Supporting Statement
for
Enhanced Maritime Domain Awareness via
Electronic Transmission of Vessel Transit Data

A. Justification

1. Circumstances that make the collection of information necessary.

As stated in *The National Strategy for Maritime Security* (September 2005)[1] (NSMS), a key national security requirement is the effective understanding of all activities, events, and trends within any relevant domain – air, land, sea, space, and cyberspace – that could threaten the safety, security, economy, or environment of the United States and its people. Awareness and threat knowledge are critical for securing the maritime domain[2] and the key to preventing adverse events. Knowledge of an adversary's capabilities, intentions, methods, objectives, goals, ideology, and organizational structure, plus factors that influence this behavior, are used to assess adversary strengths, vulnerabilities, and centers of gravity. Also, information on critical infrastructure and other potential targets of adverse events allows for their adequate protection and coordination of efforts to provide that protection. Such knowledge is essential to supporting decision-making for planning, identifying requirements, prioritizing resource allocation, and implementing maritime security operations. Domain awareness enables the early identification of potential threats and enhances appropriate responses, including interdiction at an optimal distance with capable prevention forces.

The Maritime Transportation Security Act of 2002 (MTSA) (Pub. L. 107-295, 46 U.S.C. 70115) mandates, consistent with international treaties, that the U.S. Coast Guard (delegated from the Secretary) "develop and implement a long-range automated vessel tracking system for all vessels in United States waters that are equipped with the Global Maritime Distress and Safety System [GMDSS] or equivalent satellite technology. The system shall be designed to provide the Secretary the capability of receiving information on vessel positions at interval positions appropriate to deter transportation security incidents. The Secretary may use existing maritime organizations to collect and monitor tracking information under the system." The International Convention for the Safety of Life at Sea (SOLAS), 1974, as amended, implemented the international regime for Long Range Identification and Tracking (LRIT) of Ships in SOLAS, Chapter V, Regulation 19-1 (SOLAS V/19-1). The U.S. implementing regulations are in 33 CFR 169 subpart C.

The collection of information also supports the following strategic goals:

Department of Homeland Security

[1] Found at -- http://www.dhs.gov/xlibrary/assets/HSPD13_MaritimeSecurityStrategy.pdf.

[2] As defined in The National Strategy for Maritime Security, the "maritime domain" is all areas and things of, on, under, relating to, adjacent to, or bordering on a sea, ocean, or other navigable waterway, including all maritime-related activities, infrastructure, people, cargo, and vessels and other conveyances. Note: The maritime domain for the United States includes the Great Lakes and all navigable inland waterways such as the Mississippi River and the Intra-Coastal Waterway.

- Awareness – Identify and understand threats, assess vulnerabilities, determine potential impacts and disseminate timely information to our homeland security partners and the American public.
- Prevention – Detect, deter and mitigate threats to our homeland.
- Protection – Safeguard our people and their freedoms, critical infrastructure, property, the economy of our nation from acts of terrorism, natural disasters, or other emergencies.

United States Coast Guard

- Maritime Security – Protect the public, the environment, and U.S. economic interests – in the nation's ports and waterways, along the coast, on international waters, or in any maritime region as required to support national security.
- Maritime Safety – Protect our maritime borders from all intrusions by halting the flow of illegal drugs, aliens, and contraband into this country through maritime routes; preventing illegal fishing; and suppressing violations of federal law in the maritime region.
- Protection of Natural Resources – Eliminate environmental damage and natural resource degradation associated with all maritime activities, including transportation, commercial fishing, and recreational boating.
- National Defense – Defend the nation and enhance regional stability in support of the National Security Strategy.
- Maritime Mobility – facilitate maritime commerce, and reduce interruptions and impediments to the economic movement of goods and people, especially in Vessel Traffic Service areas.

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

- Maritime Security
- Maritime Safety
- Protection of Natural Resources

2. By whom, how, and for what purpose the information is to be used.

Whom: The United States Coast Guard collects and retains vessel information that is broadcast via transponder-style equipment (such as LRIT). This information is primarily used by the USCG. However, the data, combined and correlated with other information may be shared with Federal, State, and local government agencies and foreign governments partnering with the Coast Guard in an effort to expand Maritime Domain Awareness (MDA); and, with other responsible maritime interest to enhance marine safety, security and environmental protection.

How: As discussed above, the MTSA mandates the Coast Guard require certain vessels to transmit vessel transit data. Data from the vessels transmitted by LRIT is collected and compiled outside of the LRIT system to provide the Coast Guard with a near real-time common operating picture of the maritime environment. The Coast Guard compiles this data, correlates it with other sources to which the Coast Guard has access, and analyzes this information to detect anomalies and identify potential threats to the nation and the environment. The information is included in the Coast Guard's

Common Operational Picture (COP) for sharing and disseminating to decision-makers. The COP is the primary National Maritime system for sharing operational data among those who need it to perform or support Coast Guard roles and other national missions.

For What Purpose: This information collection, storage, and analysis greatly expands the breadth and depth of the Coast Guard's MDA. The LRIT enhances security by providing the United States with the identities and current locations of vessels off our coastlines. This information gives the United States time to evaluate a potential security risk posed by a vessel and then, if necessary, provides time to respond to the risk of a possible security threat. The LRIT information also offers additional safety benefits by enhancing the information available to Search and Rescue (SAR) services. Accurate information on the location of a vessel in distress as well as vessels in the area that could lend assistance will save valuable response time to affect a timely rescue. The storage of vessel transit data also allows for analysis in support of such needs as vessel movement trend analysis, anomaly detection, and increasing efficiencies in the performance of Coast Guard missions.

3. Consideration of the use of improved information technology.

Vessel transit data is collected electronically via a transponder-style system. Transponders transmit information automatically without the need for voice radio communications. We estimate that 100% of the reporting requirements are done electronically.

4. Efforts to identify duplication. Why similar information cannot be used.

There is no other Federal, State, or local agency that requires this information collection. Therefore, there is no duplication of information collection efforts by the government. The information collected from this effort may be used by other agencies in support of their own goals.

5. Methods to minimize the burden to small businesses if involved.

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

6. Consequences to the Federal program if collection were not done or conducted less frequently.

If vessel transmissions were not collected, the Coast Guard would not gain critical identification information on a large and diverse population of vessels transiting our maritime domain. This could significantly impact marine safety, security and environmental protection, limit the Coast Guard's ability to respond to a vessel emergency in a timely and efficient manner, and could undermine our MDA.

7. Explain any special circumstances that would cause the information collection to be conducted in a manner inconsistent with guidelines.

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

8. Consultation.

A 60-day Notice was published in the *Federal Register* to obtain public comment on this collection. (See [USCG-2011-0336]; May 9, 2011; 76 FR 26746). Also, a 30-day Notice was published in the *Federal Register* to obtain public comment on this collection (July 15, 2011; 76 FR 41806). The Coast Guard has not received any comments on this information collection.

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

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

10. Describe any assurance of confidentiality provided to respondents.

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

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

There are no questions of sensitive language.

12. Estimates of reporting and recordkeeping hour and cost burdens of the collection of information.

Total number of annual respondents:	**613**
Total number of annual responses:	**613**
Total annual hour burden:	**204**
Total annual cost burden:	**$ 22,848**

FOR THE LRIT REPORTING AND RECORDKEEPING REQUIREMENTS—

The estimated number of respondents is 613 annually. We estimate the number of responses to be 613 annually.

We estimate that annually each respondent will have a 20 minute burden. This burden accounts for—

- a one-time GMDSS LRIT system initialization for each vessel,
- subsequent annual system check, and
- occasional logbook entries when a ship master switches off the LRIT equipment or the LRIT equipment fails to operation.

Once the LRIT equipment is on and initialized, no further action is necessary. Data transmission from the equipment will occur automatically.

Therefore, we estimate the **annual hour burden is 204 hours**[3] for all vessels (613 U.S. ships x 1/3 hour = 204 hours). Assuming the Vessel's Master performs the required LRIT actions (at an hourly rate of $112/hour[4], the **annual cost burden is $22,848** (204 hours X $112/hour).

13. Estimates of annualized capital and start-up costs.

There are no capital[5], start-up or maintenance costs associated with this information collection.

14. Estimates of annualized Federal Government costs.

For LRIT, we estimate that the U.S. Government will incur data transmission costs of approximately $223,750 (613 vessels x 4 transmission per day/vessel x 365 days/year (or about 895,000 transmissions) x $0.25 per transmission) annually from U.S. vessels.

15. Explain the reasons for the change in burden.

The change (i.e., increase) in burden is an ADJUSTMENT. The ADJUSTMENT (increase in respondents (+163), responses (+163) and burden hours (+54)) is the result of a change in the vessel population. The LRIT carriage requirements and the methodology for calculation burden remain unchanged.

16. For collections of information whose results are planned to be published for statistical use, outline plans for tabulation, statistical analysis and publication.

This information collection will not be published for statistical purposes.

17. Approval to not display expiration date.

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

[3] Figure rounded.

[4] Equivalent to a Coast Guard Commander (i.e., O-5) (out-of-government rate), per COMDTINST 7310.1L.

[5] While there are no capital costs associated with this ICR, the estimated cost of a GMDSS unit is about $3,000 (see LRIT Final Rule).

This information collection does not employ statistical methods.