## **Narrative of Changes**

The purpose of the Narrative of Changes is to clearly indicate changes to a collection since the previous approval

Collection Title: Financial Responsibility for Water Pollution (Vessels) and Limits of Liability OMB Control No.: 1625-0046 Current Expiration Date: 07/31/2012 Collection Instrument(s): CG-5586-4, CG-5586-3, CG-5586-2, CG-5586-1, CG-5586, CG-5585

The following listed below are revisions to the collection:

- The submission of this 83-C (Change request) is being submitted to change the burden reported for this collection.
- All burden associated for this collection has been documented correctly, but was not recorded properly via ROCIS. All the supporting documentation (i.e. Information Collection Package, Final Rule, etc) indicate the correct burden that should have been reflected with this collection.
- The burden for this collection should be reflected as 3,400 responses and 3,400 hours. (Currently to reflect that the collection is in Year 2 and Year 3)
- This change request will also correct the administrative error that relates to the burden that was captured in the previous approval (07/15/2009) for the collection. Therefore, this change request will show a decrease in responses by 0 and a decrease in hours by 6,600. The table below demonstrates.

	As of Feb. 2009	*As of August 2009,Year 1 (Incorrectly recorded)	As of August 2009,Year 1 (Correct Burden, but not recorded)	Submission of this Change Request (Reflects Years 2 and 3) The collection is currently in Year 2
Burden				
Responses	4,065	3,400	10,000	3,400
Time Burden (Hours)	2,262	10,000	10,000	3,400

\*The burden approval of this collection was incorrectly recorded. The burden recorded for this collection should have shown the response burden to be 10,000 and burden hours of 10,000. This increase in burden associated with this collection from Feb. 2009 to August 2009 approvals is related to the Final Rule (Coast Guard, 33 CFR Part 138. RIN 1625-AA98, Docket No. USCG-2005-21780). As a result of this rulemaking, all respondents were required to submit a revised guaranty form, including ship schedule indicating that the vessels that are provided COFRs have coverage to the amended financial responsibility applicable amounts under 33 CFR 138.80(f). As a result of this one-time collection, some respondents who normally would renew in Year 1 (when the rule was promulgated) will find that the one-time collection required for the amended liability amounts satisfies their requirement to renew their COFRs; therefore, they need only submit once during Year 1. Similarly, some respondents who normally would need to renew COFRs during Year 2 or Year 3 will not need to do so as a result of the one-time collection in Year 1.Therefore, the burden represents the maximum hour burden and cost by assuming that all respondents must renew or amend their COFRs during the upcoming three years in addition to responding to the one-time collection when the new regulations are was promulgated.