**JUSTIFICATION FOR CHANGE**

**INTERNATIONAL DOLPHIN CONSERVATION PROGRAM ACT**

**OMB CONTROL NO. 0648-0387**

This request is to add an online application for the Eastern Tropical Pacific Operator (ETP-O) permit onto the National Permits System (NPS) as an additional method of collection. NPS is a web based application used to facilitate the processing of the National Marine Fisheries Service (NMFS) permits. This website also offers a public application for permit applicants to apply and pay for permits, in addition to accessing permit related information. Currently, NPS only offers applicants the option to apply for the Pacific Highly Migratory Species (HMS) Permit (50 CFR Part 660) for the West Coast Region and Pacific Islands Regional Office.

The International Dolphin Conservation Program Act (IDCPA) allows U.S. fishing vessels, including purse seine vessels, to participate in the yellowfin tuna fishery in the eastern tropical Pacific Ocean (ETP). The ETP-O permit (50 CFR Part 216) is required for any operator of an ETP purse seine vessel greater than 400 st (362.8 mt) carrying capacity that participates in commercial fishing operations in the ETP. Currently, applications for ETP-O are collected in paper form. The addition of an online application will reduce the amount of time required for the applicant to send and receive their permit. The processing time by the permits office will decrease because all data entry is performed by the applicant.

The information collected from the applicant will remain the same. This includes the (1) name, address, telephone, fax number, (2) name of vessel(s) on which the applicant anticipates as an operation, (3) date, location, and providers of previous training, and (4) the applicants or applicants representative signature. An e-mail address field would be included as an option field (i.e. not required). There will be no additional burden or recordkeeping/reporting cost; in fact, based on the amount of use, the overall recordkeeping/reporting cost for the submission of this form may decrease.

NMFS seeks approval to offer an optional online application form for ETP-O managed through the WCR Permits Office.

Screen shots of the online application are attached.