

**Supporting Statement
for
Regulated Navigation Area; Reporting Requirements for Barges
Loaded with Certain Dangerous Cargoes, Inland Rivers, Eighth Coast
Guard District and the Illinois Waterway, Ninth Coast Guard District**

A. Justification.

1. Circumstances that make the collection of information necessary.

Terrorist attacks on September 11, 2001, inflicted catastrophic human casualties and property damage. These attacks highlighted terrorists' abilities to utilize multiple means in different geographic areas, increasing their opportunities to maximize destruction by using multiple terrorist acts. In response, the Coast Guard established Regulated Navigation Areas (RNAs) within the inland rivers of the Eighth Coast Guard District and Ninth Coast Guard District in order to safeguard vessels, ports and waterfront facilities from sabotage or terrorist acts. The RNAs apply to barges loaded with Certain Dangerous Cargoes (CDC) operating on the Illinois Waterway System in the Ninth Coast Guard District, and in the Eighth Coast Guard District on the Mississippi River above mile 235.0, Above Head of Passes, including all its tributaries; the Atchafalaya River above mile 55.0 including the Red River; the Ohio River and all its tributaries; and the Tennessee River from its confluence with the Ohio River to mile zero on the Mobile River and all other tributaries between these two rivers. The RNAs affect vessels transporting CDCs that can be used as weapons of terrorism resulting in substantial loss of life, loss of property, environmental damage, and grave economic consequences. The RNAs require operators of barges loading or loaded with CDCs within the RNAs to periodically report their position and other specified information to the Inland River Vessel Movement Center (IRVMC) to protect the infrastructure and citizens of the United States against sabotage and terrorist acts.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention

Coast Guard

- Maritime Security

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

- Security: Eliminate marine transportation and coastal security vulnerability.

2. Purpose of the information collection.

Title 33 CFR 165.10 defines a regulated navigation area as a defined boundary for which regulations for vessels navigating within the area have been established. The

purpose of collecting information within the RNA is to allow the Coast Guard to maintain continuous maritime domain awareness on the inland rivers to ensure port safety and security, and ensure the uninterrupted flow of commerce within the Eighth and Ninth Coast Guard Districts. This awareness will help the Coast Guard respond appropriately to actual or threatened terrorist actions and enhance maritime security by escorting CDC barges in the vicinity of high-density population areas.

3. Considerations of the use of improved information technology to reduce the burden.

The Coast Guard established the IRVMC to accept reporting in one location vice requiring reports to be made to each Captain of the Port (COTP) in which the CDC barge was operating. This alleviates the burden on the operator of a CDC barge from having to determine which COTP zone they are operating in and maintaining a contact list for each COTP. The IRVMC accepts telephone (toll free), facsimile (toll free), and e-mail transmissions as means of reporting the information. Persons subject to this requirement may utilize the means that most efficiently meets their needs, provided that the information and timeliness requirements are met. We estimate that 100% of the reporting requirements are done electronically.¹

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

The Coast Guard monitors regulatory activity in this field. To date, no equivalent State and local programs have been identified that require similar information.

5. Methods used to minimize the burdens, 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 conducted less frequently.

Less frequent collection would significantly impact the Coast Guard's ability to maintain maritime domain awareness on the inland rivers, as the Coast Guard would not have a timely and accurate picture of where CDCs were on defined segments of the inland rivers.

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.

¹ Via phone, fax or e-mail.

A 60-day Notice and a 30-day Notice were published in the Federal Register to obtain public comment on this collection (See [USCG-2012-1006], January 24, 2013, 78 FR 5192; and April 15, 2013, 78 FR 22275). The Coast Guard has not received any comments on this information collection.

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

There is no offer of monetary or material value for this information collection.

10. Describe any assurance of confidentiality is 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 information collection burden.

<i>Average number of respondents:</i>	63
<i>Total number of annual responses for reporting requirements:</i>	22,814
<i>Estimated annual hour burden for reporting requirements:</i>	1,901
<i>Total annual cost burden to respondents for reporting requirements:</i>	\$72,238

The average number of respondents is 63. This number was estimated by adding together the total number of phone calls, emails and faxes² received annually and then dividing them by 365.

The annual number of CDC reports is 22,814. This is based on the total number of phone calls, emails and faxes received by IRVMC during the past 3 years of reporting.

The estimated number of burden hours for CDC reports is 1,901. This hour burden was based on the estimated annual number of reports (responses) x 5 min/report. The cost burden is \$72,238.³ The average labor cost associated with processing each report is about \$3.17 per report.

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

² While the regulations allows for alternative reporting methods, the CG has not received reports in an alternative manner.

³ We assume the person completing a response is the civilian equivalent of a GS-6. According to the enclosure (2) to COMDTINST 7310.1(series), the out-of-government equivalent to this is \$38.00 per hour.

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

14. Estimates of annualized cost to the Federal Government.

The Federal Government cost is approximately \$448,000. This is based on 4 IRVMC watchstanders (Coast Guard or civilian personnel) equivalent to an E-6 or a GS-11.⁴

15. Reasons for change in burden.

The change in burden is due to a change in the estimated annual number of responses. There is no proposed change to the reporting requirements of this collection. The reporting requirements, and the methodology for calculating burden, remain unchanged.

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

This information collection will not be published for statistical purposes.

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.

This information collection does not employ statistical methods.

⁴ According to Enclosure (2) to COMDTINST 7310.1(series), the in-government rate for a GS-11 was \$56.00 per hour and the rate for an E-6 was also \$55.00 per hour. Thus, 2 individuals x \$56/hour x 2,000 hours + 2 individuals x \$55/hour x 2,000 hours equals \$ 448,000. As the IRVMC was moved/co-located w/ the USCG Navigation Center we assume no facility cost.