expenditures, common in this industry, that actually represent payments to owner-operators. Such payments are more akin to income or profit than costs. For economic analysis we must have the ability to identify these.

Questions 4 and 5 collect annual fuel expenditures, the quantity of fuel used, and (an estimate of) the average price of fuel. After labor and the vessel itself, fuel is a major input for a trawl

fishery; for some vessels it may even be the largest one. Given the importance of fuel to this fishery and the substantial fluctuations of its price, we are also requesting information on the annual quantity used. This will allow for policy simulations that explicitly take account of the price of fuel (since variation in total annual costs can be due to a change in quantity purchased or due to a change in the price per unit). The average fuel price for each vessel will serve as a test of the two other numbers. It is also hoped that the respondents will 'do the math' themselves and so enhance the quality of the data.

Question 6 intends to capture any other trip related costs not covered by previous questions and is needed to account for all variable costs.

Questions 7 and 8 - Annual Fixed Costs

These questions ask for total annual expenditures related to physical capital (vessel, gear and equipment) and overhead (including all other expenditures). These costs are paid regardless of whether the vessel is used or not, or has generated revenue, and are borne entirely by the owner. Since these costs do not vary according to the level of fishing activity they are referred to as fixed costs by economists. If sufficiently high, fixed costs can affect the probability of entry and exit into and out of a fishery.

Questions 7 collects information pertaining to costs related to vessel, gear and equipment maintenance, repair, replacement, and new purchases. These expenses all pertain to physical capital employed in fishing and are separated from the more business related expenses, loosely called overhead. While question 7 a) collects the total annual expenditures, with the help of question 7 b), we will try, at the population level, to roughly break them into average regular maintenance and repair expenditures, average major or haul-out expenditures, and average new investments which expand the functionality of the physical capital. We are not asking for dollar amounts in question 7 b), merely expense type, in order to keep the survey simple and short, and because retrieving exact amounts would be extremely difficult.

Question 8 is intended to collect business and indirect costs pertaining to the vessel and any remaining costs not listed elsewhere. Typical examples are annual costs associated with docking or mooring arrangements, utilities while at the dock, insurance and loan payments, fees, professional services, office expenditures, etc. This question is needed to account for all fixed costs.

Question 9 - Total Expenditure Verification

This question adds no additional information. Instead its purpose is to enhance the quality of the data collection by inducing the respondent to be comprehensive and avoid duplication while s/he is accounting for all expenses in questions 1 through 8. If the sum of questions 1 through 8 does not add up to the known or estimated total expenditures for the year, a conscientious respondent will find and correct the inaccuracies. It will also help with identifying data entry errors.

Other Important Economic Information

Question 10 - Insurance

This question collects information on the type of vessel insurance and the total amount for which the vessel is insured. The lack of hull and other related vessel insurance is indicative of the industry's economic health. Further, the level of insurance coverage is a measure of how exposed

this industry is toward risk, such as losses due to hurricanes. There is much policy interest in insurance-related questions.

Questions 11-13 - Capital, Net-Equity and Depreciation

Questions 11 to 13 try to discern the total amount of financial capital invested in the vessel, the current value of that capital, the owner's net equity in the vessel, and the annual amount the capital is depreciating by. This information is required to estimate economic profit and then to calculate various rates of return on the owner's investment. The expected rate of return is a critical factor in the owner's decision to invest further in the vessel, and whether to remain in the fishing industry. Changes in the levels of net equity should be indicative of the industry's economic health (requires at least two years of observation).

Question 11 asks for the market value of the vessel with or without commercial fishing permits, either from insurance records or as estimates. These are proxies for the current value of invested capital. Further, the question asks for the purchase price since many used vessels are recently changing hands at very low prices (due in part to hurricane impact). Since historically the vessel purchase price has been the greatest barrier to entry, we need to quantify this development.

Question 12 gathers information about outstanding loans and the interest and principal payments on these. With the help of this information we can calculate the owner's net equity tied up in the vessel. In terms of cash flow and investment decisions, loan payments can be critical to annual financial performance of the vessel operation and can be used as an indicator of the health of the industry. The amount of principal repaid during the year is required in order to correctly identify economic profits (by reducing total expenditures by this amount). Interest payments will help identify the relevant cost of capital in this industry. Many economic analyses, beyond the ones directly related to this survey, require the applicable cost of capital.

Question 13 serves to help estimate the appropriate economic depreciation that should be added as a further cost to total expenditures for the vessel when calculating profits. Calculating economic depreciation is difficult, and we will attempt, at the population level, to econometrically estimate[1] it with the help of vessel market prices and information about each vessel's age and characteristics. Question 13 will allow for an independent check on our results. Depreciation, as claimed for tax purposes, is a rough proxy for economic depreciation (especially if adjusted for the age of vessel) and is important in its own right for cash-flow analyses.

Question 14 - Vessel Activities

[1] Econometrics is a combination of mathematical economics and statistics. The two main purposes of econometrics are to give empirical content to economic theory and to subject economic theory to potentially falsifying tests. For example, economic theory may predict that a given demand curve should slope down. Econometric estimates can either verify or falsify that prediction, and shed light on the magnitude of the effect.

Econometric analysis is divided into time-series analysis and cross-sectional analysis. Time-series analysis examines variables over time, such as the effects of population growth on a nation's GDP. Cross-sectional analysis examines the relationship between different variables at a point in time; for instance, the relationship between individuals' income and food expenditures. When time-series analysis and cross-sectional analysis are conducted simultaneously on the same sample, it is called panel analysis. If the sample is different each time, it is called repeated cross section data. Multi-dimensional panel data analysis is conducted on data sets that have more than two dimensions. For example, some forecast data sets provide forecasts for multiple target periods, conducted by multiple forecasters, and made at multiple horizons. The three dimensions provide more information than can be gleaned from two dimensional panel data sets.

Question 14 is comprised of four check boxes to indicate activity by the vessel in i) any shrimp fishery, ii) any other commercial fishery, iii) any non-fishing activities generating income, or iv) no activity. This question will allow us to sort vessels into specific categories (e.g. active/inactive, pure shrimpers/crossover to other fisheries).

Question 15 - Revenues Beyond Shrimp

Other data collection efforts allow us to calculate the total revenue this vessel generates from shrimp. In the case where a vessel also engages in other commercial fisheries, portions of the reported costs will apply to these activities rather than to the catching of shrimp. This question allows us to identify the portion of costs actually incurred catching shrimp ("pro-rated" costs based on revenue share). The question will also serve as an indicator for how specialized this industry is.

Question 16 – Anti-Dumping and other "Revenues"

In recent years the United States (U.S.) shrimp fishery has seen increasing imports of shrimp flooding the market and lowering the price. This has been ruled a case of dumping and import duties have been imposed. As a result, shrimp fishing vessels have received payments 'in compensation' from the government. Government payments received due to imports and low shrimp prices (tariff money; trade assistance adjustment payments, etc.) are treated as taxable revenue and are very relevant to the economic success or failure of each operation. Further, some fishermen qualify for disaster relief funds related to hurricane damage.

At the bottom of the last page of the survey (page 2) a voluntary question asks the respondent for any comments on the survey effort.

As explained above, the information to be gathered has utility. NMFS 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 response to Question 10 of this supporting statement for more information on confidentiality and privacy. This information collection is designed to yield data that meet all applicable information quality guidelines. Prior to dissemination, the information will be subjected to quality control measures and a 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.

The data collection will be conducted as a self-administered mail survey. Given the Southeast Region's experiences with surveys of this population, a very low impact (burden) approach is necessary to get fishermen's cooperation. A mail survey will be less intrusive, more convenient, and less time-intense than one based on in-person interviews.

All respondents will be contacted by mail. They will be asked to return the completed survey instrument to us in an enclosed, pre-paid envelope. If no response is received, up to two further letters will be sent (including additional survey instruments). Non-responders will also be contacted by phone and urged to return the survey. Information will not be collected during the phone call (a further survey instrument will be sent – by mail or email – if requested). In other

fisheries, the southeast region is currently developing (designing and programming) a web-based option for the submission of survey data. Currently, it is still experimental, but we intend to adapt it to this survey when the process is operational and has proven itself.

There will be no other means, electronic or otherwise, to submit data or information for the purposes of this study. The survey responses will be entered into an electronic database by NMFS or a contractor. The *analytical results of* studies based on this data will be disseminated in internal, management related, and peer-reviewed publications. Some of these will be available over the internet.

4. Describe efforts to identify duplication.

There is currently no NMFS economic data collection in the South Atlantic shrimp fishery. Hence, there is no duplication of economic information gathering on the South Atlantic federal shrimp fishery. As previously noted, very limited historical information on vessel costs and profitability is available for the South Atlantic fishery. The only relatively recent information available on costs and profitability is for shrimp trawlers in South Carolina. Given the reduced importance of the South Carolina fleet within the overall fishery and the fact that very few vessels from South Carolina participate in the limited access rock shrimp fishery, those data are not only outdated but undoubtedly not representative of the vessels potentially impacted by the actions in this particular Amendment.

The data collection will be set up in a way to avoid duplicating the time burden for vessels that hold a Gulf shrimp moratorium permit and one or more South Atlantic shrimp permits. There are 694 unique vessels that hold one or more South Atlantic shrimp permits, and 293 of these vessels also have Gulf shrimp moratorium permits. Duplication will be avoided since the South Atlantic data collection program will be combined with the one currently in place for vessels holding Gulf shrimp moratorium permits (i.e. it will be a joint data collection program). Southeast commercial shrimp vessels will be treated as a single fleet for sampling purposes (thereby ensuring every vessel can only be selected once).

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

Only the minimum data to meet the current and future needs of NMFS management and permitting programs are collected. The information requested should be available to the respondent in the course of normal business operations. Keeping additional records is not needed and hence the burden is low. To simplify the process further, the survey collects aggregate annual data and will be timed to coincide with tax season. The results of this study are expected to improve the economic conditions of small fishing entities by affording fishery management agencies the information needed to consider economic factors in management plans and regulations.

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

Previous attempts to collect costs data have been plagued by their small geographic scope, their limited duration, and refusal by the industry to be surveyed. Current and statistically valid

economic data is needed for the South Atlantic shrimp fishery in order to accurately assess the positive and negative impacts of federal rules and regulations. Such assessments are mandated under EO 12866, the RFA, MFCMA (and the National Standards attached thereto), and the Endangered Species Act, among others. Additionally, legal decisions against the federal government have been handed down based on the absence of social and economic data (i.e. summer flounder litigation: North Carolina Fisheries Association, et al. versus Daley - Civil Nos. 2: 97cv339; 2: 98cv606).

If current and accurate socioeconomic data are not available, then the social and economic assessments of management alternatives will be impossible or inaccurate, thereby potentially leading the Council and NMFS to make poor management decisions. Thus, continuous cost data collection is needed to satisfy these various mandates and help ensure that good management decisions are made.

The purpose of collecting this data *annually* is to identify and track changes and trends through time. This fishery has recently been experiencing substantial upheaval (dumping of product on the U.S. market by foreign competition and large fuel price increases). Further reasons to collect this data annually include the paucity of existing economic data in the shrimp fishery (especially about costs); the fact that there can be wide fluctuations in all costs, not just variable, from year to year; and that future, proposed management strategies are substantially different from the current management structure. In the absence of annual data, the Council and NMFS cannot satisfy the various mandates described above and in the response to Question 1; cannot fully assess the social and economic impacts of potential management changes; and generally cannot ensure that good management decisions are made.

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

The collection is consistent 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.

Requiring owners of South Atlantic shrimp permits to provide economic data upon request is an action within Amendment 7 to the South Atlantic shrimp FMP. A proposed rule to implement this Amendment, RIN 0648-AW19, will be published in the Federal Register, at which time public comments will be solicited on this requirement and the nature of the proposed data collection reporting program. As part of the Amendment, this proposed requirement was vetted through the traditional Council process for all fishery management actions inclusive of public hearings.

When this data collection program was implemented in the Gulf shrimp fishery, efforts were made to contact persons knowledgeable about the shrimp fishery. Experts both inside and outside

the agency have been consulted, including federal and state fishery managers, scientists, and port agents (government), as well as academics, shrimp associations and fishermen (external). We collected their views on the availability of the requested data, frequency of collection, the clarity of the instrument and instructions, disclosure, making it a requirement, survey methodology, and on the data elements to be recorded, disclosed, or reported. NMFS has established that the data to be obtained through this survey is not currently available, and this is discussed in response to Question 4 above.

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

No monetary payments or other remuneration will be made to respondents.

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

The cover letter sent with the survey will explicitly state that all data that are submitted are treated as confidential, in accordance with NOAA Administrative Order 216-100 and the Magnuson-Stevens Act, Section 402(b), Confidentiality of Information).

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.

No questions will be asked of survey participants about sexual behavior and attitudes, religious beliefs, or similar sensitive activities. Questions pertaining to a respondent's business costs and expenses will be used, together with revenue data collected elsewhere, to establish their profitability. Business income (not *directly* collected) is sometimes considered private. This information is necessary for the development of economic assessment models and analyses described extensively in Questions 1 and 2. In-depth justifications for individual survey questions are also provided in Question 2. The data will be used and reported only at the aggregate or representative (average) levels. The respondents will be informed of this in the cover letter.

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

Because of this data collection's close link to the Gulf survey (OMB Control No. 0648-0476), we will sample 37% of the population across the board in the first year, as this is the percentage that will be sampled in the Gulf survey. This implies that extending the survey to the South Atlantic will add an additional sample of about 160 vessels, collected once a year (see also Table 1). Under the assumption of a 90% response rate, this will lead to 144 extra completed surveys. To allow for possible fluctuations in the survey population over the next three years (the South Atlantic penaeid and rock shrimp permits are open access), we are asking for burden hours equivalent to completing a total of 200 surveys. In later years, we might also reduce the number based on statistical analysis of the previous year's data and experience with the response rate.

The public reporting burden for this collection of information is estimated to average 45 minutes per response including the time for reading the instructions, gathering the data from business records, and completing and mailing the survey instrument. Thus, there will be an estimated annual burden of up to 150 hours (45/60 minutes x 200).

As of May 2006, which is the most currently available information, the Bureau of Labor Statistics reported that the mean wage of persons in the occupation group "first line supervisor/managers in the fishing, forestry, and farming industry" was $19.33 per hour. As a result, the estimated annual opportunity cost of this survey to each vessel and in total would be approximately $14.50 for one response and a total labor cost of $2,899.50.

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 Question 12 above).

There will be no financial cost to the public to participate in this study.

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

This study will be conducted by the Social Science Research Group of the SEFSC in collaboration with the Social Science Branch of the SERO of NMFS. The only cost not already included in the ongoing costs for the Gulf shrimp permit holders is $5,000 for outreach to the those who will be taking this survey.

15. Explain the reasons for any program changes or adjustments.

This is a new data collection.

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

These data will be published in summarized format and generalized tables in an annual NMFS economic report. A final project report will provide documentation about the survey methodologies, survey instrument, statistical and random sampling design, an assessment of the validity of the collected data, and basic descriptive statistics. The *analytical results of* studies based on this data will be disseminated in internal, management related, and peer-reviewed publications. Some of these will be available over the internet. The basic South Atlantic results will be presented in a manner similar to the Gulf ones. See Table 2 at the end of this supporting statement as an example.

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.

Not applicable.

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

Not applicable.