

**SUPPORTING STATEMENT  
PACIFIC COAST GROUND FISH TRAWL (PCGT) RATIONALIZATION PROGRAM  
PERMIT AND LICENSE INFORMATION COLLECTION  
OMB CONTROL NO. 0648-0620**

**INTRODUCTION**

This supporting statement describes revisions to the current information collection, OMB Control No. 0648-0620. *This request is a resubmission with the Final Rule 0648-BB13. No public comments were made in response to the proposed rule, that necessitated changes to this information collection revision.*

The [Magnuson-Stevens Fishery Conservation and Management Act](#) (MSA) authorizes the Fishery Management Councils to prepare and amend fishery management plans (FMP) for any fishery in waters under its jurisdiction. The National Oceanic and Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS) manages the groundfish fishery in the 3-200 mile zone off of the coasts of Washington, Oregon and California. In 1993, the Council, under Amendment 6 ([50 CFR 660 Subpart D](#)), implemented a limited entry program for the groundfish fishery. Currently, there are a total of 399 Pacific Coast limited entry permits of which 177 permits are endorsed for trawl gear.

In January 2011, NMFS implemented a trawl rationalization program, a catch share program, for the Pacific coast groundfish fishery's trawl fleet. The program was developed through Amendment 20 to the FMP and consists of an IFQ program for the shorebased trawl fleet (including whiting and non-whiting fisheries); and cooperative (coop) programs for the at-sea mothership (MS) and catcher/processor (C/P) trawl fleets (whiting only). Fixed allocations to the limited entry trawl fleet were developed through a parallel process with Amendment 21 to the FMP.

The regulations implementing the program were effective January 1, 2011; however, all of the necessary tracking systems to make the program operational became active on January 11, 2011, the date fishing began under the new program. Since that time, the Council and NMFS have been addressing implementation issues as they arise, some of which are the subject of this proposed rule. The Council took final action at its June 2011 meeting on some trailing actions for the program that are included in this proposed rule. This proposed rule also includes items that are further revisions and refinements to the program that are still within Council intent for Amendments 20 and 21, including revisions to existing language to provide greater clarity and to remove outdated language and include some minor changes to the existing program.

**JUSTIFICATION**

The trawl rationalization program is intended to increase net economic benefits, create individual economic stability, provide full utilization of the trawl sector allocation, consider environmental impacts, and achieve individual accountability of catch and bycatch for participants in the shorebased IFQ groundfish fishery and at-sea whiting mothership fishery.

## **1. Explain the circumstances that make the collection of information necessary.**

### **First Receiver Site License (FRSL)**

NMFS is proposing several changes that will affect the first receiver site license requirements. First, NMFS intends to revise the regulation to require every buyer of groundfish from an IFQ landing to have a first receiver site license for each physical location where they purchase groundfish as part of an IFQ landing. This revision will clarify that the buyer is accountable for having a FRSL for every landing location where they purchase IFQ groundfish and meeting all of the requirements required for an IFQ landing.

The current regulations define a first receiver as “a person who receives, purchases, or takes custody, control, or possession of catch onshore directly from a vessel”. This definition resulted in licenses being issued to both buyers of IFQ groundfish and to individuals/entities that are the first receiver (serve to offload, weigh and sort) of an IFQ landing. To date, some buyers have employed a first receiver with a license for a specific site to meet the requirements of an IFQ landing (must have a catch monitor present to observe/account for the landing, the landing must be weighed and sorted before transported away from the landing site). Those first receivers typically fill out an E Fish ticket for the buyer(s) of the IFQ groundfish but the E fish ticket does not indicate which license holder met the requirements for a legal IFQ landing. NMFS wants to clearly assign responsibility for meeting the IFQ landing requirements to the actual buyer who is given on the E-ticket for specific landing at specific site. This will eliminate current 3<sup>rd</sup> party arrangements where a first receiver (who has a license for the landing location) assumes the responsibility of meeting the IFQ landing requirements on behalf of the buyer(s). By requiring buyers to have a FRSL for each landing location where they buy IFQ groundfish, the catch accounting system can readily associate the buyer as listed on the E ticket to the list of persons who currently have valid first receiver site licenses.

Second, NMFS is proposing to revise the application process for a first receiver site license so that it does not require a separate written request for a site inspection. Currently, a separate written request for a site inspection must be included with the application in order to receive approval for the first receiver site license application. This requirement is unnecessary and redundant. NMFS is proposing to revise the regulations at §660.140(f)(3)(iii)(B) to state that NMFS will contact applicants to arrange an inspection after receiving a complete first receiver site license application, including the proposed catch monitoring plan.

### **Quota Share and Vessel Accounts**

NMFS is proposing to remove references from the regulations that required the account owner to formally request NMFS to register an account manager. Beginning in either late 2011 or 2012, owners of the accounts will have the capability to designate certain roles and associated privileges for users within their online QS and vessel account system under an "account information" tab. This new functionality will alleviate the need for NMFS to establish these roles/privileges on their behalf. For example, account owners will be able to designate whether an individual can initiate or accept/reject transfers of quota pounds, while others will be designated to only view account balances. To date, NMFS has allowed for vessel owners to

designate a vessel account manager through a formal request and only about 30% have made this designation. Account managers typically have the full range of privileges available in the account system.

Given that account managers frequently are employees of account owners who may have changing duties or employment status, NMFS believes it best to provide QS and vessel account owners the ability to grant roles directly in the system. The regulations at §660.140(d)(2)(ii), (d)(3)(i)(D), (e)(2)(ii), and (e)(3)(i)(D) will be revised to remove the reference to designating an account manager.

In addition, NMFS proposes to clarify regulations regarding what constitutes a change in ownership for all QS (permits) and vessel accounts. The current regulations do not specify exactly what constitutes a change in ownership. The revision to the regulations will state that any change to the legal, registered name of the QS permit/account owner, or vessel account owner is considered a change in ownership. A change will include adding or removing an individual or entity from the current legally registered name on the QS permit or vessel account.

#### **Transfer (severability) of Mothership/Catcher Vessel (MS/CV) Endorsement and whiting catch history assignment (CHA)**

With implementation of the trawl rationalization program, MS/CV endorsements and associated whiting CHA were issued for limited entry trawl permits that met the qualifying requirements for participation in the mothership sector of the whiting fishery. The CHA is expressed as a percentage of the sector's annual optimal yield. The initial allocation was based on the relative catch history of the individual permits during the qualifying period. Each qualifying trawl permit (37) was issued one MS/CV endorsement and CHA.

Subsequent to the implementation of the program, it was found that some permit owners participated primarily in the shoreside groundfish fishery and had some relatively minor amounts of catch history in the at-sea whiting mothership fishery. These permits received MS/CV endorsements with small amounts of whiting CHA. In order to use the CHA allocation associated with an MS/CV endorsement, the permit must be assigned to a coop. For the owners of permits with relatively small amounts of whiting CHA, the burden (transaction costs) of joining a coop may not be worth the benefits from that permit's allocation. While these permit owners could sell their limited entry trawl permits to other mothership whiting fishery participants; they might not want to because they need a limited entry trawl permit to participate in the Shorebased IFQ Program. If permit owners with small amounts of whiting CHA join coops each year, there may be transaction costs that offset the benefits of the small allocation, reducing the overall efficiency and benefits from the trawl rationalization program.

If permits with small amounts do not join a coop, their allocations will automatically go to the non-coop fishery where they may go unharvested. If all other MS/CV-endorsed permits have joined coops and the owners of the permits with small allocations do not have interest in gearing up for the mothership whiting fishery, this situation may contribute toward an incentive for MS/CV-endorsed permits to enter the non-coop fishery instead of joining a coop, decreasing the effectiveness of the trawl rationalization program.

In order to address these concerns, the Council took final action at their June 2011 meeting to allow permit owners to formally request a change in the registration of the MS/CV endorsement and its associated CHAs from one limited entry trawl permit to another (called severability in Council documents). Under the proposed regulations, multiple MS/CV endorsements and associated CHA could be registered to a single limited entry trawl permit, and each MS/CV endorsement will be permanently linked with its CHA as originally issued by NMFS. An MS/CV endorsement cannot be divided or registered separately to another limited entry trawl permit separate from its CHA. In addition to the MS/CV endorsement and CHA being linked together, a any change in registration of an MS/CV endorsement and CHA must be to another limited entry trawl permit (an MS/CV endorsement and CHA cannot be registered to fixed gear permit or held independent of a trawl permit). The owner of the MS/CV endorsements and CHAs must be the same as the owner who is registered on the associated limited entry trawl permit.

Each year any request to change the registration of a unique MS/CV endorsement and associated CHA allocation from one trawl permit to another trawl permit must be submitted to NMFS during the period of September 1 – December 31. This coincides with the trawl permit renewal period and will allow NMFS to make all changes in MS/CV endorsement and CHA registrations effective on January 1 of the following year. These registrations that are effective January 1 will remain in place for that calendar year. This schedule is necessary as MS coop permit applications may be submitted starting on February 1 and it is necessary for coop managers to know which CHA amounts are registered to specific permits.

In addition, the current groundfish regulations provide that trawl permits may be combined for the purposes of increasing the size endorsement of the remaining permit. The combination provision allows permit owners who choose to either increase the length of their vessel, or to purchase or build a larger vessel, to combine 2 or more permits to increase the size endorsement on one permit. When permits are combined, only one permit remains active while all others are permanently expired. *A request to combine is covered in OMB Control 0648-0203 but does not fully address impacts on MS/CV endorsements and CHA that are registered to these permits.* The current regulations provide that if two or more MS/CV endorsed permits are combined, the resultant permit will have one MS/CV endorsement and the CHA amount will be a single CHA amount which is the aggregate of all CHAs given on each of the permits involved in the combination. The proposed regulations provide an additional provision that will allow a permit owner to maintain the distinct CHA amounts on the resulting permit, however the permit owner must first change the registration of the CHA amounts to one of the permits involved in the combination while the other permits involved in the combination will have no CHA allocations registered to them. The practical effect is if the permit owner wants to maintain distinct MS/CV endorsements and CHA allocations on the permit resulting from a combination, he/she must first transfer all MS/CV endorsements and CHA to one permit involved in the combination.

## **Mothership Cooperative Permit Application**

The proposed regulation will allow a trawl endorsed permit with two or more MS/CV endorsements and CHA amounts to participate in two or more coops simultaneously or to assign the catch history assignment to both a coop and the non-coop fishery. Specifically, the owner of a single trawl permit could designate a specific CHA amount to be assigned to one coop and assign a second CHA amount to another coop. The MS coop permit application, as currently described in OMB Control 0648-0620, does not provide for the respondent to specify which MS/CV endorsement and CHA is being assigned to the coop.

**2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.**

### **First Receiver Site License:**

The two revisions to the approved collection will: 1) clarify who is required to have a first receiver site license and 2) remove the current requirement that a respondent make a separate request for a site inspection at the time of application. The existing instructions in the FRSL application form will be modified to reflect these changes. Neither of the proposed revisions made here require a new or expanded information collection. The frequency of making an application (licenses are effective for one year after approval by NMFS) and purpose of the information collection remains unchanged.

Most of the current first receiver site license holders are buyers. The clarification that buyers must hold a FRSL may require some additional buyers to apply for a FRSL specific to a particular location. However, the estimated number of additional buyers who may be required to apply for a FRSL will fall within the current estimate of number of respondents (to date about 50 entities have received a FRSL and the estimated number of respondents in the approved collection is 80). The time burden for any new buyers who need to obtain a FRSL may be reduced as buyers who share a common landing facility can submit a single standard catch monitor plan (also required as part of the application) for that location.

Also, the elimination of the requirement for a separate written request for a site inspection will reduce the time burden slightly. The proposed regulation will clarify that any application for a FRSL serves as a request for a site inspection. Currently, most applicants send a very brief email or letter to make this request. As such, the reduction in time burden is minimal. This requirement for a site inspection is covered in OMB Control 0648-0619, however, as a practical matter these site inspection requests were required as part of the application for the FRSL. The proposed regulations will eliminate the requirement for a separate written request for a site inspection and clarify that any request for a FRSL will serve as the request for a site inspection.

### **QS Account (Permit) and Vessel Account**

The two proposed revisions will: 1) eliminate the need for the account owner to formally request NMFS to register an account manager either as part of account renewal or during the year and

2) clarify that any change in the ownership of QS permit (registration of ownership is fixed on QS permits for 2011 and 2012 but may change starting in 2013) or of a vessel will require the new owners to make a new application for a QS permit or re-register for a vessel account. The revisions proposed for the QS account and vessel account will not require new or expanded

information collections, or a change the frequency of establishing or renewing the QS account (permit) and vessel account.

The designation of an account manager is currently an optional requirement. The approved collection anticipated that such designations will be made typically at the time such accounts were initially established or renewed and were not itemized as a separate request. The revision to the approved collection slightly reduces the burden on account owner when either registering for an account or renewing an account or requesting it mid-year. However, if owners of such accounts want to establish access levels (transactions v. view only) for various additional users, they will have to make such designations in the online account.

Similarly, although the approved information collection anticipated that changes in the registrants will be made to the QS and vessel accounts, the regulations were not as clear in specifying exactly what type of change will require a new registration. The revision will stipulate that any change to the legal registrant to these accounts (either adding or removing partner, or modifying an entity/person name) prompts a need to reregister the accounts in the name of the new owners. Among the reasons for this change are: 1) there is a need for the registration to accurately reflect ownership of such accounts; 2) NMFS must establish unique identifiers in its data base for any new ownership group to aid with tracking and monitoring responsibilities; and 3) NMFS must obtain an ownership interest form from any new registrant to check for compliance with various accumulation limits. The number of additional applications for changes in ownership of these accounts is covered within the current estimates of the approved collection.

### **Change in registration of MS/CV endorsements and Catch History Assignment (CHA)**

This revision will require a new information collection. Specifically, any permit owner who wishes to change an MS/CV endorsement and CHA registration to another trawl permit will be required to submit to NMFS an application form. NMFS will review and either approve or disapprove the request. Any disapproval by NMFS can be appealed by the permit owner consistent with existing regulations specifying the process for appeals (i.e.; must be in writing, allege facts, etc). Requests to transfer MS/CV endorsements and CHA from one trawl permit to another must be requested in the September 1 – December 31 period each year.

The request to change an MS/CV endorsement and CHA will require respondents to provide the following information on the attached application form:

- **Section A – Current Permit Registration:** permit number, MS/CV endorsement and CHA registration number, permit owner name, date of birth or tax identification number, business address, business phone, fax number and email (optional).
- **Section B – New Permit Registration:** permit number that MS/CV and CHA will be registered to, permit owner name, date of birth or tax identification number, business address, business phone number, fax number, and email (optional). Also, Section B requires that the applicant indicate whether the transaction (change in registration) was monetary or non-monetary in nature and if the MS/CV endorsement and CHA was monetary, to provide the sale price. If the transaction was non-monetary, the applicant

must indicate the nature of transaction. For example, the transaction may involve a trade of the whiting CHA for quota pounds of a particular IFQ species. Section C – Certify and Notary: The applicant or their authorized representative must attest that the information provided is true and correct and sign and date the form. The form must be notarized.

This information collection will be required to formally establish accurate registrations to support the sale of such endorsements and whiting CHA allocations. Both NMFS and industry need accurate records of ownership of specific MS/CV endorsement and CHA currently registered to a specific trawl permit. Coop managers will want to know how much CHA is assigned to a particular permit owner as they make annual plans to form a coop. Permit owners will want to identify whiting CHA allocations that they may seek to purchase. Further, NMFS must track the amount of CHA registered to individual permit owner for compliance with accumulation limits. The current regulations limit the amount of CHA that may be owned to 30%. If an individual through ownership of multiple permits with MS/CV endorsements and CHA exceeds the accumulation limit, NMFS is required to disapprove the transfer.

The questions regarding nature of the transaction (non-monetary v. monetary) are required in order to help NMFS analyze and assess the program. NMFS is required to review the program after 4 years and this information will assist in understanding the relative value of whiting allocations to individual permit owners and better understand the nature of non-monetary transactions that may involve whiting CHA.

In addition, the regulations will be changed to allow the owner of a permit with 2 or more MS/CV endorsements and CHA to specify that individual's CHA amounts be assigned to a coop. If there are 2 or more coops, a permit owner could be a member of multiple coops and individual CHA amounts could be assigned to different coops. Any mothership cooperative entity that makes an application for a MS coop permit will be required to specify in the application form which MS/CV endorsements and CHA are being assigned to their coop. The existing MS coop application form has been revised such that in Section B, in addition to providing the permit number that is joining the coop and the CHA amount, the applicant will need to provide the registration number for MS/CV endorsement and CHA that will be assigned to the coop. The incremental time burden will be minimal and does not require a revision to the current time burden estimate in the approved collection.

The estimated number of changes in MS/CV endorsement and CHA registrations from one trawl permit to another trawl permit includes situations where a permit owner registers all MZS/CV endorsements and CHA to one permit as part of a permit combination request, for the purpose of increasing the size endorsement of the remaining permit. Permit owners may request changes in MS/CV endorsement and CHA registrations to one trawl permit to maintain them as unique registrations on the resulting permit. Please note that the number of combinations requested in a given year is very limited (1-2 per year maximum).

The number of possible changes in MS/CV endorsement and CHA registrations is covered as part of the estimate given in Question 12 below (estimate of 6 requests per year). . The cost of purchasing permits for purpose of combination and the loss of a permit in the combination



process makes such actions expensive, and as such, the number of requests to combine permits is very few.

The proposed regulations provide that any MS/CV endorsed permit owners that have already combined permits before January 1, 2012, a window of time would be provided for them to change that permit arrangement by sending a letter to NMFS. Since January 2011, only one permit owner combined 2 MS/CV endorsed permits and the resulting permit has one CHA with an aggregated amount. The proposed regulations would provide a one-time opportunity to make a request that NMFS reissue the permit with 2 separate MS/CV endorsement and catch history assignment allocations. The proposed regulation would afford the permit owner with the same option being afforded to other permits starting in 2012 as described in the prior paragraph. Any such request would need to be submitted to NMFS within 90 days of the publication of the final rule.

### **Mothership Cooperative Permit Application**

The approved MS Coop Permit form has been revised to add a registration number for a unique MS/CV endorsement and catch history assignment (it is one extra column in Section B). The current collection anticipates one application per year and estimates 4 hours to prepare the application. The requirement of the respondent to list each MS/CV endorsement and CHA registration number on the application form (estimated 30 entries x ~30 seconds to copy from permit = 15 minutes) will be covered within the existing time burden estimate of 4 hours.

It is anticipated that the information collected will be disseminated to the public or used to support publicly disseminated information. As explained in the preceding paragraphs, the information gathered has utility. NMFS will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with National Oceanic and Atmospheric Administration (NOAA) standards for confidentiality, privacy, and electronic information. See response to Question 10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Prior to dissemination, the information will be subjected to quality control measures and a pre-dissemination review pursuant to [Section 515 of Public Law 106-554](#).

### **3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.**

NMFS will make the application form to change the MS/CV and CHA registration available as a fillable form (pdf) on the Web site. NMFS will continue to consider whether to develop a Web-based system to allow applicants to make such requests online.

### **4. Describe efforts to identify duplication.**

This is a unique information collection and does not duplicate other collections. This opportunity for an exemption from current Federal groundfish regulations has been developed by the Pacific Fishery Management Council and is unique to the Pacific Coast groundfish fishery.

The exemption has been reviewed been discussed at least 2 Council meetings and the proposed rule will be subject to public comment. No issues have been raised in the Council process identifying duplication. This program and the associated information collection are targeted at specific individuals in the trawl fishing industry and authorize specific information required to implement and administer this program.

**5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.**

The applicants will be small businesses. The collection of information does not impose a significant impact on small entities.

**6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

If NMFS does not allow for changes in MS/CV endorsement and CHA amounts, the industry will not have the flexibility to redirect CHA amounts to other permits. As mentioned above, individuals will be faced with having to sell the trawl permit and the endorsement/CHA allocation, when permit owner may wish to retain the trawl permit to conduct their shorebased IFQ operations. Further, because some CHA allocations are small, if a permit owner cannot change the registration of the MS/CV endorsement and CHA, the CHA amount may not be used by the current owner and it will be left unharvested. If the information collection was conducted less frequently (i.e.; every other year), the industry will have less flexibility to buy and sell the CHA amounts available to the region and to adapt to changing business strategies and circumstances.

**7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.**

Not Applicable.

**8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

NMFS Northwest Region published a proposed rule, RIN 0648-BB13, coincident with the original submission, requesting comments from the public. *No comments were received that affected the information collection requirements.*

**9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.**

Not Applicable.

**10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.**

Information provided on the forms: The information collected is mandatory and is required to manage commercial fishing efforts under 50 CFR part 660 and under section 402(a) of the Magnuson-Stevens Act (16 U.S.C. 1801, *et seq.*). Responses to this information request are confidential under section 402(b) of the Magnuson-Stevens Act as amended in 2006 and under [NOAA Administrative Order 216-100](#), which sets forth procedures to protect confidentiality of fishery statistics.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.**

Not Applicable.

**12. Provide an estimate in hours of the burden of the collection of information.**

The number of respondents for a change in registration of a MS/CV endorsement and CHA is estimated to be 6 per year. The time required to complete and submit the application is one hour per application. The estimated personnel costs: 6 hours x \$25 per hour = \$150.

6 applications per year x 1 hour per application = annual time burden of 6 hours

There are no burden or cost changes for the QS account or Vessel account, MS Coop Permit form or the First Receiver Site License - no additional responses are expected, and the changes to the forms will not require time beyond the current estimated time.

Estimated total respondents for the entire collection: The number of unduplicated respondents remains the same. Estimated total responses: Revise to 1,955 up from 1,949. Estimated total burden: Revise to 651 hours up from 645 hours.

**13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in Question 12 above).**

MS/CV endorsement and CHA Application fee: -0-

Mailing cost: 6 applications x \$0.44 = \$2.64

Notarized form: 6 applications x \$10 = \$60

Copy cost: 6 applications x 5 pages x .05 per page = \$1.50

Total Estimated Reporting and Recordkeeping Costs: \$64.14.

This addition would increase the recordkeeping/reporting cost from \$17,273 to \$17,337.

**14. Provide estimates of annualized cost to the Federal government.**

The approved collection currently provides an estimate of \$700,000. The incremental costs to review and reissue trawl permits will include staff time to: review applications received, print and prepare revised permits; respond to questions about make changes in registrations; organizing and filing application documents, mailing costs associated with the letter. The incremental annual cost to the Federal government review applications and to reissue permits with changes in MS/CV endorsement and CHA is included in regular staff time).

**15. Explain the reasons for any program changes or adjustments.**

**Program Change associated with a change in burden:** Previously, NMFS issued a single MS/CV endorsement and whiting CHA to trawl limited entry permit and current regulations do not allow for the endorsement and CHA to be separated from the permit. The proposed regulation will allow permit owners to sever their endorsement and CHA allocation from the permit and register them to another trawl permit and for a single trawl permit to have multiple endorsements and CHA allocations. This change adds 6 hours and \$64 in recordkeeping/reporting costs.

**16. For collections whose results will be published, outline the plans for tabulation and publication.**

The results from this collection are not planned for statistical publication.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display will be inappropriate.**

Not Applicable.

**18. Explain each exception to the certification statement.**

Not Applicable.

**B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS**

Not Applicable.