SUPPORTING STATEMENT ALASKA PROHIBITED SPECIES DONATION (PSD) PROGRAM OMB NUMBER 0648-0316

This action requests extension of the Alaska Prohibited Species Donation Program collection of information.

INTRODUCTION

The National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NMFS) manages the groundfish fishery in the Exclusive Economic Zone of the Bering Sea and Aleutian Islands management area (BSAI) and the Gulf of Alaska (GOA) under the Fishery Management Plan for Groundfish Fishery of the Bering Sea and Aleutian Islands Area and the Fishery Management Plan for the Groundfish of the Gulf of Alaska (FMPs). The North Pacific Fishery Management Council (Council) prepared, and NMFS approved, the FMPs under the authority of the Magnuson–Stevens Act (16 U.S.C. 1801 *et seq.*). Regulations implementing the FMPs appear at 50 CFR part 679.

BACKGROUND

The Prohibited Species Donation Program (PSD Program) began as a pilot project in 1994. The PSD Program applies only to the following species:

- ♦ Salmon
- Halibut delivered by catcher vessels using trawl gear to shoreside processors and stationary floating processors.

The salmon and halibut resources are of value to many stakeholders, including but not limited to commercial, recreational, subsistence, and cultural user groups. The PSD Program was initiated to reduce the amount of edible protein discarded under prohibited species catch regulatory requirements (§ 679.21). If a person is a participant in the PSD Program under § 679.26, the incidentally caught salmon and Pacific halibut may be donated to the PSD program. The PSD Program allows permitted seafood processors to retain salmon and halibut bycatch for distribution to economically disadvantaged individuals through tax exempt hunger relief organizations.

A PSD permit authorizes tax-exempt organizations to distribute salmon and halibut to hunger relief agencies, food bank networks, or food bank distributors. Salmon and Pacific halibut are considered prohibited species for vessels fishing in the BSAI and GOA groundfish fisheries. All PSC is to be avoided by vessels, but if caught while fishing for groundfish, prohibited species must be returned to the sea with a minimum of injury.

One participant, SeaShare, located at Bainbridge Island, Washington, (http://www.seashare.org/Seashare-News.htm) has applied for and retained a PSD permit over the years. This participant is still the only distributor in the PSD Program. According to their accounting to date, SeaShare has provided over 23 million pounds of seafood to men, women, and children in America. In 2012, according to SeaShare, the program included 122 fishing boats, 18 at-sea processors, 15 shore plants, nine financial donors, six Alaska receiving agencies,

and more than 20 other companies that assisted with storage, freight and other components of the program.

A. JUSTIFICATION

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

An organization seeking to distribute bycatch salmon and halibut under the PSD Program must submit an application to become a PSD distributor. Applicants must be tax-exempt organizations that have received a determination letter from the Internal Revenue Service recognizing tax exemption under 26 CFR part 1 (§§ 1.501 to 1.640). SeaShare, formerly Northwest Food Strategies, is a non-profit organization that has participated since the PSD Program's inception and to date has been the only company licensed to participate.

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.

a. Application to become a NMFS Authorized Distributor [REVISED]

The Regional Administrator may select one or more tax-exempt organizations to be authorized distributors under the PSD Program based on the information submitted by applicants under § 679.26. The number of authorized distributors selected by the Regional Administrator is based on the following criteria:

- ♦ Number and qualifications of applicants for PSD permits.
- Number of harvesters and the quantity of fish that applicants can effectively administer.
- ♦ Anticipated level of bycatch of prohibited species, salmon and Pacific halibut.
- Potential number of vessels and processors participating in the groundfish trawl fisheries.

NMFS uses the information on the PSD distributor application to determine an organization's nonprofit status. In addition, the application provides information about the ability of the organization to arrange for and distribute donated salmon and halibut as a high quality food product. A separate application must be submitted for each species. No application form is provided.

The authorized distributor and a processor retaining or receiving fish under the PSD Program annually must keep on file and make available for inspection by an authorized officer all documentation, including receipt and cargo manifests setting forth the origin, weight, and destination of all prohibited species bycatch. Receipts and cargo manifests are necessary to track salmon and halibut and to help ensure that the distribution of salmon and halibut is as intended and authorized by the PSD Program. Such documentation must be retained until 3 years after the effective period of the PSD permit.

A PSD permit is valid for a 3-year period after NMFS publishes the selection notice in the *Federal Register*.

The application to become a PSD distributor is submitted to NMFS as an attachment to email or by U.S. mail in the form of a letter. Some items, such as the insurance certificate, budget, and individual processor applications are mailed. Any changes and updates may be submitted to NMFS as an attachment to email.

All processors enrolled in the PSD Program for the distribution of salmon and halibut donate the processing and packaging of the fish.

Prohibited species retained under the PSD Program must be packaged, and all packages must be labeled to describe the fish contained in the package with:

Date of processing,

Name of the processing facility,

Contents

Weight of the fish contained in the package, and the words

NMFS PROHIBITED SPECIES DONATION PROGRAM – NOT FOR SALE -PERISHABLE PRODUCT – KEEP FROZEN

Application to be a NMFS Authorized Distributor

Proof of the applicant's tax-exempt status

Describe arrangements for processing, shipping, storing, and transporting donated fish and an estimate of the associated costs

Describe the applicant's expertise in providing for the distribution of food product from remote Alaskan locations to hunger relief agencies, food bank networks, or food bank distributors, including arrangements for transportation, distribution costs, and product quality control

Documentation of support from cold storage and transportation facilities

Operating budget that is adequate to ensure that PSD fish are distributed to hunger relief agencies, food bank networks, or food bank distributors and that the fish will be maintained in a manner fit for human consumption

Proof of the applicant's ability to obtain and maintain adequate funding for the distribution of PSD fish Copy of the applicant's articles of incorporation and bylaws. Purpose must include providing food resources to hunger relief agencies, food bank networks, or food bank distributors

Proof of the applicant's ability to take full responsibility for the documentation and disposition of PSD fish, including sufficient liability insurance to cover public interests relating to the quality of fish distributed for human consumption

Quality control criteria for vessels, processors, hunger relief agencies, food bank networks, and food bank distributors

Number of vessels and processors that the applicant is capable of administering effectively

List of all vessels and processors, food bank networks, and food bank distributors in the PSD Program. For the halibut of the PSD program, vessels are not active participants.

The list of vessels and processors must include:

Vessel's FFP number or the processor's FPP number

Name of the vessel owner or responsible operator or the name of the processor owner or plant manager Business telephone number and business fax number of the vessel or processor

Signature of the vessel owner or responsible operator, or owner or plant manager of the processor

A signed statement from the applicant and all persons listed, who would conduct activities pursuant to the PSD permit waiving any and all claims against the United States and its agents and employees for any liability for personal injury, death, sickness, damage to property directly or indirectly due to activities conducted under the PSD

A list of locations where fish must be delivered by participating vessels and processors

Changed personnel cost from \$25/hr to \$37/hr to reflect current rates.

Application to become a NMFS Authorized Distributor,				
Respondent				
Number of respondents	1			
Total annual responses	1			
Responses per respondent = 1				
Total burden hours (13.33)	13 hr			
Hours per response = 40/3 hr				
Total personnel cost (\$37 x 13)	\$481			
Total miscellaneous cost (6/3 = 2.33)	\$2			
Mailing cost (\$5 x1= 5)				
Photocopy cost ($\$0.05 \times 1 \times 20 \text{ pp} = 1$)				

Application to become a NMFS Authorized Distributor, Federal Government			
Total annual responses	1		
Total burden hours (13.3)	13 hr		
Hours per response = 40/3			
Total personnel cost (\$37 x 13)	\$481		
Total miscellaneous cost	0		

It is anticipated that the information collected will be disseminated to the public or used to support publicly disseminated information. 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 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. <u>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.</u>

The application to become a PSD distributor is submitted to NMFS by email (with attachments) or U.S. mail in the form of a letter. Some items, such as the insurance certificate, budget, and individual processor applications may be sent by e-mail.

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 not like any other.

5. <u>If the collection of information involves small businesses or other small entities, describe</u> the methods used to minimize burden.

This collection of information does not impose a significant impact on small entities. Currently, only one distributor holds a PSD permit. SeaShare was founded in 1994, the same year the PSD Program was established.

SeaShare manages numerous programs that combine several donations into nutritious seafood meals for the men, women, and children who rely on America's food bank network. SeaShare receives donations of seafood products, processing services, transportation and packaging, as well as direct cash contributions. The organization combines those donations to create seafood products that are readily usable by food banks, soup kitchens, and food pantries. Nutrient rich, low-cholesterol protein is in short supply for people in need. SeaShare works to ensure that hungry families have access to the superior health benefits that seafood provides.

6. <u>Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.</u>

Bycatch is the prohibited species catch taken incidentally in other fisheries and it cannot be sold. Without the PSD Program, fishermen would be required to discard their salmon and halibut bycatch at sea. Without the specified permitting scheme, the PSD Program would be unable to proceed, and many thousands of pounds of salmon and Pacific halibut would go to waste.

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

No special circumstances exist.

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.

A <u>Federal Register</u> Notice was published on May 8, 2014 (79 FR 26412) to solicit public comment. A survey was sent to processors and the permit holder for comments.

Summary of OMB Control No. 0648-0316 Survey Comments

This Prohibited Species Donation Program collection of information has only one official, permitted respondent, SeaShare, Inc. However, NMFS considered that it would be interesting to explore what the other participants felt about the Program. These participants deal directly with SeaShare and are not involved with NMFS not the PRA process. The survey was sent also to shoreside processors, catcher/processors, and motherships that are in the Program. These participants are listed on the latest PSD permit issued to SeaShare at http://alaskafisheries.noaa.gov/ram/psd/halibut.pdf and at http://alaskafisheries.noaa.gov/ram/psd/salmon.pdf. A survey was sent to processors and the permit holder for comments. A deadline of July 11, 2014 was indicated for return of the questionnaire. The survey instrument may be viewed in the Appendix.

The questionnaire was sent to 29 individuals: one PSD permit holder, 14 shoreside processors, 12 catcher/processors, and 1 mothership. Two emails were returned due to inaccurate address. The Permit holder offered three comments, two of which NMFS will implement or consider

implementing. The processors' comments generally were favorable of the Program and of SeaShare.

	Sent Survey	Returne d Survey	Wrong Address	Comments/NMFS Actions
PSD permit holder	1	1	0	Q2. NMFS estimated 40 hr per application. Respondent said it was 60-80 hr. Action: NMFS will change estimate
				Q11 . Respondent said to consider one application for both salmon and halibut in BSAI & GOA. Action : NMFS will consider this change.
				Q13. Respondent said support from NMFS staff in Juneau is great. Action: NMFS appreciates comment
Shoreside processors	14	2	1	Q2. NMFS asked how long to complete documentation. One response was "1-2 hr"; second response was "10-15 hr" Q6. NMFS asked how often provide info to SeaShare. One response was "every 3 years"; second response was "when they request inventory totals"
				Q7. NMFS asked for suggestions to enhance quality and clarity. Response was "seems to be working fine"
Motherships	2	1	0	 Q2. NMFS asked how long to complete documentation. Response was "minimal". Q3. NMFS asked about personnel costs to provide info to SeaShare. Response was "negligible" Q6. NMFS asked how often provide info to SeaShare.
				Response was "every year" Q9. NMFS asked for additional comments. Response was "very smooth. Works well"
Catcher/ processors	12	2	1	Q1 . NMFS asked is data provided to SeaShare easily available. Response: "Yes, for CPs. Would imagine it's more difficult for plants and CVs".
				Q2. NMFS asked how much time it takes to provide info to SeaShare. One response was "vessel captain does it". Second response was "SeaShare makes it extremely easy and the office spends no time. The vessel and SeaShare do the work"
				Q3. NMFS asked about personnel costs. One response was "minimal". Second response said "none, just slightly more recordkeeping for crew"
				Q4. NMFS asked who completes paperwork. First response was "the vessel does the tracking". Second response was "AKSC Coop Manager"
				Q5. NMFS asked about miscellaneous costs. First response was "minimal". Second response was "None, SeaShare pays shipping of fish and provides sleeves and labels for fish"
				Q6. NMFS asked how often info is provided to SeaShare. First response was "minimal". Second response was "vessel paperwork goes down with salmon being shipped, done by vessel and cold store"
				Q7. NMFS asked for suggestions to enhance quality and clarity. First response was "works great, don't change". Second response was "It would be good if NMFS and SeaShare got together to provide one set of
				"how to" specific to CVs and to CPs, to include data/ information required for SeaShare, per salmon, and handling instructions per salmon per processor mode (CV vs CP), and recordkeeping for regulatory
				purposes. As it is now we are gathering from several different sources. Also Kodiak would not accept CP fish so had to bring it back to DH." Action: NMFS will consider how to address this suggestion, because

	NMFS does not regulate activities between SeaShare and catcher vessels and catcher/processors.	
	Q8. NMFS asked for suggestions to minimize burden. Response was "It is so minimal now, don't change" Q9. NMFS asked for additional comments. Response was "SeaShare makes this extremely easy. This is a great program with little Administration and great rewards".	

SURVEY

WHAT DO YOU THINK ABOUT THE ALASKA PROHIBITED SPECIES DONATION PROGRAM? OMB Control No. 0648-0316

July, 2014

In the renewal process for information collections, the Office of Management and Budget (OMB) requires each Federal agency to ask for comments from non-agency stakeholders or participants on each collection of information -- with the goal of minimizing burden. OMB requires the solicitation of comments from participants on the availability of data, frequency of collection, the clarity of instructions and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported, as well as the accuracy of estimated burden.

Therefore, National Marine Fisheries Service, Alaska Region (NMFS), Sustainable Fisheries Division is asking for your help to carry out this task. As a participant in the Alaska Prohibited Species Donation (PSD) Program identified as OMB Control Number 0648-0316, please take a moment to answer the following questions. The comments you provide will help NMFS improve this collection of information. Thank you in advance.

Respond to YES or NO answers and NO COMMENT answers with an "X". Please add any comments. Then, email your responses to me at patsy.bearden@noaa.gov no later than **July 11, 2014**. If you have questions or need additional information, please call me at 907-586-7008.

Respectfully,

Patsy A. Bearden Sustainable Fisheries Division NMFS Alaska Region

The Prohibited Species Donation Program (PSD Program) began as a pilot project in 1994. The PSD Program applies only to the following species:

- ♦ Salmon
- Halibut delivered by catcher vessels using trawl gear to shoreside processors and stationary floating processors.

The salmon and halibut resources are of value to many stakeholders, including but not limited to commercial, recreational, subsistence, and cultural user groups. The PSD Program was initiated to reduce the amount of edible protein discarded under prohibited species catch regulatory requirements (§ 679.21). If a person is a participant in the PSD Program under § 679.26, the incidentally caught salmon and Pacific halibut may be donated to the PSD program. The PSD Program allows permitted seafood processors to retain salmon and halibut bycatch for distribution to economically disadvantaged individuals through tax exempt hunger relief organizations.

A PSD permit authorizes tax-exempt organizations to distribute salmon and halibut to hunger relief agencies, food bank networks, or food bank distributors. Salmon and Pacific halibut are considered prohibited species for vessels fishing in the BSAI and GOA groundfish fisheries.

An organization seeking to distribute bycatch salmon and halibut under the PSD Program must submit an application to become a PSD distributor. Applicants must be tax-exempt organizations that have received a determination letter from the Internal Revenue Service recognizing tax exemption under 26 CFR part 1 (§§ 1.501 to 1.640). SeaShare, formerly Northwest Food Strategies, is a non-profit organization that has participated since the PSD Program's inception and to date has been the only company licensed to participate.

OMB Control No. 0648-0316 - Expiration Date: 10/30/2014 No Application to Become a NMFS Authorized PSD Program YES NO **COMMENTS** Comment Distributor Check if N/A [] (X) (X) (X) 1. Is the data requested easily available? Is this process easy Х to understand and to apply for? If NO, explain. 2. We estimate it takes 40 hours for your office personnel to 60-80 this year Х complete this application. Is this time accurate and reasonable? IF NO, explain. 3. We estimate that personnel costs to complete and submit Х the application are \$37/hour. Is this cost accurate and reasonable? If NO, explain. 4. Does someone other than your office personnel complete Х the application? IF YES, explain and provide actual costs. 5. We estimate that it costs \$37 to mail the application and Х make copies of the application and attachments. Do you agree? If NO, explain. 6. Do you agree with the frequency of collection, which is Х every 3 years? IF NO, explain. 7. Are the instructions for completion of the application clear? Х IF NO, explain. 8. Do you agree with the reporting format, which is narrative Х form rather than completion of a form? IF NO, explain. 9. Are the requested data elements to be recorded and Χ disclosed reasonable and necessary? IF NO, explain. 10. Do you believe that this application has practical utility? If Х NO, explain. 11. Can you tell us ways to enhance the quality and clarity of Consider one application for both Х salmon and halibut in BSAI & GOA the information to be collected? Explain. 12. Can you suggest ways to minimize the burden of Χ completing this application through use of automated collection techniques or other forms of information technology. If YES, explain. 13. What else would you care to tell us? Provide any Support from NMFS staff in Juneau is additional comments on any aspect of the PSD Program. great.

OMB Control No. 0648-0)316 – Ex	cpiration	Date: 10/30/2014	
Shoreside Processor or Stationary Floating Processor Participating in Halibut PSD Program Check if N/A []	YES (X)	NO (X)	COMMENTS	No Comment (X)
1. Is the data requested by SeaShare easily available? Is this process easy to understand and to apply for? If NO, explain.	2			
2. How much time does it take for your office personnel to provide information to SeaShare? Is this time reasonable?	2		1-2 hrs It is reasonable.	
Explain.			10 – 15 hours	
3. What are the personnel costs to complete and submit the information to SeaShare?				2
4. Does someone other than your office personnel complete the application? IF YES , explain and provide actual costs.		2		
5. What are the miscellaneous costs to complete and submit information to SeaShare?	1		N/A	1
6. How often do you provide information to SeaShare?			Every three years.	
Explain.			When they request inventory totals	
7. Can you suggest ways to enhance the quality and clarity of the information to be collected? Explain .		2	Seems to be working fine	
8. Can you suggest ways to minimize the burden of providing information through use of automated collection techniques or other forms of information technology. If YES, explain.		2		
9. What else would you care to tell us? Provide any additional comments on any aspect of the PSD Program.				2

OMB Control No. 0648-0316 – Expiration Date: 10/30/2014				
Catcher/processor Participating in Salmon PSD Program Check if N/A []	YES (X)	NO (X)	COMMENTS	No Comment (X)
1. Is the data requested by SeaShare easily available? Is this process easy to understand and to apply for? If NO, explain.	2		Yes, for CPs. Would imagine it's more difficult for plants and CVs.	
2. How much time does it take for your office personnel to provide information to SeaShare? Is this time reasonable?			Vessel Captain does it	
Explain.			Sea Share makes it extremely easy, And the office spends no time, the Vessel and Sea Share do the work	
3. What are the personnel costs to complete and submit the			Minimal	
information to SeaShare?			None, just slightly more recordkeeping for crew	
4. Does someone other than your office personnel complete the application? IF YES , explain and provide actual costs .			The vessel does the tracking	
			AKSC Coop manager	
5. What are the miscellaneous costs to complete and submit			Minimal	
information to SeaShare?			None, Seashare pays shipping of fish and provides sleeves and labels for fish	
6. How often do you provide information to SeaShare?			Each trip	
Explain.			Vessel paperwork goes down with salmon being shipped, done by vessel and cold store	
7. Can you suggest ways to enhance the quality and clarity of			Works great don't change	
the information to be collected? Explain .			See below	
8. Can you suggest ways to minimize the burden of providing information through use of automated collection techniques or			It is so minimal now don't change	
other forms of information technology. If YES, explain.			It would be good if NMFS and Seashare got together to provide one set of "how to" specific to CVs and to CPs, to include data/ information required for Seashare, per salmon, and handling instructions per salmon per processor mode (CV vs CP), and recordkeeping for regulatory	
			purposes. As it is now we are gathering from several different sources. Also	

	Kodiak would not accept CP fish so had to bring it back to DH.
9. What else would you care to tell us? Provide any additional comments on any aspect of the PSD Program.	Sea Share makes this extremely easy This is a great program with little Administration and great rewards None

OMB Control No. 0648-0	316 – Ex	piration	Date: 10/30/2014	
Mothership Participating in Salmon PSD Program Check if N/A []	YES (X)	NO (X)	COMMENTS	No Comment (X)
1. Is the data requested by SeaShare easily available? Is this process easy to understand and to apply for? If NO, explain.	Х			
2. How much time does it take for your office personnel to provide information to SeaShare? Is this time reasonable?			Minimal	
Explain.				
3. What are the personnel costs to complete and submit the information to SeaShare?			Negligible	
4. Does someone other than your office personnel complete the application? IF YES , explain and provide actual costs.		Х		
5. What are the miscellaneous costs to complete and submit information to SeaShare?			None	
6. How often do you provide information to SeaShare? Explain.			Revise application 1x/3 yr	
7. Can you suggest ways to enhance the quality and clarity of the information to be collected? Explain .		Х	None	
8. Can you suggest ways to minimize the burden of providing				
information through use of automated collection techniques or		X		
other forms of information technology. If YES, explain.				
9. What else would you care to tell us? Provide any			Very smooth. Works well	
additional comments on any aspect of the PSD Program.				

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

No payment or gift to respondents is provided under this program.

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

Information collected on the application for a PSD distributor is not considered confidential and will be released to the public upon request. Other information that may be collected from commercial operations may be considered confidential under section 402(b) of the Magnuson-Stevens Act (16 U.S.C. 1801 *et seq.*) and also under <u>NOAA Administrative Order 216-100</u>, which sets forth procedures to protect confidentiality of fishery statistics.

11. <u>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.</u>

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.

Estimated total respondents: 1. Estimated total responses: 1. Estimated total burden hours: 13 hr. Estimated total personnel costs: \$481, up from \$325.

13. <u>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 Question 12 above)</u>.

Estimated total miscellaneous costs: \$2.

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

Estimated total responses: 1. Estimated total burden hours: 13 hr. Estimated total personnel costs: \$481, up from \$325.

15. Explain the reasons for any program changes or adjustment.

There are no changes; the only adjustment is to personnel costs, due to estimation of a higher hourly rate.

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

No plans exist for publishing the results of this information collection.

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.

The permit application is not a form, so the expiration date does not appear.

18. Explain each exception to the certification statement.

Not Applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.