

**Supporting Statement  
for  
Plan Approval and Records for Marine Engineering  
Systems – 46 CFR Subchapter F**

**A. Justification.**

1. Circumstances that make this information collection necessary.

(a) The collection of information pertaining to the marine engineering systems of commercial vessels is necessary to protect personnel and property on board U.S.-flag commercial vessels. Subchapter F provides the specifications, standards, and requirements for strength and adequacy of design, construction, installation, and materials for machinery, boilers, pressure vessels, safety valves, and piping systems.

(b) The Code of Federal Regulations (CFR) currently addresses the technical criteria for the safe and reliable construction of these vessels. As charged and authorized by 46 U.S.C. 3306 and 49 CFR 1.46, the Coast Guard promulgated safety regulations for marine engineering systems. The need for safety standards to ensure safety of life at sea is recognized by industry and documented by numerous Coast Guard casualty investigations. In addition, these regulations implement certain requirements of the International Convention for the Safety of Life at Sea. The U.S. is a signatory to this convention.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

Coast Guard

- Maritime Safety
- Protection of the Natural Resources

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

- Reduce the number of passenger and maritime worker fatalities and injuries
- Reduce the consequences of pollution incidents

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

This information, which is collected by the Coast Guard, is used to determine compliance with 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 the regulatory standards.

3. Consideration of the use of improved information technology.

The Coast Guard Marine Safety Center (MSC) accepts information/plans via electronic submittal. For information on submitting information go to—<https://homeport.uscg.mil/msc> > Contact Us > Mail Address, Telephone Contacts, and E-Commerce Info. Information may also be submitted to the CG Officer in Charge, Marine Inspection (OCMI) at the local Sector Office. Contact info for CG OCMI's can be found at—<http://www.uscg.mil/top/units/>. Electronic submission is voluntary, and we estimate that 56% of respondents submit their plans electronically.

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

There are no other Federal agencies with similar programs, thus there is no duplication of other Federal information collections.

5. Methods to minimize 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 done less frequently.

If this information was not collected, the Coast Guard would not be able to carry out its responsibility for the promotion of safety on commercial vessels. The information cannot be collected any less frequently, as the information is submitted when the owner seeks Coast Guard approval during construction or modification of a commercial vessel.

7. Explain any special circumstances that would cause the information collection to be conducted in a manner inconsistent with the 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-2011-0710]; August 3, 2011; 76 FR 46824). Additionally, a 30-day Notice was published in the *Federal Register* to obtain public comment on this collection (October 7, 2011; 76 FR 62424). The Coast Guard 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 a sensitive language.

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

- The estimated annual number of respondents is 178
- The estimated annual number of responses is 3,695
- The estimated annual hour burden is 3,695
- The estimated annual cost burden is \$184,750

(a) The average annual number of respondents is 178. The total number of submissions is 3,695 submissions.<sup>1</sup> The information submission is not an annual requirement. This information must be supplied to the Coast Guard only upon ship construction or modification. The actual hour burden solely due to information collection is only that time necessary to submit a set of plans and drawings to the Coast Guard, approximately one hour.<sup>2</sup> Therefore the annual burden may be calculated by multiplying the hours per submission times the number of submissions.

$$\begin{aligned} \text{Hour Burden} &= \text{Submission} * \text{Hours per submission} \\ 3,695 \text{ hours} &= 3,695 \text{ submissions} * 1 \text{ hour/submission} \end{aligned}$$

(b) The annualized cost is based on the time needed for submitting a set of plans and drawings. This cost is approximately one hour per submission at the approximate rate of \$50 per hour.<sup>3</sup> This wage rate is "loaded"; it accounts for overhead costs.

$$\begin{aligned} \text{Cost Burden} &= \text{Submission} * \text{Cost per submission} \\ \$184,750 &= 3,695 \text{ submissions} * 1 \text{ hour/submission} * \$50/\text{hour} \end{aligned}$$

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

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

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<sup>1</sup> Each respondent averages about 21 submissions (3,695 / 178 = 20.75).

<sup>2</sup> 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 time reported by the respondents of 200 hours per plan developed reflects the time required to develop these plans for their intended use as blueprints for ship construction.

<sup>3</sup> Equivalent to a GS-09 "out of gov't" rate, per COMDTINST 7310.1M.

14. Estimates of annualized Federal Government costs.

With some minor exception, the federal burden of items covered by this supporting statement will be borne by the Coast Guard's field technical office, the Marine Safety Center. This office is responsible for the review and processing of vessel plans and information. The average annual personnel cost of those actually performing the review is \$ 71,674. These costs are multiplied by a factor of two to account for administrative overhead, retirement costs, medical costs, etc., and an experience factor of .85 to account for military-related tasks of the field technical office. Using these factors and an estimated total annual time spent reviewing plans of 9,607 hours, the estimated cost to the Coast Guard for the plan review function would be—

$$\begin{aligned} & (9,607 \text{ hours/year})(.85)(2)(\$71,674/\text{year}) \\ & (40 \text{ hours/week}) (52 \text{ weeks/year}) \\ \text{Total} & = \$ 562,772/\text{year} \end{aligned}$$

15. Explain the reason for the change in burden.

The change in burden is an ADJUSTMENT due to an increase in the estimated number of plans annually submitted to the Coast Guard. There is no proposed change to the recordkeeping requirements of this collection. The 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 to not display the expiration date for OMB approval of the information 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.

The collection does not employ statistical methods.