

**Supporting Statement
for
Plan Approval and Records for Tank, Passenger, Cargo and Miscellaneous
Vessels, Mobile Offshore Drilling Units, Nautical School Vessels and
Oceanographic Research Vessels – 46 CFR Subchapters D, H, I, I-A, R and U**

A. Justification.

1. Circumstances that make the collection of information necessary.

The Coast Guard enforces regulations promoting the safety of life and property in marine transportation, authorized under 46 USC 3301 and 3306. These statutes subject freight, nautical school, passenger, tank, steam and seagoing motor vessels and barges to plan review and inspection before being certified for their intended service. This is to ensure structural adequacy, suitable accommodations, and generally, that each vessel is in full compliance with applicable marine safety regulations. The regulations include standards for structural strength, propulsion and equipment, accommodation arrangement, vessel stability, cargo gear, structural fire protection, and vapor control systems. In addition, certain vessels must meet the standards of the International Safety of Life at Sea (SOLAS) Convention. Designers, manufacturers and vessel builders normally develop both plans and manuals as a standard business practice.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

Coast Guard

- Maritime Safety
- Maritime Security
- Protection of Natural Resources

Prevention Policy & Response Policy Directorates (CG-5P & CG-5R)

- Safety: Eliminate deaths, injuries, and property damage associated with commercial maritime operations.
- Security: Eliminate marine transportation and coastal security vulnerability.
- Human and Natural Environment: Eliminate environmental damage associated with maritime transportation and operations on and around the nation's waterways.

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

a. Requirements for the submission of plans, technical information, and operating manuals: This information is required by the Coast Guard in order to determine if the vessel's construction, arrangement and equipment meet applicable regulations. The plans submitted to the Coast Guard are those normally developed by a shipyard, designer or manufacturer for the construction of the vessel. They are not developed solely for submission to the Coast Guard. Compliance with most of the standards could be determined by examining the vessel after its

completion; however, it is much more efficient and cost effective to the public to review the plans prior to construction. By reviewing the plans prior to construction, a vessel owner or builder can be assured that the vessel is designed in accordance with regulatory standards. Submissions are nonrecurring. They are made once, prior to the vessel's construction or alteration. Duplicate plans are not required to be submitted when more than one vessel is constructed to the same plans. Plans must be submitted either to the Commanding Officer, U.S. Coast Guard Marine Safety Center, 1900 Half Street SW, Washington, DC, 20024 or to the Officer in Charge, Marine Inspection at or nearest the place where the vessel is to be built.

b. Requirements for information to be available to vessel operating personnel: These requirements are intended to ensure that sufficient information is provided to the vessel's personnel for the safe and proper operation of the vessel. No format and generally no specific content are required in the manuals. Vessel operators develop and specify their own procedures for the safe and proper operation of the vessel's systems and equipment. Many vessel operators provide manuals to their vessels that exceed the minimum requirements of the Coast Guard. The Coast Guard subsequently reviews this information when it is submitted. The operating information is required to be on board the vessel as long as the vessel remains subject to the regulations.

3. Consideration of the use of improved information technology.

The Coast Guard Marine Safety Center (MSC) accepts information/plans via electronic submittal. For information on submitting information go to— <https://homeport.uscg.mil/msc> > Contact Us > Mail Address, Telephone Contacts, and E-Commerce Info. Information may also be submitted to the CG Officer in Charge, Marine Inspection (OCMI) at the local Sector Office. Contact info for CG OCMI's can be found at—<http://www.uscg.mil/top/units/>. Electronic submission is voluntary, and we estimate that 61% of respondents submit their plans electronically.

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

There are no other Federal agencies with similar programs. However, there are areas where the Coast Guard's standards parallel those of Authorized Vessel Classification Societies (ACS). To eliminate duplication in these areas, the Coast Guard and ACS cooperate under the provisions of a Memorandum of Understanding which gives ACS authority to act on behalf of the Coast Guard in many areas of plan review and inspection of vessels under construction and the tonnage measurement of vessels. Implementing policies and procedures are published in Navigation and Vessel Inspection Circular (NVIC) No. 10-82, Change 2, "Acceptance of Plan Review and Inspection Tasks Performed by the American Bureau of Shipping for New Construction or Major Modifications of U.S. Flag Vessels". Under these procedures, the Coast Guard accepts ACS approval of plans for hull structure and certain engineering systems, on those vessels that the vessel owner/operator chooses to classify with ACS.

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

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

6. Consequences to the Federal program if collection were not done or conducted less frequently.

If this information were not collected, the Coast Guard would not be able to carry out its responsibility for the promotion of safety on commercial vessels. The information cannot be collected any less frequently, as the information is submitted when the owner seeks Coast Guard approval to construct or modify a vessel.

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 a manner consistent with the guidelines in 5 CFR 1320(d)(2).

8. Consultation.

A 60-day Notice and a 30-day Notice were published in the *Federal Register* to obtain public comment on this collection (See [USCG-2012-0038], June 1, 2012, 77 FR 32657; and September 4, 2012, 77 FR 53898). The Coast Guard has not received any comments on this information collection.

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

The U.S. Coast Guard does not provide payment of gifts to respondents in exchange for a benefit sought.

10. Describe any assurance of confidentiality provided to respondents.

There are no assurances of confidentiality provided to the respondents for this information collection.

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

There are no questions of sensitive language.

12. Estimates of reporting and recordkeeping hour and cost burdens of the collection of information.

- **The estimated annual number of respondents is 137.**
- **The estimated annual number of responses is 3,589.**
- **The estimated annual hour burden is 3,589 hours.**
- **The estimated annual cost burden is \$297,887.**

MSC Plan Review: In 2009 through 2011, the **Coast Guard received an annual average of 2,483 plans** and technical submissions directly from respondents in compliance with

Subchapters D, H, I, I-A, R, and U. These plans were submitted according to the following breakdown (by 46 CFR Subchapter for vessel certification):

<u>Subchapter</u>	<u>% of Total</u>	<u>No. of Plans</u>
D	35.3	876
H	25.5	635
I & I-A ¹	36.4	902
R	1.6	40
U	<u>1.2</u>	<u>30</u>
2009-11 Total	100%	2,483

In 2009 through 2011, there were an annual average of **137 unique respondents**.²

The cost to respondents is administrative (reproduction, handling, mailing) since the engineering and drafting would be performed whether or not plans or other information were submitted to the Coast Guard. The submission of technical information is required when a vessel is first constructed or undergoes major repair or alterations that affect the vessel design or the operation of a system for which there is a regulatory standard.

ACS Plan Review: In addition to the 2,483 submissions directly to the Coast Guard, **1,106 plans were submitted by respondents directly to ACS** for review/approval on behalf of the Coast Guard.

The estimate of the burden is based upon the Coast Guard's experience with plan review and approval, estimate of annual new construction, number of vessels built to identical plans, and the number of plans required to be submitted per vessel. The estimates are based upon submissions to the Coast Guard directly, or via the ACS (for Coast Guard plan review oversight purposes). The burden hours required for the submissions are listed below:

In 2009 through 2011, plans submitted to the MSC require about 60 minutes (1 hours) of preparation time for submission to the Coast Guard. So the total number of hours required for these plans was 1,018 hours (**2,483 x 1 hours = 2,483 hours**). For the ACS plan submissions, at 1 hour of preparation/submission time per plan, the total number of hours required for these plans was 1,106 hours (**1,106 x 1 hour = 1,106 hours**).

The total burden is hence 3,589 hours (2,483 +1,106).

We assume these plans are developed by someone equivalent to level GS-13, and the wage rate used is \$83/hour.³ The annual cost is calculated as follows-- 3,589 hours x \$83/hour = \$297,887.

The total cost to the respondents is \$297,887.

¹ Data on subchapters I and I-A are not collected on a separate basis but only on a consolidated basis.

² Data on "unique" respondents is only available on a subchapter basis as opposed to on a consolidated basis. As a result the figures presented are probably overstated.

³ Equivalent to a GS-13 "out of gov't" rate, see COMDTINST 7310.1M.

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

There are no capital, start-up or maintenance costs associated with this information collection.

14. Estimates of annualized Federal Government costs.

With some minor exceptions, the federal burden of items covered by this supporting statement is borne by the Coast Guard's field technical office, the Marine Safety Center. This office is responsible for the review and processing of vessel plans and information. The technical review is performed by the equivalent of a Lieutenant (O-3). The average hourly wage of a Lieutenant is \$72⁴. Each review takes approximately 2.0 hours. Thus, the government cost burden is 4,966 hours (2,483 plans x 2.0 hours = 4,966 hours) at a cost of \$357,552 (4,966 hours x \$72 = \$357,552).

15. Explain the reasons for the change in burden.

The change in burden is an ADJUSTMENT. There is no proposed change to the reporting requirements of this collection. The reporting requirements remain unchanged.

The following items listed below are changes to the collection:

- Increase in burden (i.e., burden hours) is due to a change in the methodology. The methodology was revised to align it with similar plan review information collection request (ICR) submissions (i.e., 1hour per submission—see ICR 1625-0031, 1625-0036 & 1625-0097).
- Updates are provided for cost burden associated with this collection of information.
- The Coast Guard has updated printable instructions for this collection of information.

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

The Coast Guard does not intend to employ the use of statistics or the publication thereof for this information collection.

17. Approval to not display expiration date.

The Coast Guard will display the expiration date for OMB approval of this information collection.

18. Explain each exception to the certification statement.

The Coast Guard does not request an exception to the certification of this information collection.

B. Collection of Information Employing Statistical Methods.

⁴ Per O-3 "in-gov't" rate, see COMDTINST 7310.1M).

1625-0038

This collection does not employ statistical methods.