

**SUPPORTING STATEMENT  
AMENDMENT 80 ECONOMIC DATA REPORT (EDR) FOR THE  
CATCHER/PROCESSOR NON-AFA TRAWL SECTOR  
OMB CONTROL NO. 0648-0564**

This action requests extension of an existing information collection.

## **INTRODUCTION**

National Marine Fisheries Service, Alaska Region (NMFS) manages the groundfish fishery in the Bering Sea and Aleutian Islands Management Area (BSAI) exclusive economic zone according to the Fishery Management Plan (FMP). The North Pacific Fishery Management Council (Council) prepared the FMP under the authority of the [Magnuson-Stevens Fishery Conservation and Management Act](#), 16 U.S.C. 1801 *et seq.* (Magnuson-Stevens Act). Regulations implementing the FMP appear at [50 CFR part 679](#).

As a requirement of the Amendment 80 program designed by the Council, annual economic reports are submitted to NMFS by vessel owners and QS permit holders, providing detailed data on vessel costs, earnings, employment, quota transfers, and capital improvements. The Economic Data Report (EDR) program is a mandatory annual reporting requirement for Amendment 80 entities, and supplements data provided by in-season monitoring and data collection programs, including eLandings catch accounting and the North Pacific Groundfish Observer program. Beginning with implementation of the Amendment 80 program in 2008, EDR data collection program has collected annual economic census data, with the most recent available data representing results from the 2012 calendar year of operations.

Among the goals of Amendment 80 was to create economic incentives to improve retention and utilization, and reduce bycatch by the commercial fishing vessels using trawl gear in the non-pollock groundfisheries. The structure of the program was developed to encourage fishing practices and use of vessel capital with lower discard rates and to mitigate the costs of increased retention requirements by improving the opportunity for increasing the value of harvest species while improving operational efficiency and lowering costs.

### **A. JUSTIFICATION**

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

The Council adopted Amendment 80 to meet the broad goals of: (1) improving retention and utilization of fishery resources by the non-AFA trawl catcher/processor fleet by extending the groundfish retention standard (GRS) to non-AFA trawl catcher/processor vessels of all lengths; (2) allocating fishery resources among BSAI trawl harvesters in consideration of historic and present harvest patterns and future harvest needs; (3) authorizing the allocation of groundfish species to harvesting cooperatives and establishing a limited access privilege program (LAPP) for the non-AFA trawl catcher/processors to reduce potential GRS compliance costs, encourage

fishing practices with lower discard rates, and improve the opportunity for increasing the value of harvested species; and (4) limiting the ability of non-AFA trawl catcher/processors to expand their harvesting capacity into other fisheries not managed under a LAPP.

**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 Amendment 80 EDR collects information unavailable through other means to review the Program. Data collected through the EDR are mandatory for all Amendment 80 quota share (QS) holders. Annual submittal of the EDR should minimize the burden to industry and costs of administration, while still providing analysts with adequate data for analyzing effects of the program.

Pursuant to the legislation, the data and identifiers will also be used for program enforcement and determination of qualification for cooperative membership. Consequently, identifiers and data will be disclosed to NOAA Enforcement, NOAA General Counsel, the Antitrust Division of the Department of Justice, the Federal Trade Commission, and NOAA Restricted Access Management Program.

The Amendment 80 EDR collects cost, revenue, ownership, and employment data annually. The data are needed to assess whether Amendment 80 addresses goals to mitigate the costs associated with reduced bycatch and improved utilization of groundfish. Two primary uses for the Amendment 80 EDR data being collected are:

- ◆ Improved utilization.  
Improved utilization may be achieved through increases in production from the resource. Since participants can choose to serve different markets with different species and products or to idle various vessels, an examination of utilization must include an assessment of product prices and quantities by species to determine whether utilization levels (and targeting and production choices) are responses to market forces, and the extent to which increased vessel utilization has reduced total average costs.
- ◆ Cost of bycatch reduction.  
Reasonable assessments of costs of bycatch reductions must examine the extent to which participants are able to cost-effectively avoid discards through improvements in targeting and improvements in retention of catch. In both cases, the ability of participants to operate efficiently and profitably must be assessed.

## **a. Amendment 80 EDR**

This report collects economic data on the BSAI Non-American Fisheries Act (non-AFA) Trawl Catcher/Processor Sector, including Western Alaska Community Development Quota Program (CDQ) non-Pollock groundfish fisheries. The fisheries are referred to as Amendment 80 fisheries. The Amendment 80 EDR is intended to:

- ◆ provide managers with the data necessary to monitor and enforce certain aspects of the Amendment 80 Program.
- ◆ determine whether the program is meeting its purpose; and
- ◆ assess potential amendments to the program.

The types of data collected on an Amendment 80 EDR fall into four categories: ownership, employment, revenue, and costs. Ownership data will be used for all of the above three purposes. Revenue, cost, and employment data will be used primarily to assess the performance of the program and also to monitor the program benefits to present generations of fishermen, associated fishing sectors, including the Western Alaska Community Development Quota (CDQ) sector, communities, and the Nation, as a whole.

### Ownership Data.

NMFS collects detailed vessel ownership data within the non-AFA trawl catcher/processor sector through Amendment 80 permit applications (see OMB 0648-0565); the Alaska Fisheries Science Center (AFSC) collects vessel ownership data through the Amendment 80 EDR. A primary use of ownership data is to determine whether individuals exceed the ownership caps. Collection of this information also allows analysts to track consolidation and transfers that occur in the non-AFA trawl catcher/processor sector after cooperatives are implemented.

### Employment Data.

NMFS collects employment data for monitoring of the community impacts of this program. Limited employment data are available from catcher/processors operating in the BSAI. Through eLandings production reports (see OMB 0648-0515), NMFS collects information on the number of crew members on each vessel. However, the production reports do not provide information on crew residence, compensation, or employment stability. The Amendment 80 EDR would provide information on crew residence and compensation that are necessary for community impact analyses.

### Revenue and Cost Data.

Revenue and cost data by vessel and sector are essential to identify/estimate the costs associated with bycatch reduction and estimate the revenues generated by the sector.

### Data Collection Agent (DCA)

Pacific States Marine Fisheries Commission (PSMFC) was designated by NMFS to be the Data Collection Agent (DCA) for the Amendment 80 EDR program. Each year, on or before 1700 hours A.l.t. on June 1, each unique permit holder must submit to PSMFC an Amendment 80

EDR for each Amendment 80 QS permit held the previous calendar year. The EDR filing deadline provides the Amendment 80 QS holder adequate time to gather and review records. If an Amendment 80 QS permit holder does not submit a complete Amendment 80 EDR within the deadline, NMFS does not issue cooperative quota derived from QS holdings to that person.

PSMFC mails EDR announcements and filing instructions to Amendment 80 QS permit holders by April 1. The permit holder may use the online EDR. Amendment 80 EDR forms are also available through the Internet on the NMFS Alaska Region website at <http://www.psmfc.org/am80edr/EDRs/Am80EDR.pdf>. A copy of the EDR form may be downloaded in fillable PDF format and sent by fax or mail to the address on the form. A printed EDR may be requested by calling 1-877-741-8913 or by email to [am80edr@psmfc.org](mailto:am80edr@psmfc.org).

### Audits and Verification

Each EDR must be submitted annually by June 1; after submission, response to requests for verification of data is required within 20 days of a question. There may be EDR verification questions that are sequential, based on previous questions, so the 20-day response period is essential. The verification questions are likely to be small in number and often be addressed with a telephone call or other short communication. The 20-day response period should not place a significant burden on submitters.

Accuracy of each EDR is verified by PSMFC economists and analysts to ascertain anomalies, outliers, and other deviations from averaged variables. The principal means for data quality assessment is follow-up interviews with EDR submitters to ensure consistent interpretation of the survey form and verification of selected data entries against submitter records. A person contacted by PSMFC for EDR verification purposes needs to respond within 20 days of the inquiry for information. Responses after 20 days could be considered untimely and could result in a violation and enforcement action.

### **Amendment 80 non-AFA trawl gear catcher/processor economic data report (EDR)**

#### Amendment 80 Certification Page

##### QS Holder Information

Name of company, partnership, or other business entity

Amendment 80 QS permits held

Name of Amendment 80 vessels owned (if none, enter N/A)

Business telephone number, business fax number, and business E-mail address, if available

##### Vessel Operator Information

If a person, other than the Amendment 80 QS holder, operated an Amendment 80 vessel owned by that QS holder during a calendar year provide the following information.

Name of company, partnership, or other business entity

Business telephone number, business fax number, and business E-mail address, if available

##### Person Completing this EDR (check one)

Amendment 80 QS holder (If same as provided in the QS Holder Information block above, do not repeat)

Designated Representative for the Amendment 80 QS holder

Name and title

Business telephone number, business fax number, and business E-mail address, if available

##### QS Holder Certification

Certify that all information is true, correct, and complete to the best of his/her knowledge and belief

If completed by a designated representative, **attach** authorization

Printed name and signature of QS Holder (or Designated Representative)

Date signed

Amendment 80 Vessel Identification

Amendment 80 QS Permit No.  
Amendment 80 Vessel Name  
USCG Documentation No.  
ADF&G Vessel Registration No.  
ADF&G processor code  
Amendment 80 License Limitation Program (LLP) No(s)  
Amendment 80 limited access fishery permit No  
Name of Amendment 80 cooperative (if applicable)  
Home port  
U.S. gross registered tonnage, net tonnage, and length overall  
Beam, shaft horsepower, and fuel capacity (U.S. gal)  
Year Built

Vessel characteristics: survey value

Most recent survey value of vessel and equipment  
Indicate if this is the approximate replacement value  
Date of last value survey  
Indicate if survey value includes permits associated with vessel  
Indicate if survey value includes processing equipment

Vessel characteristics: fuel consumption

Vessel's annual and average fuel consumption for the following  
Fishing and/or processing  
Steaming (not fishing or processing) – fully loaded with product  
Steaming (not fishing or processing) – empty (transiting)

Vessel characteristics: freezer space

Amount of freezer space available at the beginning of the calendar year  
Maximum freezing capacity in pounds per hour

Vessel characteristics: processing capacity

Total number of processing lines on the vessel  
Type of product processed on the line in the Amendment 80 fishery  
Species code  
Product code  
Number of processing lines for that product  
Maximum throughput in pounds per hour for that product

Vessel characteristics: vessel activity

Number of days fishing  
A80 fishery  
All other fisheries  
Number of days processing  
A80 fishery  
All other fisheries  
Number of days traveling or offloading  
Number of days inactive

Revenues

Total fishery product sales  
Volume (metric tons)  
FOB Alaska revenue (US dollars)  
All other income derived from vessel operations  
Income from sale of LLP licenses associated with this vessel  
LLP number  
Revenue (US dollars)  
QS leased by other vessels  
quantity by species  
royalty revenue by species

Capital expenditures and materials usage

Capital Expenditure Category and Total Capitalized Expenditure (US dollars)

- Fishing gear (nets, net electronics)
- Processing equipment
- Vessel and onboard equipment (other than fishing, processing, or storage equipment)
- Other capital expenditures related to vessel operations
- Purchase LLP license(s) for use on vessel
  - LLP No.
  - Cost

Expenses

- Fishing (deck crew) labor expenses (including bonuses and payroll taxes, but excluding benefits and insurance)
- Processing labor expenses (including bonuses and payroll taxes, but excluding benefits and insurance)
- Labor expenses for all other employees aboard the vessel
- Food and provisions (not paid by crew)
- Recruitment, travel, benefits, and other employee related costs
- Lease expense for this vessel and onboard equipment
- Fishing gear leases, repairs, and purchases (nets, net electronics, doors, cables, etc.)
- Repair and maintenance expenses for vessel and processing equipment
- Freight, storage, and other sales costs for non-FOB sales
- Freight and storage costs other than for products (e.g., gear, supplies, etc.)
- Product and packaging materials
- Fuel and lubrication
- Observer fees and other monitoring and reporting costs
- Cooperative costs including lawyer and accountant costs, association fees, and other fees charged by harvest cooperative
- General administrative costs including professional services and management fees
- Insurance (vessel insurance, P&I, and other insurance associated with the operation of this vessel)
- Fisheries landing taxes (including shared fisheries business tax and fishery resource landing tax)
- Total raw fish purchases from other vessels (all fisheries and species)
  - Pounds
  - Cost
- Quantity and royalty costs for QS leased from other vessels by species
  - Quantity of QS (mt)
  - Cost

Labor

- Fishing (deck crew)
  - Average number of positions aboard
  - Total number of employees in this calendar year
- Processing
  - Average number of positions aboard
  - Total number of employees in this calendar year
- All other employees onboard the vessel
  - Average number of positions aboard
  - Total number of employees in this calendar year
- Average hours per day a typical processing line employee worked
- Indicate if the vessel used a crew or revenue share system to pay crew
  - To pay some processing crew
  - To pay all processing crew
  - To pay some non-processing crew
  - To pay all non-processing crew

The Amendment 80 Program is a limited access privilege program (LAPP) that allocates a quota share (QS) permit to a person, based on the catch history of six Amendment 80 species (Atka mackerel, Aleutian Islands Pacific ocean perch, flathead sole, Pacific cod, rock sole, and yellowfin sole) in the BSAI, from 1998 through 2004, for each of 28 originally qualifying non-AFA) trawl catcher/processors. Table 31 to part 679 shows those twenty-eight Amendment 80

QS permits. Currently, four of those vessels are no longer Amendment 80 vessels: Arctic Rose, Bering Enterprise, Golden Fleece, and the Prosperity. The Golden Fleece only fishes in the GOA, so is no longer in the Amendment 80 fisheries. The Bering Enterprise (transferred its LLP to the Harvester Enterprise) and the Prosperity (transferred the LLP to the Legacy) are not fishing. The Arctic Rose sank and the LLP has not been transferred to another vessel. One additional vessel was added, the Ocean Peace, making a total of 25 vessels.

<b>Amendment 80 EDR, Respondent</b>	
<b>Number of respondents</b>	25
<b>Total annual responses</b>	25
Frequency of response = 1	
<b>Total burden hours</b>	<b>500 hr</b>
Time per response = 20 hr	
<b>Total personnel cost</b> (\$100/hr x 560)	<b>\$50,000</b>
<b>Total miscellaneous costs</b> (24.50)	<b>\$25</b>
Photocopying (\$0.05 x 14 pp x 25 = 17.50)	
Online (0.05 x 22 = 1.10)	
Mail (0.45 x 2 = 0.90)	
Fax (\$5 x 1 = 5)	

<b>Amendment 80 EDR, Federal Government</b>	
<b>Total annual responses</b>	25
<b>Total burden hours</b>	<b>175 hr</b>
Time per response = 7 hr	
<b>Total personnel cost</b> (\$50/hr x 175)	<b>\$8,750</b>
<b>Total miscellaneous costs</b>	<b>0</b>

It is anticipated that the information collected will be disseminated in aggregated and non-confidential form to the public or used to support publicly disseminated information about the Amendment 80 Program. NOAA Fisheries will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. See the response to Question 10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Prior to dissemination, the information will be subjected to quality control measures and a 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.**

The EDRs may be submitted online. In addition, the EDRs are fillable and may be downloaded from the NMFS web site at [alaskafisheries.noaa.gov](http://alaskafisheries.noaa.gov), printed, and submitted by mail or fax to PSMFC.

#### **4. Describe efforts to identify duplication.**

None of the information collected as part of this information collection duplicates other collections. This information collection is part of a specialized and technical program that is unlike any other.

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

Based on the known affiliations and ownership of the Amendment 80 vessels, all but one of the Amendment 80 vessel owners would be categorized as large entities for the purpose of the RFA. Thus, this analysis estimates that only one small entity would be directly regulated by the proposed action. It is possible that this one small entity could be linked by company affiliation to a large entity, which may then qualify that entity as large entity, but complete information is not available to determine any such linkages. The information collection does not impose a significant impact on small entities.

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

If the collection were not conducted or were conducted less frequently, the consequences would be that NMFS could not fulfill the intent of the authorizing laws. Several pieces of legislation affect various aspects of the Program.

- ◆ Section 219 of the [Consolidated Appropriations Act of 2005](#) (Public Law No. 108-447; December 8, 2004) referred to as the Capacity Reduction Program (CRP). The elements of the CRP relevant to the Program: legislates who may participate in the non-AFA trawl catcher/processor sector in the BSAI for “non-pollock groundfish fisheries;” and defines the non-pollock groundfish fisheries in the BSAI as “target species of Atka mackerel, flathead sole, Pacific cod, Pacific ocean perch, rock sole, turbot, or yellowfin sole harvested in the BSAI.” Because all of the Amendment 80 species are included in the CRP’s definition of non-pollock groundfish fishery, the CRP’s eligibility requirements for the non-AFA trawl catcher/processor sector apply to the Program’s eligibility criteria for the Amendment 80 sector. Therefore, the Program would incorporate the CRP’s definition of a non-AFA trawl catcher/processor.

- ◆ Section 416 of the [Coast Guard and Maritime Transportation Act of 2006](#) (Public Law No. 109-241; July 11, 2006) referred to as the Coast Guard Act. The elements of the Coast Guard Act relevant to the Program are the species or species groups allocated to the Western Alaska Community Development Quota (CDQ) Program, the regulation of harvest of these allocations, and the percentage allocations of all of the groundfish species allocated to the CDQ Program, except pollock and sablefish.

- ◆ The Magnuson-Stevens Act includes amendments relating to Limited Access Privilege Programs (LAPPs), the CDQ Program, and cost recovery and fee collection provisions and other measures applicable to LAPPs. A LAPP involves a federal permit specifying the amount of catch a privilege holder may harvest. Privileges and shares may be revoked, limited, or modified

at any time, with no right to compensation. The LAPP must contribute to rebuilding overfished stocks and reducing excess harvest capacity; promote fishing safety, conservation and management, and social and economic benefits.

In addition, NMFS would be unable to provide data to the Council and the State of Alaska to evaluate the Program annually.

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

Not Applicable.

**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 in response to those comments. Describe the efforts to consult with persons outside 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.**

Public comment was solicited in a Federal Register Notice (78 FR 40103), published July 3, 2013. Comments were requested through September 3, 2013; no comments were received.

In addition, NMFS sent out questions by e-mail to the list of Amendment 80 permit holders who are required to submit an Amendment 80 EDR. NMFS attached to each e-mail a questionnaire regarding the Amendment 80 EDR and asked each respondent to complete and submit the questionnaire back to NMFS by September 3, 2013. NMFS sent ten e-mails to Amendment 80 permit holders who are required to submit an Amendment 80 EDR. Of those ten addresses, four e-mail addresses were invalid and six were valid. NMFS received four complete responses: three individual responses and one that contained responses from three individual permit holders.

A summary of the responses to the questionnaire is presented in the following table.

<b>Alaska Region Amendment 80 EDR – OMB 0648-0564 – Expiration Date 01/31/2014</b>				
QUESTION	YES (X)	NO (X)	COMMENTS	No Cmnt (X)
1. Is the information needed to complete the EDR easily available? If NO, explain.	111111		Only because we plan ahead for this	
			The first year that one has to file is the hardest. Once you've filed the following years are easier	
			Yes, in relation to the estimated time to complete	
2. Is our estimate of 20 hours to complete and submit an Amendment 80 EDR accurate? If NO, explain.	111111		Only because we plan ahead for this	
			I'm uncertain how long it takes. As stated above, the first year filing takes a lot longer than following years. I think that 20 hours is probably a good estimate. I will pay closer attention next year.	
			Yes, for one vessel. Companies with multiple vessels	

			enjoy some economies of scale	
3. Is our estimate of \$1 miscellaneous costs for completion and submittal of an EDR accurate and reasonable? If NO, explain	11111	1	I don't understand this question.	
4. Is our estimate of \$2,000 (\$100/hr x 20 hr) personnel costs for completion and submittal of an EDR accurate and reasonable? If NO, explain.	1111	11	Whenever a government official charges an hourly fee, it is much higher I think that most of the people completing this report do not earn \$100 per hour.	
5. Do you use the online access to submit the EDR? Please explain why or why not.	111111		I used it this year but was a little skeptical because some of the fields don't accept the information that I want to enter. There is no way of giving explanation on certain items when you file online. Ease of use. No additional paperwork. The ability to copy and paste answers in certain sections. Retains some prior year data unlikely to change year to year. Electronic submission.	
6. Are the instructions for completing the EDR clear and understandable? If NO, explain.	11111	1	Some questions can be interpreted differently which can create inconsistent data Mostly In general, yes. Certain sections could be a little more detailed. For example, Table 2.4 Processing Capacity – A80 species could be listed out as well as non-A80 species harvested w/ A80 PSC allocations.	
7. Provide any additional comments on any aspect of the Amendment 80 EDR requirement.			Not sure if it needs to be completed every year going forward. Maybe every odd or even year. Some questions are redundant. Table 2.5 is confusing. Has anything been done with the data that has been already collected? It would be nice if all the numeric fields could have the same formatting such as the same size and font so that all of the decimals line up. It is difficult to proof when it's not consistent. I know when it's finalized and printed it looks better but while working with it it's not so easy. At the lease, the costs of items should have commas. It would also be nice if more of the previous year's information carried over to the current year. It would be nice to log into one (master) account, then access or slide in and out of each A80 QS permit held. Rather than having a user ID and P/W for each individual vessel/permit.	

The Alaska Science Center published the 2012 SAFE Report, which included the five-year

review of the Amendment 80 program.. In response to the comments, Tables 2.4 and 2.5 will be reviewed and revised, and overall, instructions will be reviewed for clarity and questions will be examined for redundancy, before the FY13 forms are posted. Logistics will also be reviewed and changes made if feasible. This will be done with a change request. At this point, conducting the survey other than annually will not be addressed.

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

No payment or gift will be provided under this program.

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

The information collected is confidential under section 402(b) of the Magnuson-Stevens Act (16 U.S.C. 1801, *et seq.*). It is also confidential under [NOAA Administrative Order 216-100](#), which sets forth procedures to protect confidentiality of fishery statistics. Storage for the information includes a computerized data base which is password protected and to which access is limited. Paper records are filed in folders in locked cabinets in areas that are accessible only to authorized personnel. Buildings where the records are maintained employ security systems with locks and access limits. Only those that have the need to know, to carry out the official duties of their job, have access to the information. The personnel of NMFS, Alaska Region and its contractors are instructed on the confidential nature of this information.

**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.**

This information collection does not involve information of a sensitive nature.

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

Total estimated unique respondents: 25, decreased from 28. Total estimated responses: 25, decreased from 28. Total estimated time burden: 500 hr, decreased from 560 hr. Total estimated personnel cost: \$50,000, decreased from \$56,000.

**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 #12 above).**

Total estimated miscellaneous costs: \$25, decreased from \$41 (due to online submittal).

**14. Provide estimates of annualized cost to the Federal government.**

Total estimated time burden: 175 hr, decreased from 196 hr. Total personnel cost: \$8,750, decreased from \$9,800.

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

Adjustments are made due to revisions in miscellaneous costs and number of respondents.

Amendment 80 EDR and verification

- a decrease of 3 respondents and responses, 25 instead of 28
- a decrease of 60 hr in burden, 500 hr instead of 560 hr
- a decrease of \$6,000 in personnel costs, \$50,000 instead of \$56,000
- a decrease of \$16 miscellaneous cost, \$25 instead of \$4.

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

The information collected will not be published.

**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.**

Not Applicable.

**18. Explain each exception to the certification statement.**

Not Applicable.