

**Supporting Statement
for
Plan Approval and Records for Tank, Passenger, Cargo and Miscellaneous
Vessels, Mobile Offshore Drilling Units, Nautical School Vessels and
Oceanographic Research Vessels – 46 CFR Subchapters D, H, I, I-A, R and U**

A. Justification.

1. Circumstances that make the collection of information necessary.

The Coast Guard enforces regulations promoting the safety of life and property in marine transportation, authorized under 46 USC 3301 and 3306. These statutes subject freight, nautical school, passenger, tank, steam and seagoing motor vessels and barges to plan review and inspection before being certified for their intended service. This is to ensure structural adequacy, suitable accommodations, and generally, that each vessel is in full compliance with applicable marine safety regulations. The regulations include standards for structural strength, propulsion and equipment, accommodation arrangement, vessel stability, cargo gear, structural fire protection, and vapor control systems. In addition, certain vessels must meet the standards of the International Safety of Life at Sea (SOLAS) Convention. Designers, manufacturers and vessel builders normally develop both plans and manuals as a standard business practice.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

Coast Guard

- Maritime Safety
- Maritime Security
- Protection of Natural Resources

Marine Safety, Security and Environmental Protection Directorate (CG-5)

- Safety: Eliminate deaths, injuries, and property damage associated with commercial maritime operations.
- Security: Eliminate marine transportation and coastal security vulnerability.
- Human and Natural Environment: Eliminate environmental damage associated with maritime transportation and operations on and around the nation's waterways.

2. By whom, how, and for what purpose the information is to be used.

a. Requirements for the submission of plans, technical information, and operating manuals: This information is required by the Coast Guard in order to determine if the vessel's construction, arrangement and equipment meet applicable regulations. The plans submitted to the Coast Guard are those normally developed by a shipyard, designer or manufacturer for the construction of the vessel. They are not developed solely for submission to the Coast Guard. Compliance with most of the standards could be determined by examining the vessel after its

completion. However, it is much more efficient and cost effective to the public to review the plans prior to construction. By reviewing the plans prior to construction, a vessel owner or builder can be assured that the vessel is designed in accordance with regulatory standards. Submissions are nonrecurring. They are made once, prior to the vessel's construction or alteration. Duplicate plans are not required to be submitted when more than one vessel is constructed to the same plans. Plans must be submitted either to the Commanding Officer, U.S. Coast Guard Marine Safety Center (MSC), 1900 Half Street S.W., Washington, DC 20024 or to the Officer in Charge, Marine Inspection (OCMI) at or nearest the place where the vessel is to be built.

b. Requirements for information to be available to vessel operating personnel: These requirements are intended to ensure that sufficient information is provided to the vessel's personnel for the safe and proper operation of the vessel. No format and generally no specific content are required in the manuals. Vessel operators develop and specify their own procedures for the safe and proper operation of the vessel's systems and equipment. Many vessel operators provide manuals to their vessels that exceed the minimum requirements of the Coast Guard. The Coast Guard subsequently reviews this information when it is submitted. The operating information is required to be on board the vessel as long as the vessel remains subject to the regulations.

3. Consideration of the use of improved information technology.

The Coast Guard Marine Safety Center (MSC) established a Web site¹ that details the procedure for submitting electrical plans via electronic formats. Due to convenience and speed, the majority of electronic submissions are submitted via e-mail. However, CDs, floppy disks, and zip disks are also acceptable alternatives. Electronic submission is voluntary.

We estimate that 100% of the reporting requirements can be done electronically. At this time, we estimate that approximately 42% of the responses are collected electronically.

4. Efforts to identify duplication. Why similar information cannot be used.

There are no other Federal agencies with similar programs. However, there are areas where the Coast Guard's standards parallel those of Authorized Vessel Classification Societies (ACS). To eliminate duplication in these areas, the Coast Guard and ACS cooperate under the provisions of a Memorandum of Understanding which gives ACS authority to act on behalf of the Coast Guard in many areas of plan review and inspection of vessels under construction and the tonnage measurement of vessels. Implementing policies and procedures are published in Navigation and Vessel Inspection Circular (NVIC) No. 10-82, Change 2, "Acceptance of Plan Review and Inspection Tasks Performed by the American Bureau of Shipping for New Construction or Major Modifications of U.S. Flag Vessels". Under these procedures, the Coast Guard accepts ACS approval of plans for hull structure and certain engineering systems, on those vessels that the vessel owner/operator chooses to classify with ACS.

5. Methods to minimize the burden to small businesses if involved.

¹ Located at -- <https://homeport.uscg.mil/msc> > CONTACT US > MAIL ADDRESS.

This information collection does not have an impact on small businesses or other small entities.

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

If information was submitted or recorded less frequently, no assurance could be given that vessels submissions are made once, prior to the vessels construction or alteration operating within the applicable stability requirements that ensure marine safety.

7. Explain any special circumstances that would cause the information collection to be conducted in a manner inconsistent with guidelines.

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320(d)(2).

8. Consultation.

A 60-day (See [USCG-2009-0362], June 4, 2009, 74 FR 26875) and 30-day (See [USCG-2009-0362], October 15, 2009, 74 FR52969) Notice has been published in the *Federal Register* to obtain public comment on this collection. This collection has not received any comments from the public.

9. Explain any decision to provide payment or gift to respondents.

The U.S. Coast Guard does not provide payment of gifts to respondents in exchange for a benefit sought.

10. Describe any assurance 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. Estimates of reporting and recordkeeping hour and cost burdens of the collection of information.

- **The estimated annual number of respondents is 122**
- **The estimated annual number of responses is 4,815.**
- **The estimated annual hour burden is 2,970 hours.**
- **The estimated annual cost burden is \$383,130.**

In 2008, the **Coast Guard received 1,914 plans** and technical submissions directly from

respondents in compliance with Subchapters D, H, I, I-A, R, and U. These plans were submitted according to the following breakdown (by 46 CFR Subchapter for vessel certification):

<u>Subchapter</u>	<u>% of Total</u>	<u>No. of Plans</u>
D	46.8	895
H	10.3	197
I & I-A ²	40.2	770
R	0.4	8
U	<u>2.3</u>	<u>44</u>
2008 Total	100%	1,914

In 2008, there were **122 unique respondents**.³ This number did not differ significantly from the yearly average for the 2006 through 2008 (inclusively) period. That number was 123.

Respondent Cost: This cost is mostly administrative (reproduction, handling, mailing) since the engineering and drafting would be performed whether or not plans or other information were submitted to the Coast Guard. The submission of technical information is required when a vessel is first constructed or undergoes major repair or alterations that affect the vessel design or the operation of a system for which there is a regulatory standard.

In addition to the 1,914 submissions directly to the Coast Guard, **2,901 plans were submitted directly to ACS** by respondents (**4,815 total responses**), for review/approval on behalf of the Coast Guard.

The estimate of the burden is based upon the Coast Guard's experience with plan review and approval, estimate of annual new construction, number of vessels built to identical plans, and the number of plans required to be submitted per vessel. The estimates are based upon submissions to the Coast Guard directly, or via the ACS (for Coast Guard plan review oversight purposes). The burden hours required for the submissions are listed below:

In 2008, non-NVIC 10-82 plans submitted to the MSC require about 25 minutes (.41 hours) of preparation time for copying and mailing to the Coast Guard. Of the 1,914 plans submitted to the MSC, 87% (1,665) plans were other than NVIC 10-82 submissions, so the total number of hours required for these plans was 683 hours (**1,665 x .41 hours = 683 hours**). For the balance of the submissions, all NVIC 10-82 plans (a total of 249 were submitted), 2 hours of preparation time are required each for development, copying and mailing.⁴ The total number of hours required for the NVIC 10-82 plans was 498 hours (**249 x 2 hours = 498 hours**).

In 2008, 2,901 plans were submitted to ACS. No data is available on the percentage break down of the plans by NVIC 10-82 plans and non-NVIC plans. It is assumed that the percentage breakdown is the same as those submitted to the Coast Guard's MSC (87% non-NVIC 10-82

² Data on subchapters I and I&A are not collected on a separate basis but only on a consolidated basis.

³ Data on "unique" respondents is only available on a subchapter basis as opposed to on a consolidated basis. As a result the figures presented are probably overstated.

⁴ The estimated range was between 1.5 and 2.5 hours hence an average of 2 hours was used.

submissions and 13% NVIC 10-82 submissions). Using this breakdown the 2,901 plans are broken down into 377 NIVC 10-82 submissions and 2,524 non-NVIC submissions. Assuming that the processing time required for these submissions are the same as those submitted to the Coast Guard (.41 hours for non-NVIC plans and 2 hours for NVIC), the total required hours are estimated at 1,789 [(377 submissions x 2 hours) + (2,524 submissions x 0.41 hours) = 1,789 hours].

The total burden is hence 2,970 hours [(683 + 498 + 1,789) = 2,970].

The cost of preparing the submissions is assumed to be equal to the out-of-government wage of someone in the civilian sector with a wage rate equal to that of a Captain, \$129 per hour.⁵ The **total cost to the respondents is \$383,130.**

13. Estimates of annualized capital and start-up costs.

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

14. Estimates of annualized Federal Government costs.

Virtually the entire federal burden of items covered by this supporting statement is borne by the Coast Guard's Marine Safety Center. This office is responsible for the review and processing of vessel plans and technical submissions. The cost of a technical review is calculated by estimating the total number of hours required for the review of each vessel times the cost per hour of technical plus administrative (i.e., clerical) time.

The technical review is performed by the equivalent of a Lieutenant (O-3). The average hourly wage of a Lieutenant is \$67⁶. Each review takes approximately 2.0 hours. Thus, the burden of technical labor is 3,828 hours (1,914 plans x 2.0 hours = 3,828 hours) at a cost of \$256,476 (3,828 hours x \$67 = \$256,476).

We estimate it takes an average of 3 minutes (or 0.05 hours) of clerical work per review. With 1,914 reviews, the total number of hours of clerical work is 96 hours per year (1,914 reviews x 0.05 hours/review = 96 hours). The average hourly wage of a clerical worker is \$36, which is equivalent to an Petty Officer Third Class (E-4).⁷ The total annual cost for clerical work is \$3,456 (96 hours x \$36/hour = \$3,456). Hence total costs to the government are \$259,932 (\$256,476 + \$3,456).

15. Explain the reasons for the change in burden.

The change in burden is an ADJUSTMENT, due primarily for two reasons. First, subchapter J submissions are no longer counted under this collection. The reason is that subchapter J

⁵ One hundred twenty-nine is the out-of-government rate found in Enclosure (2) to COMDTINST 7310.1L.

⁶ Sixty-Seven dollars is the in-government pay rate for an O-3 (Enclosure (2) to COMDTINST 7310.1L).

⁷ Thirty-Six dollars is the in-government rate for an E-4 (Enclosure (2) to COMDTINST 7310.1L).

submissions are now covered by OMB control number 1625-0031. In 2005, subchapter J submissions accounted for 1,845 submissions, 24% of all submissions.⁸

Second, the number of submissions of non-subchapter J plans to both the Coast Guard and non-Coast Guard parties (American Bureau of Shipping or Authorized Classification Societies) fell considerably between 2005 and 2008. In 2005 there were 5,941 non-subchapter J submissions but in 2008 only 4,815.

16. For collections of information whose results are planned to be published for statistical use, outline plans for tabulation, statistical analysis and publication.

The Coast Guard does not intend to employ the use of statistics or the publication thereof for this information collection.

17. Approval to not display expiration date.

The Coast Guard will display the expiration date for OMB approval of this information collection.

18. Explain each exception to the certification statement.

The Coast Guard does not request an exception to the certification of this information collection.

B. Collection of Information Employing Statistical Methods.

This collection does not employ statistical methods.

⁸ This number is only for submissions made by respondents directly to the Coast Guard. Data for submissions to the American Bureau of Shipping are not available.