

**SUPPORTING STATEMENT
GROUND FISH TRAWL CATCHER/PROCESSOR
ECONOMIC DATA REPORT (EDR)
OMB CONTROL NO. 0648-0564**

This is a resubmission, with the Final Rule 0648-BE09, of a request for revision of an existing information collection). In addition, this request requires a name change for the collection from Amendment 80 EDR to read Groundfish Trawl Catcher/Processor Economic Data Report (EDR). There were no changes to this information collection request as a result of public comments, or for any other reason.

BACKGROUND

The Secretary of Commerce is responsible for the conservation and management of marine fishery resources within the Exclusive Economic Zone (EEZ) of the United States through National Oceanic and Atmospheric Administration/National Marine Fisheries Service. National Marine Fisheries Service, Alaska Region (NMFS) manages the Gulf of Alaska groundfish trawl fisheries in the EEZ off Alaska under the Fishery Management Plan for Groundfish of the Gulf of Alaska. Groundfish in the Bering Sea and Aleutian Islands Management Area (BSAI) is managed under the Fishery Management Plan for Groundfish of the Bering Sea and Aleutian Islands Management Area. The North Pacific Fishery Management Council (Council) prepared the FMPs under the authority of the [Magnuson-Stevens Fishery Conservation and Management Act](#), 16 U.S.C. 1801 *et seq.* (Magnuson-Stevens Act). Regulations implementing the FMPs appear at [50 CFR part 679](#).

Harvests by trawl catcher/processors in the Gulf of Alaska (GOA) are limited primarily by two management programs, the Amendment 80 Program (see <http://www.alaskafisheries.noaa.gov/sustainablefisheries/amds/80/default.htm>), and the Central GOA Rockfish Program (see <http://www.alaskafisheries.noaa.gov/sustainablefisheries/rockfish/>). All of the vessels in the trawl catcher/processor sector are subject to management under the Amendment 80 Program which is intended primarily to improve retention and utilization of fishery resources; encourage fishing practices with lower discard rates; and improve the opportunity for increasing the value of harvested species while lowering operational costs for groundfish in the BSAI.

INTRODUCTION

NMFS would revise the existing Amendment 80 EDR, which is for use by trawl catcher/processors in the BSAI, by adding GOA groundfish fisheries. These catcher/processors would become part of the new GOA Trawl Groundfish Economic Data Report Program which will evaluate the economic effects of current and future groundfish and prohibited species catch (PSC) management measures for the GOA trawl fisheries. This data collection program will provide the Council and other analysts with baseline information on affected harvesters, crew,

processors, and communities in the GOA. The information collected through the EDRs would be used to assess the impacts of major changes in the groundfish management regime, including catch share programs for PSC species and target species.

The EDRs in this new program would be submitted by Amendment 80 quota share (QS) holders, vessel owners and leaseholders of GOA trawl vessels, shoreside processors and stationary floating processors receiving deliveries from those trawl vessels, and Amendment 80 catcher/processors harvesting in the Bering Sea and Aleutian Islands Management Area (BSAI). The type of data collected would include labor information, revenues received, capital and operational expenses, and other operational or financial data.

With this action, the Amendment 80 EDR would be revised to include information from the GOA and would be renamed.

A. JUSTIFICATION

Regulations at § 679.94 require any person who held an Amendment 80 QS permit during a calendar year to submit to NMFS an Amendment 80 EDR for that calendar year for each Amendment 80 QS permit held by that person. The Amendment 80 EDR was implemented as part of the Amendment 80 cooperative program to assist in the evaluation of the program, to assist the Council to determine if the program is achieving its objectives, and to consider improvements and amendments to the program.

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

NMFS would implement the Trawl Economic Data Report Program to evaluate the economic effects of current and future groundfish and PSC management measures for the GOA trawl fisheries. Additional questions would be added to the previous Amendment 80 EDR to include harvesting crew identification numbers. Collection of these crew identifiers will allow NMFS to track the harvesting crew (captains, engineers, deck crew, and cook) over time and will provide baseline data for studies to understand how employment and compensation change in the GOA trawl fisheries. The new data will improve the scientific information that is available to make conservation and management decisions and to better understand the current structure of the GOA trawl fishing industry. Further, these data will allow analysts to better understand the impacts of the proposed trawl bycatch management program on participants in the fishery.

2. 1Explain how, by whom, how frequently, and for what purpose the information will be used. 1If 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. Groundfish Trawl Catcher/Processor Economic Data Report (EDR) (REVISED)

Each person who held an Amendment 80 QS permit or a catcher/processor trawl-gear designated groundfish License Limitation Program (LLP) license endorsed for the Central or Western GOA

during a calendar year must submit this EDR for each calendar year for each Amendment 80 QS permit.

A complete EDR must be submitted for each calendar year on or before June 1 of the following year. All information reported must be current and complete as of the date of submission, including post-season adjustments and settlements.

Pacific States Marine Fisheries Commission (Pacific States) was designated by NMFS to be the Data Collection Agent for the Amendment 80 EDR program. Pacific States mails EDR announcements and filing instructions to Amendment 80 QS permit holders by April 1.

To request a printed EDR be mailed, call 1-877-741-8913, or email a request to am80edr@psmfc.org.

An EDR may be submitted online or may be downloaded in fillable PDF format and then faxed or mailed. Submit the completed EDR:

By mail to: Pacific States Marine Fisheries Commission
NMFS Economic Data Reports
205 SE Spokane, Suite 100
Portland, OR 97202

By fax to: 503-595-3450

Online at: <https://survey.psmfc.org>

The current Amendment 80 EDR collects economic data on the BSAI Non-American Fisheries Act (non-AFA) Trawl Catcher/Processor Sector, including Western Alaska Community Development Quota Program (CDQ) non-Pollock groundfish fisheries. The fisheries are referred to as Amendment 80 fisheries. The revised EDR will additionally collect data for GOA trawl groundfish fisheries.

Depending on activity in this fishery in a given calendar year, the respondent of a catcher/processor would complete and submit the entire EDR or the EDR certification pages.

- ◆ Complete and submit the entire EDR
 - If the catcher/processor owner or the holder of the Amendment 80 QS, who harvested or processed groundfish in the Central or Western GOA
 - If the catcher/processor leaseholder, who harvested or processed groundfish in the Central or Western GOA

- ◆ Complete and submit the EDR Certification Pages only.
 - If the catcher/processor owner, who leased or sold the catcher/processor to another party, and did not harvest or process groundfish in the Central or Western GOA

Provide the name, address, and telephone number of the person to whom leased or sold the vessel
 - If the catcher/processor owner, and the catcher/processor was lost or rendered permanently inoperable due to accident, and harvested no groundfish in the Central or Western GOA
 - If the catcher/processor owner, and no one harvested or processed groundfish in the Central or Western GOA

To ensure that each permit holder is consistently and accurately completing the EDR, an audit may be performed by a qualified accountant for the purpose of validating the data reported in the EDR. This step will ensure that the data can be relied upon to produce accurate and reliable information for the Alaska groundfish trawl fisheries.

If selected for validation, auditors will verify the data report by comparing specific elements of the report with the permit holder's records. To make this process as efficient and non-intrusive as possible, NMFS suggests:

- ◆ Keep a copy of the completed EDR or certification pages submitted. Copy and attach extra sheets as needed.
- ◆ Keep a file that has all of the supporting information used in the preparation of the EDR.
- ◆ Make sure that the EDR agrees to the company's highest level of financial information. For this purpose, the highest level of financial information is defined in order as:
 - Audited financial statements
 - Reviewed financial statements
 - Compiled financial statements
 - Tax returns

**Groundfish Trawl Catcher/Processor EDR
Certification Page**

- Vessel owner or Amendment 80 QS permit holder information
 - Name of company, partnership, or other business entity
 - Amendment 80 QS permits held
 - Name of catcher/processors owned (if none, enter N/A)
 - Business telephone number, business fax number, and business E-mail address
- Vessel leaseholder information
 - Name of company, partnership, or other business entity
 - Business telephone number, business fax number, and business E-mail address

Person Completing this EDR (check one)

QS permit holder or Vessel owner - If same as above, do not repeat

Designated Representative

Name and title

Business telephone number, business fax number, and business E-mail address

Vessel Owner/Operator Certification

Certify that all information is true, correct, and complete to the best of his/her knowledge and belief

If completed by a designated representative, **attach** authorization

Printed name and signature of Vessel Owner or Designated Representative

Date signed

Economic data report

Vessel Identification

Amendment 80 QS Permit Number

Vessel Name

USCG Documentation Number

ADF&G Vessel Registration Number

ADF&G processor code

Amendment 80 License Limitation Program (LLP) No(s)

Amendment 80 limited access fishery permit No

Name of Amendment 80 cooperative (if applicable)

Home port

U.S. gross registered tonnage, net tonnage, and length overall

Beam, shaft horsepower, and fuel capacity (U.S. gal)

Year Built

Vessel characteristics: survey value

Most recent survey value of vessel and equipment (nearest 100 dollars)

Indicate whether this is the approximate replacement value

Date of vessel's last value survey

Indicate if survey value includes values of permits associated with vessel

Indicate if survey value includes processing equipment

Vessel characteristics: fuel consumption

Vessel's annual and average fuel consumption per hour

Fishing and/or processing

Steaming (not fishing or processing) – fully loaded with product

Steaming (not fishing or processing) – empty (transiting)

Vessel characteristics: freezer space

Amount of freezer space available at the beginning of the calendar year

Maximum freezing capacity in pounds per hour

Vessel characteristics: processing capacity

Total number of processing lines on the vessel

For each type of product processed on the line

Species code

Product code

Number of processing lines

Maximum throughput in pounds per hour for that product

Vessel characteristics: vessel activity

Record the total number of days the vessel was engaged in each of the following activities

Number of days fishing

A80 fishery

Central and Western GOA

All other fisheries

Number of days processing

A80 fishery

Central and Western GOA

All other fisheries

Number of days traveling or offloading
Number of days inactive

Revenues

Report the total amount of revenue received from all sources for each of the following

Total fishery product sales
Volume (metric tons)
FOB Alaska revenue (US dollars)
All other income derived from vessel operations
Income from sale of LLP licenses associated with this vessel
LLP number
Revenue (US dollars)
QS leased by other vessels
quantity by species
royalty revenue by species

Capital expenditures and materials usage

Report capital Expenditures associated with the following

Fishing gear (nets, net electronics)
Processing equipment, including freezing and cold storage
Vessel and onboard equipment (other than fishing, processing, or storage equipment)
Other capital expenditures related to vessel operations

Purchase LLP license(s) for use on vessel

LLP Number
Cost

Expenses

Report total expenses associated with the following operating cost categories

Fishing (deck crew) labor expenses (including bonuses and payroll taxes, but excluding benefits and insurance)
Processing labor expenses (including bonuses and payroll taxes, but excluding benefits and insurance)
Labor expenses for all other employees aboard the vessel
Food and provisions (not paid by crew)
Recruitment, travel, benefits, and other employee related costs
Lease expense for this vessel and onboard equipment
Fishing gear leases, repairs, and purchases (nets, doors, cables, etc.)
Repair and maintenance expenses for vessel and processing equipment
Freight, storage, and other sales costs for non-FOB sales
Freight and storage costs other than for products (e.g., gear, supplies, etc.)
Product and packaging materials
Fuel and lubrication
Observer fees and other fishery monitoring and reporting costs
Cooperative costs including lawyer and accountant costs, association fees, and other fees charged by harvest cooperative
General administrative costs including professional services and management fees
Insurance (vessel insurance, P&I, and other insurance associated with the operation of this vessel)
Fisheries landing taxes (including shared fisheries business tax and fishery resource landing tax)
Total raw fish purchases from other vessels (all fisheries and species)
Metric tons
Cost
Quantity and royalty costs for QS leased from other vessels by species
Quantity of QS (mt)
Cost

Labor

Average and total number of individuals employed onboard

Fishing (deck crew)
Processing
All other employees onboard the vessel

Average hours per day a typical processing line employee worked

Indicate if the vessel used a crew or revenue share system to pay crew

- To pay some processing crew
- To pay all processing crew
- To pay some non-processing crew
- To pay all non-processing crew

Crew licenses and CFEC permits

For each individual who worked as a captain or harvest crew member, record either Alaska Commercial Crew license 7-digit number or CFEC gear operator permit number
Do not record more than one license or permit number for any individual.

The burden hours are increased from 20 to 22 hr because additional questions are added to the EDR. The average 22 hours includes the submittal of the entire EDR, the submittal of the certification pages only, and submittal of response to questions from an auditor.

Groundfish Trawl Catcher/Processor EDR, Respondents	
Number of respondents	25
Total annual responses	25
Frequency of response = 1	
Total burden hours	550 hr
Time per response = 22 hr	
Total personnel cost (\$37/hr x 550)	\$20,350
Total miscellaneous costs (31.45)	\$31
Photocopying (\$0.05 x 14 pp x 25= 17.50)	
Online (0.05 x 21 = 1.05)	
Mail (0.45 x 2 = 0.90)	
Fax (\$6 x 2 = 12)	

The cost to implement the revised catcher/processor EDR would be minimal, because NMFS is already collecting most of these data. The addition of one catcher/processor will not affect the survey instrument development, staff needed to oversee the data collection, or hardware needed to store the data. Some additional time may be required to work with the vessel owner that is added to the program. Some additional costs may be associated with entering and verifying the additional data. However, the marginal cost increase associated with adding that vessel should be small (estimated to be about \$1,000 per year), compared to the approximately \$70,000 that was spent to maintain the program in 2012.

The previous EDR instructed respondents to submit the EDR to Alaska Science Center, which was incorrect. The EDR must be sent to Pacific States, which removes all of the Federal Government costs and burden for handling the EDR.

Groundfish Trawl Catcher/processor EDR, Federal Government	
Total annual responses	0
Total burden hours	0
Total personnel cost	0
Total miscellaneous costs	0
Initial costs, adding one respondent	\$1,000
Maintenance costs	\$70,000

It is anticipated that the information collected will be disseminated in aggregated and non-confidential form to the public or used to support publicly disseminated information about the Amendment 80 Program. 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 the 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. 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.

The EDRs may be submitted online at <https://survey.psmfc.org>. In addition, the EDRs are fillable and may be downloaded from the NMFS web site at alaskafisheries.noaa.gov, printed, and submitted by mail or fax to Pacific States.

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 unlike any other.

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

Based on the known affiliations and ownership of the Amendment 80 vessels, all but one of the Amendment 80 vessel owners would be categorized as large entities for the purpose of the RFA. This analysis estimates that only one small entity would be directly regulated by the proposed action. It is possible that this one small entity could be linked by company affiliation to a large entity, which may then qualify that entity as large entity, but complete information is not available to determine any such linkages. The information collection does not impose a significant impact on small entities.

Since the Amendment 80 EDR Program has been in place, informal testing has taken place by meeting with EDR submitters to discuss ways in which the forms used to request information could be improved. The accountants that perform the data quality audits, as well as Pacific States (who administers the data collection) also document ways in which the EDRs could be clarified and we have used this information to clarify instructions and variable definitions for this new EDR.

In addition, the AFSC held two half-day workshops to review the Amendment 80 EDR with members of industry, and conducted a meeting with each of the two cooperatives to review the EDR. AFSC scheduled a meeting to consult with the sole Amendment 80 catcher/processor that is not a member of a cooperative.

Pacific States has created one online address to submit all EDRs which allows respondents to use one ID and password for all EDRs.

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

If the collection were not conducted or were conducted less frequently, the objectives of the Council would not be met.

The Council is interested in developing a data collection program that can be established prior to the implementation of a trawl catch share program in the GOA. This fast-tracked data collection would provide the Council and analysts with relevant baseline information that can be used to assess the impacts of a catch share program on affected harvesters, processors, and communities in the GOA. In developing a data collection program that can be implemented quickly, efficiently, and with minimal burden on participating stakeholders, the Council intends to prioritize the collection of information that is relevant, reliable, and for which existing data sources do not exist. Given the potential for implementation of catch shares in both the Central and Western GOA, the scope of the analysis should include participants in both management areas.

The Council further expressed the need to better understand the potential economic and employment impacts the proposed actions would have on specific job categories of persons in fishing, processing or administration of fishing operations, additional data are needed prior to the implementation of a GOA trawl bycatch catch share program to augment data that are currently available. The Council believed and NMFS agrees that baseline information proposed to be collected will provide a better understanding of the crew members that participate in the GOA trawl fishery, processing workers that work in plants processing trawl caught groundfish from the GOA, and these worker's compensation in the time period before the Council develops a proposed GOA trawl bycatch catch share program.

The Council proposed and NMFS agrees that information on harvesting costs should focus on fuel and gear purchases by catcher vessels. Catcher/processor cost data would continue to be collected from a revised Amendment 80 EDR. Cost data collected as part of this amendment would be limited to track variables that might be expected to change significantly if management of the fishery should be operated under a catch share program in the future. For example, fuel use would be collected because it is a major component of variable costs, and gear purchases may provide insights into efforts to reduce PSC.

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

Not Applicable.

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 proposed rule (RIN 0648-BE09) was published, August 11, 2014 (79 FR 46758) coincidentally with this request, to request public comments; the comment period ended September 10, 2014. NMFS received five unique comments contained in two comment letters from fishing industry representatives associated with GOA trawl fisheries, and one comment letter from a member of the general public. The general public comment opposed the implementation of the action, but did not provide a reason for opposing the action. The comment letters from the two fishing industry representatives supported the implementation of the GOA Trawl EDR data collection program. *Two comments from the fishing industry representatives were related to the Catcher/processor EDR.*

NMFS made no changes to the regulatory text in the final rule from the proposed rule. No public comments recommended revisions to the regulatory text.

Comments & Responses in Proposed Rule	
<p>Comment 1: The analysis prepared for the proposed action describes a process where EDR form changes are discussed with the Council before they are implemented. We appreciate NMFS' willingness to vet all EDR form changes as part of the public Council process, and look forward to working with NMFS and the Council on any future revisions.</p>	<p>Response: NMFS acknowledges the comment.</p>
<p>Comment 2 During development of this action, NMFS recommended extending current Amendment 80 EDR requirements to catcher processors operating in the GOA, and collection of crew identifiers. During the April 2014 Council meeting and after Council final action, NMFS also suggested that collection of daily fishing and processing activity distinguish Central and Western Gulf activities from other activities. The change was approved by the Council and included in the proposed rule; however, the analysis was never revised to describe these changes and their impacts. Despite this oversight, we appreciate the willingness of NMFS staff working with the Council to ensure that changes to forms are merited and fully considered. We support the use of</p>	<p>Response NMFS Alaska Region does not anticipate proposing any revisions to the GOA Trawl EDR forms that have not been fully vetted through the Council. For any proposed revision that NMFS determined would be useful, that proposed revisions would be vetted by submitting it to the Council, Executive Director for review. If the Executive Director advises NMFS that the proposed revision is minor, NMFS may proceed with submitting the proposed revision for clearance through the Paperwork Reduction Act. If the Executive Director advises NMFS that the proposed revisions are not minor, then NMFS not would commence clearance of the proposed revisions through PRA, until the Council recommended revisions through an FMP or regulatory amendment.</p>

the forms as reviewed by the Council at its April 2014 meeting.	
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In addition, a review by a small group of industry representatives took place in March, 2014. This review consisted of going over the EDR, checking the clarity and consistency of the questions. The revised EDR was presented to the Council at the April 2014 meeting for review and comments.

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

No payment or gift will be provided under this program.

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

The information collected is confidential under section 402(b) of the Magnuson-Stevens Act (16 U.S.C. 1801, *et seq.*). It is also confidential under [NOAA Administrative Order 216-100](#), which sets forth procedures to protect confidentiality of fishery statistics.

The treatment of confidential data by Pacific States for the trawl catcher/processor EDR would not be revised from the current Amendment 80 EDR. Authorized NMFS, DCA, and Council staff would have access to all data collected in the Trawl catcher/processor EDR, however this data could not be released through requests from FOIA or other public inquire, without aggregation to established standards. Data, including individual identifiers from the EDR for Amendment 80 QS permit holders and the Golden Fleece would not be converted to blind data for release to NMFS or the Council staff. This is consistent with the intent of the Council, and NMFS that all catcher/processors landing groundfish in the Western or Central GOA, including those that do not receive an Amendment 80 QS permit be required to submit an Amendment 80 EDR.

11. 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.

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.

Total estimated unique respondents: 25. Total estimated responses: 25. Total estimated time burden: 550 hr, increased from 500 hr. Total estimated personnel cost: \$20,350, decreased from \$50,000.

13. 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).

Total estimated miscellaneous costs: \$31, increased from \$25 (due to online submittal).

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

Total responses: 0. Total estimated time burden: 0 hr. Total personnel cost: \$0. Total initial costs: \$1,000. Total miscellaneous costs: \$70,000.

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

Program change

This action combines the existing BSAI Amendment 80 EDR with a new GOA Groundfish Trawl Program. A few questions are added to discover information from the GOA. The resultant combined data would be used to establish a baseline for the broader trawl bycatch management program.

GOA Catcher/processor Trawl EDR and verification

an increase of 50 hr in burden, 550 hr instead of 500 hr

a decrease of \$29,650 in personnel costs, \$20,350 instead of \$50,000

an increase of \$6 in miscellaneous costs, \$31 instead of \$25

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

The information collected will not be published. It is anticipated that the information collected will be disseminated in aggregated and non-confidential form to the public or used to support publicly disseminated information.

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.

Not Applicable.

18. Explain each exception to the certification statement.

Not Applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g. establishments, State and local governmental units, households, or persons) in the universe and the corresponding sample are to be provided in tabular form. The tabulation must also include expected response rates for the collection as a whole. If the collection has been conducted before, provide the actual response rate achieved.

Entity Type	Sample Size
24 catcher/processors in BSAI	100%
1 catcher/processor in GOA	100%

Groundfish harvest includes both the GOA and BSAI, therefore groundfish activity from both areas is included. Each catcher/processor is required to have one Amendment 80 QS permit and one LLP license. Owners of multiple licenses and associated vessels are required annually to submit one EDR for each licensed vessel.

Two cooperatives have formed under Amendment 80. Alaska Seafood Cooperative (AKSC) is comprised of seven member companies and sixteen non-AFA trawl catcher/processors. Alaska Groundfish Cooperative (AGC) is comprised of four companies and nine non-AFA trawl catcher processors and/or permits.

2. Describe the procedures for the collection, including: the statistical methodology for stratification and sample selection; the estimation procedure; the degree of accuracy needed for the purpose described in the justification; any unusual problems requiring specialized sampling procedures; and any use of periodic (less frequent than annual) data collection cycles to reduce burden.

The sample selection method is an annual census of all 25 catcher/processors, as any other sampling methodology would produce too few observations to estimate representative levels of cost, earnings, and other outputs required for this collection. As this program is a mandatory collection, and valuable fishing privileges will be withheld if an EDR is not submitted, we anticipate a 100 percent response rate from QS holders. Quota shares in this program are issued to entities, rather than vessels, and specific provisions require that each QS holder is responsible for including data from any acquired vessel in this sector.

Given that a maximum of 25 catcher/processors will be participating in this fishery, it is not feasible to generate enough observations on any one of the variables without applying this collection annually. And, random sampling from this population is not a viable option for statistical reasons. Based upon the degrees of freedom and number of observations required for estimating the statistical relationship among the variables in this collection, data in the Amendment 80 EDR may be pooled to create a time-series of cross-sectional data in order to generate sufficient observations for economic and statistical analysis. Although the strata to be utilized in preparing analyses (either deterministic or statistical) of management actions for this

fleet will depend on the specific questions of interest, vessels are commonly stratified by vessel length and the distribution and amount of catch, by species.

3. Describe the methods used to maximize response rates and to deal with non-response. The accuracy and reliability of the information collected must be shown to be adequate for the intended uses. For collections based on sampling, a special justification must be provided if they will not yield "reliable" data that can be generalized to the universe studied.

Each of the owners and leaseholders in the catcher/processor sector are required to submit an annual EDR. Therefore, the response to mandatory data requirements should be very high. Those individuals who do not submit their EDR by the submission date will receive a follow-up phone call from Pacific States. If a solution cannot be reached at that point, their information will be referred to the OLE. Therefore, we are anticipating response rates of 95-100 percent.

Enforcement of the data collection program with regard to non-compliance has been different from enforcement programs used to ensure that accurate landings are reported. The economic data will not be used for in-season management; persons submitting the data are given an opportunity to correct omissions and errors before any enforcement action is taken.

Giving the person submitting data a chance to correct problems is considered important because of the complexities associated with generating these data. Only if the agency and the person submitting the data cannot reach a solution would the enforcement agency be contacted. The intent of this program is to ensure that accurate data are collected without being overly burdensome on industry for unintended errors.

4. Describe any tests of procedures or methods to be undertaken. Tests are encouraged as effective means to refine collections, but if ten or more test respondents are involved OMB must give prior approval.

Since the Amendment 80 EDR Program has been in place, informal testing has taken place by meeting with EDR submitters to discuss ways in which the forms used to request information could be improved. The accountants that perform the data quality audits, as well as Pacific States (who administers the data collection) also document ways in which the EDRs could be clarified and we have used this information to clarify instructions and variable definitions for this new EDR.

In addition, the AFSC held two half-day workshops to review the Amendment 80 EDR with members of industry, and conducted a meeting with each of the two cooperatives to review the EDR. AFSC scheduled a meeting to consult with the sole Amendment 80 catcher/processor that is not a member of a cooperative.

5. Provide the name and telephone number of individuals consulted on the statistical aspects of the design, and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

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