

**JUSTIFICATION OF CHANGE
SOUTHEAST REGION PERMIT FAMILY OF FORMS
OMB CONTROL NO. 0648-0205**

The National Marine Fisheries Service (NMFS) proposes to modify OMB Control Number 0648-0205 to give the option to Southeast Region permit holders to submit applications for permit renewal online. NMFS is currently developing an on-line version of the Federal Permit Application for Vessels Fishing in the Exclusive Economic Zone (EEZ) (EEZ Application). The EEZ application is a customized web interface that will eventually allow applicants to apply for new permits, renew existing permits, and transfer permits online. Use of the online system will be voluntary. Until now, the paper application was the only method for applicants to obtain permits. At this initial phase of the online system, applicants will only be able to renew existing permits online; however, both the online application and the paper application will be accepted to renew a permit. If an applicant wants to apply for a new permit or transfer a permit, a paper application must be completed and submitted to the Southeast Regional Office (SERO) Permits office for processing.

Use of the online system will be advantageous to both the applicant applying for permits and the NMFS SERO Permits office.

The advantages of the online system for the applicant are as follows:

- Reduction of the chance of an applicant selecting wrong permit to be renewed because all the permits eligible for renewal will be listed online;
- Allowing applicants to change mailing address online, which will allow permits to be mailed to the correct location and save costs associated with returned mail for insufficient addresses;
- Saving postage costs of mailing application and supporting documentation;
- Allowing applicants to use debit cards or credit cards for permit payments through pay.gov (the card information will not be retained in the system);
- Issuing an application identification number which serves as a reference number to allow applicants to see permit status online;
- Attaching all supporting documents necessary for processing permit requests online;
- Allowing the applicant to focus on the areas of application specific to his/her permit request.

The advantages of the on-line system for SERO Permits Office are as follows:

- Making applications legible, thereby increasing production rate;
- Allowing processors greater efficiency in processing the correct permits selected by the applicant without expending time calling applicant with questions;
- Reducing costs associated with postage for mailing deficient letters;
- Saving man-power hours for issuing revoked permits due to insufficient funds;
- Saving man-power hours for processing checks and money orders received for permit payment;
- Allowing more data accuracy for permit renewal because data will be pre-set in the online system.

Currently, NMFS estimates the burden time to complete and mail the paper EEZ application requires 20 minutes per response. Using the new online system, NMFS estimates the burden time to complete the online form would require an estimated 15 minutes per response. The response time would be affected by the applicant's knowledge of technology, familiarity with the English language, familiarity with the format of the EEZ application, and types of documents used as supporting documentation for permit issuance. Providing permit holders the option to submit an application for permit renewal online (and eventually for new and transferred permits) could significantly decrease the burden hours to the public for completing the form. Currently, there are approximately 6,000 vessels with valid permits. Accordingly, NMFS might receive at most, 6,000 online renewal applications. However, because use of the system is voluntary, NMFS does not anticipate all permit holders will utilize the online system. Therefore, it is not possible to estimate the number of permit holders that will use the online system and calculate the corresponding reduction in burden hours.

Once the online system is implemented, it could significantly reduce the costs to the public because applicants would be able to submit an application and supporting documents electronically, as opposed to paying postage. NMFS received approximately 6,000 permit renewal applications last year. At average postal cost of \$1.50 per parcel, this system could save the public at most \$9,000 in postage. Currently, there are few direct savings to the Federal government because regulations still require NMFS to mail, via postal delivery, applications to permit holders eligible for permit renewal.

NMFS anticipates significant indirect benefits to the public and to the Agency. The system's dynamic interface will reduce the number of application deficiencies, thereby reducing the need for applicants to resolve incomplete applications, and preventing them from applying for permits they are ineligible to receive. The agency will benefit from this design by having to respond to less incomplete or ineligible applications, and reducing the data entry/processing time required reviewing and processing each application. These indirect savings are the most significant benefit of the system.

At this time NMFS retains the current burden and cost estimates for OMB Control Number 0648-0205 at 12,877 respondents, 12,877 responses, 5,999 hours, and \$490,634.