

**SUPPORTING STATEMENT
ATLANTIC HERRING AMENDMENT 5 FAMILY OF FORMS
OMB CONTROL NO. 0648-XXXX**

A. JUSTIFICATION

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

This request is for a new information collection to support regulatory changes to the Atlantic Herring Fishery Management Plan (FMP). FMPs for Federal Fisheries managed under the National Ocean and Atmospheric Administration's (NOAA) National Marine Fisheries Service (NMFS) are developed under the authority of the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act).

Amendment 5 to the Atlantic Herring FMP (Amendment 5) was developed by the New England Fishery Management Council (Council) to: improve the collection of real-time, accurate catch information for the Atlantic herring fishery; enhance the monitoring and sampling of catch at-sea; and address bycatch issues, in particular bycatch of river herring and shad, through responsible management.

Information collection requirements contained in Amendment 5, to be put forth in Proposed Rule 0648-AY47 and codified in 50 CFR 648, will be ultimately be added to existing information collections.

The items outlined in this information collection include:

- A new open access herring permit with 20,000 lb possession limit in Areas 2/3 for limited access mackerel permit holders;
- Provisions for new herring at-sea dealer permit;
- A requirement that Atlantic herring dealers that do not sort landings by species document, at each transaction, how they estimate the relative composition of catch;
- An increase in the number of vessels required to submit herring pre-landing notifications through onboard vessel monitoring systems (VMS);
- The elimination of the VMS power-down exemption for vessels issued Atlantic herring permits;
- The option to use VMS to declare into the herring fishery in lieu of applying for a Letter of Authorization (LOA) for herring carriers;
- Gear declarations for limited access herring vessels;
- Observer notification requirement for all limited access herring vessels, and the herring carriers;
- A requirement for vessel captains to submit a released catch affidavit documenting slippage events;
- A requirement that Category A and B Atlantic herring permit holders contribute \$325 per sea day to cover observer costs; and
- Requirements for observer service providers.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

The information collections that result from Amendment 5 will be used by several offices of NMFS, the United States Coast Guard (USCG), the New England Fishery Management Council (NEFMC), the Mid-Atlantic Fishery Management Council (MAFMC), state fishery management agencies, academic institutions, and other fishery research and management organizations to evaluate current management programs and future management proposals. All information collections are necessary for improved monitoring of the Atlantic herring fishery.

Areas 2/3 Open Access Herring Permit

Amendment 5 would establish a new open access herring permit for vessels engaged in the mackerel fishery. The new Areas 2/3 Open Access Herring Permit would allow vessels to possess up to 20,000 lb of herring per trip in herring management Areas 2 and 3. The new permit is intended to prevent discarding of Atlantic herring by limited access mackerel vessels that do not also have a limited access Atlantic herring permit. Vessels that have not been issued a limited access herring permit but have been issued a limited access mackerel permit would be eligible for the Areas 2/3 Open Access Herring Permit. Vessels may hold both open access herring permits at the same time.

The new open access permit would be subject to a number of the same reporting requirements as other herring permits. Permit holders would be required to submit vessel trip reports (VTRs) (Form 88-30 approved under OMB Control Number 0648-0212) on a weekly basis. In addition, they would be required to install and maintain a VMS unit on their vessels and declare intent to target Atlantic herring via VMS.

Atlantic Herring At-Sea Dealer Permit

Herring carriers typically receive herring from harvesting vessels and transport those herring to Federal dealers. The harvesting vessel reports those herring as catch, and dealers report those herring as a purchase. NMFS verifies the amount of herring caught by comparing the amount reported by the harvesting vessel against the amount reported by the dealer. If the herring transported by a herring carrier is not purchased by a Federal dealer, then NMFS does not have any dealer reports to compare to the vessel reports. Amendment 5 would establish an At-Sea Atlantic Herring Dealer Permit that would be required for herring carriers that sell herring, rather than deliver those fish on behalf of a harvesting vessel to a dealer for purchase. This permit would require compliance with Federal dealer reporting requirements. Vessels that have both an At-Sea Atlantic Herring Dealer Permit and a Federal fishing permit would be required to fulfill the reporting requirements of both permits while in possession of both permits, as appropriate. NMFS expects the reporting requirements for the At-Sea Atlantic Herring Dealer Permit to minimize instances where catch is reported by harvesting vessels but then cannot be matched to dealer reports; thereby improving catch monitoring in the herring fishery.

Dealer documentation of relative species composition

Amendment 5 seeks to improve the quality of information collected about Atlantic herring landings transactions, as well as information about any incidental landings of non-target species, namely river herring and shad. In order to gain additional information about how catch is handled, this amendment puts forth a requirement that Atlantic herring dealers that do not sort by species must document, at each transaction, how they estimate the relative composition of catch. This requirement would apply to all transactions involving the sale of any amount of Atlantic herring. Dealers are currently permitted to submit reports using a variety of electronic submission methods. This requirement would allow dealers to submit catch composition information along with standard dealer reports. It is expected that this information would facilitate quota monitoring, and cross-checking with other sources of landings information.

Pre-landing notifications

Currently, vessels with Category A or B permits, and vessels with a Category C permits fishing with midwater trawl gear in Areas 1A, 1B, and/or 3 are subject to a pre-landing VMS notification requirement. Amendment 5 would expand this pre-landing VMS notification requirement so that vessels with limited access herring permits, the new Area 2/3 Open Access permit, and vessels declaring herring carrier trips via VMS must notify NMFS Office of Law Enforcement via VMS of the time and place of offloading at least 6 hours prior to crossing the VMS demarcation line on their return trip to port, or if a vessel does not fish seaward of the VMS demarcation line, at least 6 hours prior to landing.

Elimination of Power-down Exemption

Limited access herring vessels are currently able to turn off (i.e., power-down) their VMS when in port, if they do not hold other permits requiring continuous VMS reporting. Vessels authorized to turn off their VMS in port must submit a VMS activity declaration prior to leaving port. Amendment 5 would prohibit vessels with herring permits from turning off their VMS when in port, unless specifically authorized by NMFS. A vessel representative would request a letter of exemption (LOE) from NMFS to turn off its VMS if that vessel will be out of the water for more than 72 hr. Herring vessels would not be allowed to turn off their VMS until they have received an LOE from NMFS. Additionally, a vessel owner would be able to sign a herring vessel out of the VMS program for a minimum of 30 days by requesting and obtaining an LOE from NMFS. When VMS units are turned off, consistent with an LOE, the vessel would not be able to leave the dock until the VMS unit was turned back on. Amendment 5 would prohibit herring vessels from turning off VMS units in port to improve the enforcement of herring regulations and help make herring VMS regulations consistent with VMS regulations in other Northeast fisheries. This requirement was approved under OMB Control Number 648-0202 and it will eventually be removed from that information collection.

Removal of weekly VTR requirement for Herring Carriers

Amendment 5 would exempt herring carriers from the VTR requirements associated with their vessel permits. Vessels issued herring permits are required to submit weekly VTRs to NMFS. However, dealers have incorrectly attributed catch to herring carrier vessels, rather than correctly attributed catch to the appropriate harvesting vessel, by reporting the herring carrier's VTR serial number rather than the VTR serial number of the harvesting vessel. To help prevent catch being attributed to the wrong vessel and minimize data mismatches between vessel and dealer reports, Amendment 5 would exempt herring carriers from the VTR requirement associated with

their herring permit. Dealers would still be responsible for correctly reporting the VTR serial number of the vessel that harvested the herring. This requirement was approved under OMB Control Number 648-0212 and, upon renewal, will be removed from that information collection.

VMS Declaration for Herring Carriers

Currently, herring carriers are vessels that may receive and transport herring caught by another fishing vessel, provided the herring carrier has been issued a herring permit, does not have any gear on board capable of catching or processing herring, and has been issued a letter of authorization (LOA) from the NMFS Regional Administrator (RA). The herring carrier LOA exempts the herring carrier from possession limits and catch reporting requirements associated with the vessel's herring permit. To allow time for the processing, issuance, and, if necessary, cancellation of the LOAs, the herring carrier LOAs have a minimum 7-day enrollment period. During the LOA enrollment period, vessels may only act as herring carriers and they may not fish for any species or transport species other than herring.

Amendment 5 would allow vessels to choose between enrolling as a herring carrier with an LOA and declaring a herring carrier trip via VMS. If a vessel chooses to declare a herring carrier trip via VMS, it would be allowed to receive and transport herring caught by another fishing vessel provided the herring carrier has been issued a herring permit, does not have any gear on board capable of catching or processing fish, and only transports herring. By declaring a herring carrier trip via VMS, a vessel would be exempt from the catch reporting (i.e., daily VMS reporting) associated with its herring permit and not bound by the 7-day enrollment period of the LOA. A vessel declaring a herring carrier trip via VMS may only act as a herring carrier and may not fish for any species or transport species other than herring. This measure would increase operational flexibility by allowing vessels to schedule herring carrier trips on a trip-by-trip basis. Vessels that do not possess a VMS or choose not to declare a herring trip via VMS may still act as carriers by obtaining a herring carrier LOA from the NMFS RA and operating in accordance with the LOA requirements.

Gear declaration for limited access herring vessels

Vessels with limited access herring permits are currently subject to a VMS activity declaration. Amendment 5 would expand the VMS activity declaration requirement by adding a gear code declaration. Open access permit holders are not currently subject to VMS requirements, and are not affected by this change.

Observer Funding Contribution

Amendment 5 would increase observer coverage on Category A and B vessels, and require industry contributions of a target maximum of \$325 per day to help offset the cost of additional coverage.

Observer notification requirements

Amendment 5 would expand and modify trip notification and VMS requirements for vessels with herring permits to assist with observer deployment and provide enforcement with advance notice of trip information to facilitate enforcement monitoring of landings. Currently, vessels with Category A or B permits, as well as any vessels fishing with midwater trawl gear in Areas 1A, 1B, and/or 3, are required to contact NMFS at least 72 hr in advance of a fishing trip to request an observer. Amendment 5 would modify this pre-trip observer notification

requirement, such that vessels with limited access herring permits, vessels with open access Category D permits fishing with midwater trawl gear in Areas 1A, 1B, and/or 3, vessels with open access Category E permits, and herring carrier vessels would be required to contact NMFS at least 48 hr in advance of a fishing trip to request an observer. This measure would assist NMFS's scheduling and deployment of observers across the herring fleet, with minimal additional burden on the industry, helping ensure that observer coverage targets for the herring fishery are met.

NMFS intends for the change from a 72-hr notification requirement to a 48-hr notification requirement to allow vessels more flexibility in their trip planning and scheduling. The list of information that must be provided to NMFS as part of this pre-trip observer notification is described in the proposed regulations. Vessels with herring permits currently contact NMFS via phone. If a vessel is required to notify NMFS to request an observer before its fishing trip, but it does not notify NMFS before beginning the fishing trip, that vessel would be prohibited from possessing, harvesting, or landing herring on that trip. If a fishing trip is cancelled, a vessel representative must notify NMFS of the cancelled trip, even if the vessel is not selected to carry an observer. All waivers or selection notices for observer coverage will be issued by NMFS to the vessel via VMS so the vessel would have an on-board verification of either the observer selection or waiver.

If an observer is not available through the observer program, Category A and B herring vessels required to carry an observer must arrange for carrying a Northeast Fisheries Observer Program (NEFOP) certified observer from an approved observer service provider. The owner, operator, or vessel manager of a vessel selected to carry an observer must contact the observer service provider by phone and must provide at least 48 hours for the provider to arrange for observer deployment for a specified trip.

An owner, operator, or vessel manager of a vessel who cannot procure a certified observer within 48 hours of the notification to the provider, due to the unavailability of an observer, may request a waiver from the requirement for observer coverage for that trip, but only if the owner, operator, or vessel manager has contacted all of the available observer service providers to secure observer coverage. To request a waiver based on the unavailability of observers, an owner, operator, or vessel manager of the vessel must call the NEFOP. If the NEFOP confirms that no observers are available, it will issue a waiver within 24 hours.

Finally, Amendment 5 would require that when vessels issued limited access herring permits are working cooperatively in the Atlantic herring fishery, including pair trawling, purse seining, and transferring herring at-sea, vessels must provide to observers, when requested, the estimated weight of each species brought on board or released on each tow.

Released Catch Affidavits

Amendment 5 would require limited access vessels to bring all catch aboard the vessel and make it available for sampling by an observer. The Council recommended this measure to improve the quality of at-sea monitoring data by reducing the discarding of unsampled catch. If catch is discarded before it has been made available to the observer, that catch is defined as slippage. If a slippage event occurs, Amendment 5 would require the vessel operator to complete a released catch affidavit within 48 hr of the end of the fishing trip. The released catch affidavit would

detail: (1) Why catch was slipped; (2) an estimate of the quantity and species composition of the slipped catch; and (3) the time and location of the slipped catch.

Observer Service Provider Requirements

The following set of requirements is intended to facilitate coordination between the NEFOP and approved observer service providers. These requirements are based on those included in the overall observer provider collection (OMB Control No. 0648-0546) but feature the additional burden required to certify and collect information from observer service providers for the Atlantic herring fishery.

1. *Observer deployment report:* The observer service provider deployment reports are used to inform NEFOP when, where and to whom an observer has been deployed within 24 hours of the observer's departure. The observer service provider also must ensure that the observer reports back to the NEFOP its OBSCON data, as described in the certified observer training, within 12 hours of landing.
2. *Observer Availability Report:* The observer service provider availability reports are used to inform NEFOP of any occurrence of their inability to respond to an industry request for observer coverage due to the lack of available observers on staff by 5:00 pm, Eastern Standard Time, on any day with an industry request for observer coverage.
3. *Safety Refusals:* The observer service provider safety refusal reports are used to inform NEFOP of any trip that has been refused due to safety issues, e.g., failure to hold a valid USCG Commercial Fishing Vessel Safety Examination Decal or meet the safety requirements of the observer's pre-trip vessel safety checklist, within 24 hours of the refusal.
4. *Raw observer data:* The submission of raw (unedited) data (via courier service eg. FedEx, DHL, etc.) collected by the observer to the NEFOP within 72 hours of trip landing is necessary for NEFOP to administer the observer program. This data is also used to monitor bycatch in the Atlantic herring fishery.
5. *Observer debriefing:* The observer service provider must ensure that the observer remains available to the NEFOP and/or NMFS Office for Law Enforcement for debriefing for two weeks following any observed trip. Observer debriefings ensure the data collected by the observer is as accurate as possible, and any potential issues are addressed. An observer that is at sea during the two-week period must contact the NEFOP upon his or her return if requested.
6. *Other reports:* Reports of possible observer harassment, discrimination, concerns about vessel safety or marine casualty, observer illness or injury, and any information, allegations, or reports regarding observer conflict of interest or breach of the standards of behavior must be submitted to the NEFOP in a timely manner.

7. *Biological samples:* The observer service provider must ensure that biological samples, including whole marine mammals, turtles and sea birds, are stored/handled properly and transported to the NEFOP within 7 days of landing.
8. *New permit application for observer provider:* Any third party provider that wishes to operate in the Atlantic herring observer program must submit a thorough application and gain approval from NMFS.
9. *Applicant response to a denial:* If an application for approval as an observer service provider is incomplete or does not meet the requirements of an approved observer service provider, the application will be provided with a written denial. Each applicant may present additional information to NMFS to rectify the deficiencies specified in the written denial within 30 days of the applicant's receipt of the denial notification.
10. *Request for observer training:* The observer service provider must submit a request for a certified training class at least 30 days prior to the beginning of the proposed training class to ensure that the NEFOP is provided with the necessary time and information to prepare for the training of candidate observers.
11. *Rebuttal of pending removal from list of approved observer providers:* An observer provider that fails to meet the requirements, conditions, and responsibilities of an approved observer service provider will be notified in writing that it is subject to removal from the list of approved observer service providers. An observer service provider that has received notification that it is subject to removal from the list of approved observer service providers may submit information to rebut the reasons for removal from the list within 30 days and must give written evidence that clearly disproves the reasons for removal.
12. *Observer contact list updates:* The updated observer contact list would facilitate the ability of NMFS/NEFOP to contact an observer when necessary. This list would be updated by the service provider as necessary.
13. *Observer availability updates:* The observer status report would facilitate the ability of NMFS/NEFOP to confirm observer availability, or the lack thereof, when a provider notifies NMFS/NEFOP of instances when no observers were available for deployment. This list would be updated by the service provider as necessary.
14. *Service provider material submissions:* NMFS/NEFOP may request service providers to provide copies of materials provided to the fishing industry. This would allow NMFS/NEFOP to ensure such materials are accurate and in keeping with the objectives of the program. This information would likely be solicited when changes to such materials are made.
15. *Service provider contracts:* NMFS/NEFOP may request service providers to provide a copy of each type of signed and valid contract between the observer provider and those entities requiring observer services. This would allow NMFS/NEFOP to resolve contract disputes between the provider and industry, and to ensure provider contracts with their

employees are in keeping with the objectives of the observer program. This information would likely be solicited when changes to such materials are made.

NMFS retains control over all information and safeguards it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. The information collection is designed to yield data that meet all applicable information quality guidelines. Prior to dissemination, the information would be subjected to quality control measures and pre-dissemination review pursuant to Section 515 of Public Law 106-554.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

After the initial permit issuance, permit renewal has been made as simple as possible and currently feasible for both the public and the issuing office. The information obtained from current permits is used to prepare a computer-generated, pre-printed renewal permit, which is sent to the permit holder for updating. If there are no changes in the information required on the permit, renewal requires only the applicant's signature. This feature minimizes the reporting burden on the public as well as the administrative burden on the agency. Permit information and all initial permit applications are posted as fillable Adobe Acrobat documents (PDF file format) on the NE Regional Office's (NERO) web site: <http://www.nero.noaa.gov>. Posting this information on the internet makes it widely available to the public, thereby reducing both public and administrative burden. At this time, permit applications, with signature and accompanying documents, must be mailed.

Federally permitted dealers are required to submit detailed, electronic reports of all purchases from fishing vessels. Dealers submit transaction information through an online data entry form available at <http://www.accsp.org/safis.htm>.

Due to the required confidentiality of fish purchase reports, information sent from dealers to NMFS is subject to strict encryption standards and is available only to authorized agency personnel and the submitter. Dealers receive a username and personal identification number (PIN) that enables them to log onto a secure site and submit their reports. Dealers are also allowed to access, review, and edit the information they have submitted using a secure procedure similar to those in common usage throughout the banking industry. These submission constitute the official reports as required by the various FMPs in the Northeast region.

All data submitted through the vessel's VMS unit is electronic. VMS vessel polling is automated and besides for the initial cost, does not impose any burden on commercial fishing vessels.

The observer providers and vessels submit materials to NMFS/NEFOP via email, fax, mail or phone call. Instructions for providers and vessels are available on the NERO web site.

4. Describe efforts to identify duplication.

The information to be collected through the issuance of permits is not duplicated elsewhere.

The information collected on daily VMS catch reports is often duplicated on vessel trip reports (VTRs) which are approved under the 0648-0212 family of forms. However, VMS daily catch reports are necessary to monitor fisheries catch in real-time. VTRs are submitted to NMFS on a weekly or monthly basis, and are therefore used to cross-check the accuracy of the daily VMS catch reports.

The application processes and information submissions for the observer program and vessels are unique to the Atlantic herring observer program, and direct duplication with other collections does not exist.

None of the other information collected through this family of forms is duplicated elsewhere.

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

Only the minimum data needed to meet the objectives of Amendment 5 are requested from all respondents. Since most of the respondents are small businesses, separate requirements based on the size of business have not been developed.

For initial and renewal vessel and dealer permits, as well as applications for observer service providers, detailed instructions are included with the application to help facilitate proper completion of the form. NMFS also sends bulletins detailing reporting requirements to all permitted entities.

NMFS has currently certified three vendors to provide VMS service to vessels participating in the fisheries that require VMS as a condition of their permits. Each vendor offers comparable equipment and services over a range of prices. This reduces the burden on the public by increasing competition among vendors, thereby decreasing costs to the fishing industry to obtain and operate a VMS unit. Further, the increased variety of VMS units may allow vessel owners/operators to select the most economical and efficient unit to purchase, therefore minimizing costs associated with VMS.

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

To the extent practicable, frequency of information collection under this family of forms has been minimized. To reduce the frequency any further would compromise the intent of each collection of information requirement.

Information on permit applications and renewal forms for vessels, dealers, and operators, is necessary for accurately tracking information about who is issued permits annually, gathering data on permit holders, and ensuring compliance with fishing regulations. Furthermore, this information (in a consolidated form) is used by a variety of researchers, students, and managers when making important fisheries policy decisions.

All information is required for the efficient operation of the Atlantic herring observer program must be submitted in the time frames requested. Collecting this information less frequently would jeopardize the goals and objectives of the observer program and the effective management of the Atlantic herring fishery.

VMS units are crucial for enforcing area based fishing regulations; without VMS tracking of fishing vessel activity, it would be near impossible to monitor whether fishing vessels are complying with such regulations. VMS catch reporting is vital to gaining real-time data on fish catch. Without such information, or if the information was collected less frequently, it would be very difficult to monitor fisheries quotas and ensure sustainable harvests that prevent overfishing.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

The data collection is consistent with 5 CFR 1320.6 guidelines except that it requires information to be reported more frequently than quarterly. The need for this is described in Question 6.

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

The information collection contained in this submission is part of a proposed rule, 0648-AY47, to implement management measures outlined in Amendment 5 to the Atlantic Herring FMP. This rule proposes the provisions specified above and solicits public comment on the information collection.

The NEFMC held many Council and MSB Oversight Committee meetings during the development of Amendment 5 between 2009 and June 2012, during which there were opportunities for public discussion of proposed management strategies. The Council approved the measures contained in Amendment 5, including the measure specified above, on June 21, 2012.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

No payment or gift will be made to respondents.

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

All data will be handled in accordance with NOAA Administrative Order 216-100, Confidentiality of Fisheries Statistics, and will not be released for public use except in aggregate statistical form (and without identifying the source of data, i.e., vessel name, owner, etc). In addition, any information collected under the Permit Family of Forms would be considered confidential and would not be disclosed except as provided in Section 402(b) of the Magnuson-Stevens Act.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

There are no questions of a sensitive nature involved in this collection of information.

12. Provide an estimate in hours of the burden of the collection of information.

The time burden of this information collection is presented in Table 1. **The total annual responses are 26,486 and annual time burden is 3,400 hours.**

Areas 2/3 Open Access Herring Permit

Many of the new vessels that would qualify for this permit are already subject to permit and reporting requirements (weekly VTR, VMS, permit renewal) for other Northeast Region permits. This collection only estimates the burden for the few vessels that would not have already been subject to these requirements related to other permits. Analysis of the permits issued as of April 2013 suggests that a maximum of 6 out of 80 new permit holders would be subject to several of the new requirements related to this permit. Only the daily VMS catch report will be new to all 80 qualifiers for this permit.

There would be a short application process to obtain a new Areas 2/3 Open Access Herring Permit. Fishery participants eligible for this permit would be easily identifiable, as only vessels with limited access mackerel permits could qualify. The Northeast Regional Office would likely directly mail all qualifiers and ask them to check a box and sign to indicate that would like the new permit. The form to indicate the desire for this new permit would take 1 minute to complete, **for a total burden of 1 hour (80 applications * 1 minute).**

The new Areas 2/3 Open Access Herring Permit would require the vessel to purchase and maintain a VMS. Because other Northeast Federal permits require vessels to maintain a VMS, it is estimated that only 6 vessels issued open access herring permits do not already have a VMS. **The VMS certification form takes an estimated 5 minutes to complete, and the call to confirm a VMS unit takes an estimated 5 minutes to complete. The total burden to confirm VMS installation is 1 hour (6 vessels * 5 minutes per certification form + 6 vessels * 5 minutes per installation call).**

Northeast Region regulations require VMS trip declarations, which take an estimated 5 minutes to complete. **If a vessel takes an average of 5 trips per year, the total burden estimate would be 2 hours (6 vessels * 5 minutes * 5 declarations).** Permit holders would also be required to submit a daily VMS catch report that would take an estimated 5 minutes to complete. **The total annual time burden for daily VMS catch reports is 67 hours (5 minutes per catch report * 5 trips * 2 days per trip * 80 vessels).**

Holders of the new Area 2/3 Open Access permit would also be required to submit weekly VTRs (52 per year). Since all vessels that qualify for this new permit would already be submitting monthly reports related to their limited access mackerel permits (currently approved under OMB Control No. 0648-0212), this information collection would add 40 (52 minus 12) reports per year. **VTRs are estimated to take 5 minutes to complete, so the total burden for weekly VTR submissions is 20 hours (40 weeks * 5 minutes * 6 vessels).**

Atlantic Herring At-Sea Dealer Permit

There would be a new reporting burden associated with obtaining an At-Sea Herring Dealer Permit. The new herring dealer permit is for herring carriers that sell fish. Historically, approximately 25 vessels per year have been issued an LOA to act a herring carrier. The application for an At-Sea Herring Dealer Permit would take an estimated 15 minutes to complete, for a **total burden of 6 hours (25 initial applications * 15 minutes).** The annual burden estimate to renew an At-Sea Herring Dealer Permit would be **5 minutes to complete the renewal, for a total burden of 2 hours (25 renewal applications * 5 minutes).**

Vessels issued the new At-Sea Herring Dealer permit would also be required to submit dealer reports. Dealer reports take 15 minutes to complete and must be submitted weekly (52 times per year), for a **total burden of 325 hours (25 initial applications * 15 minutes * 52 per year).**

Dealer documentation of relative species composition

This requirement would apply to all transactions involving the sale of any amount of Atlantic herring. The documentation of relative species composition would occur as part of regular dealer submissions of landings data for the above transactions, which means the submissions would occur in over one of the many forms of electronic submission currently used by dealers. The dealers will be presented with an open text field to enter a limited amount of characters describing how they estimated relative species composition for each purchase of Atlantic herring listed on a given dealer report. The additional work of reporting relative species composition for each of the above types of transactions is expected to take 5 minutes per transaction.

As of April 2013, there were 262 entities that held either an Atlantic herring dealer (260) or an Atlantic herring at-sea processor permit (2). In addition, Amendment 5 creates a new At-Sea dealer permit, and it is expected that 25 vessels may apply for this new permit (see above). In total, an estimated 287 Atlantic herring dealers may be required to report relative species composition.

From 2006 to 2012, there was an average of 3,000 Atlantic herring dealer transactions. It is expected that this number of annual dealer transactions will continue to occur for the upcoming years if the Atlantic herring quota and stock status remains the same. Thus, an estimated 3,000 dealer transactions would result in **total yearly burden of 250 hours (5 minutes * 3,000 dealer**

transactions).

Elimination of Power-down Exemption

Amendment 5 would remove a VMS power-down exemption for herring vessels and a catch reporting requirement for herring carrier vessels. Amendment 5 would prohibit herring vessels from powering-down their VMS units in port, unless specifically authorized by the NMFS RA. The existing power-down exemption was approved under OMB Control Number 0648-0202 and, upon renewal, will be removed from that information collection.

Removal of weekly VTR requirement for Herring Carriers

Amendment 5 would also remove the existing weekly VTR requirement for herring carrier vessels. That requirement was approved under OMB Control Number 648-0212 and, upon renewal, will be removed from that information collection.

Pre-landing notifications

Amendment 5 would expand the number of herring vessels required to submit a VMS pre-landing notification and would add a gear declaration to the existing VMS activity declaration requirement. A subset of herring vessels are currently required to notify NMFS OLE via VMS 6 hours prior to landing, and this action proposes to expand that requirement to all limited access herring vessels, vessels issued the new Areas 2/3 Open Access Herring Permit (Category E), and herring carrier vessels. It is estimated that Amendment 5 would require an additional 51 Herring Category C vessels, 80 Herring Category E vessels, and 25 herring carriers to submit VMS pre-landing notification. Each VMS pre-landing notification is estimated to take 5 min to complete.

Category C vessels are estimated to take an average of 13 trips per year, so the total annual burden estimate for a Category C permits is **55 hours (13 trips * 51 vessels * 5 minutes)**.

The new Category E vessels would take an estimated 5 trips per year, so the total annual burden estimate for a Category E vessel making VMS pre-landing notifications would be **33 hours (5 trips * 80 vessels * 5 minutes)**.

Herring carriers are estimated to take an average of 4 trips per year, so the total annual burden estimate for a herring carrier making VMS pre-landing notifications **8 hours (4 trips * 25 vessels * 5 minutes)**.

Gear declaration for limited access herring vessels

The proposed gear declaration would apply to limited access herring vessels. There would be no additional reporting burden associated with the gear declaration because it would only be an additional field added to the existing VMS pre-trip notification requirement, approved under OMB Control No. 0648-0202.

VMS Declaration for Herring Carriers

Amendment 5 would allow vessels to choose between enrolling as a herring carrier with LOA or declaring a herring carrier trip via VMS. Vessels may declare a herring carrier trip via VMS, if they already have and maintain a VMS, or continue to request an LOA. There would be no additional reporting burden associated with this measure because both the LOA and the VMS pre-trip notifications are existing requirements for herring vessels.

Observer notification requirements

Amendment 5 would increase the reporting burden for measures designed to improve at-sea sampling by NMFS-approved observers. A subset of herring vessels are currently required to notify NMFS to request an observer, and this action proposes to expand that requirement to all limited access herring vessels, vessels issued the new Areas 2/3 Open Access Herring Permit (Category E), and herring carrier vessels. This pre-trip observer notification requirement is estimated to affect 156 additional vessels, each of which is estimated to take 25 trips per year. Vessels would be required to call NMFS to request an observer at least 48 hours prior to beginning a herring trip. The phone call is estimated to take 5 minutes to complete, for a total annual burden of **325 hours (156 vessels * 25 trips * 5 minutes)**.

If a vessel has already contacted NMFS to request an observer and then decides to cancel that fishing trip, Amendment 5 would require that vessel to notify NMFS of the trip cancellation. The call to notify NMFS of a cancelled trip is estimated to take 1 min to complete. Since each vessel has the potential to cancel every trip for which it submitted notification, the total annual burden of the cancellation call is **65 hours (156 vessels * 25 trips * 1 minute)**.

Under the proposed industry-funded observer program, Category A and B vessels would be required to contact an observer service provider to request an observer. An estimated 42 limited access vessels would be subject to this requirement. If those vessels took an estimated 25 trips per year and the call to the observer service provide took an estimated 10 minutes to complete, the annual reporting burden of the proposed notification requirement is estimated to be **175 hours (42 vessels * 25 trips * 10 minutes)**

If an observer service provide had no observer available, Category A and B vessels would be required to notify NMFS to request an observer waiver. The likelihood of an observer not being available is anticipated to be low. Therefore, if on 2 occasions the vessels needed to contact NMFS to request a waiver, and the call took an estimated 5 minutes to complete, the annual reporting burden to request a waiver is estimated to be **7 hours (42 vessels * 2 occasions * 5 minutes)**.

Amendment 5 would require that when vessels issued limited access herring permits are working cooperatively in the Atlantic herring fishery, including pair trawling, purse seining, and transferring herring at-sea, vessels must provide to observers, when requested, the estimated weight of each species brought on board or released on each tow. NMFS expects that the vessel operator would do this for each trip, and not on a tow by tow basis. Vessel operators should have this information recorded and available to report to the observer, so NMFS estimates the response to take 1 minute. The total annual burden for this requirement is **18 hours (42 vessels * 25 trips * 1 minute)**.

Released Catch Affidavits

Amendment 5 would require a released catch affidavit for limited access vessels that discard catch before it had been made available to an observer for sampling (slipped catch). The reporting burden for completion of the released catch affidavit is estimated to average 5 minutes. The affidavit requirement would affect an estimated 93 limited access herring vessels. If those vessels slipped catch once per trip with an observer onboard, and took an estimated 38 trips per

year, **the total annual reporting burden for the released catch affidavit would be 295 hours (93 vessels * 38 trips per year * 5 minutes).**

There is an additional requirement for released catch affidavits in Amendment 5 related to the use of mid-water trawl gear in groundfish closed areas. The burden related to the requirement for released catch affidavits for discarded catch detailed above is more expansive than that for the groundfish closed areas because it concerns all possible fishing areas for Atlantic herring. Because a vessel would only submit a single released catch affidavit if a slippage event occurred inside a groundfish closed area, there is no burden for this requirement.

Observer Funding Contribution

There is no time burden associated with the observer funding contribution.

Observer Service Provider Requirements

It is estimated that 6 service providers may be able to support the Atlantic herring observer program during the three year renewal period for this information collection. Three service providers are already approved for other northeast fishery observer programs. Therefore, the majority of the information collections here were analyzed for 6 Atlantic herring observer program providers.

1. *Observer deployment report:* Each provider is estimated to submit 250 observer deployment reports annually (once a day not including weekends) for a total of 1,500 reports annually (250 * 6 providers). **Each report is estimated to take 10 minutes to fill out and email to NEFOP, for a total of 250 hours.**
2. *Observer Availability Report:* Each provider is estimated to submit 150 observer availability reports annually (estimate from NEFOP) for a total of **900 reports annually (150 * 6 providers). Each report is estimated to take 10 minutes to fill out and email to NEFOP, for a total of 150 hours.**
3. *Safety Refusals:* Each provider is estimated to submit a maximum of 25 safety refusal reports annually (estimate from NEFOP) for a total of 150 reports annually (25 * 6 providers). **Each report is estimated to take 30 minutes to fill out and email to NEFOP, for a total of 75 hours.**
4. *Raw observer data:* Each provider is estimated to submit raw data to the NEFOP 250 times annually (once a day not including weekends) for a total of 1,500 total times annually (250 * 6 providers). **Each report is estimated to take 5 minutes to fill out and send via express mail to NEFOP for a total of 125 hours.**
5. *Observer debriefing:* Each provider is estimated to have 70 debriefings with observers annually for a total of 420 observer briefings (70 * 6 providers). **Each briefing is estimated to take 2 hours for a total of 840 hours.**
6. *Other reports:* Each provider is estimated to submit 35 other reports (predominantly incident reports) annually for a total of 210 reports. **Each report takes 30 minutes to fill out and email to NEFOP for a total of 105 hours.**

7. *Biological samples:* Each provider is estimated to submit biological samples 250 times annually for a total of 1,500 times (250 * 6 providers). **Each submission is estimated to take 5 minutes to mail to NEFOP for a total of 125 hours.**
8. *New permit application for observer provider:* Three providers are already approved by NMFS to observe other fishery observer programs. Each new provider will need to submit an application, for a total of 3 new permit applications. **Each application is estimated to take 10 hours to complete for a total of 30 hours.**
9. *Applicant response to a denial:* NEFOP staff estimated that one new provider application would be denied annually (maximum) and have the opportunity to respond. **Each response would take 10 hours to put together and submit to NEFOP for a total of 10 hours.**
10. *Request for observer training:* Each new provider is estimated to request observer training twice annually for a total of six times (2 * 3 providers). **Each request is estimated to take 30 minutes for a total of 3 hours.**
11. *Rebuttal of pending removal from list of approved observer providers:* NEFOP staff estimated that no more than one new provider would be removed from the list of approved providers and have the opportunity to rebut their removal. **Each rebuttal is estimated to take 8 hours to complete and mail to NEFOP for a total of 8 hours.**
12. *Observer contact list updates:* Each new provider is estimated to update their observer contact list 12 times annually (once a month) for a total of 36 times (12 * 3 providers) (the existing 3 are already submitting updates). **Each update is estimated to take 5 minutes to email to NEFOP for a total of 3 hours.**
13. *Observer availability updates:* Each new provider is estimated to update their observer availability list 12 times annually (once a month) for a total of 36 times (12 * 3 providers) (the existing 3 are already submitting updates).. **Each update is estimated to take 1 minute to email to NEFOP for a total of 36 minutes (1 hour).**
14. *Service provider material submissions:* Each provider is estimated to submit new materials to NEFOP twice annually for a total of 12 times (2 * 6 providers). **Each update is estimated to take 30 minutes to mail to NEFOP for a total of 6 hours.**
15. *Service provider contracts:* Each provider is estimated to submit service provider contracts to NEFOP twice annually for a total of 12 times (2 * 6 providers). **Each contract is estimated to take 30 minutes to mail to NEFOP for a total of 6 hours.**

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in Question 12 above).

The cost burden of this information collection is presented in Table 1. **The total annual cost for all requirements in this information collection is \$646,631.**

Areas 2/3 Open Access Herring Permit

The application to request an Areas 2/3 Open Access Herring Permit would cost **\$0.45 to mail, for a total annual cost of \$36.**

The new Areas 2/3 Open Access Herring Permit would require the vessel to purchase and maintain a VMS. Because other Northeast Federal permits require vessels to maintain a VMS, it is estimated that only 6 vessels issued open access herring permits do not already have a VMS.

The average cost of purchasing and installing a VMS is \$3,400, the VMS certification form costs \$0.45 to mail, and the call to confirm a VMS unit costs \$1. The average cost of maintaining a VMS is \$600 per year. The total cost to install and maintain a VMS unit is **\$24,009 (6 vessels * \$3,400 = \$20,400) + [6 vessels * \$0.45 + 6 vessels * \$1 = \$9] + [6 vessels * \$600 = \$3,600]**.

Northeast regulations require VMS trip declarations and automated polling of VMS units to collect position data: **1) Each trip declaration costs \$0.50 to transmit, for a total cost of \$15 (\$0.50 * 5 trips * 6 vessels); 2) Each automated polling transmission costs \$0.06. Since automated polling occurs once every hour for each day of the year, the total annual cost is \$3,154 (\$0.06 * 365 days per year * 24 hours * 6 vessels).** Vessels are also required to submit a daily VMS catch report, at a cost of \$0.60 per transmission. The total annual cost for daily VMS catch reports is \$480 (\$0.60 per catch report * 5 trips * 2 days per trip * 80 vessels).

The new Area 2/3 Open Access permit would also be required to submit weekly VTRs (52 per year). Recall from Question 12 above that these new permits would only have to submit an additional 40 reports per year over their current monthly VTR reporting requirement. **VTRs cost \$0.45 to mail, for a total annual cost of \$108 (40 additional reports * \$0.45 * 6 vessels).**

Atlantic Herring At-Sea Dealer Permit

The cost for mailing the initial application for the at-sea dealer permit would be \$0.45 per application, for a total cost of \$11 (\$0.45 * 25 initial applications). The renewal application would also result in a total annual cost of \$11 (\$0.45 * 25 renewals). There is not cost for the weekly dealer reports, which are submitted electronically (start-up costs covered in another submission).

The 25 vessels that may obtain the new at-sea dealer permit proposed under Amendment 5 may not already accessing the Internet for other reasons/requirements, and would have to obtain internet access. Internet access would be required for the submission of weekly dealer reports. **Operating costs consist of Internet access available through either dial up or cable modem, with an average annual cost for Internet of \$652. Thus the annual**

recordkeeping/reporting cost for this information collection is \$16,300 (\$652 x 25 vessels permitted as at-sea dealers). The per-report cost (52 days x 25 vessels = 1,300) would be \$12.54 (rounded up from 12.5384615).

Dealer documentation of relative species composition

Because dealer reports and the species composition submission described in the Amendment 5 proposed rule will be submitted via the Internet, the monetary cost for this information collection is related to Internet access. The 262 entities that already hold Atlantic herring dealer/at-sea processor permits are already submitting their reports via the Internet. Because they already have Internet access, there is no recordkeeping/reporting cost associated with the submission of species composition information.

Elimination of Power-down Exemption

Amendment 5 would remove a VMS power-down exemption for herring vessels and a catch reporting requirement for herring carrier vessels. Amendment 5 would prohibit herring vessels from powering-down their VMS units in port, unless specifically authorized by the NMFS RA. The existing power-down exemption was approved under OMB Control Number 0648-0202 and, upon renewal, will be removed from that information collection.

Removal of weekly VTR requirement for Herring Carriers

Amendment 5 would also remove the existing weekly VTR requirement for herring carrier vessels. That requirement was approved under OMB Control Number 648-0212 and, upon renewal, will be removed from that information collection.

Pre-landing notifications

Each VMS pre-landing notification cost \$1.

Category C vessels are estimated to take an average of 13 trips per year, so **the total cost for a Category C permits is \$663 (13 trips * 51 vessels * \$1).**

The new Category E vessels would take an estimated 5 trips per year, so the total cost for a Category E vessel making VMS pre-landing notifications would be **\$400 (5 trips * 80 vessels * \$1).**

Herring carriers are estimated to take an average of 4 trips per year, so the total cost for a herring carrier making VMS pre-landing notifications is **\$100 (4 trips * 25 vessels * \$1).**

Gear declaration for limited access herring vessels

The proposed gear declaration would apply to limited access herring vessels. There would be no additional cost associated with the gear declaration because it would only be an additional field added to the existing VMS pre-trip notification requirement, approved under OMB 0648-0202.

VMS Declaration for Herring Carriers

Amendment 5 would allow vessels to choose between enrolling as a herring carrier with LOA or declaring a herring carrier trip via VMS. Vessels may declare a herring carrier trip via VMS, if they already have and maintain a VMS, or continue to request an LOA. There would be no

additional cost associated with this measure because both the LOA and the VMS pre-trip notifications are existing requirements for herring vessels.

Observer notification requirements

The pre-trip observer notifications, as well as the trip cancellation notification, are calls to NMFS. The cost of these calls is negligible, so there is no additional cost for these requirements.

The call to the observer service provider cost \$1 per call. If required vessels take 25 trips per year, the total cost is **\$1,050 (42 vessels * 25 trips * \$1)**.

The call to notify the observer program that no observer is available from the service provider costs \$0.50, for **a total cost of \$42 (42 vessels * 2 occasions * \$0.50)**.

There is no cost for vessels to provide to observers the estimated weight of each species brought on board or released on each tow.

Released Catch Affidavits

The released catch affidavits must be submitted by mail, for \$0.45 per submission. If each of the 93 vessels required to submit the affidavits slipped catch once per trip with an observer onboard, and took an estimated 38 trips per year, the total annual cost for the released catch affidavit would be **\$1,590 (93 vessels * 38 trips per year = 3,534 * \$0.45)**.

Observer Funding Contribution

Amendment 5 would require 100 percent observer coverage on Category A and B herring vessels, coupled with a \$325 per day contribution by industry. There are an estimated 42 Category A and B vessels in the herring fishery and each vessel spends an average of 42 days per year at sea. Therefore, the annual cost associated with carrying an NMFS-approved observer for a Category A or B vessel is estimated to be **\$573,300 (42 x 42 x \$325)**.

Observer Service Provider Requirements

The cost to observer service providers are exclusively mail or telephone costs associated with the information collections. Phone calls were estimated to cost \$0.10 per minute and stamps are currently \$0.45 each. Some information collections are required to be sent by express mail (ex. \$13.00 for an express mail envelope) such as raw observer data for timely monitoring of particular bycatch species. The burden cost for each information collection is presented here as well as in Table 1:

1. *Observer deployment report:* sent via e-mail = \$0
2. *Observer Availability Report:* sent via e-mail = \$0
3. *Safety Refusals:* sent via e-mail = \$0
4. *Raw observer data:* **\$13.00 per raw data mailing (express mail) times (6 x 250) items = \$19,500**
5. *Observer debriefing:* **\$12.00 per debriefing times 420 debriefings = \$5,040**

6. *Other reports:* sent via e-mail = \$0
7. *Biological samples:* **\$0.50 per sample times 1,500 samples = \$750**
8. *New permit application for observer provider:* \$0.45 per application times 3 applications = \$1.32 (\$1)
9. *Applicant response to a denial:* \$0.45 per denial times 1 application = \$0.45 (\$1)
10. *Request for observer training:* \$1.80 per request times 6 requests = \$10.80 (\$11)
11. *Rebuttal of pending removal from list of approved observer providers:* \$0.44 per rebuttal time 1 estimated rebuttal = \$0.45 (\$1)
12. *Observer contact list updates:* sent via e-mail = \$0
13. *Observer availability updates:* sent via e-mail = \$0
14. *Service provider material submissions:* \$2.50 per submission times 12 submissions = \$30.00
15. *Service provider contracts:* \$2.50 per contract times 12 contracts = \$30.00

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

The total annualized cost to the Federal government from the herring observer program is **\$195,450** and is detailed in Table 1. This is the cost to the Federal government based on 7,818 hours at a rate of \$25 per hour.

15. Explain the reasons for any program changes or adjustments.

As described above, this information collection request includes new information collection burdens associated with the provisions included in Amendment 5, and would be used to implement and manage the provisions proposed above.

16. For collections whose results will be published, outline the plans for tabulation and publication.

Results from this collection may be used in scientific, management, technical, or general informational publications such as Fisheries of the United States, which follows prescribed statistical tabulations and summary table formats. Data are available to the general public on request in summary form only. Data are available to NMFS employees in detailed form on a need-to-know basis only.

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

Vessel trip declarations and VMS catch report for Atlantic herring are presented through an electronic prompt on VMS units. Thus, the OMB control number will not be displayed.

18. Explain each exception to the certification statement.

Not Applicable.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

No statistical methods are employed in the information collection procedures. The requirements are mandatory for all participants in the indicated fisheries.

Table 1.

	Number of entities	Items per entity	Total # of items	Public				Government		
				Response time (minutes)	Total time burden (hours)	Cost per item	Total Public cost	Response time per item (minutes)	Total Government Response Time	Total Government Cost
Areas 2/3 Open Access Permit										
Initial Permit Application	80	1	80	1	1	\$0.45	\$36	15	20	\$500
Herring at-sea dealer permit										
Initial Permit Application	25	1	25	15	6	\$0.45	\$11	60	25	\$625
Permit Renewal Application	25	1	25	5	2	\$0.45	\$11	60	25	\$625
Dealer Reports	25	52	1300	15	325	\$12.54	\$16,300	60	1300	\$32,500
Dealer reporting requirements										
Dealer documentation of relative species composition	287	10.5 (approx)	3000	5	250	\$0.00	\$0	0	0	\$0
Reporting Requirements for Areas 2/3 Open Access Herring Permit										
Weekly VTR	6	40	240	5	20	\$0.45	\$108	60	240	\$6,000
VMS installation	6	1	6	60	6	\$3,400.00	\$20,400	0	0	\$0
VMS Certification Form	6	1	6	5	30 min.	\$0.45	\$3	10	1	\$25
Call-in for Unit Confirmation	6	1	6	5	30 min.	\$1.00	\$6	10	1	\$25
Trip Declaration	6	5	30	5	3	\$0.50	\$15	10	5	\$125
VMS Operation	6	1	0	0	0	\$600.00	\$3,600	0	0	\$0
Automated VMS polling	6	8760	0	0	0	\$0.06	\$3,154	0	0	\$0
Daily VMS Catch Reports	80	10	800	5	67	\$0.60	\$480	10	133	\$3,333
Herring Pre-Land Notification										
Category C vessels	51	13	663	5	55	\$1.00	\$663	15	165.75	\$4,144
20K Area 2/3 herring permit	80	5	400	5	33	\$1.00	\$400	15	100	\$2,500
Herring Carrier	25	4	100	5	9	\$1.00	\$100	15	25	\$625
Observer reporting changes for vessels										
Pre-trip notification to observer program	156	25	3900	5	325	\$0.00	\$0	10	650	\$16,250
Trip Cancellation notification to observer program	156	25	3900	1	65	\$0.00	\$0	5	325	\$8,125
Released catch affidavit	93	38	3534	5	295	\$0.45	\$1,590	30	1767	\$44,175
Industry contribution for observers	42	42	0	0	0	\$325.00	\$573,300	30	0	\$0
Request for observer to observer service provider	42	25	1050	10	175	\$1.00	\$1,050	5	87.5	\$2,188

	Number of entities	Items per entity	Total # of items	Public				Government		
				Response time (minutes)	Total time burden (hours)	Cost per item	Total Public cost	Response time per item (minutes)	Total Government Response Time	Total Government Cost
Vessel operator notification of species lb to observer	42	25	1050	1	18	\$0.00	\$0	0	0	\$0
Notification of unavailability of observers	42	2	84	5	7	\$0.50	\$42	15	21	\$525
Observer provider requirements										
Observer deployment report	6	250	1500	10	250	\$0.00	email	10	250	\$6,250
Observer availability report	6	150	900	10	150	\$0.00	email	10	150	\$3,750
Safety refusals	6	25	150	30	75	\$0.00	email	30	75	\$1,875
Raw observer data	6	250	1500	5	125	\$13.00	\$19,500	30	750	\$18,750
Observer debriefing	6	70	420	120	840	\$12.00	\$5,040	120	840	\$21,000
Other reports	6	35	210	30	105	\$0.00	email	30	105	\$2,625
Biological samples	6	250	1500	5	125	\$0.50	\$750	30	750	\$18,750
New application to be a service provider	3	1	3	600	30	\$0.45	\$1	60	3	\$75
Applicant response to denial	1	1	1	600	10	\$0.45	\$0	1	0	\$0
Request for observer training	3	2	6	30	3	\$1.80	\$11	1	0.1	\$3
Rebuttal of pending removal from list of approved observer providers	1	1	1	480	8	\$0.45	\$0	5	0.1	\$2
Observer contact list updates	3	12	36	5	3	\$0.00	email	2	1.2	\$30
Observer availability updates	3	12	36	1	1	\$0.00	email	1	0.6	\$15
Service provider material submissions	6	2	12	30	6	\$2.50	\$30	5	1	\$25
Service provider contracts	6	2	12	30	6	\$2.50	\$30	2	0.4	\$10
TOTALS			26,486		3,400		\$646,631		7,818	\$195,450