

**Supporting Statement
for
Plan Approval and Records for Subdivision and
Stability Regulations -- Title 46 Subchapter S**

OMB No.: 1625-0064
COLLECTION INSTRUMENTS: Instruction.

A. Justification.

1) Circumstances that make the collection of information necessary.

Under the authority of the Secretary in the department in which the U. S. Coast Guard is operating, the Coast Guard administers and enforces the laws and regulations promoting the safety of life and property in marine transportation. Title 46 USC 3301 and 3305 require that every freight, seagoing motor, and steam vessel, and every seagoing barge, including a mobile offshore drilling unit be inspected to determine that it is in full compliance with applicable marine safety regulations. Title 46 USC 3306 directs the Secretary to make appropriate regulations, including standards for vessel stability. Title 46 USC 3703 directs the Secretary to prescribe additional regulations for vessels which carry liquid bulk dangerous cargoes. In addition, certain vessels must meet the standards of the Safety of Life at Sea Convention (SOLAS). Plan and vessel characteristics submissions by builders/designers and logging requirements by owners/operators are needed to assure the regulations are met.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

Coast Guard

- Safety
- Protection of the Natural Resources

Prevention Policy & Response Policy Directorates (CG-5P & CG-5R)

- Safety: Eliminate deaths, injuries, and property damage associated with commercial maritime operations.
- Human and Natural Environment: Eliminate environmental damage associated with maritime transportation and operations on and around the nation's waterways.

2) Purposes of the information collection.

Requirements for the submission of plans, technical information, or operating instructions: This information is required by the Coast Guard in order to assure that a vessel meets the applicable stability standards. Plans and other information submitted are normally developed by the shipyard, designer, or manufacturer to assure the construction and safe operation of a vessel. The material and information required is not solely for Coast Guard use, although the material does contain the information necessary to meet Coast Guard regulations. Part of the submissions are nonrecurring; they are made only once at or prior to vessel construction or alteration. Resubmission of plans is not required when more than one vessel is constructed to the same plans, nor is a stability generally test required. In this case, only a certification of sistership status by an authorized officer of the shipbuilding company is needed. Operators may elect to have a classification society, the American Bureau of Shipping (ABS), review their plans on the Coast Guard's behalf.

Requirements for the stability information to be available to vessel operating personnel and for the logging of stability verification: These requirements are necessary to help ensure the safe operation of each vessel. There are specific requirements for the content of the stability booklet and operating manuals; however, the format will vary with vessel type. Many vessel operators provide manuals to their

vessels which meet or exceed any requirements of the Coast Guard. Most, though not all of the information, is reviewed by the Coast Guard. The required operating information is required to be on board the vessel as long as the vessel remains subject to inspection. Recordkeeping requirements will vary for each vessel type and operation and are required by the Coast Guard in order to determine if a vessel meets the appropriate stability and subdivision requirements.

3) Consideration of the use of improved information technology.

Information may be submitted in writing or electronically via e-mail, to the CG Officer in Charge, Marine Inspection (OCMI) at the local Sector Office, or the CG Marine Safety Center (MSC). Contact info for CG OCMI's can be found at—<http://www.uscg.mil/top/units/>. For information on submitting information to the CG MSC, go to— <https://homeport.uscg.mil/msc> > Contact Us > Mail Address, Telephone Contacts, and E-Commerce Info. We estimate that 100% of the reporting requirements can be done electronically. At this time, we estimate that 81% of responses are collected electronically.

4) Efforts to identify duplication.

The Coast Guard monitors State and local regulatory activity in this field. To date no equivalent State and local programs have been identified that require equivalent information, and no other federal agencies have similar or equivalent regulatory requirements.

5) Methods to minimize the burden to small business if involved.

It is likely that some of the companies in question would be considered small entities; however the overall impact of the requirement is minimal. Small businesses, such as independent naval architects, vessel owners and small shipyards, are favorably affected by these regulations. Subchapter S consolidates standards for all types of vessels into one set of regulations. In addition, these regulations provide clarifications to and interpretations of the previous regulations, as well as policy statements made by the Coast Guard relating to stability standards for specific vessel types, and new stability standards set by SOLAS¹. This enables smaller firms, such as independent naval architects, vessel owners, and smaller shipyards, to better prepare stability plans because they will have a better knowledge and understanding of the requirements. Smaller firms will also be better informed of Coast Guard policy and regulation interpretations, in the absence of the large staffs available to major organizations.

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

If information was submitted or recorded less frequently, no assurance could be given that vessels are operating within the applicable stability requirements that ensure marine safety.

7) Special collection circumstances.

This information collection is conducted in manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

8) Consultation.

A 60-Day Notice (See [USCG-2013-1007], January 29, 2014, 79 FR 4746) and 30-Day Notice (March 31, 2014, 79 FR 18042) were published in the Federal Register to obtain public comment on this collection. The Coast Guard has not received any comments on this information collection.

9) Provide any payments or gifts to respondents.

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

¹ SOLAS -- International Convention for Safety of Life at Sea, 1974.

10) Describe any assurance of confidentiality provided to respondents.

There are no assurances of confidentiality provided to the respondents for this information collection.

11) Additional justification for any questions of a sensitive nature.

There are no questions of sensitive language.

12) Estimate of annual hour and cost burdens to respondents.

- The estimated number of annual respondents is 272.
- The estimated number of annual responses is 2,994.
- The estimated hour burden is 10,639 hours.
- The estimated cost burden is \$1,489,485.

The annual reporting hour and cost burdens on Industry are summarized in Appendix A and are based on the following information:

Reporting:

The U.S. Coast Guard Marine Safety Center (MSC) maintains two databases² to track plan review information. The average annual number of plans submitted (responses) to either the MSC or Authorized Classification Societies (ACS) was derived from these databases by taking a multi-year average of plans received.

To determine the time required to submit plans and technical documents, a percentage of the time to develop such plans is used. This is because most of the documents required by the Coast Guard for stability review are prepared by the vessel designer or builder as part of the shipbuilding process. However, some changes and additions are necessary to comply with the Coast Guard requirements. It is estimated that it takes approximately three hours of the respondent's time per document in order to satisfy the additional requirements of the Coast Guard. The industry personnel submitting plans and keeping records is a senior technical expert, determined to be equivalent to the Captain O-6 Standard Rate found in COMDTINST 7310.1(series).

The hour burden associated with reporting requirements of this COI is estimated as the product of the total number of responses, to both MSC and ACS, and the time needed to complete a submission, while the cost burden is the product of the hour burden and the wage rate.

Recordkeeping

In order to develop the recordkeeping burden, we estimate an additional three percent of plan development hours. To estimate the hour and cost burdens, this three percent estimate was assessed on the hour and cost burdens of the reporting requirements.

13) Total annualized capital and start-up costs.

There are no capital, start-up or maintenance costs associated with this information collection.

14) Estimates of annualized Federal Government costs.

The estimated annual Federal Government cost is \$186,825 (see Appendix B). The Federal burden is borne by the Coast Guard's Marine Safety Center. This office is responsible for the review and processing of vessel plans and technical submissions. The cost of technical review for current Subchapter S submittals has been calculated by estimating the total number of hours of technical time

² MASCOT (for internal work done at the MSC) and PRAS (for work done by classification societies on behalf of the Coast Guard).

required for the stability review of each vessel and multiplying it by the cost per hour of technical time, determined to be the wage rate for the Lieutenant O-3 Standard Rate of COMDTINST 7310.1(series). The total cost burden for the Federal Government is the product of this cost of technical review and the number of responses, which is a multi-year average of submissions received by the MSC and ACS, found in the MASCOT and PRAS databases.

15) Reasons for the change in burden.

The change (i.e., decrease) in burden is an ADJUSTMENT due to a decrease in the average annual number of respondents.

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) Explain each exception to the certification statement.

The Coast Guard does not request an exception to the certification of this information collection.

B. Collection of Information Employing Statistical Methods.

The information collection does not employ statistical methods.