

**JUSTIFICATION FOR CHANGE  
NORTHEAST REGION PERMIT FAMILY OF FORMS  
OMB CONTROL NO. 0648-0202**

National Marine Fisheries Service (NMFS) is proposing a change to the OMB Control No. 0648-0202 Family of Forms to remove the requirement for vessels to report vessel baseline tonnages when filling out the application for Vessel Replacement, Upgrade, and Confirmation of Permit History. In addition, NMFS is proposing to remove the one-time upgrade limit for vessels, thus eliminating the need for a separate vessel upgrade process. Implementing these measures would reduce the administrative burden to permit holders, leading to increased profits for the regulated community.

Removing tonnages from vessel baselines may also simplify or eliminate the need for a permit holder to hire a naval architect to determine and document tonnage if it was not previously established. NMFS estimates the resulting average cost savings of as much as \$375 per survey, and we estimate that half of all requests require a survey. Also, we are removing the one-time limit on upgrades, so that there is no longer a need for vessels owners to send in an RUPH form to reflect when they have upgraded their vessel. Currently, if a vessel owner upgrades his engine horse power from 300 to 330 HP, for example, he would need to send us the RUPH form and declare that an upgrade has occurred. Under the new measures, vessel owners will be able to upgrade multiple times within the 20% limit. Therefore, we are removing "Upgrades" from the RUPH form.

Removing tonnages and upgrades from the form may negate the need for a permit holder to hire a third party to research the permit's history and prepare the replacement application. Estimates of the costs for these third party services were not available, but NMFS estimates that permit holders spend an average of 3 hours preparing vessel replacement applications.

In 2014, NMFS received 92 vessel replacement/upgrade, and confirmation of permit history requests for permits that had baseline requirements, for a total burden of 279 burden hours (93 x 3 hours), 46 requests for vessel specification verification and 23 requests for unseaworthy vessel (proof of loss) surveys, for a total cost of \$25,875 (43 + 23 = 69 x \$375).

We estimate that the removal of GRT and NT and the one-time upgrade will reduce the need for surveys and the time involved in preparing a vessel replacement application by 50 percent. Therefore, this change will reduce the cost burden on the industry by \$12,750 (34 total fewer surveys) and 139 burden hours per year. The estimated times to prepare a vessel replacement application and retention history would be 1.5 each, rather than 3, hours, for a total of 140 hours; 23 vessels would require vessel specification verification surveys and 11.5 (12) would require unseaworthy vessel (proof of loss) surveys, for a total of \$13,125.

Removing the one-time upgrade limit would also simplify administration of vessel baselines by eliminating the need for permit holders and NMFS to determine whether a permit already used its one-time upgrade or an upgrade to tonnage at some point in its history. This research can be a substantial time and cost burden for a permit holder, especially if the permit has changed hands several times.

The revised burden and cost table for the RPH is shown below:

RUPH Application	Total # of Items	Response Time (hours)	Total Time Burden (hours)	Total Public Recordkeeping/ Reporting Costs
Replacement/CPH	92	1.5	138	\$42
History Retention	1	1.5	1.5 (2)	\$0.45
Vessel Specification Verification	23	NA	NA	\$8,625
Unseaworthy vessel (proof of loss)	12	NA	NA	\$4,500
TOTALS	93		140	\$13,167.45

ROCIS will also show adjustments from the 2013 extension, reflecting the decrease from 600 estimated RUPH requests to 93. These adjustments result in decreases of 607 responses, 1,710 hours and \$146,897 in costs.

We did receive two comments on the proposed rule and both were supportive of removing vessel baseline tonnages and the one-time upgrade restriction.