

**SUPPORTING STATEMENT
Standard Numbering System**

OMB Control No.: 1625-0108

Collection Instrument: None

[as modified by USCG-2003-14963; RIN 1625-AB45]

A. JUSTIFICATION:

1. Circumstances that make the collection of information necessary.

Subsection 12301(a) of Title 46, United States Code, requires undocumented vessels equipped with propulsion machinery of any kind to be numbered in the State where the vessel is principally operated. In 46 U.S.C. 12302(a), the statute authorizes the Secretary to prescribe, by regulation, a Standard Numbering System (SNS) that may be implemented by the States to perform this function on behalf of the Federal Government with systems approved by the Secretary. This authority has been delegated to the U.S. Coast Guard. The regulations requiring the numbering of undocumented vessels are in 33 CFR Part 173; regulations establishing the SNS for States to carry out this function are contained in Part 174.

In States that do not have an approved system, the Federal Government (U.S. Coast Guard) must administer the vessel numbering system. Currently, all 56 States and Territories have approved numbering systems. The approximate number of undocumented vessels registered by the States in 2009 was nearly 13 million.

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

The SNS collects information on undocumented vessels and vessel owners. States submit reports annually to the Coast Guard on the number, size, construction, etc., of vessels they have numbered. That information is used by the Coast Guard in 1) publication of an annual "Boating Statistics" report required by 46 U.S.C. 6102(b), and 2) for allocation of Federal funds to assist States in carrying out the Recreational Boating Safety (RBS) Program established by 46 U.S.C. Chapter 131.

On a daily basis or as warranted, Federal, State, and local law enforcement personnel use SNS information from the States' numbering systems for enforcement of boating laws or theft and fraud investigations. In addition, when encountering a vessel suspected of illegal activity, information from the SNS increases officer safety by assisting boarding officers in determining how best to approach a vessel. Since the September 11, 2001 terrorist attacks on the United States, the need has increased for identification of undocumented vessels and their owners for port security and other missions to safeguard the homeland, although the statutory requirement for numbering of vessels dates back to 1918.

3. Consideration of the use of improved information technology.

Although the Coast Guard created the SNS, and published regulatory requirements for information collected in State systems, implementation of the program in a State is not mandatory and the regulations do not prescribe how the States are to maintain the system. Each State creates and maintains its own system for numbering of undocumented vessels. Currently, there is no way to determine the percentage of registration documents submitted electronically or how much of the system in its entirety is electronic, although we are aware of an increasing number of States moving toward an electronic function for renewals. Aggregate vessel population information is electronically transmitted by the States to the Coast Guard.

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

The information required by the SNS is not available from any other source. The information collection meets the statutory requirement of 46 U.S.C. 12301 and 12302, as well as requirements for performing the homeland security mission, by providing identifying information on undocumented vessels.

5. Methods to minimize the burden to small businesses if involved.

The information required by the SNS is the minimum necessary to properly implement the statutory requirement for numbering of undocumented vessels propelled by machinery, and is applied uniformly to all owners. Small businesses operating as liveries for rental of recreational and certain undocumented vessels provide the same information on their vessels as any individual owner. There is no burden on other small businesses unless they have been authorized by the States to voluntarily act as agents of the State to collect the information, e.g., a boat dealer provides the application to a new boat buyer and sends the application to the State for processing.

6. Consequences to the Federal program if the collection(s) was conducted less frequently.

As required by statute and the SNS regulations (46 U.S.C. 12304(a); 33 CFR 173.79 and 174.27), a vessel registration must be renewed at least once every three years. Each State has the option under the program to do so more frequently and some States require annual or biannual renewal. From a law enforcement/homeland security perspective, annual renewals would be preferable but cannot be required under current law.

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.

The Coast Guard published on May 7, 2010, a Notice of Proposed Rulemaking (NPRM) entitled “Changes to Standard Numbering System, Vessel Identification System, and Boating Accident Report Database” (SNS-VIS-BARD) [USCG-2003-14963; RIN 1625-AB45; 75 FR 25137]. The rulemaking proposed—

- to amend its rules related to numbering of undocumented vessels and reporting of casualties. These changes would align and modernize terminology used in the Standard Numbering System (SNS), the Vessel Identification System (VIS), and casualty reporting; require validation of vessel hull identification numbers; require SNS vessel owners to provide personally identifiable information; and provide administrative flexibility for States. Together, the proposed changes would improve recreational boating safety efforts, enhance law enforcement capabilities, advance maritime security, and clarify requirements for all stakeholders.

The Coast Guard received no collection of information-related comments to the NPRM. On March 28, 2012, the SNS-VIS-BARD Final Rule was published (77 FR 18689).

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 by the federal government to the respondents for this information collection.

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

There are no questions of sensitive nature.

12. Estimates of Annualized Burden Hours and Cost

The paperwork burden from the SNS program is based on a three-year registration cycle. The true number of registrations will vary according to actual growth in numbered vessels as reported by States. There would be an annual estimated burden of 385,464 hours for the estimated 4,644,142 annual responses..

Cost estimates are based on a GS-03 wage \$28 per hour and an average 5 minutes per response. The total annual cost of vessel registrations is \$10,792,992. See Table 1: Summary.

Table 1: Summary

Number of Respondents	56
Number of Responses	4,644,142
Total Burden Hours	385,464
Total Cost	\$10,792,992

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

There are no capital and start-up costs, record keeping costs or maintenance costs for the respondents. Each State's system is unique, so system costs vary from State to State. The cost to States is the cumulative cost associated with all State SNS systems and likely \$28,000,000 to \$56,000,000 for all 56 systems that cost in the range of \$500,000 to \$1,000,000 per system.

14. Estimates of annualized Federal Government costs.

Collection costs to the Federal Government for the SNS are negligible, because States implement the program. The Coast Guard does receive aggregate vessel population numbers from the States as a result of this collection, but time spent receiving and reviewing this data is minimal.

15. Explain the reasons for the change in burden.

First, the change (i.e., increase) in hour burden is a PROGRAM CHANGE due to the SNS-VIS-BARD rulemaking [USCG-2003-14963; RIN 1625-AB45]. The changes to the reporting requirements are as follows—

- An additional term for “engine drive type” was added.
- Terms found in 33 CFR 174.17 “Contents of application for certificate of number” and 33 CFR 174.19 “Contents of certificate number” were modified to align with the terms used in 33 CFR 187.103 “What information must be collected to identify a vessel?”.

Second, the methodology for calculating burden remains unchanged.

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

States report the number of vessels to the Coast Guard each year. These reports are compiled in the annual “Boating Statistics” report, and are used in the annual allocation of Federal financial assistance available for State boating safety programs.

17. Explain the reasons for seeking not to display the expiration date for OMB approval of the collection of information.

USCG will display the expiration date for OMB approval of this information collection

18. Explain each exception to the certification statement.

USCG does not request an exception to the certification of this information collection.

B. COLLECTION OF INFORMATION EMPLOYING STATISICAL METHODS

This information collection does not employ statistical methods.