

**SUPPORTING STATEMENT
HIGHLY MIGRATORY SPECIES PERMIT FAMILY OF FORMS
OMB CONTROL NO. 0648-0327**

A. JUSTIFICATION

This request is for revision and extension of a current information collection.

The collection consists of vessel and dealer permits, which are part of the National Marine Fisheries Service (NMFS) program to manage Atlantic highly migratory species (HMS) including tuna, billfish, sharks, and swordfish. The HMS fishery management program is implemented under the [Atlantic Tunas Convention Act](#) (ATCA) (16 U.S.C. 971), the [Tunas Convention Act](#) (TCA, 16 U.S.C. 955), the [Magnuson-Stevens Fishery Conservation and Management Act](#) (MSA) (16 U.S.C. 1801), the 2006 Consolidated HMS Fishery Management Plan, and regulations at [50 CFR part 635](#) and [50 CFR part 300 subpart M](#).

NMFS issues permits to fishing vessels and dealers in order to collect information necessary to comply with domestic and international obligations, secure compliance with regulations, and disseminate necessary information. Regulations at 50 CFR 635.4 require that vessels participating in commercial and recreational fisheries for Atlantic HMS, and dealers purchasing Atlantic HMS from a vessel obtain a Federal permit issued by NMFS. Regulations at 50 CFR 300.182 require that individuals entering for consumption, exporting, or re-exporting consignments of bluefin tuna, southern bluefin tuna, swordfish, frozen bigeye tuna, and/or shark fins obtain an HMS International Trade Permit (ITP) from NMFS. This action addresses the renewal of permit applications currently approved under OMB Control No. 0648-0327. Vessel permits include Atlantic Tunas (except Longline permits, which are approved under OMB Control No. 0648-0205), HMS Charter/Headboat, HMS Angling, and Swordfish General Commercial permits. Dealer permits include the Atlantic Tunas Dealer permit and the HMS ITP. The covered permits are listed in the table below.

This collection is revised by removing two HMS vessel permits and by adding the collection of an International Maritime Organization/Lloyd's Registry (IMO/LR) number to the permit application for commercial HMS vessels ≥ 20 meters (65' 7") in length.

In 2011, NMFS added the issuance of two new vessel permits (Smoothhound Shark and Incidental HMS Squid Trawl permits) to this collection. This collection is revised to remove the Smoothhound Shark and Incidental HMS Squid Trawl permits from OMB 0648-0327. The Smoothhound Shark permit will be transferred to OMB Control No. 0648-0205 (Southeast Region Permit Family of Forms), and the Incidental HMS Squid Trawl permit will be moved to OMB Control No. 0648-0202 (Greater Atlantic Region Permit Family of Forms).

The Smoothhound Shark permit requirement is expected to become effective in late 2015. Amendment 3 to the 2006 Consolidated HMS FMP (Amendment 3) (75 FR 30484, June 1, 2010);

corrected by 75 FR 50715, August 17, 2010) brought smoothhound sharks under federal management and required a permit for retention of the species. Although the final rule implementing Amendment 3 published in June 2010, NMFS postponed the effective date of the Amendment 3 smoothhound management measures, including the smoothhound shark permit requirement (76 FR 70064), to provide time for the NMFS Southeast Regional Office of Protected Resources to finalize a Biological Opinion (BiOp) under Section 7 of the [Endangered Species Act \(ESA\)](#) for the Amendment 3 management measures. In 2012, NMFS completed the 2012 Shark BiOp which includes the smoothhound shark fishery: http://www.nmfs.noaa.gov/sfa/hms/related_topics/bycatch/documents/2012_hms_shark_smoothhound_bo.pdf. Also, after publication of the final rule implementing Amendment 3, the [Shark Conservation Act of 2010](#) (Public Law 111-348) became law. This legislation directly impacted the smoothhound shark fishery. Accordingly, NMFS is now finalizing Amendment 9 to the 2006 Consolidated HMS FMP (Amendment 9) which will incorporate certain Terms & Conditions of the 2012 Shark BiOp and implement congressionally-mandated smoothhound fishery management measures under the Shark Conservation Act. The Agency anticipates that the smoothhound shark permit requirement will become effective 30 days after publication of the final rule for Amendment 9. Notice of the effective date will be provided to the public through a variety of channels. To avoid double counting the costs and burden associated with the smoothhound shark permit, it is being removed from this information collection and added to OMB 0648-0205 (Southeast Region Permit Family of Forms) because the permit will be issued by that office.

This information collection is also being revised by removing Incidental HMS Squid Trawl permits. Those permits were combined with the information collection for the Greater Atlantic Region (formerly Northeast Region) Federal Fisheries Initial Permit Application form, which is covered under OMB Control No. 0648-0202. To avoid double counting the costs and burden associated with the Incidental HMS Squid Trawl permit, it is being removed from this collection because the permits are issued by the Greater Atlantic Regional Fisheries Office (GARFO).

Finally, this collection is revised by adding a one-time collection of an IMO/LR number to the permit applications for commercial HMS vessels ≥ 20 meters (65' 7") in length. The International Commission for the Conservation of Atlantic Tunas (ICCAT) approved a recommendation (13-13) for Contracting Parties to require commercial vessels ≥ 20 meters (65' 7") in length to obtain an IMO/LR number from IHS/Fairplay by no later than January 1, 2016. Under ATCA, the Secretary promulgates regulations as may be necessary and appropriate to carry out ICCAT recommendations. Current HMS regulations at 50 CFR part 635.4(h) are sufficient to comply with this Recommendation because they allow NMFS to collect required supporting documents, including an IMO/LR number, as a condition for obtaining an Atlantic HMS permit and for being included on the ICCAT list of authorized large scale fishing vessels. This requirement was described in proposed and final rules that published in the [Federal Register](#) on September 11, 2014 (79 FR 54247), and December 5, 2014 (79 FR 72557), respectively. This one-time requirement would apply only to owners of commercial vessels ≥ 20 meters (65' 7") in length seeking to renew or obtain an Atlantic tunas permit, HMS Charter/headboat permit, and/or a Swordfish General Commercial permit. Permit applications that do not contain the required

supporting documents will be considered incomplete. NMFS will amend the permit applications so that affected constituents can provide their IMO/LR number upon permit purchase or renewal.

Dealer Permits
HMS International Trade Permit
Atlantic Tunas Dealer Permit
Vessel Permits
Atlantic Tunas (except for tuna longline)
HMS Charter/Headboat Permit
HMS Angling Category Permit (recreational)
Swordfish General Commercial Permit

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

The purpose of this collection of information is to comply with the statutory obligations of ATCA (16 U.S.C. 971), the TCA (16 U.S.C. 955), the MSA (16 U.S.C. 1853), and the implementing regulations at 50 CFR part 635 and part 300 subpart M.

Section 971d(c)(3) of ATCA provides the statutory authority to promulgate regulations as necessary and appropriate to implement the recommendations of ICCAT. As a contracting party to ICCAT, the United States is required to implement ICCAT recommendations and take part in the collection of biological statistics for research purposes (fishing effort and catch). The United States must implement specific quotas established by ICCAT and support ICCAT rebuilding and fishery management programs. ICCAT recommendations have also established statistical and catch document programs to track the trade of bluefin tuna (Atlantic, Pacific, and Southern bluefin tuna), swordfish, and frozen bigeye tuna. Statistical document programs recommended by the Commission for the Conservation of Southern Bluefin Tuna and the Indian Ocean Tuna Commission are also implemented under the authority of ATCA to effectively implement ICCAT consignment document programs.

The United States is also a member of the Inter-American Tropical Tuna Commission (IATTC), and authorized under the TCA to implement resolutions approved by IATTC. Like ICCAT, IATTC has adopted a resolution for a frozen bigeye tuna statistical document program.

The Atlantic tunas, swordfish, billfish and shark fisheries are also managed under the MSA and the 2006 Consolidated HMS Fishery Management Plan, and several of these fisheries are subject to catch quotas with the goal of recovering the stocks to a level commensurate with maximum sustainable yield. Section 303(b) of the MSA provides statutory authority to require permits for fisheries governed by management plans issued by the Secretary of Commerce.

Regulations at 50 CFR parts 635 and 300 subpart M require the permits listed above. The importance of the information collected prior to permit issuance and the use of the permit system is explained in Question 2.

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.

All permits in this collection must be renewed annually. Permits can be used to accomplish many functions. One of the main purposes for issuing permits is to identify the participants in a particular trade or industry. NMFS manages fisheries on a regional basis; likewise, permits are issued by regional offices and the permit databases are regionally distributed. The HMS Management Division works with two regions (Greater Atlantic and Southeast), a contractor (ERT Corporation), and NMFS's Office of Science and Technology to issue HMS permits. Under current HMS regulations, it is possible that the same business will hold more than one HMS permit. For example, dealers may hold both the Atlantic tunas dealer permit and the HMS ITP. Conversely, vessels in the HMS recreational fishery can be identified as holding only one HMS vessel permit. All other respondents could hold more than one dealer or commercial vessel permit.

Vessel Permits

The general information collected for vessel permits includes all or some of the following:

- Vessel owner, corporate status, birthdate or corporation filed date, social security number or Federal ID number, names of additional owners, and contact information (e.g. address, phone, etc.);
- Vessel name, registration, and port;
- Vessel characteristics (including length) and construction type;
- Gear type/category;
- IMO/LR number (for commercial vessels ≥ 20 meters (65' 7")); and
- Signature and payment/delivery information.

Collection of information through annual vessel permits provides current information on the vessel owners participating in these fisheries, thus facilitating quota monitoring necessary to avoid exceeding catch quotas for HMS. For example, NMFS requires that vessel permits be displayed to dealers and that permit numbers be recorded on dealer reports in order to validate landings of HMS.

A current permit holder list aids NMFS in the communication and enforcement of fishery regulations through distribution of management program brochures, fish identification guides, and regulatory compliance guides. In addition, a permit "universe" facilitates collecting catch and effort information about commercial and recreational fisheries, as required by law. NMFS constructs sampling frames for dockside and telephone surveys from permit holder lists and uses the list to select vessels for logbooks and/or at-sea observers (addressed under separate collections). Such surveys, logbooks, and observer reports provide essential information for management of the Atlantic tunas and HMS fisheries in the United States, particularly in terms of quota allocation decisions which follow ICCAT and MSA recommendations, such as

allocating fishing opportunities consistent with traditional fishing patterns and considering the economic values to various user groups. NMFS operates a mandatory angler catch reporting program for bluefin tuna, swordfish, and billfish (addressed under a separate collection) that is linked to the permit number to avoid false reporting and facilitates enforcement. Another purpose of the vessel permit requirement is that it serves as a useful tool in support of enforcement of fishery regulations. That is, the permit can be revoked as a penalty for a violation of fishery conservation measures.

Dealer Permits

The general information collected for dealer applications includes all or some of the following information:

- Business & owner name and contact information (e.g., phone, address, business website, etc.), birth date for the sole proprietor or applicant;
- Business report or articles of incorporation (other than sole proprietorship);
- Facilities where product is received or other business addresses/contact information;
- Applicant name and contact information;
- Federal Tax I.D. number;
- Type of dealer permit requested;
- Other NMFS dealer permit identification; and
- Applicant signature and date.

Note: the Federal Taxpayer Identification Number (TIN) requirement is included in this revision, specifically for support of the cost recovery requirement in the Southeast Region Gulf of Mexico Red Snapper IFQ Program, OMB Control No. 0648-0551. Dealers with HMS dealer permits are likely to participate in the cost recovery program for red snapper. Collection of the TIN is necessary to ensure that we are collecting from the person who owes the debt. If the fee submission and payment are not received, the agency must begin collection processes and those collection processes cannot be initiated or accomplished without the TIN. *Because the TIN in this instance is collected for NMFS cost recovery, there is demonstrable practical utility. In addition, cost recovery is mandated by the MSA (16 U.S.C. 1852 et seq.) as amended in 2006, and the collection of TINs in such an instance is supported by [31 U.S.C. Section 7701](#).* Requiring TINS on permit applications is the only method we have for identifying TINs for those involved, or who may become involved, in the IFQ program.

For dealer permits, submission of the appropriate hard copy application is required, as indicated below in Question 3. In general, the purpose and use of dealer permits is to (1) identify fish dealers and the characteristics of their operations; (2) increase compliance (e.g., impose permit sanctions pending collection of required reports or unpaid penalties); (3) provide a mailing list for the dissemination of important information to the industry; and (4) provide a universe for data collection samples.

Although the information collected is not expected to be disseminated directly to the public, it may be used in the development or review of fishery management plans or subject to release

through a [Freedom of Information Act](#) request, and is therefore subject to NOAA's Information Quality Guidelines. The MSA and other confidential requirements would apply to any such proposed release. NMFS 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 subject 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 public can request an application for an Atlantic tunas, HMS Charter/headboat, Swordfish General Commercial, and HMS Angling vessel permits via both telephone (888-872-8862) and secure internet automated systems (<https://hmspermits.noaa.gov/>). Applicants may fill out and submit an application electronically via an internet automated system. These automated systems are available on a 7 day/24 hour basis, and are available at no additional charge to the permit holder beyond the cost of the permit. After an electronic application has been submitted, a vessel owner can track the application process and permit status via the internet at <https://hmspermits.noaa.gov/>. Once application processing is complete, a permit can be printed off the Web site or faxed or mailed back to the vessel owner.

Alternatively, fillable, printable applications for these vessel permits can be obtained directly from the internet site or through the mail via an automated internet or phone request and submitted by mail. Automated information is available on a toll free telephone line (888-872-8862). Atlantic tunas dealer permits are fillable pdfs, available at <http://www.greateratlantic.fisheries.noaa.gov/aps/permits/dealer/>.

For Atlantic tunas dealer permits, renewal is facilitated by providing a pre-filled renewal application. Vessel permit renewals for Atlantic tunas, HMS Charter/headboat, Swordfish General Commercial, and HMS Angling permits also provide pre-filled fields for both Internet and phone renewal.

HMS ITP (a product of International Affairs) must be submitted in hard copy. Electronic versions of these applications are available at http://www.nmfs.noaa.gov/sfa/hms/compliance/itp/documents/current_itp_app.pdf to be printed and filled out by hand.

The requirement for certain commercial HMS vessels to obtain an IMO/LR number is accomplished by accessing a secure internet automated system supported by IHS/Fairplay (<http://www.imonumbers.lrfairplay.com/>). Applicants may fill out and submit an application

electronically. This automated system is available on a 7 day/24 hour basis, and the IMO/LR number is available at no additional charge to the vessel owner.

4. Describe efforts to identify duplication.

The HMS Advisory Panel meets twice per year to discuss issues pertinent to management of HMS fisheries, including permits. This panel includes representatives from fishing and processing industries, environmentalists, the academic community, and the Atlantic, Gulf of Mexico, and Caribbean states and/or territories. Through this forum and the federal rule-making process, information including any potential duplication of permitting requirements is identified.

Vessel Permits

No other federally-issued fishing permits are required for the activities covered by the permits in this collection. State permits may be necessary for fishing in some states’ waters for certain species. HMS permitted vessels may participate in other federally regulated commercial fisheries (e.g., northeast multi-species) for which permits are issued. NMFS is investigating means to consolidate the permitting process so that permits for multiple fisheries may be issued/renewed through a single application process (e.g., one stop shopping).

Dealer and Trade Permits

Tuna Dealer permits are required for purchasing tunas from fishing vessels (see table below). In addition, HMS dealers who import, export, or re-export species covered by the HMS International Trade permits (ITP) are required to hold that permit as well (see table below). Therefore, although U.S. dealers may be required to hold more than one permit for purchasing and trading HMS, each permit covers a different function, and none of the permits are duplicative in the activities they cover.

Atlantic Tunas Dealer Permit Requirements.

SPECIES	PERMIT FOR PURCHASE FROM VESSEL
Atlantic bluefin tuna	Atlantic Tunas Dealer Permit
Atlantic bigeye tuna	Atlantic Tunas Dealer Permit
Atlantic albacore tuna	Atlantic Tunas Dealer Permit
Atlantic yellowfin tuna	Atlantic Tunas Dealer Permit
Atlantic skipjack tuna	Atlantic Tunas Dealer Permit

HMS International Trade Permit Requirements (import, export, re-export).

SPECIES	PERMIT FOR TRADE
Atlantic bluefin tuna	HMS ITP
Pacific bluefin tuna	HMS ITP
Southern bluefin tuna	HMS ITP
Atlantic bigeye tuna (frozen only)	HMS ITP
Swordfish	HMS ITP
Shark Fins	HMS ITP

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

Annual permitting does not have a significant impact on small businesses (all respondents are considered small businesses). The minimal burden per application is outlined in Question 12. Impacts have been minimized for all vessel permits by providing application and renewal services over the Internet and telephone, as discussed in Question 3.

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

If this information collection were not conducted, the United States would have difficulty fulfilling international reporting and compliance obligations under ICCAT, possibly resulting in violations of ICCAT recommendations, including catch and capacity reporting requirements. ICCAT penalties may include reduction in the assigned country catch quota equal to a minimum of 125% of the excess harvest. In addition, trade restrictions may be imposed on countries that fail to restrict catch to the level of the assigned quotas.

Estimates of the status of the Atlantic HMS stocks would be less accurate without this information, since all contracting parties to ICCAT must submit catch and effort information on an annual basis. Without such catch and effort statistics, the conservation and management objectives of ICCAT with respect to the tuna and swordfish rebuilding programs could be jeopardized. Furthermore, it would be difficult for the United States to formulate domestic policy consistent with the MSA, which must be based on sound socio-economic and biological data and analyses. NMFS would be less able to prepare documents such as Regulatory Impact Reviews, or Environmental Impact Statements, etc., as required under the Magnuson-Stevens Act, National Environmental Policy Act, and other applicable laws.

If this information collection were not conducted, NMFS would not gather the annual permitting information that provides an accurate vessel and dealer list and facilitates quota monitoring and data collections necessary to meet ICCAT obligations. Widening the timeframe for collection of information on HMS fisheries participants (e.g., every two years rather than annually) would provide a less accurate sampling frame that is the basis for fleet size calculations used for annual catch and effort estimates. Many vessels are sold, transferred, or move to new locations from year to year. It is also necessary to issue annual dealer permits in order to ensure accurate records of landings and to communicate regulatory changes efficiently and effectively.

Likewise, annual permitting for international trade participants provides NMFS with a comprehensive list of individuals involved in trade of species included in regional fishery management organization (e.g., ICCAT) statistical document programs. This allows NMFS to communicate program requirements, including time-sensitive changes, and collect necessary data for required regional fishery management organization reports. If these reports are not submitted, the United States could be penalized by quota reductions as discussed above.

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 Federal Register Notice published on February 10, 2015 (80 FR 7417) solicited public comment regarding the revision and extension of this information collection. Also, proposed and final rules were published in the Federal Register on September 11, 2014 (79 FR 54247; RIN 0648-BE12), and December 8, 2014 (79 FR 72557; RIN 0648-BE12), respectively, that solicited public comment regarding the revision of this information collection by including a one-time requirement to obtain an IMO/LR number and to provide that number when purchasing or renewing a commercial permit for vessels ≥ 20 meters (65' 7") in length. No comments were received.

All of the permits covered under this collection were established via the federal rulemaking process which required analyses of the impacts of the permits and provided an opportunity for public comment. In addition, the HMS Advisory Panel meets twice annually to provide input on HMS regulatory and operations programs. Copies of the February 10, 2015, Federal Register notice soliciting public comment on this collection were distributed in person to affected constituents at the March 2015 HMS Advisory Panel meeting. Follow-up e-mail reminders were sent to these constituents on April 9, 2015.

One comment was received stating that the estimated times needed to accurately complete the initial permits and the renewal permits for the HMS Charter/Headboat, HMS Angling, and tunas permits appear to be reasonable and accurate. A second comment was received from a permit holder indicating that the initial permit application takes between 15 – 30 minutes to complete and that a renewal takes approximately 6 minutes. No action was taken in response to these comments, as they indicate that the current burden estimates are accurate.

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.

As stated on the forms, the information collected is confidential under section 402(b) of the MSA, as amended in 2006. It is also confidential under [NOAA Administrative Order 216.100](#), which sets forth procedures to protect confidentiality of fishery statistics.

A Privacy Act System of Records Notice, Commerce/NOAA-19, Permits and Registrations for United States Federally Regulated Fisheries, was published in the Federal Register on June 11, 2008 (73 FR 33065). An updated SORN was submitted for DOC review in May 2013.

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 sensitive questions are asked.

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

Numbers of respondents, responses, burden hours and recordkeeping/reporting costs for each permit are given in the table below. For most permit types, the number of respondents/responses in the first column is based upon actual 2014 data.

Permit Type	Annual Respondents/ Responses	Annual Respondents/ Respondents (REQUESTED)	Time per Response (hrs)	Annual Burden (hrs)	Cost (\$) (@\$15/hr)
VESSEL PERMITS					
INITIAL -- Atlantic Tunas (General, Harpoon & Trap categories), HMS Charter/headboat	1,001*	5,000	30 min	2,500	37,500
RENEWAL -- Atlantic Tunas (General, Harpoon & Trap categories), HMS Charter/headboat	6,546	6,500	6 min.	650	9,750
INITIAL -- HMS Angling	4,183	4,200	30 min	2,100	31,500
RENEWAL -- HMS Angling	16,569	18,972	6 min.	1,897	28,455
RENEWAL -- Atlantic Tunas Purse seine limited access	3	5	6 min.	1	15
INITIAL -- Swordfish General Commercial	668	2,000	30 min.	1,000	15,000
RENEWAL -- Swordfish General Commercial	N/A**	700	6 min.	70	1,050
INITIAL & RENEWAL -- One-time requirement to obtain IMO/LR number	113***	50	30 min.	25	375
TOTALS (VESSEL)	29,103	37,427	N/A	8,243	123,645
DEALER PERMITS					
INITIAL - Atlantic Tunas Dealer	105	50	15 min.	13	195
RENEWAL - Atlantic Tunas Dealer	314	377	5 min.	31	465

HMS ITP – INITIAL & RENEWAL	253	241	5 min.	20	300
TOTALS (DEALER)	672	668	N/A	64	960
GRAND TOTALS	29,775	38,095	N/A	8,307	124,605

*2014 was an unusually low number for initial permit requests. The requested number in Column 3 better represents the estimated number.

**Permits first issued in 2014, so no permit renewals in 2014

***Obtained independently before requirement was in effect.

13. Provide an estimate of the total annual recordkeeping/reporting cost burden to the respondents resulting from the collection (excluding the value of the burden hours in Question 12 above)

Permit Type	Annual Responses (Requested)	Estimated Permit Cost (\$)	+ Application Submission and/or Permit Delivery Cost	Total Recordkeeping and Reporting Cost (\$)
VESSEL PERMITS				
Atlantic Tunas, HMS Charter/headboat, HMS Angling, purse seine limited access, Swordfish General Commercial – internet application & self- printed/faxed (99% of 37,377)	37,003	\$20	\$0.0*	\$740,060
Atlantic Tunas, HMS Charter/headboat, HMS Angling, purse seine limited access, Swordfish General Commercial– hardcopy application (0.95% of 37,377)	355	\$20	\$0.49	\$7,274
Atlantic Tunas, HMS Charter/headboat, HMS Angling, purse seine limited access, Swordfish General Commercial – USPS overnight delivery (.05% of 37,377)	19	\$20	\$5.75	\$490
One-time requirement to obtain IMO/LR number – internet application	50	\$0	\$0	\$0
SUBTOTAL	37,427	N/A	N/A	\$747,824
DEALER PERMITS				
Atlantic Tunas Dealer	427	\$0	\$0.50	\$214
HMS ITP	241	\$25	\$0.50	\$6,146
SUBTOTAL	668			\$6,360
TOTALS	38,095			\$754,184

* There is no cost for delivery of permits applications sent electronically or by fax.

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

The cost of all these permits will be reimbursed by an administrative cost recovery fee included in the permit fee, and there will be no cost to the Federal government.

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

Program changes:

Since the last action under this OMB Control No., NMFS has removed two vessel permits (Smoothhound Shark permit and Incidental HMS Squid Trawl permit) from this collection. These permits were removed because they will be, or are currently, covered under OMB Control No. 0648-0205, Southeast Region Permit Family of Forms (Smoothhound Shark permit) and OMB Control No. 0648-0202, Greater Atlantic (Northeast) Region Permit Family of Forms (Incidental HMS Squid Trawl permit). The total number of responses, hours, and recordkeeping/reporting costs **removed due to these program changes are 4,079 responses; 2,020 hours; and \$2,040.00 recordkeeping/reporting costs.**

Also, since the last action under OMB Control No. 0648-0327, NMFS has added a requirement for the owners of vessels ≥ 20 meters to obtain an IMO/LR number. The total number of responses, hours, and recordkeeping/reporting costs **added due to this program change are 50 responses; 25 hours; and \$0.00 recordkeeping/reporting costs.**

TOTAL PROGRAM CHANGES: (-) 4,029 Responses; (-) 1,995 Hours; (-) \$2,040 Recordkeeping/reporting costs.

Adjustments:

For permits now in this collection, several adjustments are being requested. These adjustments are based primarily upon the actual number of initial permit applications and renewals received by NMFS in 2014, and/or anticipated to be received by NMFS in the future.

Permit Type	Current	Requested	Difference
VESSEL PERMITS			
Atlantic Tunas, HMS Charter/headboat, HMS Angling, purse seine limited access, Swordfish General Commercial permit application and renewal	Responses: 36,514	Responses: 37,377	(+) 863
	Hours: 9,759	Hours: 8,218	(-) 1,541
	Recordkeeping/reporting costs: \$ 730,518	Recordkeeping/reporting costs: \$747,824	(+) \$17,306
DEALER PERMITS			
Atlantic Tunas Dealer permit application and renewal	Responses: 427	Responses: 427	0
	Hours: 44	Hours: 44	0
	Recordkeeping/reporting costs: \$214	Recordkeeping/reporting costs: \$214	\$0
HMS ITP permit application and renewal	Responses: 241	Responses: 241	0
	Hours: 20	Hours: 20	0
	Recordkeeping/reporting costs: \$6,146	Recordkeeping/reporting costs: \$6,146	\$0
TOTAL CHANGES DUE TO ADJUSTMENTS	Responses: 37,182	Responses: 38,045	Responses: (+) 863
	Hours: 9,823	Hours: 8,282	Hours: (-) 1,541
	Recordkeeping/reporting costs: \$736, 878	Recordkeeping/reporting costs: \$754,184	Recordkeeping/reporting costs: (+) \$17,306

TOTAL ADJUSTMENT CHANGES: (+) 863 Responses; (-) 1,541 Hours; (+) \$17,306 Recordkeeping/reporting costs.

In summary, the overall number of respondents/responses and burden hours associated with this information collection has decreased due to the removal of the Smoothhound Shark permit and the Incidental HMS Squid Trawl permit. Those two permits were previously determined to be free of charge, so their costs were minimal (\$2,040). The *primary* reason that recordkeeping/reporting costs increase is because the number of Atlantic Tunas, HMS Charter/headboat, HMS Angling, Purse Seine limited access, and Swordfish General Commercial initial permit applications and renewals are expected to increase modestly by 863 permits. Based upon data from recent years, NMFS has decreased the number of initial permit

applications and increased the number of permit renewals. Because these permits cost \$20 each, recordkeeping/reporting costs for this collection also increase ((863 * \$20.00) - \$2,040 = \$15,220).

CURRENTLY APPROVED: 41,261 Responses; 11,843 Hours; \$738,918 Recordkeeping/reporting costs.

REQUESTED: 38,095 Responses; 8,307 Hours; and \$754,184 Recordkeeping/reporting costs.

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

No publication of information is planned other than annual summary tables of the total number and type of permit issued by state and region. Such tables may appear in reports to ICCAT, Stock Assessment and Fishery Evaluation reports, Environmental Assessments, Regulatory Impact Reviews, etc.

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.

Section B. Collections of information employing statistical methods

This collection does not employ statistical methods.