

**Supporting Statement
for
Towing Vessels – Title 46 CFR Subchapter M**
(with proposal by USCG-2006-24412)

Summary of Proposed Rule

The proposed rule would burden owners and operators of towing vessels, third-party auditors and surveyors with new collection of information.

Owners and operators of towing vessels that would be required to develop, complete and implement a safety management system at the management level and comply with safety management system verification through audits and surveys at the vessel level would be burdened with new reporting and recordkeeping requirements.

Third-party organizations conducting audits and surveys would also be burdened by new collection requirements to obtain the approval of the Coast Guard and renew their status as an approved third-party organization every five years.

The burden and cost to the Coast Guard results largely from man hours reviewing reports from industry to approve or deny applications for the issuance of a Certificate of Inspection, conducting compliance examinations of towing vessels at least every five years and overseeing the third-party organizations through approval and observation.

For more information about the affected parties and impacts of the proposed requirements, see the “Preliminary Regulatory Analysis and Initial Regulatory Flexibility Analysis,” Docket Number USCG-2006-24412, which will be available on the public docket at <http://www.regulations.gov>.

We will collect comments from the public, and we will consider them for future analysis of the burden. The following is an analysis of the additional burden and costs associated with this proposed collection requirements from this proposed rule.

A. PROPOSED JUSTIFICATION

1. Circumstances making the collection necessary.

The inspection of towing vessels is necessary to implement section 415 of the Coast Guard and Maritime Transportation Act of 2004. The statutory authority for the Coast Guard to prescribe, change, revise, or amend the affected domestic regulation, 33 CFR parts 160, 161, 164, and 165, and 46 CFR parts 2, 15, and add parts 136 to 144 is provided under 33 U.S.C. 1223, 1231; 46 U.S.C. 8502 and Chapter 701; as delegated to the Coast Guard in the Department of Homeland Security Delegation No. 0170.1.

Section 415 added towing vessels, as defined in section 2101 of title 46, United States Code, as a class of vessels that are subject to safety inspections under chapter 33 of that title.

Section 415 also added new section 3306(j) of title 46, authorizing the secretary of the department in which the Coast Guard is operating to establish by regulation a safety management system appropriate for the characteristics, methods of operation, and nature of service of towing vessels.

The proposed collection requirements support the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

Coast Guard

- Maritime Safety
- Protection of Natural Resources

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 proposed information is to be used.

The Coast Guard would use the proposed information collection to document that towing vessels meet inspection requirements of 46 CFR Subchapter M. The information is needed for the proper administration and enforcement of the proposed towing vessel inspection program. The respondents are the owners and operators of towing vessels, third-party auditors and surveyors that would be required to complete various forms, reports and keep reports.

3. Consideration of the use of improved collection technology for proposed collection of additional information.

The proposed information requirements under this ICR are both of reporting and recordkeeping nature. The manner in which reporting and recordkeeping requirements are satisfied depends on the element.

We estimate that 90% of the reporting and recordkeeping requirements can be done electronically. At this time, based on our experience with inspections of comparable vessels, we estimate that 15% of the responses will be collected electronically.

4. Efforts to identify duplication of the proposed, additional collection. Why similar information cannot be used.

There are no other Federal agencies with similar programs. Other agencies involved in maritime affairs do not collect similar information. The Coast Guard is the only agency collecting this information for use as described in the answer to justification 2 above. There is no similar information available that could be used or modified for these purposes.

5. Methods to minimize the additional burden to small entities if involved.

Most of towing vessels that would be inspected under the proposed 46 CFR Subchapter M are owned and operated by small entities. The Coast Guard would take steps to provide these owners and operators with flexibility and options to comply with proposed requirements. Though the Coast Guard establishes a deadline to conduct inspection for certification, a towing vessel owner is able to submit an application for inspection well in advance of the deadline so that the inspection may be completed at a more convenient time.

6. Consequences to the Federal program if Coast Guard conducts the proposed, additional collection less frequently.

Reducing the frequency of collection would hinder or degrade the administration of the towing vessel inspection program.

7. Explain any special circumstances that would cause the proposed, additional 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. Solicitation of comments and consultation with persons outside the agency.

The NPRM comment period will offer the public an opportunity to comment on this information collection.

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

No payments or gifts are provided to the proposed respondents.

10. Describe any assurance of confidentiality of information for the proposed additional collection requirements.

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

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

The proposed, additional information collected is not of a sensitive nature.

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

The number of respondents in the first year and recurring annually for the two years following is 1,059 owners and operators of 5,208 towing vessels and 175 third-party organizations. Respondents would have to report and keep records with varying frequencies. The frequency of each regulation creating a new burden for corresponding respondents is detailed in the tables of Appendix A for the private sector.

The estimated total annual responses would be 78,424 and the recurring industry burden (hours and cost) is 123,454 hours and \$3,858,603.¹

In estimating annual burden for the private sector, we use the mean industry hourly wage of \$30/hour from the “2007 Occupational Employment and Wages for Captains, Mates and Pilots of Water Vessels” and \$18.00/hour from the “2007 Occupational Employment and Wages for Motorboat Operators” published by the U.S. Bureau of Labor Statistics.² We applied the 1.40 load factor to \$30 to estimate \$42 loaded hourly wage rate (\$30/hour mean wage/hour x 1.40 benefit multiplier) and applied the same 1.40 load factor to \$18/hour to estimate \$25 loaded hourly wage rate (\$18/hour mean wage/hour x 1.40 benefit multiplier).³

We apply a load factor (or benefits multiplier) of 1.40, to determine the actual cost of employment to employers and industry.⁴ We consider these estimates for the unit cost of labor to be a reasonable average labor cost to employers and industry.

Table 1. below presents the summary of annual reporting and recordkeeping burden hours by part. Please see Appendix A for the detailed breakdown of estimated total annual burden hours.

¹ We estimated the total recurring industry burden by computing the mean of burden estimates for the first three years (2010-2012) of the proposed requirements that are presented in Appendix A. The burden estimates may not match those shown in the Regulatory Analysis due to rounding and

² <http://www.bls.gov/oes/current/oes535021.htm> and www.bls.gov/oes/current/oes535022.htm

³ We apply a load factor (or benefits multiplier) of 1.40, to determine the actual cost of employment to employers and industry. This load factor is within the range of potential benefit multipliers for transportation professionals based on 2007 BLS compensation data (<http://www.bls.gov/ncs/ect/data.htm>).

⁴ This load factor is within the range of potential benefit multipliers for transportation professionals based on 2007 BLS compensation data (<http://www.bls.gov/ncs/ect/data.htm>).

Table 1. Private Sector Reporting and Recordkeeping Burden Estimate

46 CFR Regulation	Description	Total Private Sector Annual Burden*	
		Hours	Cost (\$)
Part 136	Certification	987	41,472
Part 137	Vessel Compliance	63,826	1,526,511
Part 138	Towing Safety Management Systems	24,639	1,034,817
Part 139	Third Party Organizations	1,403	58,926
Part 140	Operations	21,415	899,416
Part 141	Lifesaving	4,583	114,576
Part 142	Fire Protection	19	804
Part 143	Machinery and Electrical Systems and Equipment	6,405	175,614
Part 144	Construction and Arrangement	177	6,467
TOTAL		123,454	3,858,603

*Burden estimates are distributed equally over the 3-year ICR renewal period.

13. Estimate of annualized capital and start-up costs to proposed collection requirements.

There would be no capital or start-up costs.

14. Estimate of annualized Federal Government costs.

There are Federal Government costs. In estimating those costs for the Federal Government (Coast Guard), we use the GS-13 hourly wage of \$67/hour from the “Commandant Instruction 7310.1L” as an equivalent wage rate for Coast Guard officers who would be reviewing reports from industry to approve or deny applications for the issuance of a Certificate of Inspection, conducting compliance examinations of towing vessels at least every five years and overseeing the third-party organizations through approval and observation.⁵

Table 2. below presents the summary of annual burden hours by part for the Federal Government.⁶ Please see Appendix B for a detailed outline of the annual Federal Government costs.

⁵ www.uscg.mil/directives/ci/7000-7999/CI_7310_1L.PDF

⁶ The burden estimates may not match those shown in the Regulatory Analysis due to rounding and presentational differences.

Table 2. Government Reporting and Recordkeeping Burden Estimate

46 CFR Regulation	Description	Total Annual Burden to Federal Government (Coast Guard)	
		Hours	Cost (\$)
Part 136	Certification	876	58,698
Part 137	Vessel Compliance	1,870	125,260
Part 138	Towing Safety Management Systems	1,780	119,271
Part 139	Third Party Organizations	1,186	79,445
Part 140	Operations	2,998	198,223
Part 141	Lifesaving	14	930
Part 142	Fire Protection	2	103
Part 143	Machinery and Electrical Systems and Equipment	188	12,539
Part 144	Construction and Arrangement	8	488
TOTAL		8,921	594,957

*Burden estimates are distributed equally over the 3-year ICR renewal period.

15. Explain the reasons for proposed burden.

The burden is a program change due to the proposed towing vessel inspection program.

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

There are no plans to use statistical analysis or to publish this additional information.

17. Explain the reasons for seeking not to display the expiration date for OMB approval of the proposed information that would be collected.

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 proposed, additional collection of information does not employ statistical methods.

Appendix A Total Annual Burden Estimates (Industry and Other)

Note: “*” denotes company

Regulation	Frequency	Annual time burden/ vessel (hours)	Number of vessels or companies affected per year	Total annual time burden (hours)	Unit time cost (\$/hour)	Year 1		Year 2		Year 3	
						Hours	Cost (\$)	Hours	Cost (\$)	Hours	Cost (\$)
Reporting											
Part 136 – Certification(begins in Year 3 after phase-in period)											
136.210 (b) (1)	Every 5 yrs.	0.50	1,302	651	42	-	-	-	-	651	27,342
136.210 (b) (2)	Every 5 yrs.	0.50	1,302	651	42	-	-	-	-	651	27,342
136.210 (b) (3)	Every 5 yrs.	0.50	1,302	651	42	-	-	-	-	651	27,342
136.210 (b) (4)	Every 5 yrs.	0.50	1,302	651	42	-	-	-	-	651	27,342
136.220	Every 5 yrs.	0.08	1,302	109	42	-	-	-	-	109	4,557
136.235 (b)	Annual	0.50	130	65	42	-	-	-	-	65	2,734
136.235 (c)	Annual	0.50	57	29	42	-	-	-	-	29	1,197
136.240 (b) (1)	Annual	0.50	26	13	42	-	-	-	-	13	547
136.245 (b) (4)	Annual	0.50	26	13	42	-	-	-	-	13	547
136.245 (c) (1)	Annual	0.50	26	13	42	-	-	-	-	13	547
136.245 (c) (2)	Annual	0.50	26	13	42	-	-	-	-	13	547
Part 137 - Vessel Compliance (begins in Year 3 after phase-in period)											
137.130 (e)	One time	0.5	1,302	651	42	-	-	-	-	651	27,342
137.135 (a)	One time	1.00	1,302	1,302	42	-	-	-	-	1,302	54,684
137.200 (a)	Every 5 years	16.00	1,302	20,832	42	-	-	-	-	20,832	874,944
137.205	Every 5 years	16.00	1,005	16,080	42	-	-	-	-	16,080	675,360
137.210	One time and every 5 years	16.00	3,868	12,378	42	-	-	-	-	12,378	519,859
137.300 (a)	Twice in 5 years	0.50	1,302	651	42	-	-	-	-	651	27,342
137.305 (a) (1)	Twice in 5 years	16.00	121	1,930	42	-	-	-	-	1,930	16,209
137.305 (a) (2)	Once in 5 years	16.00	214	3,430	42	-	-	-	-	3,430	28,815
Part 138 - Towing Safety Management Systems (* begins in Year 3 after phase-in period)											
138.305	TSMS Certificate	1.00	530	530	42	530	22,260	530	22,260	530	22,260
138.310 (w/o SMS)	Internal Audits	16.00	827	13,232	42					13,232	555,744
138.310 (w/ SMS)		1.00	232	232	42					232	9,744
138.315 (a)	External Audits	8.00	414	3,312	42	3,312	139,104	3,312	139,104	3,312	139,104

138.315 (a)		2.00	116	232	42	232	9,744	232	9,744	232	9,744
138.315 (b) (1)		8.00	1,134	9,072	42	9,072	381,024	9,072	381,024	9,072	381,024
138.315 (b) (1)		1.00	1,471	1,471	42	1,471	61,782	1,471	61,782	1,471	61,782
138.500	Notification prior to audit	0.25	1,302	326	42	326	13,671	326	13,671	326	13,671
138.505	Submittal of audit results	1.00	5,208	5,208	42	5,208	218,736	5,208	218,736	5,208	218,736
Part 139 – Third-Party Organizations (* begins in Year 2 or 3 after phase-in period)											
139.120	One time	16.00	175	2,800	42	2,800	117,600	-	-	-	-
139.135	Annual*	0.25	18	5	42	-	-	5	189	5	189
139.140	Annual*	8.00	44	350	42	-	-	-	-	350	14,700
139.165	Annual	1.00	175	175	42	175	7,350	175	7,350	175	7,350
Part 140 - Operations (* begins in Year 3 after phase-in period)											
140.305	Annual	6.00	1,403	8,416	42	8,416	353,472	8,416	353,472	8,416	353,472
140.420	Annual*	8.00	260	2,083	42	-	-	-	-	2,083	87,494
140.645	Annual*	0.25	2,084	521	42	-	-	-	-	521	21,882
Part 144 - Construction and Arrangement (begins in Year 3 after phase-in period)											
144.315 (c)	Annual	16.00	12	192	42	-	-	-	-	192	11,520
144.320	Annual	7.00	26	182	42	-	-	-	-	182	4,004
144.320	Annual	4.00	13	52	42	-	-	-	-	52	1,144
Recordkeeping											
Regulation	Frequency	Annual time burden/ vessel (hours)	Number of vessels or companies affected per year	Total annual time burden (hours)	Unit time cost (\$/hour)	Year 1		Year 2		Year 3	
						Hours	Cost (\$)	Hours	Cost (\$)	Hours	Cost (\$)
Part 136 - Certification (begins in Year 3 after phase-in period)											
136.220	Annual	0.08	1,302	104	42	-	-	-	-	104	4,375
Part 137 - Vessel Compliance (* begins in Year 3 after phase-in period)											
137.125 (a) (b)	Annual	40.00	400	16,000	42	16,000	672,000	16,000	672,000	16,000	166,400
137.125 (a) (b)	Annual	2.00	25	50	42	50	2,100	50	2,100	50	2,600
137.125 (a) (b)	Annual	4.00	125	500	42	500	21,000	500	21,000	500	26,000
137.130 (d)	Annual	8.00	400	3,200	42	3,200	134,400	3,200	134,400	3,200	83,200
137.130 (d)	One time	4.00	400	1,600	42	67,200	67,200	-	-	-	-
137.130 (e)	Annual	6.00	400	2,400	42	2,400	100,800	2,400	100,800	2,400	124,800
137.200 (b) (2)	One time and every 5 years*	0.08	3,868	62	42	-	-	-	-	62	2,599
137.210 (c)	One time and every	0.08	3,868	62	42	-	-	-	-	62	2,599

	5 years*										
137.300	One time	0.08	5,208	434	42	434	18,228	-	-	-	-
137.305 (a) (2)	Twice in 5 years*	0.08	214	18	42	-	-	-	-	18	750
Part 139 – Third-Party Organizations											
139.165	Annual	1.00	175	175	42	175	7,350	175	7,350	175	7,350
Part 140 - Operations (* begins in Year 3 after phase-in period)											
140.305	Annual	4.00	1,403	5,611	42	5,611	235,648	5,611	235,648	5,611	235,648
140.400	Daily*	29.17	52	1,519	42	-	-	-	-	1,519	63,798
140.405	One time	0.08	130	11	42	11	456	11	456	-	-
140.410 (c)	Annual*	4.00	29	115	42	-	-	-	-	115	4,822
140.415	Annual*	0.08	1,042	83	42	-	-	-	-	83	3,501
140.420	Annual*	8.00	200	1,600	42	-	-	-	-	1,600	67,200
140.425	Annual*	8.00	1460	11,680	42	-	-	-	-	11,680	490,560
140.435	Annual*	0.08	1460	417	42	-	-	-	-	417	17,499
140.510 (f)	One time*	0.08	1460	117	42	-	-	-	-	117	4,906
140.615 (c)	Every day*	28.00	138	3,864	42	-	-	-	-	3,864	162,288
140.645 (b)	One time*	0.08	138	11	42	-	-	-	-	11	464
140.820	Once a month*	0.96	138	132	42	-	-	-	-	132	5,564
Part 141 - Lifesaving											
141.235	One time	48.00	52	2,500	25	2,500	62,496	-	-	-	-
141.315	One time	24.00	52	1,250	25	1,250	31,248	-	-	-	-
141.320	One time	24.00	52	1,250	25	1,250	31,248	-	-	-	-
141.340 (b) (3)	One time	24.00	52	1,250	25	1,250	31,248	-	-	-	-
141.345	One time	24.00	52	1,250	25	1,250	31,248	-	-	-	-
141.350 (c)	One time	24.00	52	1,250	25	1,250	31,248	-	-	-	-
141.355 (c)	One time	24.00	52	1,250	25	1,250	31,248	-	-	-	-
141.360 (e)	One time	24.00	52	1,250	25	1,250	31,248	-	-	-	-
141.375	One time	24.00	52	1,250	25	1,250	31,248	-	-	-	-
141.380	One time	24.00	52	1,250	25	1,250	31,248	-	-	-	-
Part 142 - Fire Protection (begins in Year 3 after phase-in period)											
142.240	Annual	1.00	29	29	42	-	-	-	-	29	1,205
142.330 (d) (5)	One time	1.00	29	29	42	-	-	-	-	29	1,205
Part 143 - Machinery and Electrical Systems and Equipment (* begins in Year 3 after phase-in period)											
143.260 (b)	Weekly*	100.00	29	2,870	42	-	-	-	-	2,870	120,540
143.270	One time*	1.00	29	29	42	-	-	-	-	29	1,205
143.275	Annual	1.00	29	29	25	29	718	29	718	29	718
143.280	One time	1.00	5,208	5,208	25	5,208	130,200	-	-	-	-
143.325	One time	1.00	5,208	5,208	25	5,208	130,200	-	-	-	-

143.340 (a) (2), (b) (2) (4)	Annual	1.00	29	29	25	29	359	29	359	29	718
143.355 (d)	Annual	1.00	29	29	25	29	718	29	718	29	359
143.405	One time	1.00	5,208	5,208	25	5,208	130,200	-	-	-	-
143.435	One time	0.08	5,208	434	42	434	9,114	-	-	-	-
Part 144 - Construction and Arrangement (* begins in Year 3 after phase-in period)											
144.240	One time	1.00	26	26	42	26	547	-	-	-	-
144.315	Annual	0.25	52	13	42	13	547	13	547	13	547
144.330	One time	0.25	52	13	42	13	547	-	-	-	-

Appendix B Total Annual Burden Estimates (Federal Government)

Note: “*” denotes company

Regulation	Frequency	Annual time burden/ vessel (hours)	Number of vessels or companies affected per year	Total annual time burden (hours)	Unit time cost (\$/hour)	Year 1		Year 2		Year 3	
						Cost (\$)	Hours	Cost (\$)	Hours	Cost (\$)	Hours
Reporting											
Part 136 – Certification (begins in Year 3 after phase-in period)											
136.210 (b) (1)	Every 5 yrs.	0.50	1,302	651	67	-	-	-	-	43,617	651
136.210 (b) (2)	Every 5 yrs.	0.50	1,302	651	67	-	-	-	-	43,617	651
136.210 (b) (3)	Every 5 yrs.	0.50	1,302	651	67	-	-	-	-	43,617	651
136.210 (b) (4)	Every 5 yrs.	0.50	1,302	651	67	-	-	-	-	43,617	651
136.235 (b)	Annual	0.08	130	11	67	-	-	-	-	727	11
136.235 (c)	Annual	0.08	57	5	67	-	-	-	-	318	5
136.240 (b) (1)	Annual	0.08	26	2	67	-	-	-	-	318	5
136.245 (b) (4)	Annual	0.08	26	2	67	-	-	-	-	145	2
136.245 (c) (1)	Annual	0.08	26.04	2	67	-	-	-	-	145	2
136.245 (e) (2)	Annual	0.08	26.04	2	67	-	-	-	-	145	2
Part 137 - Vessel Compliance (* begins in Year 3 after phase-in period)											
137.125 (a) (b)	One time*	0.08	1,059	88	67	-	-	-	-	5,913	88
137.125 (a) (b)	Annual	0.08	1,059	88	67	5,913	88	5,913	88	5,913	88
137.130 (a), (b), (c), (d)	One time	0.08	5,208	434	67	29,078	434	-	-	-	-
137.130 (a), (b), (c), (d)	One time	0.08	1,059	88	67	5,913	88	-	-	-	-
137.130 (e)	One time	0.08	5,208	434	67	29,078	434	-	-	-	-
137.130 (e)	One time*	0.08	1,302	109	67	-	-	-	-	7,270	109
137.135 (a)	One time*	0.08	1,302	109	67	-	-	-	-	7,270	109

Regulation	Frequency	Annual time burden/ vessel (hours)	Number of vessels or companies affected per year	Total annual time burden (hours)	Unit time cost (\$/hour)	Year 1		Year 2		Year 3	
						Cost (\$)	Hours	Cost (\$)	Hours	Cost (\$)	Hours
137.200 (a)	Every 5 years*	0.08	1,302	109	67	-	-	-	-	7,270	109
137.200 (b) (1)	Every 5 years*	0.08	1,340	112	67	-	-	-	-	7,482	112
137.200 (b) (2)	One time and every 5 years*	0.08	3,868	64	67	-	-	-	-	4,319	64
137.205 (a) (b)	Annual	0.08	1,005	84	67	5,611	84	5,611	84	5,611	84
137.210 (a)	One time	0.10	3,868	387	67	25,916	387	-	-	-	-
137.210 (b)	Annual	0.08	3,868	322	67	21,596	322	21,596	322	21,596	322
137.210 (c)	One time and every 5 years	0.10	3,868	387	67	25,916	387	-	-	-	-
137.300	Every 5 yrs.	0.08	1,302	109	67	7,270	109	-	-	-	-
137.305 (a) (1)	Twice in 5 years*	0.08	121	10	67	-	-	-	-	673	10
137.305 (a) (2)	Once in 5 years*	0.08	214	18	67	-	-	-	-	1,197	18
Part 138 - Towing Safety Management Systems											
138.305	One time	0.25	530	133	67	8,878	133	-	-	-	-
138.500	Annual	1.00	1,302	1,302	67	87,234	1,302	87,234	1,302	87,234	1,302
138.505	Annual	0.08	5,208	434	67	29,078	434	29,078	434	29,078	434
Part 139 - Third-Party Organizations											
139.120	One time	16.00	88	1,400	67	93,800	1,400	-	-	-	-
139.135	Annual	0.25	18	5	67	302	5	302	5	302	5
139.140	Annual	8.00	88	700	67	46,930	700	46,900	700	46,900	700
Part 140 - Operations											
140.305	Annual	0.25	1,403	351	67	23,495	351	23,495	351	23,495	351
140.405	Annual	0.25	260	65	67	4,362	65	4,362	65	4,362	65
Part 144 - Construction and Arrangement (* begins in Year 3 after phase-in period)											
Regulation	Frequency	Annual time	Number of vessels or	Total annual	Unit time cost	Year 1		Year 2		Year 3	

		burden/ vessel (hours)	companies affected per year	time burden (hours)	(\$/hour)						
						Cost (\$)	Hours	Cost (\$)	Hours	Cost (\$)	Hours
144.315	Annual	0.25	12	3	67	-	-	-	-	201	3
144.320	Annual	0.25	13	3	67	-	-	-	-	218	3
Recordkeeping											
Part 137 - Vessel Compliance											
137.125 (a) (b)	Annual	1.00	400	400	67	26,800	400	26,800	400	26,800	400
137.125 (a) (b)	Annual	0.08	25	2	67	140	2	140	2	140	2
137.125 (a) (b)	Annual	0.08	125	10	67	698	10	698	10	698	10
137.130 (d)	Annual	0.08	400	33	67	2,233	33	2,233	33	2,233	33
137.130 (d)	One time	0.08	400	32	67	2,144	32	-	-	-	-
137.130 (e)	Annual	0.25	400	100	67	6,700	100	6,700	100	6,700	100
Part 139 - Third-Party Organizations											
139.165	Annual	0.08	175	15	67	977	15	977	15	977	15
Part 140 - Operations (* begins in Year 3 after phase-in period)											
140.305	Annual	0.25	1,403	351	67	23,495	351	23,495	351	23,495	351
140.400	Daily*	29.17	52	1,519	67	-	-	-	-	101,773	1,519
140.405	One time	0.08	130	11	67	727	130	-	-	-	-
140.410 (c)	Annual*	0.25	29	7	67	-	-	-	-	481	7
140.415	Annual*	0.08	1042	83	67	-	-	-	-	5,585	83
140.420	Annual*	0.25	200	50	67	-	-	-	-	3,350	50
140.425	Annual*	0.25	1460	365	67	-	-	-	-	24,455	365
140.435	Annual*	0.08	1460	417	67	-	-	-	-	27,915	417
140.510 (f)	One time*	0.08	1460	117	67	-	-	-	-	7,826	117
140.615 (c)	Every day*	28.00	138	3,864	67	-	-	-	-	258,888	3,864
140.645 (b)	One time*	0.08	138	11	67	-	-	-	-	740	11
140.820	Once a month*	0.96	138	132	67	-	-	-	-	8,876	132
Part 141 - Lifesaving (begins in Year 3 after phase-in period)											
141.235	Annual	0.08	52	4	67	-	-	-	-	279	4
141.315	Annual	0.08	52	4	67	-	-	-	-	279	4
Regulation	Frequency	Annual time burden/ vessel	Number of vessels or companies affected per	Total annual time burden	Unit time cost (\$/hour)	Year 1	Year 2	Year 3	Regulation	Frequency	Annual time burden/ vessel

		(hours)	year	(hours)		Cost (\$)	Hours	Cost (\$)	Hours	Cost (\$)	Hours
141.320	Annual	0.08	52	4	67	-	-	-	-	279	4
141.340 (b) (3)	Annual	0.08	52	4	67	-	-	-	-	279	4
141.345	Annual	0.08	52	4	67	-	-	-	-	279	4
141.350 (c)	Annual	0.08	52	4	67	-	-	-	-	279	4
141.355 (c)	Annual	0.08	52	4	67	-	-	-	-	279	4
141.360 (e)	Annual	0.08	52	4	67	-	-	-	-	279	4
141.375	Annual	0.08	52	4	67	-	-	-	-	279	4
141.380	Annual	0.08	52	4	67	-	-	-	-	279	4
Part 142 - Fire Protection (begins in Year 3 after phase-in period)											
142.240	Annual	0.08	29	2	67	-	-	-	-	154	2
142.330 (d) (5)	One time	0.08	29	2	67	-	-	-	-	154	2
Part 143 - Machinery and Electrical Systems and Equipment (* begins in Year 3 after phase-in period)											
143.260 (b)	Weekly*	4.00	29	115	67	-	-	-	-	7,692	115
143.270	One time*	0.08	29	2	67	-	-	-	-	154	2
143.340 (a) (2), (b) (2) (4)	Annual	0.08	29	2	67	77	2	77	2	77	2
143.355 (d)	Annual	0.08	29	2	67	154	2	154	2	154	2
143.435	One time*	0.08	5,208	434	67	-	-	-	-	29,078	434
Part 144 - Construction and Arrangement											
144.240	One time	0.08	26	2	67	70	2	-	-	139	2
144.315	Annual	0.08	52	4	67	279	4	279	4	279	4