**JUSTIFICATION FOR CHANGE**

**ALASKA REGION PERMIT FAMILY OF FORMS**

**OMB CONTROL NO. 0648-0206**

**JUSTIFICATION: Revise Federal Fisheries Permit (FFP) and Federal Processor Permit (FPP) application submission, approval, surrender, revision, and receipt [Associated rule, RIN 0648-AX78]**

National Marine Fisheries Service, Alaska Region (NMFS) manages the United States (U.S.) groundfish fisheries of the exclusive economic zone off Alaska under the Fishery Management Plan for Groundfish of the Gulf of Alaska and the Fishery Management Plan for Groundfish of the Bering Sea and Aleutian Islands Management Area (FMPs). The FMPs were prepared by the North Pacific Fishery Management Council and approved by the Secretary of Commerce under authority of the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C. 1801 et seq. The FMPs are implemented by regulations at 50 CFR part 679.

For a person to participate in Federal fisheries, NMFS requires a Federal Fisheries Permit (FFP), a Federal Processor Permit (FPP), or an Experimental Fisheries Permit (EFP).

♦ The FFP is required for vessels that are used to fish for groundfish in the GOA or BSAI or engage in any fishery that requires retention of groundfish, such as the commercial halibut fishery. These vessels include catcher vessels, catcher/processors, motherships, tender vessels (buying stations), and support vessels assisting other vessels in those fisheries.

♦ The FPP is required for shoreside processors, stationary floating processors (SFPs), and for Community Quota Entity (CQE) floating processors that receive, process, purchase, or arrange to purchase unprocessed groundfish harvested in the GOA or BSAI.

♦ The EFP is issued for limited experimental purposes to support projects that could benefit the groundfish fisheries and the environment and result in gathering information not otherwise available through research or commercial fishing operations. No changes are made to this permit.

This action would revise FFP and FPP application submission, approval, surrender, revision, and receipt of these permits. The revisions would benefit the fisheries participants by reducing the time, expense, and administrative effort associated with submitting permit requests to NMFS.

♦ Instead of an original FFP or FPP, a current, legible copy of an FFP or FPP (such as a fax copy) would be acceptable when fishing and/or processing groundfish.

♦ Instead of returning an original FFP or FPP to NMFS to revise or to surrender a permit, an application would notify NMFS of the requested change.

An FFP is in effect for three years. The FFP numbers in this summary reflect the number of FFPs issued for 2012. There is no change in the respondents’ response time.

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| **Federal Fisheries Permit, respondents** | |
| **Total number of respondents (1603/3)**  1,252 catcher vessels;  151 catcher/processors  28 motherships  162 tender vessels  10 support vessels  **Total number of responses**  Response per participant = 1  **Total Time burden**  (186.90)  Time per response (21 min x 534)  **Total personnel costs** ($25/hr x 187)  **Total miscellaneous costs** (656.55)  Submit by fax ($6 x 75 = 450)  Submit by mail (.45 x 459 = 206.55) | **534**  **534**  **187 hrs**  **$4.675**  **$657** |

The time per response for Federal Government is changed from 45 minutes to 25 minutes, because the mailing of an original permit is no longer required.

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| **Federal Fisheries Permit, Federal Government** | |
| **Total number of responses**  **Total time burden**  (222.50)  Time per response (25 min)  **Total personnel cost** ($25/hr x 223)  **Total miscellaneous costs** | **534**  **223 hrs**  **$5,575**  **$0** |

An FPP is in effect for one year. The FPP numbers in this summary reflect FPPs issued for 2012. There is no change in the respondents’ response time.

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| **Federal Processor Permit, respondents** | |
| **Total number of respondents**  110 shoreside processors  14 SFPs  0 CQE floating processors  **Total number of responses**  Response per year = 1  **Total time burden** (43.04)  Time per response (21 min) x 124  **Total personnel cost** ($25/hr x 43 hr)  **Total miscellaneous cost**  Submit by fax ($6 x 24 = 144)  Submit by mail (.45 x 100 = 45) | **124**  **124**  **43 hrs**  **$1,075**  **$189** |

The time per response for Federal Government is changed from 45 minutes to 25 minutes, because the mailing of an original permit is no longer required.

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| **Federal Processor Permit, Federal Government** | |
| **Total number responses**  **Total time burden** (51.67)  Time per response (25 min)  **Total personnel cost** ($25/hr x 52 hrs)  **Total miscellaneous cost** | **124**  **52 hrs**  **$1,300**  **$0** |

This action would result in a total reduction of Federal burden hours of 290 hr. There are adjustments to the responses, hours and costs, due to updating the numbers of responses: 195 fewer responses, and thus 6 fewer hours, as well as $88 less in recordkeeping/reporting costs.