

**JUSTIFICATION FOR CHANGE  
NORTHEAST REGION PERMIT FAMILY OF FORMS  
OMB CONTROL NO. 0648-0202**

The National Marine Fisheries Service (NMFS) is proposing a change to OMB Control No. 0648-0202, to add a new information collection requirement for vessels requesting a days-at-sea (DAS) credit for a canceled trip. There would be a maximum of 388 hours added to the public burden and \$1,704 in recordkeeping/reporting costs, associated with this change. This analysis was conducted assuming each permitted vessel will request one canceled trip DAS credit per fishing year.

In response to a fishing industry request, NMFS is proposing a provision that would allow vessels that have canceled a fishing trip due to unforeseen circumstances, but have not yet conducted any fishing activity, to be credited DAS upon written request of the vessels owner/operator. This provision would apply to all fisheries that operate under a DAS management system, specifically the Northeast (NE) multispecies, monkfish, and Atlantic sea scallop fisheries. Under this provision, a canceled trip DAS credit would only be approved in cases where fishing gear was set or hauled and the vessel was, therefore, not in possession of any fish. The vessel's vessel monitoring system (VMS) will provide data that will help determine whether or not the vessel hand engaged in setting or hauling fishing gear. To ensure the enforceability of this provision, vessels seeking a canceled trip DAS credit would be required to notify NMFS Office of Law Enforcement to coordinate a monitored landing event. The initial notification method depends upon the reporting requirements of the vessel's permit type. Vessels required to report using a VMS unit will be required to send a VMS email and vessels not required to use a VMS must call the interactive voice response (IVR) backup line. Additionally, after landing, both VMS and IVR vessels would be required to submit a DAS credit request form. *This change request addresses the VMS requirement and the DAS credit form only and adds an additional form to the 0648-0202 family of forms. The IVR requirement is being submitted in a change request to the 0648-0212 family of forms.*

The new DAS credit form will also be used when requesting a DAS credit under two previously implemented DAS credit provisions, specifically the Good Samaritan and the standing by

entangled whale DAS credits. These two provisions previously required an original written report rather than completing a NMFS issued standardized form. This change request does not require any additional information to be provided under these two previously implemented DAS credit provisions.

As of August 2011, there were 890 NE multispecies DAS permits, 672 monkfish DAS permits, and 346 scallop DAS vessels. Thus, this new requirement could apply to a maximum of 1,908 permit holders. However, of the 1,908 permits affected, 845 are VMS vessels and the remainder, 1,063, are either IVR vessels or inactive vessels. In practice, the number of affected vessels is expected to be substantially lower because DAS permitted fisheries are generally grouped together into a single suite of permits, however it is not possible to estimate the exact number prior to implementation of the requirement.

*The VMS notification requirement of this change request only applies to the 845 vessels using VMS. The VMS email is estimated to take 5 minutes per vessel to fill out, for a total of 70 hours (5 min. x 845 vessels). Each VMS email will cost approximately \$1, for a total of \$845 (\$1 x 845 vessels x 1 submission per vessel).*

All 1,908 permit holders will be required to fill out the DAS credit form when requesting a DAS credit from NMFS. Each DAS credit form will take 10 minutes to fill out and send in, for a total of 318 hours (10 min. x 1,908 vessels). The cost of each form will be \$0.45 (current cost of a stamp) for a total of \$859 (\$0.45 x 1,908 vessels x 1 submission per vessel).

The 0648-0202 burden table will be modified as shown below:

					<b>Total Burden (hours)</b>		<b>Cost to:</b>	
	<b># of Entities</b>	<b>Items per Entity</b>	<b>Total # of Items</b>	<b>Response Time (min)</b>	<b>Public</b>	<b>Government</b>	<b>Public</b>	<b>Govt.</b>
VMS Email	845	1	845	5	70	141	\$845	\$3,525
Cancelled trip DAS Credit request	1,908	1	1,908	10	318	318	\$859	\$7,950
<b>Net additional responses, hours and costs</b>	<b>No change</b>		<b>2,753</b>		<b>388</b>	<b>459</b>	<b>\$1,704</b>	<b>11,475</b>