

SUPPORTING STATEMENT

Title: Continuous Discharge Book, Merchant Mariner Application, Physical Examination Report, Sea Service Report, Chemical Testing Form, and Entry Level Physical Examination Report

Agency Form #: CG-719B, CG-719K, CG-719S, CG-719P, and CG-719K/E

OMB #: 1625-0040

A. JUSTIFICATION

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

Title 46, Code of Federal Regulations (46 CFR), parts 10.105(b) 10.205(a), 10.207(a), 10.209(a) (1) and 12.02-9(a) requires that each applicant for a license, certificate of registry or merchant mariner document make written application to the Coast Guard (CG Form 719B). 46 CFR parts 10.205 (a), 10.207 (e) (2) , 10.209 (d) (2) , 12.05-5 and 12.15-5 mandate that each applicant for a license or merchant mariner document must present a completed Coast Guard physical examination report (CG Form 719K) executed by the physician.

46 CFR part 10.211 mandates presentation of documentary evidence of sea service on vessels (CG Form 719S). 46 CFR parts 10.202(i) and 12.02-9(f) mandates that each applicant must produce evidence (CG Form 719P) of having passed a chemical test for dangerous drugs. 46 CFR part 12.02-17(e) requires entry-level merchant mariner document applicants to provide a statement from a qualified practitioner attesting to the applicant's medical fitness to perform the functions for which the document is issued. (CG Form 719KE)

The Supplementary Notice of Proposed Rulemaking (SNPRM) "Implementation of the Amendments to the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, and Changes to Domestic Endorsements" (RIN 1625-AA16)(Docket No. USCG-2004-17914) is proposing to add the requirement that all credentialed mariners advise the US Coast Guard National Maritime Center (NMC) of any significant change in medical conditions as defined in proposed 46 CFR 10.307(b).

2. Indicate how, by whom, how frequently, and for what purposes the information is to be used and the consequence to the Federal program or policy activities if the collection of information was not conducted.

The Coast Guard will evaluate this collected information against applicable statutes, regulations and policies solely for the purposes of determining eligibility for issuance and retention of a merchant mariner credential(s), i.e. license, certificate of registry or merchant mariner document. This evaluation is performed on occasion, meaning as submitted by the respondent when he or she applies for a Coast Guard credential or

notifies the NMC of any significant changes in their medical condition. Per the regulations, the Coast Guard needs this information to process applications only from, and issue credentials only to, applicants who can prove their identity, and whose backgrounds, training and certifications can be verified to ensure security and safety related requirements are met. This information assists the Coast Guard in its effort to help secure U.S. ports, waterways, marine infrastructure, and marine-related commercial activities, including international trade, by protecting the licensing and COR process from abuse or fraud. Additionally, the information is stored in the Merchant Mariner Licensing Database. Retaining the data in the application saves the government and the applicant from having to repeatedly submit information and documents the basis upon which the license was issued.

3. Describe whether the collection of information involves the use of automated collection techniques.

Respondents currently have the option to obtain electronic formats of the forms for this collection. The Coast Guard recently implemented email submissions of Merchant Mariner Credentials and their supporting documentation to Regional Examination Centers (RECs) starting January 4th, 2010. Please see Appendix A (attached) for submission instructions and a list of email addresses available to the public. Coast Guard also accepts submissions by fax and via paper copies. If submitted in paper, the copies are scanned into an electronic version. (Please note that Coast Guard does not accept direct submissions from examining physicians or drug testing facilities.) We currently do not have an estimate of electronic submissions as this is a new process.

4. Describe efforts to identify duplication.

As the requirements for a Coast Guard merchant mariner credential are unique and very specific, no duplication of information collected is known. These are the only records available that specifically address the requirements for issuance of a Coast Guard merchant mariner credential. No other Federal, State, or Local agencies collect this information.

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

The information collection does not impact small businesses.

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

The Coast Guard is mandated by law to issue licenses, certificates of registry, and merchant mariner documents to individuals found qualified as to age, character, habits of life, experience, professional qualifications, and physical fitness. Without the ability to collect this information, the Coast Guard would be unable to adhere to statutory and regulatory requirements.

7. Explain any special circumstances.

No special circumstances exist for this collection of information.

8. Federal Register of the agency's notice soliciting comments on the information collection prior to submission to OMB. Describe efforts to consult with persons outside the agency.

The Coast Guard published on November 17, 2009, a Notice of Proposed Rulemaking (NPRM) entitled "Implementation of the Amendments to the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, and Changes to Domestic Endorsements" [Docket No. USCG-2004-17914; RIN 1625-AA16; 74 FR 59354]. The rulemaking proposed—

- to revise the physical requirements for mariners applying for Coast Guard-issued credentials. The revisions included annual submission of physicals by pilots, removal of specific tests for color vision, revision of the vision and hearing standards, and clarification regarding demonstration of physical ability

The SNPRM now proposes -

- to add the requirement that all credentialed mariners advise the US Coast Guard National Maritime Center (NMC) of any significant change in medical conditions as defined in proposed 46 CFR 10.307(b).

As a signatory to the STCW Convention, this proposed rule is necessary to demonstrate to the International Maritime Organization that the United States has in place certain specific regulations that implement the international requirements and related amendments to the STCW Convention. The Coast Guard received no collection of information-related comments on the NPRM.

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

No payments or gifts are provided to respondents and no decisions have been made to do so.

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

No assurance of confidentiality is provided to respondents.

11. Provide additional justification for any questions of a sensitive nature.

There is no information of a sensitive (private) nature collected.

12. Provide estimates of the hour burden of the collection of information.

In FY 2007 65,299 applications (CG-719B forms) were received and processed. This is a good representation of an average year of application. An application itself takes approximately 10 minutes (= 0.167 hours) to complete, and may be hand carried or mailed to a Regional Examination Center (REC) for processing. The total hour burden based on FY 07 numbers will be approximately 10883 hours.

Total Application (TA):	65,299
Time to complete 1 application (TC):	0.167 hours per application
Original Burden hours: (TA X TC)	10,833 hours
Notifications of Change (NC)	8,000
Time to complete 1 notification (TN)	0.3333 hours per notification (20 min)
Additional Burden hours (NC X TN)	2,667 hours (rounded)
New Total Submissions	73,299
New Total Burden Hours	13,500

The Supplementary Notice of Proposed Rulemaking (SNPRM) “Implementation of the Amendments to the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, and Changes to Domestic Endorsements” (RIN 1625-AA16)(Docket No. USCG-2004-17914) is proposing to add the requirement that all credentialed mariners advise the US Coast Guard National Maritime Center (NMC) of any significant change in medical conditions as defined in proposed 46 CFR 10.307(b).

Based on information received from the NMC, an estimated 8,000 mariners annually have a significant change in medical condition which will need to be reported. This notification can be in the form of a letter provided by the medical practitioner. We estimate it will take 20 minutes to provide this documentation – 15 minutes for the medical practitioner to write the letter and 5 minutes for the mariner to supply additional relevant information. The Coast Guard estimates 8,000 mariners will need to comply annually. We estimate the additional annual hour burden for this requirement to be 2,667 hours [8,000 mariners X (20/60) hours].

13. Provide estimates of the total annual cost burden to respondents.

There are no annualized capital and start-up costs.

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

The annual cost to the government is estimated at ~~\$170~~108,000.00. This cost is for the storage of the information collected in the Merchant Mariner Licensing Database (MMLD) and is derived by multiplying the 2,000 additional burden hours estimated as being required for reviewing the notifications by an average hourly wage of \$54.

The Coast Guard estimates an additional hour burden associated with the proposed changes in the Supplementary Notice of Proposed Rulemaking (SNPRM) “Implementation of the Amendments to the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, and Changes to Domestic

Endorsements” (RIN 1625-AA16)(Docket No. USCG-2004-17914). The SNPRM is proposing to add the requirement that all credentialed mariners advise the US Coast Guard National Maritime Center (NMC) of any significant change in medical conditions as defined in proposed 46 CFR 10.307(b).

The Coast Guard would need to review the approximate 8,000 notifications submitted by the mariners. We estimate a review time of 15 minutes per record with an annually estimated 2,000 additional burden hours [8,000 records X (15/60) hrs] imposed on the Federal Government.

15. Explain reasons for any program changes.

A PROGRAM change will result from the SNPRM, “Implementation of the Amendments to the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, and Changes to Domestic Endorsements” (RIN 1625-AA16)(Docket No. USCG-2004-17914). The Coast Guard is amending its regulations governing requirements for credentialed mariners by adding the requirement that all credentialed mariners advise the US Coast Guard National Maritime Center (NMC) of any significant change in medical conditions as defined in proposed 46 CFR 10.307(b). As a signatory to the STCW Convention, this program change is necessary to demonstrate to the International Maritime Organization that the United States has in place certain specific regulations that implement the international requirements and related amendments to the STCW Convention.

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

There are no current plans to use the information for statistical purposes.

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

The OMB expiration date should and will be displayed on reports.

18. Explain each exception to the certification statement identified in “Certification for Paperwork Reduction Act Submission”.

There are no exceptions.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS.

This information is not collected through the use of statistical methods.

Appendix A: Submission of Merchant Mariner Credential (MMC) Applications to Regional Examination Centers (RECs) Using Email.



Commanding Officer
United States Coast Guard
National Maritime Center

100 Forbes Drive
Martinsburg, WV 25404
Phn: (888) 427-5662
E-mail: iasknmc@uscg.mil

December 10, 2009

SUBMISSION OF MERCHANT MARINER CREDENTIAL (MMC) APPLICATIONS TO REGIONAL EXAMINATION CENTERS (RECs) USING E-MAIL

Beginning January 4, 2010, the Coast Guard will begin accepting credential applications at the 17 Regional Examination Centers using e-mail. This bulletin provides basic information on how mariners can submit credential application packages using e-mail.

INSTRUCTIONS FOR E-MAILING APPLICATIONS TO AN REC:

- E-mail only complete application packages that meet the Coast Guard's [Application Acceptance Checklist](#) requirements.
- The subject line of your e-mail *must* be:
Your Last Name
Your First Name
Your Middle Initial
Your Mariner # (if known)
- Attach a complete application in .pdf format not exceed 10 MB in size.
- Applications must be scanned at a resolution not to exceed 300 dpi.
- The e-mail attachment must include a copy of your TWIC or TWIC application receipt.
- User fees (if applicable) must be paid using www.pay.gov. The e-mail attachment must include a copy of your pay.gov user fee receipt.

E-MAIL YOUR APPLICATION TO ONE OF THE FOLLOWING RECS:

Anchorage, AK	REC-ANC-AppSubmission@uscg.mil
Baltimore, MD	REC-BAL-AppSubmission@uscg.mil
Boston, MA	REC-BOS-AppSubmission@uscg.mil
Charleston, SC	REC-CHA-AppSubmission@uscg.mil
Honolulu, HI	REC-HON-AppSubmission@uscg.mil
Houston, TX	REC-HOU-AppSubmission@uscg.mil
Juneau, AK	REC-JUN-AppSubmission@uscg.mil
Long Beach, CA	REC-LOS-AppSubmission@uscg.mil
Memphis, TN	REC-MEM-AppSubmission@uscg.mil
Miami, FL	REC-MIA-AppSubmission@uscg.mil
New Orleans, LA	REC-NEW-AppSubmission@uscg.mil
New York, NY	REC-NYC-AppSubmission@uscg.mil
Oakland, CA	REC-OAK-AppSubmission@uscg.mil
Portland, OR	REC-POR-AppSubmission@uscg.mil
Seattle, WA	REC-SEA-AppSubmission@uscg.mil
St. Louis, MO	REC-SLM-AppSubmission@uscg.mil
Toledo, OH	REC-TOL-AppSubmission@uscg.mil

Questions regarding this new submission process should be directed to the NMC Mariner Information Call Center at 1-888-IASKNMC (1-888-427-5662). We thank you for your continued support and patience as we continue to improve service to mariners.

Sincerely,

David C. Stalfort
Captain, U. S. Coast Guard
Commanding Officer