



Date: April 24, 2013

To: Marine Mammal Protection Act (MMPA) Authorization Holder

Re: Request for Information on Your MMPA Incidental Take Authorization

Hello,

The Paperwork Reduction Act of 1995 (PRA) prevents federal agencies from placing undue burdens on the public when asking for information. To comply with the PRA, we would seek public comment, through a 60-day *Federal Register* notice, on the information collection requirements for a Marine Mammal Protection Act Incidental Take Authorization (ITA).

As a part of this process we must:

- estimate an applicant's paperwork and response burden (*i.e.*, time and cost) for an Incidental Harassment Authorization (IHA) or a Letter of Authorization (LOA) application; and
- seek input on the clarity of our instructions, the accuracy of previous reported estimates, and the usefulness of the information collected pre- and post-activity.

We'll present a summary of this information in the *Federal Register* notice. If you would like to submit estimates for time and cost and provide your opinion on our ITA process, please fill out the enclosed table and answer three quick questions. If a particular activity in the table does not apply to your situation, please note N/A.

Your organization is not required to complete this survey, but we appreciate your willingness to do so. Once you've finished the survey, please return this table to me at jeannine.cody@noaa.gov by Friday, May 3, 2013. Also, if you have any questions, feel free to call me at 301.427-8415.

Thank you.

Jeannine Cody

Jeannine Cody

2013 Survey for NMFS, Office of Protected Resources, Incidental Take Program's Applicants on Burden of Information Collection Requirements under the Paperwork Reduction Act.

Activity <i>(Please note N/A, if not applicable.)</i>	Time to Complete (Hours)
IHA Application Preparation	
Initial LOA Application Preparation for 5-year Regulations	
Subsequent Annual/Bi-Annual LOA Application	
Environmental Assessment	
Preparation of an Interim Report for an IHA	
Preparation of a Draft Annual Report for an IHA or LOA	
Preparation of a Final Annual Report IHA or LOA	
Preparation of a LOA Draft Comprehensive Report	
Preparation of a LOA Final Comprehensive Report	
Activity	Estimated Cost (Dollars)
Equipment (computers, software)	
Copying / Printing	
Faxing / Phone Calls	
Postage / Shipping	

Question 1:

On a scale from 1 to 10, how clear are the instructions for submitting and completing an Incidental Take Authorization? (0 = Not Clear; 10=Extremely Clear)

Brief Answer:

Question 2:

How accurate are the burden estimates shown in Attachment #1 (Page 3) for your organization? (e.g., much lower than my estimate, very close to my estimate, much higher than my estimate)

Brief Answer:

Question 3:

What are your thoughts on the utility on the data that we collect from your organization?

Brief Answer:

Table 1 – 2010 Survey Results of Time Spent on ITA Applications and Reports

Information Collection Activity	Estimated Length of Time to Prepare	
	Hours	Days
IHA Application	399	50
IHA Interim Draft Report	310	39
IHA Draft Annual Report	422	52
IHA Final Annual Report	163	20
LOA - Initial Application Preparation for Regulations	1,100	138
LOA - Annual LOA Application	70	9
LOA - Draft Annual Report	220	28
LOA - Final Annual Report	65	8
LOA - LOA Draft Comprehensive Report	625	78
LOA - LOA Final Comprehensive Report	300	38

* We calculated business days as 8-hour increments.