

SUPPORTING STATEMENT
for
Certificate of Discharge to Merchant Mariners
1625-0012

A. JUSTIFICATION

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

Title 46, United States Code, 10311 and Title 46, Code of Federal Regulations, 14.301 requires each master or individual in charge of a vessel when Shipping Articles are required, to prepare a Certificate of Discharge for each merchant mariner being discharged. The Certificate of Discharge provides discharged mariners with evidence of sea service to determine eligibility for various benefits, such as medical and retirement. The information collected is also used to show eligibility for an original, renewed or upgraded Merchant Mariner Credential (MMC), and to provide information to the U.S. Maritime Administration (MARAD) on the availability of mariners in a time of national emergency. The Coast Guard's Merchant Mariner Licensing and Documentation system captures information from the Certificates of Discharge, which is used by the Coast Guard's National Maritime Center as a means to evaluate the qualifications of mariners who apply for a MMC. The information from this system is compiled annually by MARAD to prepare congressionally mandated reports on mariner availability.

2. Indicate how, by whom, how frequently, and for what purposes the information is to be used and the consequence to the Federal program or policy activities if the collection of information was not conducted.

The information is used primarily on an as needed basis by mariners and the Coast Guard to establish sea service time and qualifications for issuing original, renewal or upgraded MMCs; in claims against employers; in medical claims; and in qualifying for retirement benefits or insurance benefits.

3. Describe whether the collection of information involves the use of automated collection techniques.

At present, the Coast Guard does not employ methods for collecting this information electronically or by any other automated process. The only methods available for collecting this information are by mail or email. The current paper format (CG-718A) has been in use since World War II and was last revised in March of 1985. Shipping companies can order the form via the NMC website at <http://www.uscg.mil/nmc/cd.asp>. However, the Coast Guard developed an editable .pdf version of this form which is being submitted with the revision of this collection. The .pdf format will be available in addition to the paper format (CG-718A), since not all vessels are equipped with the technology to complete and print an electronic CG-718A. The CG-718A

is in triplicate carbon copy form per regulatory requirements. The online version will be available to the general public via the internet.

4. Describe efforts to identify duplication.

No duplication of information collected is known. This is the only collection available that specifically address these requirements. Although the Coast Guard Authorization Act of 2010 (Public Law 111–281—Oct. 15, 2010, 124 Stat. 2905) amended Section 7502 of title 46, United States Code, by adding “The Secretary may prescribe regulations requiring a vessel owner or managing operator of a commercial vessel, or the employer of a seaman on that vessel, to maintain records of each individual engaged on the vessel subject to inspection under chapter 33 on matters of engagement, discharge, and service...,” the Secretary has not prescribed new regulations requiring the aforementioned.

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

This collection does not have an impact on small businesses or other small entities.

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

If the information is not collected, the statutory requirements (46 U.S.C. Chapter 103) would not be met and the Coast Guard would not be able to maintain copies of all discharges which are used to substantiate the nature and duration of a mariner’s employment on a particular vessel. Additionally, if the information is not collected, MARAD would be unable to manage its manpower program and provide reports to Congress.

7. Explain any special circumstances.

No special circumstances exist for this collection of information.

8. Solicitation of Comments.

One comment was received in connection with the 30 day notice. The comment states that there are two separate systems that maintain a mariner’s ‘sea service’ and ‘employment record’. The two systems identified were the Certificate of Discharge and a sea service letter that may be furnished by employers. The comment specifically asks, “Is there a separate OMB Approval number to collect this information by a Sea Service letter?”

There is no OMB approved collection that requires the information in 1625-0012 to be duplicated. However, vessels that do not meet the applicability requirements for Certificates of Discharge must still document the sea service of employed mariners. This documentation is accepted in different forms including the OMB approved CG-719S, collection 1625-0040, and letters from employers containing the information required by 46CFR.

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The Coast Guard reviewed this collection and the submitted comment and did not identify a duplicate collection of information.

9. Explain any decision to provide any payment or gift to respondents.

No payments or gifts are provided to respondents.

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

Confidentiality is provided to respondents via a System of Records, 65 FR 19476-01, dated April 11, 2000.

11. Provide additional justification for any questions of a sensitive nature.

There is no “sensitive nature” information collected.

12. Provide estimates of the hour burden of the collection of information.

In 2011, approximately 44,332 Certificates of Discharge of Merchant Mariners (CG-718A) were received and processed. The completion of an average CG-718A takes approximately 2 minutes to complete, and is mailed to the National Maritime Center. The total hour burden based on 2011 numbers will be approximately 1,478.

Annual CG-718As completed:	44,322
Time to complete a CG-718A:	2 minutes
Original Burden Hours:	2,443 hours
Notifications of Change:	-965 hours
Additional Burden Hours:	0
New Total Burden Hours for CG-718A:	1,478 hours

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

The 44,322 annual submissions of the CG-718A are grouped and mailed to the Coast Guard in approximately 5,300 separate packages. The average shipping cost for each package is \$2, with an annualized capital cost of \$10,600.

14. Provide estimates of annualized cost to the Federal Government.

Once the Certificate of Discharge is received from the respondent, the Coast Guard performs the appropriate data entry. This information is available to the Coast Guard during the evaluation of MMC applications via the Merchant Mariner Licensing and Documentation (MMLD) database.

Annual Burdened Cost to Government						
	Per Month	Per Year	Total minutes to complete 1 CD Date Entry	Total minutes to Complete CD Data Entry (per year)	Total Hours to Complete CD Entries	Annual Burden Costs to Government
CD's	~3,694	~44,322	.5	22,161	~369	\$12,354

The estimated average hourly costs:

.5 min = 30 seconds

30 seconds * 44,322 = 1,329,660 seconds / 60 = 22,161 minutes / 60 = 369.35 hours

\$20.22 * 369 hours = \$7,461

The hourly wage of \$20.22 was estimated by equating a respondent to a GS 7 step 1 position. (Info located at the following location http://www.opm.gov/oca/10tables/pdf/dcb_h.pdf).

15. Explanation for Program Changes or Adjustments.

There are no program changes or new information associated with this collection. However, the number of responses since the last revision of this collection reduced by 28,968, which equates to an adjustment of 965 less burden hours. The adjustment in burden hours could be influenced by fewer voyages under these requirements or higher non-compliance with applicable regulations. Foreign, intercoastal, and coastwise voyages can be influenced by supply and demand. In addition, the annualized capital cost changed from no cost to \$10,600 because this information was not captured on the previous collection. The Coast Guard developed an editable .pdf version of this form which is being submitted with the revision of this collection.

16. For collection of information whose results will be published.

This information collection will not be published for statistical purposes.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that displaying the expiration date would be inappropriate.

The OMB expiration date should and will be displayed on reports.

18. Explain each exception to the certification statement identified in "Certification for Paperwork Reduction Act Submission".

There are no exceptions.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS.

This information is not collected through the use of statistical methods.