**JUSTIFICATION FOR CHANGE**

**NORTHEAST REGION PERMIT FAMILY OF FORMS**

**OMB CONTROL NO. 0648-0202**

National Marine Fisheries Service (NMFS) is proposing a change to the 0648-0202 family of forms to add a new information collection for federally permitted vessels. This information collection will provide vessel owners with the option to reduce duplicate letters they receive if they own more than one boat with the same address. This change applies only to our general Permit Holder Letters that are sent to active permit holders. It does not change how we generate and mail permit specific information, such as applications, individual fishing quotas, and landings information. There will be 46 hours of burden added and no additional public cost burden associated with this change.

The Northeast Regional Office (NERO) is redesigning their address profile system that would enable vessel owners to receive a single notice for our general Permit Holder Letter mailings. This option should decrease the amount of mail generated by NERO and reduce the amount of redundant mail received by industry. In addition, a program is being created that will provide vessel owners with the option to go “paperless” and receive all communications from the NERO electronically through email. However, the NERO does not currently have the permission from the vessel owner to consolidate their mailings into a single letter. This change request adds an optional form for vessels to request a change to their mailing options as part of the Federal Northeast Vessel Permit Application and Renewal Forms in 0648-0202 family of forms.

Currently, there are approximately 500 businesses and documentation services that receive mail for more than one vessel at their address. The total number of vessels that this would impact is about 1,250. In addition, new owners, if they have multiple vessels, will be asked to submit the mailing option form. It is expected to take the 500 businesses 5 minutes each to complete the vessel mailing option form, for a total of 42 hours (2,500 minutes), and an additional 50 businesses as they sign up, 4 hours. Businesses that opt into this program will not be required to complete the form each year. For businesses/permit holders that remain in the single letter program, completing the enrollment form for the single letter option will be a one-time event and thus not require an annual selection.

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

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  |   |   |   |   |   |   |
|   | **# of Entities** | **Items per Entity** | **Total # of Items** | **Response Time (min)** | **Total Burden (hours)** | **Cost to Public** |
| **Dealer Emails** |  |  |  |  |  |  |
|  Initial Establishment  | 500 | 1 | 500 | 5 | 42 |  $0 |
|  Continuing Updates | 50 | 1 | 50 | 5 | 4 |  $0 |