

B. Collection of Information Employing Statistical Methods - The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on the Form OMB 83-I is checked, "Yes," the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

a. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection methods to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

Sampling Frame and Coverage

The ultimate unit of analysis includes all U.S. marine terminals that have waterside berths and are engaged in the movement of international freight. This includes all categories of cargo, i.e., containerized, general, bulk, breakbulk, and neobulk. MARAD plans to collect data from many terminals in the US. The purpose of this study is to determine the amount and nature of cargo throughput in U.S. marine terminals that are engaged in the movement of international freight.

There is no current sampling frame of all terminals. A list of all terminals can be obtained through the U.S. Army Corps of Engineers (USACE) Geographic Distribution of U.S. Waterway Facilities database. However, the data are not completely current. In order to verify which terminals are closed and identify new ones, MARAD will also be contacting both public port authorities and private terminal companies. MARAD already has a list of all public port authorities. MARAD will obtain a comprehensive list of private terminal companies and their headquarters information from two sources: The World Shipping Council and The National Association of Waterfront Employers (NAWE).

There are two survey instruments that will be used in this process. The *Marine Port Survey* will be provided to the public port authorities to first determine all the terminals under their jurisdictions. Similarly, the *Marine Terminal Company Survey* will be provided to independent public and private companies involved in terminal operations.

Based on initial determinations from the U.S Army Corps of Engineers (USACE) Geographic Distribution of U.S. Waterway Facilities database, MARAD expects the total number of in-scope terminals to be about 1400.

However this number may change slightly based on the identification of new and closed terminals from the responses to the *Marine Port Survey* that will be sent to 146 Port Authorities out of 361 major ports in the U.S. and the *Marine Terminal Company Survey* that MARAD expects to send to about 50 private terminal companies. The estimate of total number of port authorities and private terminal companies (representing both U.S. and foreign owners) were also obtained from the USACE database. The number of private terminal companies may change slightly based on updates from NAWA and the World Shipping Council during the process of frame updating.

Through this process MARAD expects to have 100 percent coverage for in-scope terminals at a given point in time. Given the changes in terminal ownership and functions, MARAD feels that a survey once every two years will result in appropriate estimates of cargo throughput in ports and terminals engaged in the movement of international freight.

Data Collection Procedures and Response Rates

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In each case, the survey questionnaire will be sent to the head of the organization as designated. In each case, a primary contact will be asked to be named for follow-up communication and contact. We anticipate that the planning offices will ultimately be responsible for completing the surveys. With the survey instrument and follow-up efforts (e.g., telephone contacts and emails) we anticipate a 50% response rate from each of the survey instruments.

A cover letter will accompany each survey. The primary purpose of this letter is to explain: (1) the purpose of the survey questionnaire and its importance to the U.S. government, (2) the scope of the data being collected and (3) MARAD's policy and promise of confidentiality to protect their interests.

We will explain the importance of the survey, the confidentiality of the data, and what objectives concerning port and terminal intermodal access issues will be pursued. MARAD plans to send out the first survey in September of 2011 with a publication date in February 2012. The surveys will be sent out every other year from then.

b. Describe the procedures for the collection of information including: * Statistical methodology for stratification and sample selection, * Estimation procedure, * Degree of accuracy needed for the purpose described in the justification, * Unusual problems requiring specialized sampling procedures, and * Any use of periodic (less frequent than annual) data collection cycles to reduce burden.

Statistical methodology for stratification and sample selection, and estimation procedures will not be used. For our purposes, total and comprehensive

coverage provides the best and only estimate of system performance, since terminals and ports are not alike.

c. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

If responses are not received within two weeks of mail out, MARAD will start follow up communication with respondents to determine if they received the questionnaire and whether they have any questions. A maximum of 30 days will be allotted for responses. This will be followed by follow-up communication to identified responders for an additional 30 days. Considering the number of surveys, we will allow another 30 days for additional responses and to make sure that we reach at least a 75 percent response rate. In addition, MARAD expects to prefill as much basic contact and other information as possible obtained through secondary sources in order to reduce the burden on respondents. MARAD hopes that this reduced burden will help increase response rates.

Since MARAD is interested in totals of different cargo throughput related factors, it is very important that high response rates are achieved. Response rates will not only be evaluated in terms of the number of non-responding terminals, but also based on how much cargo these terminals handle. Some sense of non-response bias may be obtained based on data on the terminals that will be obtained from the USACE database, port authorities and terminal companies.

d. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of test may be submitted for approval separately or in combination with the main collection of information.

As outlined in A. 8., MARAD Beta tested the survey instruments with representatives from AAPA, NAWA, WSC and APM Terminals, Inc. We also Beta tested at three port authorities to gauge responses in geographic regions. The survey instruments have been adjusted based on comments and suggestions received. Since then, we conducted and completed the first Port and Terminal Data Survey in 2009. Although responses were not to the level we were anticipating, we feel we have a solid foundation to build upon for the next wave of surveys.

e. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

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