

**Supporting Statement  
for  
Plan Review and Records for Vital System Automation**

**A. JUSTIFICATION**

**1. CIRCUMSTANCES WHICH MAKE COLLECTION NECESSARY**

(a) The collection of information pertaining to the vital automation systems of commercial vessels is necessary to protect personnel and property on board U.S. flag commercial vessels. The vital systems in machinery and engineering spaces of Coast Guard inspected commercial vessels are automated for a variety of reasons. These reasons include convenience of operation, improvements of efficiency, reduction of personnel, and the detection and control of unsafe conditions. Most automation is implemented at the discretion of the vessel owner to reduce necessary manning and increase operating efficiency, thereby significantly reducing operating costs.

(b) The Code of Federal Regulations (CFR) currently addresses the technical criteria for the safe and reliable automation of these vessels in the following sections: 46 CFR Parts 52, 56, 58, 61, 62, 110, 111, and 113. As charged and authorized by 46 U.S.C. 3306, 46 U.S.C 8105, and 49 CFR 1.46, the Coast Guard promulgated safety regulations for automated vital systems on inspected commercial vessels on 18 May 1988. The need for automation safety standards to ensure safety of life at sea is recognized by industry and documented by numerous Coast Guard casualty investigations. These regulations also ensure that U.S. flag vessels conform to the automation regulations of the International Convention for the Safety of Life at Sea. The U.S. is signatory to this convention.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention

Coast Guard

- Maritime Safety

Marine Safety, Security and Stewardship Directorate (CG-5)

- Reduce crewmember deaths and injuries on U.S. commercial vessels
- Reduce the number of collisions, allisions, and groundings

**2. BY WHOM, HOW, AND FOR WHAT PURPOSE THE INFORMATION IS TO BE USED**

This information, which is collected by the Coast Guard, is used to determine compliance with safety regulations. Through the review of the plans prior to construction, the vessel owner or builder may be assured that the vessel, if built in accordance with the plans, will meet the regulatory standards.

**3. INFORMATION TECHNOLOGY USED TO REDUCE THE BURDEN**

The Coast Guard Marine Safety Center (MSC) has established a Web site<sup>1</sup> that details the procedure for submitting plans both electronically and otherwise. The majority of electronic submissions are submitted via e-mail [msc@uscg.mil](mailto:msc@uscg.mil). However, CDs, floppy disks, and zip disks are also acceptable alternatives. Electronic submission is voluntary.

While 100% of the reporting requirements can be done electronically, at this time we estimate that approximately 18% of the responses are collected electronically.

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<sup>1</sup> Located at -- <http://homeport.uscg.mil> , select Contact Us >> Mail Address.

#### 4. EFFORTS TO IDENTIFY DUPLICATION

(a) There are no other Federal agencies with similar programs; therefore there is no duplication of other federal information collections.

(b) The unique design and construction of individual automated vessel designs generally precludes the existence and the use of prior design information. Coast Guard experience has shown that the other information collection presently authorized by OMB for Title 46 of the Code of Federal Regulations is not entirely appropriate or adequate to determine the compliance of marine engineering systems with the performance standards of the subject rules. In cases where a class of similar or identically designed vessels is evaluated, information is required for the first vessel only. Similarly, where previously approved plans and information are to be used in an identical manner and meet the criteria of 46 CFR 50.20-15, resubmittal is not required.

#### 5. IMPACT ON SMALL BUSINESSES

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

#### 6. CONSEQUENCES IF INFORMATION IS NOT COLLECTED

If this information were not collected, the Coast Guard would not be able to carry out its responsibility for the promotion of safety on commercial vessels. The information cannot be collected any less frequently, as the information is submitted when the owner seeks Coast Guard approval of automation installations or changes in vessel manning.

#### 7. SPECIAL COLLECTION CIRCUMSTANCES

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

#### 8. PUBLIC CONSULTATION

A 60-day (See [USCG-2009-0115], March 12, 2009, 74 FR 10752) and 30-day (See [USCG-2009-0115], June 24, 2009, 74 FR 30102) Notices were published in the *Federal Register* to obtain public comment on these collections. The USCG has not received any comments on these collections.

#### 9. PAYMENT OF GIFT TO RESPONDENTS

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

#### 10. CONFIDENTIALITY FOR RESPONDENTS

There are no assurances of confidentiality provided to the respondents for this information collection.

#### 11. JUSTIFICATION FOR QUESTIONS OF A SENSITIVE NATURE

There are no questions of sensitive language.

#### 12. HOOR BURDEN OF THE COLLECTION OF INFORMATION

- The estimates number of annual respondents is 55.
- The estimated number of annual responses is 800.
- The estimated annual hour burden is 60,000 hours.
- The estimated annual cost burden is \$4,380,000.

The MSC estimates that the average annual number of responses continues to be about 800 per year.<sup>2</sup> According to the MSC, the estimated time for a respondent to prepare the necessary information is approximately 75 hours. This number reflects a conservative average as some respondents simply resubmit previous years documents and therefore would have a much lower burden hour requirement while others must spend more time preparing new plans and the requisite COI documents. Plan development is not performed to meet information collection requirements, but rather in order to develop the plans necessary to build or modify the vessel. There are no recordkeeping requirements for this information collection.

Thus the annual burden may be calculated by multiplying the hours per submission by the number of submissions:

$$800 \text{ submissions} * 75 \text{ hours/submission} = 60,000 \text{ hours}$$

The cost of this collection information is the wage rate paid for the number of hours involved in developing the plan. We assume these plans are developed by someone equivalent to level GS-13, and the wage rate used is therefore \$73/hour.<sup>3</sup> The annual cost is calculated as follows:

$$800 \text{ submissions} * 75 \text{ hours/submission} * \$73/\text{hour} = \$4,380,000$$

The number of unique respondents (as opposed to submissions) in 2008 was 64 and averaged 55 for the years 2006 through 2008 (inclusively).

### 13. TOTAL ANNUALIZED CAPITAL AND START UP COSTS

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

### 14. ANNUALIZED COST TO THE FEDERAL GOVERNMENT

With some minor exceptions, the federal burden of items covered by this supporting statement will be borne by the Coast Guard's field technical office, the Marine Safety Center. This office is responsible for the review and processing of vessel plans and information. We estimate that 900 hours of labor per year are required to implement the regulation. This includes time for the review of submissions and other indirectly related tasks such as field support, industry outreach and training related specifically to the regulation. The personnel working the 900 hours have pay equal to GS-level 13. The applicable hourly rate is \$67/hour.<sup>4</sup> Thus the full cost to the Federal Government is \$60,300 (900 hours \* \$67/hour = \$60,300).

### 15. REASONS FOR CHANGES IN BURDEN

The change in burden is an ADJUSTMENT due primarily to the change in the number of plans submitted to the Marine Safety Center. For the period covered by the last Collection of Information Document (2003 through 2005), the annual average number of submissions was 872. During the period covered by the current Collection of Information (2006 through 2008), the annual average number of submissions was 800.

<sup>2</sup> Average number of yearly submissions for the years 2006 through 2008.

<sup>3</sup> Seventy-Three Dollars per hour is the figure corresponding to the "out-of-government" rate (GS-13) in Enclosure (2) to COMDTINST 73101.1L.

<sup>4</sup> Sixty-Seven Dollars per hour is the figure corresponding to the "In Government" rate (GS-13) in Enclosure (2) to COMDTINST 73101.1L.

16. PLANS TO PUBLISH INFORMATION

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

17. REASONS FOR NOT DISPLAYING THE EXPIRATION DATE FOR OMB APPROVAL

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

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

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

**B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS**

This information collection does not employ statistical methods.