

**JUSTIFICATION OF CHANGE  
EXPANDED VESSEL MONITORING SYSTEM REQUIREMENT FOR THE  
PACIFIC GROUND FISH FISHERY  
OMB CONTROL NO. 0648-0573**

This request is to merge OMB Control No. 0648-0478, “Vessel Monitoring System (VMS) Program for the Pacific Coast Groundfish Fishery,” into OMB Control No. 0648-0573, “Expanded Vessel Monitoring System Requirement In the Pacific Coast Groundfish Fishery.” OMB Control No. 0648-0573 had been opened because another OMB Control No. 0648-0478 action was at OMB at the time; the new collection contained all information collection requirements from OMB Control No. 0648-0478, with additional respondents. Therefore, no hours or costs are being added from OMB Control No. 0648-0478 as part of this merger; in fact, because the number of additional vessels under OMB Control No. 0648-0573 had been overestimated, this merger shows a decrease in burden. The new estimate also reflects OMB's clarification that VMS automatic position reports are not to be counted as burden (transmission costs only are counted).

Responses have decreased from 18,096,355 to 15,975; hours have decreased from 38,334 to 8,581 and costs, from \$3,546,466 to \$2,900,250.

Once this merger is approved, OMB Control No. 0648-0478 will be discontinued.