

**Supporting Statement  
For  
Great Lakes Pilotage  
1625-0086**

**A. Justification.**

This collection of information relating to the Rate-making requirements is required pursuant to 46 CFR parts 401 and 404 and discussed in the following paragraphs.

1. Circumstances that make the collection of information necessary.

Pursuant to 46 CFR part 404, the Director of the Great Lakes Pilotage is required to set pilotage rates on the Great Lakes. In meeting this requirement, the Director requires that pilot associations provide data relating to bridge hours; vessel delay, detention, cancellation, and movage; pilot travel; revenues; and pilot availability. Presently this data is being recorded and provided to the Office of Great Lakes Pilotage via hard copy source forms that each pilot association prepares immediately following each completed pilot assignment. Copies of the source forms are mailed to the Office of Great Lakes Pilotage on a monthly basis. Pilot availability is reported monthly on a separate form. In an effort to improve the timeliness and accuracy of the data collection and to utilize enhanced data collection technology, the Director mandated the use of electronic data collection.

In March 2006, the Office of Great Lakes Pilotage commenced its use of electronic data collection with the implementation of the Great Lakes Electronic Pilot Management System software. A web based system, it provides the three U.S. pilot associations electronic capabilities in entering and storing pilotage data relating to bridge hours; vessel delay, detention, cancellation, and movage; pilot travel; revenues; and pilot availability. This software also makes this data readily available and retrievable by the Office of Great Lakes Pilotage for use in the course of daily operational oversight and rate-making.

Additionally, the Office of Great Lakes Pilotage oversees pilot registration in accordance with 46 CFR part 401. To meet these requirements, the office collects mariner credentialing information to verify eligibility for registration as a Great Lakes Registered Pilot.

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

The Director uses the data stored in the Great Lakes Electronic Pilot Management System and on form CG-4509 to carry out operational and rate making oversight of pilotage activities on the Great Lakes.

3. Considerations of the use of improved technology.

The Office of Great Lakes Pilotage has commenced electronic tracking of vessels and pilot assignments on the Great Lakes using real time data via the Great Lakes Electronic Pilot Management System. This system enables the program to accurately and quickly answer queries from pilots, industry, or the general public regarding operations and/or retrieve information that previously was not always readily available. Additionally, the use of the pilotage software program enables the Office of Great Lakes Pilotage to access and view all foreign vessel traffic in the Great

Lakes and to determine pilot availability at any given time. The three U.S. pilots association have unlimited access to the Great Lakes Electronic Pilot Management System through the use of a username and secured passwords. The Great Lakes Electronic Pilot Management System (GLEPMS) uses the Klein Systems Group "KleinPilot" software (<http://www.kleinsystems.com/default.asp?parent=129&view=192&showsub=129>) specifically tailored to meet the needs and business practices of each of the three Great Lakes Pilot Associations and provides real-time pilotage data and information to users. The application does not have a standalone web address but rather consists of an online database accessed through a specific program. Furthermore, the system has added firewall security measures that allow the host server to recognize only those remote servers with pre-registered IP addresses. The five (5) screen shots named below are provided as separate files to indicate the capabilities of the system:

Screen Shot No. 1 – Vessel Table

Screen Shot No.2 – Vessel Scheduling and Dispatch with Window of Vessel Specifics

Screen Shot No.3 – Summary Dispatch Report

Screen Shot No. 4 – Map of the Great Lakes with Real Time Location of Vessels and Job Status Window

Screen Shot No. 5 – Pilot Rotation Window

Form CG-4509 will be posted to the internet for easy access. It is a fillable pdf that can be printed, signed and scanned to the Office of Great Lakes Pilotage via a dedicated email address ([GreatLakesPilotage@uscg.mil](mailto:GreatLakesPilotage@uscg.mil)).

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

The database information is not collected in any form, and therefore is not duplicated elsewhere. The Office of Great Lakes Pilotage is currently discussing elimination of CG-4509 with the National Maritime Center after the necessary information is moved to the CG-719B. However, the specific information captured on the CG-4509 is not captured on any form currently used by the National Maritime Center.

5. Methods used to minimize the burdens of small business if involved.

To minimize the burden of this collection, the three U.S. pilot associations have been provided on site training on the Great Lakes Electronic Pilot Management System and will be provided follow-on training and site-visits to ensure continued proficiency with the pilot software program. The Coast Guard has set up a dedicated email for the CG-4509 and will continue to respond to any inquiries regarding the form or its instructions.

6. Consequences to the Federal program if collection were conducted less frequently.

The Coast Guard pilotage regulations require annual reviews of pilotage rates and the creation of a new rate at least once every five years, or sooner, if the annual review shows a need. To facilitate this process, the Office of Great Lakes Pilotage must rely on the pilot associations to submit timely and accurate data that includes financial reports; bridge hours; vessel delay, detention, cancellation, and moorage; pilot travel; revenues; and pilot availability. From an operational standpoint, quick access of the pilotage data on a daily basis allows the Director to make accurate assessments and informed decisions on pilotage activities on the Great Lakes immediately. Similarly, from a rate making standpoint, immediate entry, access, and retrieval of the pilotage data allows the Office to calculate and make proper adjustments to pilotage rates as required.

The CG-4509 must be collected in a timely manner to ensure that Great Lakes Registered Pilots and mariners interested in becoming certified as such meet the registration requirements specified in 46 CFR part 401.

7. Special Collection Circumstances.

The Great Lakes Electronic Pilot Management System provides the three U.S. Great Lakes pilot associations the ability to enter bridge hour related data which is required by regulations and which in turn enables the Office of Great Lakes Pilotage to make decisions on the need for rate adjustments. The Great Lakes Electronic Pilot Management System also allows the Office of Great Lakes Pilotage to access foreign vessel traffic and pilot assignment data that its Canadian counterpart, the Canadian Great Lakes Pilotage Authority, maintains. Similarly, the Canadian Great Lakes Pilotage Authority has similar access capability to view U.S. foreign vessel traffic and pilot assignments only.

8. Consultation.

A 60-day Notice was published in the Federal Register to obtain public comment on this collection (02/21/2013; 78 FR 12083). Additionally, a 30-day Notice will be published in the Federal Register to obtain public comment on this collection (05/30/2013; 78 FR 32410). The Coast Guard has not received any comments on this information collection.

9. Provide any payment or gift to respondents.

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

10. Assurances of confidentiality provided to respondents.

The data that is collected from the Great Lakes Electronic Pilot Management System is required in order for the Director to determine whether rate adjustments are needed. This data is public data and therefore there are no assurances of confidentiality provided to the respondents for this information collection.

Form CG-4509, in accordance with the Privacy Act, manages public disclosure under the Great Lakes Registered Pilot Eligibility System of Records, 73 Fed. REG. 245 (December 19, 2008).

11. Additional justification for any questions of a sensitive nature (e.g. sexual behavior, attitudes, religious beliefs, other private information).

There are no questions of sensitive nature.

12. Estimate of the hour burden of collection of information.

There is an added burden of 1 hour respecting the collection of information because of the inclusion of CG-4509 in this collection. For the added form, there are estimated to be six respondents per year providing one response each (at 10 minutes each) for a total of one annual burden hour. The Great Lakes Electronic Pilot Management System software provides the three U.S. pilot associations an electronic capability to collect data that, up until now, has been conducted on a manual basis. There was no standardization of process amongst the three U.S. pilot associations in the collection

and maintenance of this information. The Great Lakes Electronic Pilot Management System standardizes this process and transfers the process from a manual system to an electronic system.

The original estimate of hour burden remains the same as noted under the existing and currently approved OMB 1625-0086. Under this OMB 1625-0086 approval, the original hour burden was arrived at as follows:

“There are three respondents who might provide a maximum of 60 responses per year at an average time of .3 hours per response, for a total of 18 hours per year for the industry. The hour burden for each of the three respondents is expected to be the same so each respondent is expected to have 6 hour yearly. The total annual cost burden to industry is estimated to be \$900, which is calculated by multiplying \$50 (the average hourly salary of a mid-level independent accountant) by the 18 hours total hour burden for the industry.”

To further clarify, there are approximately three individuals who might provide responses for each association for the electronic system. Thus, there might be as many as nine individual respondents for the electronic system. This is in addition to the six new respondents for the added form. Overall, we expect the association burden (the three respondents in the initial approval) to remain the same, with the exception of the new form. The increase in the one hour burden and six respondents is for Great Lakes Registered Pilots and members of the public interested in becoming registered as such to complete CG-4509. This results in an increase of \$44.57 (the 75<sup>th</sup> percentile hourly wage for captains, mates and pilots of water vessels). The new total cost is \$944.57 and the new total annual burden is 19 hours.

13. Estimate of total annualized capital and start-up cost.

The Great Lakes Electronic Pilot Management System is being provided to the three U.S. Great Lakes Pilot associations at no cost to the associations with respect to equipment, software, and training. These expenses are absorbed by the Office of Great Lakes Pilotage located at Coast Guard Headquarters, Washington, DC. Because the management system is web-based, the three U.S. Great Lakes pilot associations use their existing computer equipment to execute the management system program. There are no record keeping, capital, start-up or maintenance costs associated with this information collection.

14. Estimate of annualized cost to the Federal Government.

Annualized cost, minus the initial cost of system acquisition of \$150,000, of the Great Lakes Pilotage Electronic Management System is estimated at \$25,000. This amount is an agreed upon figure listed in the performance contract between the U.S. Coast Guard and the Klein Systems Group, and it covers the cost of server support of 24 hours a day and maintenance related to the upkeep of the system.

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

The estimated annual burden has increased by 1 hour to reflect the inclusion of CG-4509 in this collection. This form is the document through which current and prospective pilots communicate their intent to seek or renew pilotage registration on the Great Lakes. Previously, this form was not aligned with any active collection of information. The Coast Guard has modernized this form and allowed it to be filled out electronically and emailed to the Coast Guard to expedite processing time and ease the burden of completion on the current and prospective pilot community.

16. Plans for tabulation, statistical analysis and publication.

This information collection will not be published for statistical purposes.

17. Approval for not explaining the expiration date for OMB approval.

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

18. Exception to the certification statement.

USCG 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.