

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

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.

Brian Garber-Yonts, Ph.D. [statistical design and analysis of data]
Research Economist
NOAA/NMFS, Alaska Fisheries Science Center
PH: (206) 526-6301
Internet Address: Brian.Garber-yonts@noaa.gov

Darrell Brannan, Ph.D. [statistical design and analysis of data]
Research Economist
NOAA/NMFS, Alaska Fisheries Science Center
PH: (907) 271-2809
Internet Address: Darrell.Brannan@noaa.gov

Jeff Hartman [principal author on EDR proposed rule]
NOAA/NMFS, Alaska Region
PH: (907) 586-7442
Internet Address: jeff.hartman@noaa.gov

Geana Tyler [collection of data, verification of accuracy of data]
Pacific States Marine Fisheries Commission
PH: (503) 595-3100
Internet Address: gtyler@psmfc.org

Tracy Buck [permits, permit data]
Supervisor of Permits
PH: (907) 586-7889
NOAA/NMFS, Alaska Region
Internet Address: tracy.buck@noaa.gov

Steve Whitney [administers Amendment 80 Program]
NOAA/NMFS, Alaska Region
PH: (907) 586-7269
Internet Address: steve.whitney@noaa.gov