

**SUPPORTING STATEMENT
ALASKA LICENSE LIMITATION PROGRAM FOR GROUND FISH, CRAB,
AND SCALLOPS
OMB CONTROL NO. 0648-0334**

INTRODUCTION

National Marine Fisheries Service, Alaska Region (NMFS) manages the fisheries in the exclusive economic zone off the coast of Alaska under the Fishery Management Plan for Groundfish of the Gulf of Alaska, the Fishery Management Plans (FMP) for: 1) Groundfish of the Gulf of Alaska, 2) Groundfish of the Bering Sea and Aleutian Islands Management Area, 3) Bering Sea/Aleutian Islands King and Tanner Crabs, and the 4) the Scallop Fishery off Alaska. Under the Scallop FMP, management of all aspects of the scallop fishery, except limited access, is delegated to the State of Alaska. The North Pacific Fishery Management Council (Council) prepared, and NMFS approved, the FMPs under the authority of the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C. 1801 *et seq.* as amended in 2006. These FMPs are implemented by regulations at 50 CFR part 679.

This action describes a revision of this collection due to Amendment 86 to the Fishery Management Plan for Groundfish of the Gulf of Alaska, as described in the proposed rule Regulation Identifier Number (RIN) 0648-AY42.

A. JUSTIFICATION

The intended effect of the License Limitation Program (LLP) is to limit the number of participants and reduce fishing capacity in fisheries off Alaska. One of the measures used by the Council and NMFS is the LLP which limits access to the groundfish, crab, and scallop fisheries in the Bering Sea and Aleutian Islands Management Area (BSAI) and Gulf of Alaska (GOA). The LLP is intended to limit entry into federally managed fisheries.

1. Explain the circumstances that make the collection of information necessary.

Amendment 86 substantially limits the number of licenses eligible to participate in the directed Pacific cod fisheries in Federal waters of the Western and Central GOA. The intent of the amendment is to prevent the future entry or re-entry of latent fixed gear licenses into the fixed gear Pacific cod fisheries, which could have adverse effects on license holders that have recently participated in, and exhibited dependence on, these fisheries. Preventing these licenses from entering the Pacific cod fisheries in Federal waters in the future could contribute to long term stability in this fishery. In the short term, this action may not result in a perceptible change from the status quo, because most licenses with recent participation qualify for a Pacific cod endorsement. Limiting effort in the fisheries could contribute to slowing down the fisheries, although if total allowable catches (TACs) continue to decline and market conditions for Pacific cod continue to improve, the pace of the fisheries is unlikely to slow down.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

The main economic benefit from the proposed action is that it will prevent the possibility of future entry of existing latent fixed gear LLP licenses into the Western and Central GOA directed Pacific cod fisheries in Federal waters, which will primarily benefit LLP license owners who are economically dependent on the GOA Pacific cod fisheries (as defined by the Council's qualification criteria). The action may have modest distributional effects among persons eligible to enter licenses into the directed Pacific cod fisheries that are subject to the LLP.

This action would add non-severable, gear-specific Pacific cod endorsements to fixed gear licenses. These endorsements would limit entry into the directed Pacific cod fisheries in Federal waters of the Western and Central GOA management areas. The Council recommended establishing a fixed gear LLP endorsement for Pacific cod to reduce the risk that in the future vessel operators could assign latent LLP licenses to vessels, effectively reactivating those licenses and thereby increasing the amount of fixed gear effort in the Pacific cod fisheries which would adversely affect currently active participants. This adverse effect would not only increase competition and dilute their potential gross revenues but also would create incentives for harvesters to race for fish in a potentially wasteful manner. This action would effectively remove the potential for new effort in the fishery beyond currently active participants as defined by this proposed action. Thus some assurance would be provided to current participants that their fishing operations would not be disrupted.

Amendment 86 would:

- ◆ Establish a GOA Pacific cod endorsement for fixed gear LLP licenses. [No PRA effect.]
- ◆ Exempt certain vessels using jig gear in the GOA from the requirement to carry an LLP license. [No PRA effect.]
- ◆ Modify the maximum length designation of certain LLP licenses: Modification of the maximum length designation on a specific set of fixed-gear licenses would ensure that vessel owners would be able to continue using the vessel and LLP licenses in the fisheries as they have traditionally, and receive a Pacific cod endorsement applicable to the length of the vessel to which the LLP license has been assigned.
- ◆ Allow entities representing specific GOA community to receive a limited number of fixed gear licenses with Pacific cod endorsements for use on vessels designated by entities representing the communities.

Qualified community quota entities (CQE) in the Central and Western GOA shall be eligible to request, from NMFS, non-transferable fixed gear groundfish licenses with a Pacific cod endorsement for the management area in which the community is located. Each qualified CQE may request additional fixed gear LLPs up to the number listed for each CQE in the table below.

Implementation of the action would require NMFS to process and adjudicate the qualifying and non-qualifying licenses. The LLP Program file administered by NMFS will need to be updated to reflect the changes to existing licenses. Also, NMFS will need to update and make changes to databases used to store license information, in order to track Pacific cod endorsements that have non-transferable status. The addition of gear-specific Pacific cod endorsements to fixed gear licenses will introduce new administrative costs for NMFS and possibly create new enforcement costs.

NMFS would not establish an appeal process for CQEs to receive LLP licenses. The proposed action would allow CQEs to request LLP licenses, provided the specific requirements are met. If those conditions are not met, NMFS would not issue LLP licenses to the CQEs. Because NMFS is not proposing to remove or otherwise restrict existing harvest opportunities available to CQEs, no appeal process is required.

a. Application for a CQE to Receive a Non-trawl Groundfish LLP License

Entities representing specific communities may receive a limited number of fixed gear LLP licenses with Pacific cod endorsements for use on vessels designated by entities representing the communities. This is expected to:

- ◆ Provide greater economic stability for fixed gear LLP license holders with recent participation in the Central GOA and Western GOA Pacific cod fisheries.
- ◆ Reduce the potential for substantial increases in fishing effort from latent LLP license holders.
- ◆ Provide additional harvesting opportunities for residents of specific communities (see table below) located adjacent to the Western and Central GOA, including the West Yakutat District through Non-profit CQEs who hold fixed gear LLP licenses.

A groundfish license approved for issuance to a CQE by the Regional Administrator for an eligible community:

May not be transferred to any person;

Will have only the regional designation specified for that community.

Will have a maximum length overall (MLOA) of 60 feet specified on the license.

Will have only a catcher vessel designation;

Will receive only a non-trawl gear endorsement;

Will be assigned a Pacific cod endorsement with a non-trawl gear designation.

May not be assigned to any vessel other than the vessel specified for that groundfish license in the annual CQE authorization letter; and

May not be assigned for use by any person other than the person specified for that groundfish license in the annual CQE authorization letter, or any subsequent amendment to that annual authorization letter that is made by the CQE provided that NMFS receives that amendment prior to that person using that groundfish license aboard a vessel.

Non-trawl Pacific cod gear endorsements on groundfish licenses approved for issuance to CQEs shall have the following gear designations:

Only pot gear Pacific cod endorsements for groundfish licenses with a Western GOA designation to CQEs on behalf of an eligible community.

Either a pot gear or a hook-and-line gear Pacific cod endorsement for a groundfish license with a Central GOA designation to CQEs on behalf of an eligible community.

There are 21 communities eligible under the CQE Program, located in the Western and Central GOA management areas, including West Yakutat. Under the Federal LLP, the Central GOA endorsement area also authorizes vessels to fish in the West Yakutat management area, and communities located in this area are also included in this discussion. To be eligible under the Federal CQE program, a community must have fewer than 1,500 residents, lack direct road access, have direct access to saltwater, and have historic participation in the halibut and sablefish fisheries. The main benefit to the community of the CQE Program is that it could provide opportunities for new entrants who reside in the community to participate in the Federal waters directed Pacific cod fishery.

Maximum number and the regulatory area specification of groundfish licenses that may be granted to CQEs representing specific GOA communities.

Central GOA Pacific cod endorsed non-trawl groundfish license		Western GOA Pacific cod endorsed non-trawl groundfish license	
Community	Maximum Number of groundfish licenses	Community	Maximum Number of groundfish licenses
Akhiok	2	Ivanof Bay	2
Chenega Bay	2	King Cove	7
Chignik	2	Perryville	2
Chignik Lagoon	4	Sand Point	10
Chignik Lake	2		21
Halibut Cove	2		
Karluk	2		
Larsen Bay	2		
Nanwalek	2		
Old Harbor	2		
Ouzinkie	7		
Port Graham	2		
Port Lions	6		
Seldovia	6		
Tyonek	2		
Yakutat	3		
Tatitlek	2		
	50		

The CQEs, representing specific communities in the Central GOA and Western GOA, would need to submit:

- ◆ An application to receive a fixed gear LLP license endorsed for Pacific cod, the selection of fixed gear type by CQEs in the Central Gulf (CG), a description of the methods used to assign any fixed gear LLP licenses received,

- ◆ A letter of authorization for persons using LLP licenses assigned to a CQE, and
- ◆ An annual report detailing the distribution and use of LLP licenses.

Each CQE that is approved by the Regional Administrator may apply to receive groundfish licenses on behalf of the communities that the CQE is designated to represent. To receive a groundfish license a CQE must submit a complete application for a groundfish license to the Regional Administrator, NMFS, P.O. Box 21668, Juneau, AK 99802.

A CQE may apply for and may receive a maximum amount of groundfish licenses designated in the regulatory area specified for a community. Licenses would have an MLOA designation of 60 ft. Western GOA licenses would be endorsed for pot gear, and Central GOA CQEs may choose either a pot or hook-and-line endorsement. The application must be received by NMFS no later than six months after the effective date of the Amendment 86 final rule. A maximum of 50 Central GOA and 21 Western GOA licenses would be issued.

Application for a CQE to receive a Non-trawl groundfish LLP license

Identification

Name of non-profit organization

Name of contact person for the CQE

NMFS person ID number

Permanent business mailing address

Business telephone number, business e-mail address, and business fax number

Procedures to determine the distribution of LLP licenses to community residents represented by that CQE

Procedures used to solicit requests from residents to be assigned an LLP license

Criteria to determine the distribution of the use of LLP licenses among qualified community residents and the relative weighting of those criteria

Number of LLP licenses the CQE is requesting and the gear designation for each license

Application for a CQE to receive a Non-trawl groundfish LLP license, Respondent	
Total respondents	1
50 Central GOA LLP licenses	
21 Western GOA LLP licenses	
Total responses = 1	1
Frequency of response = Initial application	
Total burden hours	20 hr
Time per response = 20 hr	
Total personnel cost (\$25 x 20)	\$500
Total miscellaneous costs (129.22)	\$129
Postage (0.44 x 3 x 71 = 93.72)	
Copying (0.05 x 10 pp x 71 = 35.50)	

Application for a CQE to receive a Non-trawl groundfish LLP license, Federal Government	
Total responses	1
Total burden hours	4
Time per response = 4 hr	
Total personnel costs (\$25 x 4)	\$100
Total miscellaneous costs	0

b. Letter of Authorization for Persons Using LLP Licenses Assigned to a CQE.

The LLP is issued to the CQE and the CQE designates the vessel to which the LLP license is assigned. Prior to requesting an LLP, the CQE shall provide NMFS with a detailed plan for soliciting and determining recipients of the CQE permit.

Upon receipt of the LLPs from NMFS, the CQE shall determine who may use the LLP license and provide them with a letter of authorization. The LLP license issued cannot designate more than one vessel per LLP per calendar year. The person specified for an LLP groundfish license in an annual CQE authorization letter, or any subsequent amendment to that annual authorization letter, who operates a vessel under the authority of an LLP license issued to a CQE, must be onboard the vessel during directed fishing.

As part of this authorization letter, NMFS would require that the CQE attest that the authorized representative using a groundfish license issued to a CQE

(1) is a citizen of the United States;

(2) has maintained a domicile in a CQE community in the CG or Western Gulf (WG) eligible to receive an LLP license endorsed for Pacific cod for the 12 consecutive months immediately preceding the time when the assertion of residence is made; and

(3) is not claiming residency in another community, state, territory, or country, except that residents of the Village of Seldovia shall be considered to be eligible community residents of the City of Seldovia for the purposes of eligibility to serve as an authorized vessel operator.

The residency requirements for a vessel operator using a CQE license would ensure that residents of a specific community actively participate in the Pacific cod fishery consistent with the overall goal the Council established for CQE LLP licenses. This authorization letter would require that the CQE attest to individuals' residency, but would not require individuals to submit proof of residency to NMFS in order to use the LLP license issued to the CQE. This approach would reduce potential administrative burdens on NMFS that could be required to determine the residency of a specific person. In many cases, particularly in smaller communities, the representatives of CQEs are likely to have specific local knowledge that can be used to assess a person's claim of residency in a particular community.

The CQE must provide an authorization letter assigning a specific vessel and designating the vessel operator. The authorization letter must be sent to the authorized vessel and to NMFS, and a copy of that letter must be maintained onboard the vessel. This would help to ensure that only those persons and vessels that have been vetted through the CQE would be able to use the LLP license.

CQE Letter of authorization, Respondent	
Total respondents	21
17 Central GOA communities	
04 Western GOA communities	
Total responses = 1	21
Frequency of response = 1	
Total burden hours (5.25)	21 hr
Time per response = 1 hr	
Total personnel cost (\$25 x 21)	\$525
Total miscellaneous costs (11.34)	\$11
Postage (0.44 x 21 = 9.24)	
Copying (0.05 x 1 pp x 21 = 1.05 x 2 = 2.10)	

CQE Letter of authorization, Federal Government	
Total responses	0
Total burden hours	0
Total personnel costs	0
Total miscellaneous costs	0

c. CQE Annual Report.

CQE annual reports are required to be submitted to NMFS and the governing body of the community that the CQE represents. These annual reports serve as a means of tracking the progress of the CQEs that have received LLP licenses and of assessing whether the issuance of LLP licenses is meeting the overall goal of providing its residents access to the Pacific cod resource. The Council requested that the CQE provide information in its annual reports, describing the use of LLP licenses during a calendar year.

Consistent with the timeline required for submission of the CQE annual report under Amendment 66, these annual reports would be due by January 31 for the prior fishing year for each community represented by the CQE for which those LLP licenses were granted.

The CQE shall submit a complete annual report detailing the distribution and use of LLP licenses to the Regional Administrator, NMFS, P.O. Box 21668, Juneau, AK 99802 and to the governing body of each community represented by the CQE as identified in Table 21 to part 679 (see table on page 4).

CQE Annual Report

- The number of community residents requesting a groundfish license from the CQE
- A description of the distribution of groundfish licenses among community residents
- Vessels assigned to use the groundfish licenses
- The number and residency of crew employed on a vessel using the LLP license
- The amount of any payments made to CQEs for use of the LLP licenses, if any

CQE Annual Report, Respondent	
Total respondents	1
Total responses	1
Frequency of response = 1	
Total burden hours	40 hr
Time per response = 40 hr	
Total personnel cost (\$25 x 40)	\$1,000
Total miscellaneous costs (0.94)	\$1
Postage (0.44 x 1 = 0.44)	
Photocopy (0.05 x 10 pp x 1 = 0.50)	

CQE Annual Report, Federal Government	
Total responses	1
Total burden hours	4 hr
Time per response = 4 hr	
Total personnel costs (\$25 x 4)	\$100
Total miscellaneous costs	0

d. Survey to Verify the Length Overall (LOA) of the Vessel.

The maximum length designation on a specific set of fixed gear licenses would be modified to ensure that vessel owners would be able to continue using the vessel and LLP licenses in the fisheries as they have traditionally and receive a Pacific cod endorsement applicable to the length of the vessel to which the LLP license has been assigned.

To determine the MLOA that would be applied to the LLP license, NMFS would use the LOA of the vessel to which the LLP license is assigned at the time of the effective date of Amendment 86, if approved. If the LLP holder disagreed with the LOA on file with NMFS, and wished to provide data to NMFS establishing a different LOA for the vessel, NMFS would require that the LLP license holder provide a survey conducted by a naval architect or marine surveyor independent from the vessel owner or LLP license holder to verify the LOA of the vessel prior to approving the designation of an LLP license for that vessel, if that vessel does not have a certified survey on file.

NMFS would provide a vessel owner 90 days from the effective date of Amendment 86 to provide the survey to NMFS. The 90-day time period would provide the LLP license holder with the time necessary to have a vessel surveyed and provide that information to NMFS. NMFS would not assign a Pacific cod endorsement to an LLP license holder with a greater LOA than that provided in NMFS's record unless a timely independent survey was submitted and received by NMFS.

If no survey is provided within the 90 day time frame, NMFS would reissue the LLP license with the MLOA equal to the LOA of the vessel that the LLP license was assigned based on the LOA on file with NMFS. Any LLP license that would receive an endorsement under this provision could not be equal to or exceed 60 feet MLOA under any circumstance.

It is estimated that less than six LLP licenses would have their MLOAs adjusted by this exemption. A survey may cost an estimated \$12 to \$15 per linear foot, with potentially lower

costs per foot for larger vessels. If a certified marine surveyor is not available locally, travel costs may increase the cost of a survey.

Survey to verify the LOA of the vessel, Respondent	
Total respondents	6
Total responses	6
Frequency of response = 1	
Total burden hours	6 hr
Time per response = 1 hr	
Total personnel cost (\$25 x 6)	\$150
Total miscellaneous costs (818.28)	\$818
Surveyor costs \$13.50/vessel ft x 60 ft = 810	
Postage (0.88 x 6 = 5.28)	
Photocopy (0.05 x 10 pp x 6 = 3)	

Survey to verify the LOA of the vessel, Federal Government	
Total responses	6
Total burden hours	6 hr
Time per response = 1 hr	
Total personnel costs (\$25 x 6)	\$150
Total miscellaneous costs	0

It is anticipated that the information collected will be disseminated to the public or used to support publicly disseminated information. As explained in the preceding paragraphs, the information gathered has utility. NMFS will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with National Oceanic and Atmospheric Administration (NOAA) standards for confidentiality, privacy, and electronic information. See response to Question 10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Prior to dissemination, the information will be subjected to quality control measures and a pre-dissemination review pursuant to Section 515 of Public Law 106-554.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

The Application for a CQE to Receive LLPs and the CQE Annual Report are large reports with various sizes of pages which do not lend themselves to automated submittal. They would be mailed or delivered. The vessel length survey may contain over-sized pages if diagrams are attached; and if so would need to be mailed or delivered. The letter of authorization may be submitted as an attachment to an email.

4. Describe efforts to identify duplication.

None of the information collected as part of this information collection duplicates other collections.

5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

The directly regulated entities under this proposed rule are holders of LLP licenses endorsed for fixed gear activity who directed fish for Pacific cod in the GOA. NMFS estimates that a maximum of 956 entities hold LLP licenses with fixed gear endorsements with catcher vessel or catcher/processor endorsements; of these an estimated 908 small entities would be directly regulated by this action. Estimates of the number of small entities directly regulated by this proposed action are complicated by limited LLP license holder ownership information, and are based on available records of employment and information on participation in other fisheries.

The estimate of the number of small entities is conservative. Other supporting businesses may also be indirectly affected by this action if it leads to fewer vessels participating in the fishery. This action minimizes adverse economic impacts on the directly regulated small entities. The action would reduce the potential for substantial increases in fishing effort from latent LLP license holders, and would provide additional harvesting opportunities for CQEs who hold fixed gear LLP licenses. In no case, are these combined impacts expected to be substantial.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

Competition among fixed gear participants in the Western and Central GOA Pacific cod fisheries has intensified in recent years, and long-term participants are concerned about the potential for latent fixed gear licenses to re-enter the fisheries. The proposed amendment would address this concern by limiting future participation in the Pacific cod fishery to fixed gear licenses that have actively participated in recent years and, thus, qualify for a Pacific cod endorsement. This action may enhance stability in the GOA Pacific cod fisheries, reduce competition among fixed gear participants, and sustain the historic division of catch among recent participants. In the absence of this action, future entry of latent effort into the Western and Central GOA Pacific cod fisheries could further intensify competition among fixed gear participants and erode catches of long-term active participants.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

No special circumstances are associated with this information collection.

8. Provide a copy of the PRA Federal Register notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

The NMFS Alaska Region will submit a proposed rule, RIN 0648-AY42, coincident with this submission, requesting comments from the public.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

No payment or gift will be provided under this program.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.

The information collected is mandatory and is required to manage commercial fishing efforts under 50 CFR part 679 and under section 402(a) of the Magnuson-Stevens Act (16 U.S.C. 1801, *et seq.*). As stated on the forms and in the regulations, responses to this information request are confidential under section 402(b) of the Magnuson-Stevens Act as amended in 2006 and under NOAA Administrative Order 216-100, which sets forth procedures to protect confidentiality of fishery statistics.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

This information collection does not involve information of a sensitive nature.

12. Provide an estimate in hours of the burden of the collection of information.

Estimated total respondents: 171 up from 142. Estimated total responses: 171, up from 142. Estimated total burden: 355 up from 268 hours. Estimated total personnel costs: \$8,875 up from \$6,700.

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in Question 12 above).

Estimated total miscellaneous costs: \$2,110 up from \$1,151.

14. Provide estimates of annualized cost to the Federal government.

Estimated total responses: 150, up from 142. Estimated total burden: 232 hr, up from 218 hr. Estimated total personnel costs: \$14,200, up from \$13,850.

15. Explain the reasons for any program changes or adjustments.

Program Change. This action describes new management measures to substantially limit the number of LLP licenses eligible to participate in the directed Pacific cod fisheries in Federal waters of the Western and Central GOA.

Application for a CQE to Receive a Non-trawl Groundfish LLP License (New)

- an increase of 1 respondent and response, 1 instead of 0
- an increase of 20 hr burden, 20 instead of 0
- an increase of \$500 personnel costs, \$500 instead of \$0

an increase of \$129 miscellaneous costs, \$129 instead of \$0

Letter of authorization (New)

an increase of 21 respondents and responses, 21 instead of 0

an increase of 21 hr burden, 21 hr instead of 0

an increase of \$525 personnel costs, \$525 instead of \$0

an increase of \$11 miscellaneous costs, \$11 instead of \$0

COE Annual Report (New)

an increase of 1 respondent and response, 1 instead of 0

an increase of 40 hr burden, 40 hr instead of 0

an increase of \$1,000 personnel costs, \$1,000 instead of \$0

an increase of \$1 miscellaneous costs, \$1 instead of \$0

Survey to Verify the LOA of the Vessel (New)

an increase of 6 respondents and responses, 6 instead of 0

an increase of 6 hr burden, 6 hr instead of 0

an increase of \$150 personnel costs, \$150 instead of 0

an increase of \$818 miscellaneous costs, \$818 instead of 0

All other burden and cost remains the same.

16. For collections whose results will be published, outline the plans for tabulation and publication.

NMFS Alaska Region posts LLP license information on the web at <http://alaskafisheries.noaa.gov/ram/llp.htm#list>. The lists contain LLP groundfish and crab licenses issued as of the indicated preparation date. Data are sorted alphabetically and are updated daily. Under current regulations, vessels must be designated on the licenses and the identities of original qualifying vessels are provided for reference only.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

Not applicable.

18. Explain each exception to the certification statement.

Not applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.