

**SUPPORTING STATEMENT  
MARINER OPINIONS ON THE NORTH ATLANTIC RIGHT WHALE MANDATORY  
SHIP REPORTING SYSTEM  
OMB CONTROL NO. 0648-XXXX**

**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.**

As explained in Part A Question 7, the respondent universe that this pilot survey will target includes ship captains and crew who (have) traverse(d) the MSR reporting area at least once. A sampling frame does not exist for this population and constructing a frame would be prohibitively expensive, if it could be done at all, and thus the survey will be programmed online and hosted on a specific website. A link to the survey will be broadly distributed via a number of entities associated with the maritime industry.

We have enlisted the help of a number of entities, including Federal agencies, shipping associations, and maritime trade journals, to distribute information about the objectives and intent of the MSR survey and to invite participation. These entities routinely provide information to a large number of ship's masters and mates, shipping companies, vessel owners, and various other components of the commercial maritime community. Over the years and in various capacities, we have worked with each of these groups in the past to disseminate information about right whale conservation issues.

**Entities expected to assist in distributing information about the MSR survey.**

***Federal Agencies***

*National Geospatial Agency* – annually publishes the *Notice To Mariners* that provides specific guidance regarding safety of navigation and environmental stewardship for ships and ships' masters engaged in international voyages. *Notice To Mariners* has included reporting requirements of the MSR since 1999. The NGA will send a notification of the survey along with periodic (e.g., monthly) notifications.

*National Oceanic and Atmospheric Administration (NOAA), National Ocean Service's Office of Coast Survey (OCS)* – publishes, maintains, and updates the *Coast Pilot*. The *Coast Pilot* contains essential information (e.g., weather buoy locations, underwater hazards, specific requirements for port entry) for all U.S. waters. It is mandatory that a copy of the *Coast Pilot* -- and a thorough knowledge of its content -- is aboard every ship sailing in U.S. waters. MSR reporting requirements information has appeared in the *Coast Pilot* since 1999. OCS will announce the availability of the survey in its newsletter to its distribution list.

NOAA NMFS's, Northeast and Southeast Regional Offices –shipping liaisons maintain e-mail distribution lists of shipping industry contacts. Announcements will be distributed to industry contacts by e-mail.

NOAA's National Weather Service – operates an Automated Mutual-assistance Vessel Rescue system (AMVER) Shipboard Environmental data Acquisition System (SEAS) program, involving ca. 400 ships at sea that voluntarily provide meteorological and oceanographic conditions data from around the world. The AMVER SEAS is in regular contact with these vessels and will make a general announcement to the vessels about the survey.

Department of Transportation's Maritime Administration (MARAD) – maintains jurisdiction of hundreds of “in service” merchant mariner vessels that may be called upon in time of war. Through this program, and through its regular distribution lists, MARAD can contact hundreds of ships' masters to alert them to the survey.

**Maritime Periodicals**

*Maritime Executive* – published six times per year, the *Maritime Executive* provides maritime news, jobs, events, and industry analysis industry professionals. The journal's newsletter is published five times a week and is sent to more than 60,000 subscribers. We will use one or both of these to notify mariners about the survey.

NOAA's National Weather Service – publishes *Mariner's Weather Log* quarterly. The *Log* contains information on meteorological events, but also includes stories of general interest and articles regarding marine environmental protection. In the past, we have published information in this journal on right whale conservation issues and on the MSR specifically.

**Industry Associations**

*World Shipping Council* (WSC) – represents about two dozen companies that comprise over 90% of international container traffic. The Council provides periodic updates on various pertinent maritime events and notifications.

*Chamber of Shipping of America* (CSA) – represents over 10 companies engaged primarily in domestic shipping activities. The Chamber was instrumental in helping to establish the MSR in 1999. Collectively, the CSA and WSC have distribution lists going to hundreds of their members. We have close working relationships with both the Chamber and the WSC and will call upon them to distribute MSR survey announcements.

Entities	Expected number of individuals reached (not unduplicated)
<b>Federal Agencies</b>	
<i>Notice To Mariners (NGA)</i>	4,000
<i>Coast Pilot (OCS)</i>	6,000
<i>NMFS's, Northeast and Southeast Regional Offices</i>	100 - 200
<i>AMVER SEAS (NWS)</i>	400
<i>MARAD</i>	2,000 – 2,200

<b>Maritime Periodicals</b>	
<i>Maritime Executive</i>	60,000
<i>Mariner's Weather Log</i> (NWS)	8,000
<b>Industry Associations</b>	
<i>World Shipping Council &amp; Chamber of Shipping of America</i>	1,000 – 2,000

While the invitation to participate in the survey will be on a rather broad scale, we expect the number of respondents to be a fraction of the number to whom the information is sent. We expect a return of approximately 500 respondents for several reasons. First, we acknowledge that opportunistic sampling can generate relatively low responses, and there will likely be overlap in a general distribution approach (e.g., many recipients will receive the information more than once). Much of shipping activity is seasonal or intermittent; therefore, mariners engaged in lengthy international voyages (about one-half of the time) are not working or receiving work-related communications while not at sea. In addition, not all mariners will be familiar with the MSR program, because (a) it applies only to ships sailing in waters along U.S. eastern seaboard, (b) not all ships enter certain U.S. east coast ports (e.g., Boston, MA; Jacksonville, FL) where MSR areas are situated; and (c) not all ships meet the 300 gt threshold for reporting.

**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.**

As described above, in order to reach the target population we must employ a non-random opportunistic sample. The entities described above will assist us in distributing the survey link, and we will provide a brief introductory paragraph concerning the purpose of the survey. There will be no a-priori stratification; however, post stratification of the data may be possible based on survey responses (e.g. ship type, years as captain, etc.). Although we recognize that the lack of a statistical sample may not result in responses that are representative of the mariner population, we believe the results will still be useful for management in evaluating and improving the MSR program.

**3. Describe the methods used to maximize response rates and to deal with nonresponse. 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.**

As a sampling frame does not exist, we will not be able to systematically address non-response bias. However, we have taken steps to maximize the number of surveys completed, including extensive outreach, making the survey a brief, concise, and clear instrument, limiting the number of open-ended questions, and revising the survey based on feedback from mariners in a small focus group conducted in Baltimore, MD.

**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.**

Prior to the survey implementation, NOAA Fisheries conducted a focus group with 7 mariners in Baltimore, MD. Their feedback was used to revise language and questions in the survey and to ensure that material is understood and interpreted by the respondent as intended.

**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.**

Sampling Design, Data Analysis and Report Writing:  
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**Figure 1.** Locations of the Mandatory Ship Reporting systems, Area To Be Avoided, and vessel speed restriction seasonal management areas.

