**JUSTIFICATION FOR CHANGE**

**NORTHEAST REGION PERMIT FAMILY OF FORMS**

**OMB CONTROL NO. 0648-0202**

National Marine Fisheries Service (NMFS) is proposing a change to OMB Control No. 0648-0202, Northeast Region Family of Forms, to add two (2) exemptions in the Atlantic herring previously not included, although approved under a final rule. There will be four (4) hours of public burden but no cost burden, associated with this change.

The original Atlantic Herring Fisheries Management Plan (FR 0648-AI78 (65 FR 77450, December 11, 2000)) authorized vessels issued Atlantic herring permits to transfer herring at sea and act as carrier vessels with a letter of authorization from the Regional Administrator. Vessel owner/operators are required to call the NMFS Northeast Regional Office (NERO) to request either letter of authorization. Although these exemptions, and subsequent public burden of calling the NMFS NERO office, have been in place since 2000, they have not been accounted for under the Paperwork Reduction Act. This change request adds the Transfer at Sea and Herring Carrier exemption to this information collection.

Based on the 2010 records of vessels that received letters of authorization, there are thirty-five (35) vessels that apply for the Transfer at Sea letter of authorization and fifteen (15) vessels that apply for the Carrier letter of authorization annually. Each vessel applies once a year, for a total of 50 (35 + 15) total phone calls. Each phone call is expected to take five (5) minutes for a total of 4.2 hours (4 hours). There is no additional public cost associated with this change as phone calls are assumed to be free.

The 0648-0202 burden table will be modified as shown below (additions in red):

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Transfer at Sea – associated burden** | **# of Entities** | **Items per Entity** | **Total # of Items** | **Response Time** | **Public Burden** | **Public Cost** |
| Herring Carrier LOA | 15 | 1 | 15 | 5 min. | 1 hour, 15 minutes | $0 |
| Herring Transfer at Sea LOA | 35 | 1 | 35 | 5 min. | 3 hours | $0 |
| **TOTALS** |  |  | **50** |  | 4 hours, 15 minutes **(4 hours)** |  |