

## JUSTIFICATION STATEMENT: Changes to Pacific Whiting Vessel License Application Form

We are requesting minor changes to the Pacific Whiting Vessel License Application form. This form was included in a Paperwork Reduction Act (PRA) package that recently was pre approved (OMB Control Number 0648-0583, expiration date 01/31/2012). On the revised form, we have highlighted in red those items that have been added. All of the changes are found in Section C.

In Section C, the applicant is asked to provide information that demonstrates that the vessel named in Section A meets the qualification standards for one or more of the four whiting fishery sectors (catcher vessels delivering to a shoreside facilities, mothership, catcher vessel delivering to mothership or catcher-processor vessel). For each of the applicable sectors, the applicant was previously requested to provide the following information:

Year of landing

Total Amount of whiting landed/delivered/received/processed/caught for the year

The applicant was requested to provide supplemental documents (i.e.; fish ticket, observer report, delivery report) to verify the above information.

The revised version of the form asks for the following:

Total amount of whiting landed/delivered/received/processed/caught for one landing

The specific date (including year) of the landing/delivery/receipt/catch/processing

The name/vessel registration number of the vessel delivering to the mothership

In the case of catcher vessels delivering to shoreside facility, the name of the company and its location and the fish ticket number and state of issuance

In the case of motherships, the name and vessel documentation number for the vessel delivering whiting

There are two reasons for asking for these changes. First, in reconsidering the information requested and the qualification standard, we realized that only one legal landing/delivery/receipt/catch or process instance involving any amount of whiting in a qualifying year is sufficient to meet the qualifying requirement. We realized that asking for total amounts of whiting caught/delivered/caught or processed in a year and supplemental documentation supporting that total was excessive.

Second, after further review of the application form, we realized that certain key information on the supplemental document may not be represented on the form. We believe it is important to have key document information printed by the applicant on the application form to help staff verify exactly what is on the actual supplemental document. We anticipate that some of the supplemental documents may be copies of originals and hand written and as such, may be difficult to read. More importantly, the printed information on the form provided by the applicant becomes a certified statement of how the vessel specifically met the qualifying criteria. The applicant will be required to take the additional information required from the supplemental document (i.e. fish ticket) and print it on the application form. The respondent will not be required to spend extra time to research or do additional calculation.

The fact that the applicant does not have to calculate the amount of whiting that was caught, delivered or processed in one year should reduce the amount of time required by the applicant to fill out the form. We estimate that with this change, the form will now take 45 minutes, rather than one hour, to complete. With an annualized number of 40 permit applications, this will save a total of 10 burden hours (40 x 45 minutes/60 minutes = 30 hours).

In order for fishermen to comply with this new requirement, approval is needed no later than March 17.