

Supporting Statement
for
Official Logbook

OMB No.: 1625-0018

COLLECTION INSTRUMENTS: Instruction and CG-706B

A. Justification

1. Circumstances that make the collection of information necessary: The Coast Guard is tasked with the commercial vessel safety program. As part of this tasking, Title 46, United States Code (USC) 11301, 11302, 11303, and 11304 require applicable merchant vessels to maintain an Official Logbook. The Official Logbook provides a vehicle through which many statutory and regulatory record keeping requirements are maintained.
2. What purpose is the information to be used: Information is used by federal and/or civil courts in instances of injury or litigation between a seaman and a shipping company (employer). Coast Guard inspectors use the information to determine compliance with various laws and to examine incidents of shipboard misconduct. The Official Logbook may also be used by casualty investigators to determine liability following an accident. If the information were not collected, the commercial vessel safety program would be negatively impacted, as there would be no official record of U. S. merchant vessel voyages.

The logbook entries are made by the master of the vessel and signed and witnessed by the chief mate or another seaman. The book contains information about the voyage, the vessel's crew and drills, and operations conducted during the voyage. Official Logbook entries identify particulars of the voyage, including the name of the ship, official number, port of registry, tonnage, names and merchant mariner credential numbers of the master and crew, the nature of the voyage, and class of ship. The book also contains entries for the vessel's drafts, maintenance of watertight integrity of the ship, drills and inspections, crew list and report of character, a summary of laws applicable to logbooks, and miscellaneous entries.

Lack of these particulars would make it difficult for a seaman to verify vessel employment and wages, and for the Coast Guard to verify compliance with laws and regulations concerning vessel operations and safety procedures. The Official Logbook serves as an official record of events required to be entered by law and a record of miscellaneous recordable events transpiring at sea such as births, deaths, marriages, disciplinary actions, illnesses, injuries and treatment, etc. Absent the Official Logbook, there would be no official civil record of these events. The courts accept log entries as proof that the logged event occurred. In addition, those seeking to prove that an event required to be logged occurred would not have an official record available.

To make certain that a vessel has been loaded safely, a vessel's sailing drafts and load line are recorded before departing from the loading port or place for a voyage to sea. This information is required to ensure that there have been no abnormal stresses and/or strain placed upon the structural members of the ship. Draft records have often played a major role in the marine casualty investigation involving vessel groundings. Load line records are required because it prevents vessels from overloading beyond their stability and structural capacity as required by the International Convention of Load Lines, 1966, promulgated into law by 46 USC Chapter 51. Absence of a draft record could cause many load line requirements to be ignored, thereby causing loss of life and where the vessel is carrying oil, damage to the environment.

For certain classes of ships, it is necessary to record the time of opening and closing of watertight doors, hinged doors, gangway, cargo ports, and other openings required by regulation to be kept closed while at sea. Failure to record the opening and closing of watertight doors would hinder efforts to limit legal liability of the vessel. The master would be unable to contain legal damages if the opening and closing of watertight doors which affect the seaworthiness of the vessel, were not recorded.

Of particular interest to the Coast Guard are the records of all safety-related drills and inspections. This information allows the Coast Guard to monitor a vessel's compliance with safety regulations. Vessels that strictly adhere to the requirements for timely fire and boat drills (including a variety of other safety drills and inspections) will also provide a safe work environment for the crew. Failure to record drills and inspections contributes to ignorance of safety requirements and availability of equipment, thereby causing poor operation of the vessel and possible loss of life at sea.

The Official Logbook maintains a record of the name, merchant mariner credential number, capacity engaged, and character evaluations of each crewmember employed aboard the vessel. Additionally, the Official Logbook maintains a record of the time a watch was relieved or assumed, the number of hours each seaman and officer is in service to the vessel, and an account of each accident, illness, and injury that occurred during the watch. These records provide a service to the merchant mariner as well as the U.S. Coast Guard. For example, report of character entries are used to evaluate the performance of individuals holding a merchant mariner credential issued by the Coast Guard. Failure to list this entry would deny the seaman his or her rights as set forth in the Merchant Seamen Protection and Relief Act.

3. Electronic submission: There are no electronic submission plans for the Official Logbook. In many instances, the Official Logbook requires the signature of mariners and merchant vessels may not have the capability for this requirement.
4. Efforts to identify duplication: Although some shipping companies often provide their own company logbooks, they are not mandated to do so by law,

and as such, there is no guarantee that these logbooks would be available for inspection or even maintained should there be a subsequent marine casualty investigation or civil litigation years later. No state, local or federal agencies have similar programs.

5. Small business impacts: Not applicable as the collection of information involves large shipping companies.
6. Consequences to federal programs if collection is not conducted: The Coast Guard would not be able to ensure the safety of the vessels commissioned for voyages, which could result in a loss of life and property. There would be no means for the Coast Guard to investigate complaints received from seamen against vessel owners or operators or take appropriate action in instances of negligence, misconduct, or violation of a law/regulation by a seaman.
7. Special circumstances: Special circumstances that require the collection to be conducted in a manner:

- requiring respondents to report information to the agency more often than quarterly;

The Official Logbooks are used in litigation involving injury or disciplinary action, and in evaluation of performance. The information is provided at the end of each voyage. The period of each voyage differs depending on the type of voyage, cargo, and destination(s).

- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

The only written response necessary is the completion of the form. No further reports are required.

8. Consultation: A 60-day Notice (See [USCG-2015-0070], March 23, 2015, 80 FR 15233) and 30-Day Notice (August 28, 2015, 80 FR 52327) were published in the Federal Register to obtain public comment on this collection, The Coast Guard has not received any comments on this information collection.
9. Respondent payment/gifts: There are no payments or gifts to respondents.
10. Confidentiality assurances: No assurance of confidentiality is provided to respondents.
11. Sensitivity nature justification: There are no questions of a sensitive nature on these documents.
12. Hour burden estimate of the collection of information: There are approximately 350 annual respondents. Each respondent submits approximately 5 Official Logbooks annually. Maintenance of an Official Logbook does not add a

significant burden to the maritime industry. It is likely that the Official Logbook might very well save a shipping company a great deal of money should they ever become embroiled in civil litigation. The information reported in the Official Logbook is required to be recorded by law. As a result, there is no significant burden being placed upon the maritime industry concerning entries in the Official Logbook. It is estimated that the transcription of data into the Official Logbook will generally consume one hour's time during the course of each voyage. This estimate is based on agency and shipping company experience.

Annual number of respondents:	350
Annual number of responses per respondent:	5
Annual number of responses:	350 X 5 = 1,750
Annual burden per response:	1 hour
Annual burden hours per response:	1,750 hours

There are approximately 350 deep-sea merchant vessels engaged in the foreign commerce of the United States. The average length of voyage is 70 days. Each vessel consumes, on the average, five logbooks per year. Assuming a labor charge of \$22.00 per hour, the estimated cost to the maritime industry is approximately \$38,500 or \$110 per ship/year (5 x \$22/hr. = \$110 per ship; 350 vessels x \$110 = \$38,500 estimated cost for the respondents).

13. Estimates of annualized capital and start-up costs: There are no annualized capital start up costs.

14. Annual cost to Federal government:

The estimated Federal Government cost is \$7,000. This figure is based on the following:

Printing Cost	\$3,000
Distribution Cost	\$2,000
General overhead (warehouse storage, Shipping & handling costs)	<u>\$2,000</u>
TOTAL	\$7,000

15. Reasons for changes in burden: The estimated annual burden remains unchanged. There is no proposed change to the reporting requirements of this collection. The recordkeeping and reporting requirements, and the methodology

for calculating burden, remain unchanged.

16. Publication of information collected: Not applicable; this information will not be used for statistical purpose.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

USCG will display the expiration date for OMB approval of this information collection.

18. Explain each exception to the certification statement identified in "Certification for Paperwork Reduction Act Submission".

There are no exceptions.

B. Collection of Information Employing Statistical Methods: This information is not collected through the use of statistical methods.