

**Supporting Statement  
for  
Plan Approval and Records for Electrical Engineering  
Regulations -- Title 46 CFR Subchapter J**

**A. Justification.**

1. Circumstances that make the collection of information necessary.

These regulations contain the primary standards for the review of electrical installations on all new U.S. Coast Guard certificated vessels except small passenger vessels. Recent amendments to the regulations clarify the regulations, bring them up to date, and delete unnecessary requirements. The revisions to Subchapter J reduced the reliance on domestic standards and adopted SOLAS and other international standards developed through consensus by the international maritime community. The information collection requirements described in this supporting statement are necessary to implement the regulations in 46 CFR Parts 110 through 113.

The Coast Guard requires industry complete electrical engineering plans to meet performance requirements on new-built vessels. These requirements help resolve much of the confusion during inspections that has risen due to the varying special missions of modern merchant vessels.

The collection of information is needed to demonstrate that certain specific regulations implement the international requirements. The requirements generally reflect routine practices for U.S. merchant companies.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

Coast Guard

- Maritime Safety
- Maritime Stewardship

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

- Safety: Eliminate deaths, injuries, and property damage associated with commercial maritime operations.
- Human and Natural Environment: Eliminate environmental damage associated with maritime transportation and operations on and around the nation's waterways.

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

The purpose of the information collection is to ensure compliance with electrical safety regulations. Through the review of the plans prior to construction, the vessel owner or builder may be assured that the vessel, if built in accordance with the plans, will meet regulatory standards.

3. Considerations of the use of improved information technology.

We estimate that 100% of the reporting requirements can be done electronically. At this time, we estimate that approximately 62% of the responses are collected electronically. The information may be e-mailed to the Coast Guard's Marine Safety Center (MSC) at the following link [MSC@uscg.mil](mailto:MSC@uscg.mil). Amplifying information on this capability may be found at the MSC pages on the Coast Guard's "Homeport" internet portal, at the following link: <http://homeport.uscg.mil/msc>.

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

There is no State or local regulations relating to this issue. No similar information collection is conducted by other federal agencies. Similar information does not exist.

5. Methods to minimize the burden to small entities 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 conducted less frequently.

The information cannot be collected any less frequently because the information is submitted only when the owner seeks Coast Guard approval of ship design or modification.

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 and a 30-day Notice were published in the *Federal Register* to obtain public comment on this collection. (See [USCG-2011-0119]; March 21, 2011; 76 FR 15330; and June 14, 2011; 76 FR 34737). The USCG has not received any comments on this information collection.

9. Explain any decision to provide any 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.

- **The estimated annual number of respondents is 186.**
- **The estimated annual number of responses is 4,754.**
- **The estimated annual hour burden is 4,754 hours.**
- **The estimated annual cost burden is \$399,336.**

The burden of information submission is not an annual requirement. This information must be supplied to the Coast Guard only upon ship construction or modification. Plan development is not performed to meet information collection requirements, but rather in order to develop the plans necessary to build or modify the vessel. The actual hour burden solely due to information collection would be that time necessary to organize and submit their copy of the plans and drawings to submit to the Coast Guard, which is one hour.

The average annual number of respondents is 186 respondents. Given that one respondent typically submits more than one plan each year; the annual number of submissions is 4,754.<sup>1</sup> Furthermore, approximately one hour is required to complete each submission.

Under these assumptions, the annual hour and cost burdens to respondents are the following:

$$\begin{array}{lcl} \text{Hour Burden: } & \mathbf{4,754 \text{ hours}} & = \quad (1 \text{ hour/submission}) (4,754 \text{ submissions}) \\ \text{Cost Burden: } & \mathbf{\$399,336} & = \quad (\$84/\text{hour})^2 (4,754 \text{ hours}) \end{array}$$

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

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

14. Estimates of annualized Federal Government costs.

Government costs are accumulated from the examining and reporting of electrical engineering submissions. The electrical plan reviews are conducted at the MSC and require approximately 7 hours for review. Furthermore, an individual at the Lieutenant level or at the GS-13<sup>3</sup> level performs these reviews, with an hourly rate ranging between \$67 and \$73, thus we use \$70/hour.

Therefore, the annual hour burden to the Federal Government is 33,278 hours [4,754 reviews × 7 hours/review]. The annual cost burden to the Federal Government is \$2,329,460 [4,754 reviews × 7 hours/review × \$70/hour].

15. Explain the reasons for the change in burden.

<sup>1</sup> The number of responses per respondent varies, from 1 or a few responses (i.e., plan submissions) to dozens of responses per respondent per year. On average, the Coast Guard receives annually about 25 responses per respondent.

<sup>2</sup> Equivalent to an O-3 (outside govt.) wage rate from COMDTINST 7301.1L

<sup>3</sup> Wage rates from COMDTINST 7301.1L

The change (i.e., increase) in burden is an ADJUSTMENT due to a change in the number of plans received by the MSC. There is no proposed change to the reporting or recordkeeping requirements of this collection. The reporting and recordkeeping requirements and the methodology for calculating 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. Explain the reasons for seeking not to display the expiration date for OMB approval of the information of collection.

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.**

This information collection does not employ statistical methods.