

**Supporting Statement
for
Offshore Supply Vessels – Title 46 CFR Subchapter L**

A. Justification.

1. Circumstances which make the collection of information necessary.

Under the authority of the Secretary found in 46 USC 3301 *et seq.*, the Coast Guard must prescribe necessary regulations and conduct inspections of offshore supply vessels (OSVs) to secure the safety of individuals and property on board. The regulations include the design, construction, alteration, repair, and operation of these vessels, including requirements for lifesaving and firefighting equipment, inspections, and tests. Based upon this mandate, the regulations in 46 CFR Subchapter L, Offshore Supply Vessels, include reporting and posting requirements to ensure safe operation, prevent emergencies to the extent reasonably possible, and ensure proper reaction when emergencies do occur.

Title 46 USC 3301 and 3305 require that every offshore supply vessel (OSV) be inspected before it is put into service to determine its structural adequacy, that it has suitable accommodations, and generally that it is in full compliance with applicable marine safety regulations. Title 46 USC 3306 directs the Secretary to make appropriate regulations for inspections and tests to ensure that OSVs comply with standards for structural strength, propulsion and auxiliary machinery, construction materials, safety and lifesaving equipment, accommodations arrangement, vessel stability, cargo gear and structural fire protection. Title 46 USC 3307 and 3308 requires the Secretary to examine each vessel subject to inspection at proper times to ensure [continued] compliance with the laws and regulations. Presently, these examinations, are provided for in 46 CFR part 126. Title 46 CFR 126.530 provides ways of conducting re-inspection examinations of OSVs that are alternatives to re-inspection examinations conducted by Coast Guard marine inspectors. In place of Coast Guard examinations, examination reports from vessel masters or from other owner's representatives acceptable to the Coast Guard, are needed by the Coast Guard to determine whether eligible OSVs remain in satisfactory condition and continue to be reasonably fit for their intended route and service.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

Coast Guard

- Safety
- Protection of the Natural Resources

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

- Reduce crewmember deaths and injuries on U.S. commercial vessels
- Reduce the amount of oil discharged into the marine environment
- Reduce the amount of chemicals entering the environment
- Reduce the consequences of pollution incidents

2. Purpose for the information collection and consequences to the Federal program if the information was not collected.

First, the notification requirements are generally intended to ensure that the Coast Guard is aware when significant maintenance or repair work is done on offshore supply vessels. If necessary, attendance by a Coast Guard inspector may be scheduled. Also listed under 'reporting burden' are plan submittal requirements for significant modifications to existing vessels. These plans are required to be submitted for technical review prior to the modification of the vessel to ensure that the structure, arrangement, stability, and outfitting are satisfactory for the intended service. The costs and burdens estimated are strictly administrative (reproduction, handling, mailing), inasmuch as the engineering and handling would be performed whether or not the plans were submitted.

Second, the recordkeeping and posting requirements are necessary for several purposes. They make readily apparent to the crew, offshore workers, boarding officers and inspectors that the vessel is currently in compliance with various regulations and treaties. The markings and placards, which are required to be posted, provide instructions to those on board of actions to be taken to prevent or respond to an emergency. Recordkeeping requirements provide inspectors with a means to verify compliance with routine operating requirements, and with a reliable means of identifying the vessel's condition, and the number of persons on board in the event of a casualty.

Finally, the reporting requirements in 46 CFR 126.530 provide a mechanism for the owners and operators of OSVs based overseas to submit certified examination reports and statements to the Coast Guard as an alternative to Coast Guard re-inspection examinations. By providing an alternative examination procedure, the Coast Guard estimates there is a potential of cost saving to OSV owners/operators.

3. Consideration of the use of improved information technology.

Many of the requirements in Subchapter L may be satisfied by simple telephone calls or posting requirements. For information that must be submitted to the Officer in Charge, Marine Inspection (OCMI), it may be provided in writing or electronically via e-mail. Contact info for CG OCmis can be found at—<http://www.uscg.mil/top/units/>.

For plan review-related requirements, the information is vessel specific: they are one-time or on occasion submissions and generally take the form of vessel or equipment plans or operating manuals. The Coast Guard Marine Safety Center (MSC) has a Web site¹ that details how a respondent may submit plans electronically for review. Electronic submission is voluntary, and is done via e-mail.

We estimate that 50% of the reporting and recordkeeping requirements could be done electronically. At this time, we estimate that 10% of all requirements are done in electronic format.

4. Efforts to identify duplication.

There are no other agencies with similar requirements for offshore supply vessels.

¹ Located at -- <https://homeport.uscg.mil/msc>, select Contact Us >> Mail Address and E-Commerce Info.

5. Methods used to minimize burden to small business if involved.

Owing to the nature of the industry, recordkeeping requirements for small entities are generally proportionately less because of the smaller number of operations performed. In order to minimize the burden on the public, only the minimum information necessary for the Coast Guard to fulfill its regulatory functions is required to be recorded.

6. Consequences to the Federal program if collections were conducted less frequently.

Markings are needed to clearly indicate to crewmembers and vessel personnel where emergency equipment and exits are located. Reducing the frequency of collection for logbook entries would hinder or degrade the administration of the marine safety rules. Since the Coast Guard uses the information in the log books to enforce the regulations, it is imperative that the information be recorded accurately and in a timely manner.

For the reporting/recordkeeping requirements of 46 CFR 126.530, if information was submitted or recorded less frequently, no assurance could be given that vessels are operating within the applicable requirements that ensure marine safety. If the reporting or recordkeeping requirements are decreased, the Coast Guard would not be fulfilling its obligation to enforce the regulations. If this information is not collected, the Coast Guard could not offer the proposed alternative reinspection program.

7. Special circumstances due to inconsistency with the guidelines in 5 CFR 1320.6.

This information collection is conducted in manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

8. Efforts to consult with persons outside the agency.

A 60-day Notice and 30-day Notice were published in the Federal Register to obtain public comment on this collection. (See USCG-2009-0457; June 24, 2009; 74 FR 30104; November 10, 2009, 74 FR 58040). The USCG has not received any comments on this information collection.

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

There is no offer of monetary or material value for this information collection.

10. Assurances of confidentiality provided to respondents.

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

11. Additional justification for any question of a sensitive nature.

There are no questions of sensitive language.

12. Estimate of the burden hours and cost for the collection of information.

- **The annual number of respondents is 1,004.**

- The annual number of responses is 3,446.
- The estimated annual hour burden is 2,068.
- The estimated annual cost burden is \$116,325.

The requirements of Subchapter L affect approximately 3,446 offshore supply vessels responses. This figure is based upon the total number of documented offshore supply vessel reports in the United States Coast Guard's Marine Information Safety and Law Enforcement database (MISLE).

The requirements of Subchapter L affect approximately 1,004 respondents. This figure is based upon the total number of documented offshore supply vessel owners (99) and vessels (905) in MISLE.

The frequency of responses is estimated to be approximately 3.4 per annum per respondent. This estimate is based upon number of documented offshore supply vessels divided by the number of documented offshore supply vessels owners in MISLE, and it will vary considerably depending on the respondent and the number of vessels owned by the respondent.

**For these 1,004 respondents, there will be 3,446 responses.
 $(3,446 \text{ responses}) * (0.60 \text{ hrs/response})^2 = 2,068 \text{ hours annually.}$**

Cost burden of Subchapter L requirements.

An hourly rate of cost to the public per hour was estimated as \$45 (the GS-9 equivalent as prescribed in COMDTINST 7310.1L "Standard Rates") to cover the wide distribution of personnel (from deckhand to owner) who would perform the reporting requirements. We assume it would take public approximately 15 minutes to complete reporting requirements. The total annual public hours were estimated as 2,068 hours for the requirements. Assuming an overhead cost of 25 percent, the annual cost to the public is:

$$(2,068 \text{ hrs}) * (\$45/\text{hr}) * (1.25 \text{ overhead}) = \$116,325$$

13. Estimate of annualized capital and start up costs.

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

14. Annualized cost to the Federal Government and to the respondents.

The cost to the Federal Government results largely from work-hours spent preparing, issuing, and evaluating documents and verifying posting requirements are met. We estimate it would take Coast Guard personnel 15 minutes to prepare, issue, and evaluate documents and verify posting requirements. Material costs are estimated to be less than 1 percent of the total cost, based on similar reporting requirements in other subchapters.

The total annual government hours were estimated as 862 hours for the requirements. Essentially, all of the Federal Government personnel involved are Coast Guard officers. An hourly rate of \$58 was used (the Chief Warrant Officer W-2 rate as prescribed in COMDTINST 7310.1L. "Standard Rates"). The

² Using historical data on total hours divided by the number of responses.

annual cost to the Federal Government is then:

$$(3,446 \text{ responses}) * (0.25 \text{ hours})^3 * (\$58 \text{ per hour}) = \$49,967$$

15. Reasons for the change in burden.

The change in burden is an ADJUSTMENT due to a change in vessel population. Over time the CG has maintained vessel data on several agency databases. With each transition from one database to another, the amount of vessel data (e.g. level of detail) and the method for making data extractions has changed. Most recently the database change was from MSIS⁴ to MISLE.⁵ MISLE is able to house more details on vessel types and descriptions. In some cases data calls include vessels that may not have been available under a less refined database such as MSIS. As a result, the recent shift from MSIS to MISLE is the cause for the increase in vessel population.

16. For collections of information whose results will be published.

This information collection will not be published for statistical purposes.

17. Display of OMB reference number.

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 information collection does not employ statistical methods.

³ Using historical data on total hours divided by the number of responses.

⁴ Marine Safety Information System (MSIS)

⁵ Marine Information for Safety and Law Enforcement (MISLE).