

**SUPPORTING STATEMENT
ALASKA CRAB ECONOMIC DATA REPORTS
OMB CONTROL NO. 0648-0518**

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

The Council developed the following purpose and need statement defining its rationale for considering this action:

As a part of its Bering Sea and Aleutian Island crab rationalization (CR) program, the Council developed a comprehensive economic data collection (EDR) program to provide information to analysts to assess the effects of the CR program and identify problems that may require future amendments to the EDR program.

Council review of the EDR program, development of the EDR metadata through PNCIAC and testimony from the industry has resulted in the identification of substantial portions of the EDR data that are inaccurate. In addition, several elements are wholly or partially redundant with other existing data collection requirements, and some components may not further the Council's objectives. The cost to industry, both directly through data submission, and indirectly through cost recovery funding of program administration, outweigh the benefits of the resultant data and greatly exceed estimates provided in the initial analysis of the EDR program and in the accompanying regulatory analyses.

To address these problems, the Council intends to amend the EDR process so that the data collected is accurate, informative to the Council, not redundant with existing reporting requirements, and can be reported by industry and administered at a reasonable cost.

The Council expressly wants to limit the EDR to the collection of data that have been demonstrated, through the development of the EDR metadata, and other reviews of the data, to be sufficiently accurate. Data collection should be structured and specific elements identified, to minimize costs while maintaining accuracy and providing the greatest information value to the management decision making process.

As analysts develop, refine, and verify methods for accurately collecting additional informative data elements, the Council will consider expansion of the data collection program to include those elements. This process can also inform the future Council action regarding other existing and future EDR programs.

1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g. establishments, State and local governmental units, households, or persons) in the universe and the corresponding sample are to be provided in tabular form. The tabulation must also include expected response rates for the collection as a whole. If the collection has been conducted before, provide the actual response rate achieved.

This data collection process is in the form of a census; therefore, all vessel and plant owners are required to fill out the EDRs or certification section, as applicable. The response rate is expected to be 100 percent, as it was in 2011. NOAA Fisheries Office for Enforcement (OLE) can levy fines against any individual who does not comply with the law.

2. Describe the procedures for the collection, including: the statistical methodology for stratification and sample selection; the estimation procedure; the degree of accuracy needed for the purpose described in the justification; any unusual problems requiring specialized sampling procedures; and any use of periodic (less frequent than annual) data collection cycles to reduce burden.

EDRs will be collected from all vessels and plant owners participating in CR crab fisheries during each year. Owners of these vessels and plants will be identified through fish tickets, COAR, and crab quota shareholder data. We will not be sampling from these populations, but rather compiling a census for the historical years and a census for all future years.

With the response (produced from completed and verified data forms), AFSC analysts will construct statistical models for estimating key variable values for each strata. These data will also be used to develop cost functions from this data and to estimate changes in variable costs of operations, average gross earnings, and changes to net revenues arising from changes in the costs of elements collected. Data may be developed to estimate changes in purchases and economic impacts before and after CR Program implementation. Several methods are available to estimate these outputs. The analysts will select the best methods based on an assessment of the data in this collection and from other sources.

3. Describe the methods used to maximize response rates and to deal with nonresponse. The accuracy and reliability of the information collected must be shown to be adequate for the intended uses. For collections based on sampling, a special justification must be provided if they will not yield "reliable" data that can be generalized to the universe studied.

Each of the owners and leaseholders in the CR crab harvesting and processing sectors are required to submit an annual EDR. Therefore, the response to mandatory data requirements should be very high. Those individuals who do not submit their EDR by the submission date will receive a follow-up phone call from PSMFC. If a solution cannot be reached at that point, their information will be referred to the OLE. Therefore, we are anticipating response rates of 95-100 percent.

Enforcement of the data collection program with regard to non-compliance has been different from enforcement programs used to ensure that accurate landings are reported. The economic data will not be used for in-season management; persons submitting the data are given an opportunity to correct omissions and errors before any enforcement action is taken.

Giving the person submitting data a chance to correct problems is considered important because of the complexities associated with generating these data. Only if the agency and the person submitting the data cannot reach a solution would the enforcement agency be contacted. The intent of this program is to ensure that accurate data are collected without being overly burdensome on industry for unintended errors.

4. Describe any tests of procedures or methods to be undertaken. Tests are encouraged as effective means to refine collections, but if ten or more test respondents are involved OMB must give prior approval.

Since the CR crab EDR Program has been in place, informal testing has taken place by meeting with EDR submitters to discuss ways in which the forms used to request information could be improved. The accountants that perform the data quality audits, as well as PSMFC (who administers the data collection) also document ways in which the EDRs could be clarified and we have used this information to clarify instructions and variable definitions.

5. Provide the name and telephone number of individuals consulted on the statistical aspects of the design, and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

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