SUPPORTING STATEMENT
WEST COAST REGION VESSEL MONITORING SYSTEM AND PRE-TRIP REPORTING REQUIREMENTS
OMB CONTROL NO. 0648-0498

A. JUSTIFICATION

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

This request is for a revision of this information collection, based on inclusion of VMS requirements for the West Coast drift gillnet fishery under final rule making RIN 0648-BE25. Also, note the title change from *SWR VMS and Pre-Trip Reporting Requirements* to *West Coast Region Longline Vessel Monitoring System and Pre-Trip Reporting Requirements.*

The Magnuson-Stevens Fishery Conservation and Management Act (MSA) established regional fishery management councils, including the Pacific Fishery Management Council (Pacific Council), to develop fishery management plans for fisheries in the United States (U.S.) exclusive economic zone (EEZ). These plans, if approved by the Secretary of Commerce, are implemented by Federal regulations, which are enforced by the National Oceanic and Atmospheric Administration's (NOAA's) National Marine Fisheries Service (NMFS) and the U.S. Coast Guard (USCG) with the cooperation of state agencies to the extent possible. The Pacific Council submitted for approval the Fishery Management Plan for U.S. West Coast Fisheries for Highly Migratory Species (HMS FMP) which was partially approved by the Secretary of Commerce on February 4, 2004. On April 7, 2004, NMFS published a final rule to implement the approved portions of the HMS FMP (69 FR 18444).

The FMP is intended to ensure conservation and promote the achievement of optimum yield of HMS throughout their ranges, both within and beyond the U.S. EEZ, to the extent practicable. The FMP establishes basic conservation and management measures applicable to U.S. vessels fishing for managed species. Among the conservation and management measures are permit and reporting requirements for commercial and charter fisheries for HMS as described in this proposal. The final rule became effective May 7, 2004, except for various record keeping and reporting elements (e.g., permits and logbooks). These elements became effective on February 10, 2005, upon notice in Federal Register of the approval by the Office of Management and Budget of collection-of-information requirements for this action.

NMFS will publish a final rule under the authority of the Magnuson-Stevens Fishery Conservation and Management Act (MSA) that would require mandatory use of a NMFS-approved Vessel Monitoring System (VMS) and institute a 48-hour pre-trip notification requirement for vessel owners and operators permitted to participate in the West Coast large-mesh drift gillnet (DGN) fishery.

This action will implement recommendations of the Pacific Fishery Management Council (Council) from their March and September 2014 meetings. In making their recommendations, the Council anticipated the expiration of temporary regulations based on input from the Pacific Offshore Cetacean Take Reduction Team (TRT). These temporary regulations included VMS and pre-trip notification requirements (78 FR 54548, September 4, 2013, and 79 FR 29377, May 22, 2014), and expired on August 5, 2014. This action would make permanent the VMS and pre-trip notification requirements. The VMS portion of this rule would also satisfy terms and conditions of the incidental take statement that accompanied the August 2013 Endangered Species Act (ESA) Section 7 biological opinion for the fishery.

The following species are included as management unit species under the HMS FMP:

Billfish/Swordfish:

striped marlin (Tetrapturus audax)
swordfish (Xiphias gladius)

Sharks:

common thresher shark (Alopias vulpinus)
shortfin mako or bonito shark (Isurus oxyrinchus)
blue shark (Prionace glauca)

Tunas:

north Pacific albacore (Thunnus alalunga)
yellowfin tuna (Thunnus albacares)
bigeye tuna (Thunnus obesus)
skipjack tuna (Katsuwonus pelamis)
northern bluefin tuna (Thunnus orientalis)

Other:

dorado or dolphinfish (Coryphaena hippurus)

These species are highly migratory and are harvested in U.S. waters and on the high seas by U.S. fishermen and fishermen of other nations. In the U.S., the transboundary migratory patterns of many of the species potentially bring them in varying degree under the jurisdiction of three councils: the Pacific Fishery Management Council, the Western Pacific Fishery Management Council, and the North Pacific Fishery Management Council. The Western Pacific Council has implemented a Fishery Management Plan for the Pelagic Fisheries of the Western Pacific Region (Pelagics FMP) governing management of many of the same species in the EEZ of Hawaii, American Samoa, Guam, the Commonwealth of the Northern Mariana Islands, and other U.S. possessions in the western Pacific region. Jurisdiction in the western Pacific extends only to the various EEZs in the western Pacific and to those vessels that may fish on the high seas with permits issued under the authority of the Pelagics FMP. The Pacific Council's HMS FMP will complement the Pelagics FMP but will strive to minimize duplicate requirements, even for vessels that sometimes fish in waters under both jurisdictions.

The regulations implementing the HMS FMP essentially require that operators of any commercial fishing vessels and recreational charter vessels engaged in fishing for HMS maintain

and submit logbooks to NMFS or state authorities recording catch and effort for that fishing. These requirements are met for most vessels by reporting in accordance with existing laws and regulations. In several fisheries, vessel operators are already required under state law to maintain and submit logbooks to state agencies. The regulations require that state reporting requirements be met in the manner and on the forms required by the states. Currently, the State logbook requirements for drift gillnet, harpoon and recreational charter vessels are used to satisfy Federal information needs under the HMS FMP. Thus, there is no Federal burden associated with the reporting requirements for these fisheries.

In addition, logbooks recording daily catch and effort statistics are required for fishing activity by vessels fishing on the high seas under the authority of the High Seas Fishing Compliance Act (HSFCA) under OMB Control No. 0648-0304 including longline, high seas troll/baitboat, and high seas purse seine fishing. Those requirements would continue, although they can be met by submitting forms provided by the West Coast Region (WCR) NMFS, for reporting under the HMS FMP. A Federal Pacific Albacore Logbook has been developed and distributed to HMS FMP troll and baitboat permit holders, including HSFCA eligible participants. The fleet is being instructed to use this logbook as the primary means for meeting the HMS FMP and HSFCA reporting requirements. A separate collection of information has been established for mandatory reporting and record keeping through use of the Federal Pacific Albacore Logbook (OMB Control No. 0648-0223).

An electronic vessel monitoring system (VMS) utilizing global positioning by satellite is required to be installed and operated on all longline and drift gillnet vessels managed under the HMS the FMP. The VMS requirement pertains to basic monitoring of the fishery to obtain information needed by, among others, NMFS, the USCG, and the States to monitor the activities of the participating vessels and the performance of the fisheries. Knowing the number and location of vessels enables effective monitoring of vessel activity for enforcement purposes (e.g., to determine whether or not vessels are fishing in closed areas) and provides additional data to assist in validation of logbook records accuracy The VMS, among other benefits, provides NMFS and law enforcement personnel with the ability to monitor the DGN fishery for compliance with conservation measures, efficiently deploy agents to inspect vessels, and provide the ability to more closely examine and compare observed and unobserved fishing effort.

Longline vessels are also required to notify NMFS prior to departing on a fishing trip so that NMFS can determine whether an observer should be placed on the vessel Final Rule 0648-BE05 will require this notification from drift gillnet vessels also. The pre-trip notification requirements assist NMFS in efficiently placing observers on deep-set longline vessels and drift gillnet vessels. Observer coverage of these fleets is necessary to monitor and assess impacts of their fishing activities on protected species.

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.

The requirement for HMS vessel operators to contact NMFS prior to a trip departure enables NMFS to plan on placement of an observer when it is necessary and appropriate (e.g., for under-observed gear/trip types and/or pending available funding).

The VMS vessel location reports will be used to facilitate enforcement regarding prohibited or restricted fishing areas in the eastern Pacific Ocean closed to commercial fishing. The reports provide National Marine Fisheries Service, Office of Law Enforcement (OLE) and the United States Coast Guard (USCG) real-time vessel location and activity information. The VMS reports also can be used to check the accuracy of vessel position information reported by the vessel operator in the daily fishing logbooks required by the regulations. The information provides a basis for determining whether changes in management are needed to protect sensitive species.

Installation/activation reports will be used to provide OLE with information about hardware installed and communication service provider that will be used by the vessel operator. Specific information that links a permitted vessel with a certain transmitting unit and communication service is necessary to ensure that automatic position reports will be received properly by NMFS and to identify the unique signature for each VMS unit. In the event that there are any problems, NMFS will need to have ready access to a database that links owner information with installation information. NMFS can then apply troubleshooting techniques and as necessary contact the vessel operator and discern whether the problem is associated with the transmitting hardware or the service provider. This is not expected to occur more than once per year.

Declaration Reports are provided by drift gillnet vessels owners or operators to the NMFS West Coast Region Office of Law Enforcement (OLE) before the vessel leaves port to fish with DGN gear in state or federal waters and are used to determine which vessels may be at sea at any given time and when to expect VMS position reports.

Hourly position reports are transmitted 24 hours per day throughout the calendar year and provide NMFS and USCG with real-time vessel location and activity information. When an operator is aware that the transmission of automatic position reports has been interrupted, or when notified by NMFs that automatic position reports are not being received, they must contact NMFS and follow instructions provided.

Exemption reports allow vessels to discontinue or reduce transmissions when the vessel is seaward of the monitored area or has been removed from the water for an extended period and is without electrical power source needed to operate VMS transceiver unit. These reports allow flexibility to the industry participants while providing NMFS OLE with the information needed to determine why a position report is not being received from the vessel. Exemption reports includes haul out, outside areas, long-term departure, and emergency exemptions for vessels to be excused from operating the VMS continuously during vessel maintenance, emergencies, or when the vessel has left the fishing area for an extended period.

Transfer of Ownership reports allow vessels to sell or transfer their VMS to another vessel and

provide NMFS OLE with information necessary to determine a verifiable transfer has occurred

Currently, there are fewer West Coast-based vessels actively fishing with longline or drift gillnet gear than there was in the past. Currently, a single deep-set longline vessel is operating out of the west coast and fishing on the high seas. Shallow-set longline fishing was prohibited east of 150 degrees west longitude under the HMS FMP regulations. Therefore, most of the swordfish longline vessels now fish out of Hawaii due to the re-opening of the shallow-set longline fishery in April, 2004. The Hawaii-based vessels are authorized to land fish on the West Coast and continue to fish under the Pelagics Limited Entry longline permit. These vessels must have VMS units on board. If any of these vessels call to the west coast, vessel operators would have to allow NMFS agents to verify the operational status of the units. There are 77 vessels permitted to fish with drift gillnet gear in the U.S. EEZ off the West Coast. However, only 18 of these vessels actively fished in 2013, bringing the number of active vessels up 2 vessels from 16 in 2012 which was a record low year for participation in the fishery. Over the last decade, the highest amount of vessels to actively fish in one year was 40 with an average of 30 for that time.

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. Although the information collected is not expected to be disseminated directly to the public, results may be used in scientific, management, technical or general informational publications. Should NOAA Fisheries Service decide to disseminate the information, it will be subject to the quality control measures and 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.

VMS position reporting is entirely electronic. Electronic VMS shipboard equipment installed on board a vessel provides information about the vessel's position and activity. That information is communicated between the shipboard VMS unit and the monitoring agency's fishery monitoring center, where the identity and location of the vessels are shown on a map display, comparing vessel positions with features of interest, such as closed area boundaries. Written activation reports may be submitted via mail, facsimile or e-mail to the Special Agent in Charge (SAC), the point of contact for the NMFS Office of Law Enforcement, and must include: the vessel's name; the vessel's official number; the VMS unit manufacturer and identification number; and telephone, facsimile or email contact information for the vessel owner or operator. While the vessel is in operation, position reports are transferred automatically at a specified frequency and received via a satellite communication system by NOAA.

Pre-trip notification reporting is done by telephone. The vessel owners or operators must provide their name, contact information, vessel name, port of departure, and estimated date and

time of departure to the observer provider. Upon receipt of a pre-trip notification, the observer provider will notify the vessel owner/operator whether their fishing trip has been selected for observer coverage.

Several information portals will be used to inform the public about management program requirements including websites maintained by the WCR and the Pacific Council. A Small Entity Compliance Guide has been prepared to assist permit holders in understanding the requirements that must be met, including reporting requirements. Required Federal forms and instructions are available online at: http://www.westcoast.fisheries.noaa.gov/fisheries/migratory_species/highly_migratory_species_logbooks.html, along with an explanation of the process for returning them to NMFS. The WCR will also work with state agencies and the Pacific Council to use their web sites and license-issuing offices to increase the distribution of required reporting and record keeping California: www.dfg.ca.gov; Oregon: http://www.dfw.state.or.us; Washington: http://www.wdfw.wa.gov.

4. Describe efforts to identify duplication.

U.S. West Coast-based fishing vessels that fish part or full time in the Western Central Pacific Fisheries Commission Endorsement Area (in the Central and Western Pacific Ocean, principally west of 150 degrees west longitude) have explicit VMS requirements that are codified in a Final Rule (75 FR 3335) published January 21, 2010. PRA requirements for West Coast-based vessels were covered in a separate PRA submission (OMB Control Number 0648-0441) handled by the NMFS Pacific Islands Regional Office and are not included under this PRA submission (OMB Control Number 0648-0498), thereby avoiding duplication of efforts. NMFS published a rule on February 6, 2014 (79 FR 7152), that would require VMS for owners and operators of U.S. commercial fishing vessels, 24 meters or more in overall length, used to target tuna in the Inter-Tropical Tuna Commission (IATTC) Convention Area. Compliance with the existing VMS requirements for deep-set longline vessels (DSLL) under 50 CFR 660 would satisfy these new requirements relating to the installation, carrying, and operation of VMS units, provided that the VMS unit and mobile communications service provider are type-approved by NOAA specifically for fisheries in the IATTC Convention Area, the VMS unit is operated continuously at all times while the vessel is at sea, the vessel owner or operator have authorized NOAA to receive and relay transmissions from the VMS unit, and the proposed requirements applicable in case of VMS unit failure are followed.

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

Under the June 20, 2013, the Small Business Administration (SBA) final rule revising the small business size standards for several industries effective July 22, 2013 (78 Fed. Reg.37398), all fishing operations involving vessels in the highly migratory fisheries, can be categorized as small businesses. However, the reporting burden for pre-trip reporting is insignificant compared to the overall cost of fishing. The requirement of VMS equipment is the most costly provision, but federal funds of up to $3,100 are currently available to reimburse vessel owners for the purchase of an approved VMS unit. Fishermen may also connect other communications equipment to the VMS unit to improve their own ability to communicate. No special measures are needed to offset any disproportionate effect on small businesses.

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

VMS reports) are necessary to ensure adequate monitoring of vessel movements to determine compliance with time and area controls and to facilitate cost effective use of enforcement patrols. Less frequent reports would likely result in higher likelihood of non-compliance with low probability of detection of violations. Pre-trip notification reports made too far in advance of a vessel's departure are likely to result in changes in vessel plans as fishery conditions change rapidly; reports after a departure don't allow NMFS to make a decision to place an observer before the vessel leaves port. In both cases, there is likely to be a resulting loss of data collection opportunity, which could result ultimately in inappropriate management decisions. This could adversely affect the fisheries.

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.

NMFS published a proposed rule on September 15, 2014, (79 FR 54950) and requested public comment on the implementation of the VMS and pre-trip notification requirements. A regulatory impact review analysis, which incorporated anticipated costs of VMS to vessel owners, accompanied that proposed rule. Three written public comments were submitted on the proposed rule. One commenter expressed concerns about the restrictions being unfair for smaller vessels

based in San Diego that do not transit through the Pacific Leatherback Conservation Area. Two comments, one of which came from the Council's Enforcement Consultant Advisory Body (EC) during the September 2014 Council meeting, included recommendations for more restrictions on the operations of the DGN fleet. With the exception of the recommendation to add a continuous transit provision and increase the ping rate of the VMS units, most of the suggested recommendations are beyond the scope of this action. However, NMFS Protected Resources Division, the TRT, and the Council are currently considering additional management measures for the DGN fishery (which would be implemented through another action). NMFS will respond to the relevant comments in the final rule.

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

There are no payments or gifts to respondents.

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

Data submitted to NMFS will be managed as confidential data consistent with Section 402(b) of the Magnuson-Stevens Act, which stipulates that data required to be submitted under an FMP shall be confidential and shall not be released except to Federal employees and Council staff responsible for FMP monitoring and development or when required under court order. Data will also be handled consistent with the requirements of NOAA Administrative Order 216-100.

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.

No questions are asked of a sensitive nature.

12. Provide an estimate in hours of the burden of the collection of information.
Vessel Monitoring System

Longline vessels fishing under the Hawaii Pelagics FMP and/or the West Coast HMS FMP must have a VMS installed at the expense of NMFS (up to $3,100 per unit). Many if not most of the longline vessels fishing that previously fished from West Coast ports already have VMS because they originated in Hawaii, where VMS units were required. If these vessels opt to exercise the right to land product on the west coast, NMFS will need to check and maintain any VMS units installed or reactivated. Longline vessels based in the Western and Central Pacific Ocean are subject to VMS requirements at 50 CFR part 300.219 and 50 CFR part 665 and are operating in compliance with regulations for DSLL under 50 CFR part 660.

Currently, there is a single west coast-based deep-set longline vessel fishing on the high seas for tuna with as many as 4 additional vessels that might participate in this fishery in the future.

These vessels will have to be boarded to have their VMS units installed, or if already present then inspected and reactivated, possibly with some servicing required. Vessel owners whose vessels are not equipped will have to contact NMFS to arrange for installation and initiation of the VMS unit. Burden and costs for these vessels was included in the May 2014 extension: 16 hours, 36 responses, and $705.

Under the current revision and the forthcoming final rule, up to 30 drift gillnet vessels are anticipated to be affected by the VMS installation and pre-trip notification requirements, as well as the annual maintenance and communication costs. This is based on a historic 5 year average of vessels actively participating in the fishery versus a total of 77 currently permitted vessels. Of the 30 vessels, 18 already have VMS installed and operating, but were not required to do so. VMS installation will be required for the estimated12 drift gillnet vessels that do not now have VMS units. *Since the first 18 were not previously required to install and operate VMS units, we are including the burden and cost for those 18 units and related reporting in this request.*

When at sea, a position report is made once per hour, or 24 reports per day. However, as these reports are automatic, there is no public burden associated with them.

The estimated average time per response is 4 hours, one time, to install a VMS unit and 1 hour annually to maintain or repair a VMS unit. The vessel owner or representative generally observes the initial installation, which is projected to involve a total of about 40 hours, annualized (estimated initial installations on 30 vessels x 4 hours per vessel/3). The vessel owner or representative may also observe any maintenance and repair, for a total of 30 hours annually (30 vessels x 1 hours per vessel). Thus, the additional annual burden for the DGN vessels is 70 hours.

Annual Estimates:
30 vessels x 4 hours per vessel to install unit, annualized to 10 responses and 40 hours.
30 vessels x 1 hours per year maintenance and repair = 30 responses and 30 hours.
Total estimated annual responses and burden hours = 40 and 70.
Note: Time estimates for VMS installation and maintenance were developed by NOAA OLE Pacific Islands Division.

For installation/activation reports the estimated response time for respondents to prepare and submit reports is estimated to be 5 minutes per report. Because 30 vessels are anticipated to submit installation/activation reports, the total burden hours is estimated to be about 1 hour (this would be over a period of three years, annualized to 10 responses but the annualized time is still rounded to 1 hour).
30 vessels x .083 hours (5 minutes) /3 = .83 hours rounded to 1 hour (annualized to 10 responses and 1 hour).

For the additional 30 DGN vessels, an average of 5 trips per vessel per year is estimated. A pre-trip notification report is required for each trip and is estimated to take 5 minutes each.
Thus, 30 vessels x 5 trips x 5 minutes = 12.5 hours annually.

For declaration reports, each of the 30 additional DGN vessels is expected to make 1 report per vessel per year at the initiation of the fishing season. Each declaration report is estimated to take 5 minutes each. Thus, 30 vessels x 1 declaration x 5 minutes = 2.5 hours annually.

All categories of exemption reports (haul out, outside area, long term departure, emergency, exemption cancellation) and the transfer of ownership report is anticipated to be rare events and seldom required. A total of 5 reports annually at 5 minutes each is estimated.
5 reports x 5 minutes = 0.5 hour annually.

Total pre-trip and other reports: 185 responses and 15.5 (16) hours.

Note: time estimates for VMS reports were developed by NMFS, Pacific Island Regional Office, Honolulu, Hawaii VMS PRA (OMB Control Number 0648-0596).

Total for the 30 additional DGN vessel annual responses and hours: 235 responses and 87 hours.

Including the 5 longline vessels accounted for in the May 2014 extension with 36 responses and 16 hours, total annual responses and hours are: 271 and 103.

Hourly position reports are automatic, and no responses or burden are calculated for them.

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 annualized cost burden for the VMS unit installation and operation is presented in Table 1 below.

In addition:

The estimated cost for sending NMFS installation/activation reports is estimated to cost $3 per fax. Therefore the total cost for respondents to send NMFS this report is $90, annualized to $30.

For pre-trip and other reports, the cost of a telephone call is $1, so the cost for the 30 vessels would be $185.

Total costs in addition to those shown in Table 1: $215.

Table 1. Estimated costs of compliance with VMS requirements.

Year	Descriptions of the Compliance Costs	Formula	Unit	Rate	Total
Per Vessel:					
Year 1	VMS Purchase and professional Installation per vessel	A	Lump sum	$4,000.00	$4,000.00
Year 1	Daily position report costs per vessel (Hourly, 24/day; and 24 reports/day)	B	Per Day	$1.50	-
Year 1	Annual position report cost per vessel ($1.50/day * 365 days/year) if operated year round.	C	Per Annum	$547.50	$547.50
Year 1	Annual maintenance cost per vessel	D	Per Annum	$250.00	$250.00
Year 2 and on	Recurring position reports and VMS maintenance cost per vessel (Year 2 and beyond)	E=C+D	Per Annum		$797.50
Year 1	Initial total cost per vessel (Year 1; unit + installation + position reports+ maintenance)	F=A+E	Per Annum		$4,797.50
Year 1 to 3	Cumulative costs based on total 3 year life of the VMS unit	G=F+2E	Per Three Year		$6,392.50
H	Annual VMS Compliance cost per vessel	A/3 + D	Annualized purchase and annual maintenance and messaging		$2,131
For Fleet:					

	Number of affected vessels	I	Number		30
	Total Annualized cost for the fleet	H*30			$63,930

The analysis assumes that vessels will pay for VMS. However, federal funds are available for reimbursement of type-approved units up to $3,100. The availability of these funds for reimbursement for the cost of purchasing a VMS unit is not guaranteed, but is anticipated to be available on a first-come first-served basis. If all vessel owners utilize available federal funds for reimbursement of type-approved units, then costs per vessel can be reimbursed up to $3,100, for a total of $31,000 annually. This could reduce estimated total annual cost from $55,950 to $24,950 annually.

Total annual costs for 30 DGN and 5 LL vessels is estimated at $68,163 ($63,930 + $215 + $705* plus adjusted cost for the 5 LL vessels, whose cost was shown in the 2014 revision/extension as $135 each for maintenance and position reporting: $3,313). Note that the total in ROCIS is $68,158. The difference appears to be a compounded rounding error, as the calculations have all been triple-checked.

*Annualized cost for five longline VMS operations; in this case (2014 revision/extension), it was assumed that NMFS would pay for the unit itself.

14. <u>Provide estimates of annualized cost to the Federal government</u>.

NMFS is required to ensure that VMS units have been installed properly and are operational. In addition, review of the data transmissions are required to maintain the integrity of the restricted conservation areas. The majority of tuna fishing vessels 24 meters or more in length in the eastern Pacific Ocean already participate in the U.S. VMS program. Therefore costs to the Federal government associated with monitoring VMS units can be accomplished by using existing resources (e.g., cost of maintaining the base station, and NMFS employees dedicated to maintaining the system).

These resources have been accounted for in previous PRA documents, OMB Control Number 0648-0478, later merged into OMB Control No. 0573, for VMS regulations. NMFS has five full-time employees who are dedicated to monitoring the system annual labor costs are $461,636. Recurring operational costs for equipment are $8,364. The estimated cost of the total program is $470,000 a year. The total annualized cost into the future is expected to range between $450,000 and $500,000.

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

Program Changes:

A change has been made to amend the title to reflect the inclusion of drift gillnet vessels in the information collection.

Additional affected drift gillnet vessels were added to the information total burden hours and costs: 235 responses, 87 hours and $64,145 ($40,000 in capital costs and $24, 145 in recordkeeping/reporting costs).

Adjustments were made to the calculations for VMS installation and certification, and VMS transmissions to be consistent with similar requirements in OMB approved collection 0648-0596. The main adjustment was to add $3,313 to bring the annual transmission costs for each of the five longline vessels up from $135 to $797.50.

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

There are no plans at this time for publications based on the collections.

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

This collection does not employ statistical methods.