

SUPPORTING STATEMENT
VESSEL MONITORING SYSTEM REQUIREMENTS IN THE EASTERN PACIFIC
HIGHLY MIGRATORY SPECIES FISHERIES
OMB CONTROL NO. 0648-xxxx

A. JUSTIFICATION

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

Collection of this information is necessary for the United States to satisfy its international obligations under the 1949 Convention for the Establishment of an [Inter-American Tropical Tuna Commission](#) (IATTC), to which it is a Contracting Party. At its 72nd Meeting, in June 2004, the IATTC adopted by consensus Resolution [C-04-06](#): Resolution on the Establishment of a Vessel Monitoring System (VMS). In addition, the IATTC adopted a resolution at its 87th meeting in July 2014 to amend and replace C-04-06. Therefore, NMFS published a supplemental proposed rule (79 FR 7152) on February 6, 2014, to revise the original proposed rule. The United States needs to implement VMS requirements at this point, to be compliant with international law and to ensure that commercial fishing vessels 24 meters or more in overall length and engaging in fishing activities for tuna or tuna-like species in the Convention Area are not considered illegal, unreported and unregulated (IUU) vessels. The associated proposed rule is 0648-BD54.

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.

The VMS vessel location reports will be used to facilitate enforcement regarding prohibited or restricted fishing areas in the eastern Pacific Ocean closed to commercial fishing. The reports provide National Marine Fisheries Service, Office of Law Enforcement (OLE) and the United States Coast Guard (USCG) real-time vessel location and activity information. The VMS reports also can be used to check the accuracy of vessel position information reported by the vessel operator in the daily fishing logbooks required by the regulations. The information provides a basis for determining whether changes in management are needed to protect sensitive species.

Installation/activation reports will be used to provide OLE with information about hardware installed and communication service provider that will be used by the vessel operator. Specific information that links a permitted vessel with a certain transmitting unit and communication service is necessary to ensure that automatic position reports will be received properly by NMFS and to identify the unique signature for each VMS unit. In the event that there are any problems, NMFS will need to have ready access to a database that links owner information with installation information. NMFS can then apply troubleshooting techniques and as necessary contact the vessel operator and discern whether the problem is associated with the transmitting hardware or the service provider. This is not expected to occur more than once per year.

Position reports are transmitted 24 hours per day and provide OLE and USCG with real-time vessel location and activity information. When an operator is aware that the transmission of

automatic position reports has been interrupted, or when notified by OLE that automatic position reports are not being received, they must contact OLE and follow instructions provided.

“On/off reports”: although vessel will be required to carry a VMS unit and operate it at all times, the VMS unit may be turned off while the vessel is at port, or after the end of the fishing season, provided that the vessel owner or operator notifies NMFS in advance of each such shutdown and each time the VMS unit is subsequently turned back on (termed “on/off reports”). These reports allow flexibility to the industry participants while providing NMFS OLE with the information needed to determine why a position report is not being received from the vessel.

NOAA Fisheries 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 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. Although the information collected is not expected to be disseminated directly to the public, results may be used in scientific, management, technical or general informational publications. Should NOAA Fisheries Service decide to disseminate the information, it will be subject to the quality control measures and 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 VMS is an automated, satellite-based system that assists NOAA OLE and the USCG in monitoring compliance with closed areas in a reliable and cost-effective manner. Electronic VMS shipboard equipment installed permanently on board a vessel provides information about the vessel’s position and activity. That information is communicated between the shipboard VMS unit and the monitoring agency’s fishery monitoring center, where the identity and location of the vessels are shown on a map display, comparing vessel positions with features of interest, such as closed area boundaries.

Installation/activation reports: written activation reports may be submitted via mail, facsimile or e-mail to the Special Agent in Charge (SAC), the point of contact for the NMFS Office of Law Enforcement, and must include: the vessel’s name; the vessel’s official number; the VMS unit manufacturer and identification number; and telephone, facsimile or email contact information for the vessel owner or operator. While the vessel is in operation, position reports are transferred automatically at a specified frequency and received via a satellite communication system by NOAA.

4. Describe efforts to identify duplication.

NMFS has identified the fleets that are already required to carry and operate VMS units as part of a NMFS-administered VMS. Owners/operators of vessels in these fleets are required to authorize the OLE to receive position reports via their VMS units, but they will not bear any additional time burden or cost burden as a result of the data transmissions to the OLE. There are no similar comparable programs to collect real-time vessel location information. Requiring vessel operators to make at-sea reports of vessel locations is much more costly and

difficult, and would impose a direct reporting burden on the vessel operator. The VMS unit is passive and automatic, requiring no reporting burden on the vessel operator.

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

Vessels in the eastern Pacific Ocean fisheries generally range in size from 7 meters to 124 meters in length. The VMS requirement would affect any U.S. commercial fishing vessel that is 24 meters or more in overall length and engaging in fishing activities for tuna or tuna-like species in the Convention Area, and for which either of the following permits is required: Pacific highly migratory species permit under 50 CFR 660.707, or high seas fishing permit under 50 CFR 300.13. These vessels are categorized as “small businesses”. The majority of these vessels are already subject to VMS requirements in the western and central Pacific Ocean. For those vessels not covered under similar VMS requirements, NMFS will notify the vessel owner when the requirement would take effect and provide information on VMS requirements.

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

Without VMS, the United States is not compliant with international law and vessels 24 meters or greater in overall length and fishing within the IATTC Convention Area could be considered IUU vessels. VMS units would be required to report on an hourly basis. This is consistent with the frequency reporting for other U.S. VMS regulations and is necessary to ensure compliance with conservation and management measures.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

The collection is consistent with OMB guidelines except that the VMS reports more frequently than quarterly (multiple times per day). This interval is necessary for enforcing regulations.

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.

NMFS published a proposed rule, RIN 0648-BD54, on February 6, 2014 (79 FR 7152), and a supplemental proposed rule on May 19, 2015 (80 FR 28572). Public comment was solicited and NMFS received comments on both the supplemental and original proposed rules during the public comment periods. Summaries of the comments received for both the supplemental and original proposed rules and NMFS’s responses appear below.

Comment 1: The proposed rule allows a condition for shutting down the VMS unit after the end of the fishing season, but this condition is too strict and could negatively impact vessels which participate in other fisheries. This could be easily addressed by requiring the VMS unit be turned

on only when that vessel will be targeting tuna or tuna-like species.

Response: NMFS believes that allowing more VMS on and off flexibility would weaken the effectiveness of using VMS position information to monitor the locations of vessels. Allowing VMS power-downs, aside from the in-port and after a fishing season exemptions provided in the rule, could also encourage non-compliance and compromise the integrity of the VMS. Lastly, vessel owners and operators should be aware of fees associated with shutting down VMS units as well as reactivating VMS units after they are shut down that. For example, some mobile communications service providers charge a \$60 VMS unit deactivation fee as well as a separate \$60 reactivation fee. The service fee for continuous VMS unit reporting on an hourly basis is estimated to be \$45 per month. Therefore, deactivating or reactivating a VMS unit once within a month can add approximately \$120 to the monthly costs. For these reasons, NMFS believes that the benefits of requiring position reports everywhere at sea, aside from the exemptions provided in the rule, outweigh the burden.

Comment 2: The proposed rule would require that all vessels turn on VMS units when leaving port, regardless of whether a vessel plans to participate in tuna fisheries. There are a number of affected vessels that participate in fisheries other than tuna fisheries. Some of these vessels only opportunistically fish for tuna. For example, the coastal purse seine vessels that fish for tuna typically make infrequent trips (e.g., fewer than 3 trips a year) that are short in duration (e.g., fewer than 18 hours), and they do not fish for tuna in some years due to lack of availability in the U.S. EEZ, though they remain active in tuna fisheries.

Response: In addition to the rationale outlined in the response to Comment 1 above, the United States is obligated, as a member of the IATTC, to implement Resolution C-14-02, which calls for each IATTC Member to require that its commercial fishing vessels harvesting tuna or tuna-like species be equipped with VMS. Therefore, VMS requirements in this final rule apply to any U.S. commercial fishing vessel that is 24 meters or more in overall length and engaging in fishing activities for tuna or tuna-like species in the Convention Area, and for which either of the following permits is required: Pacific highly migratory species permit under 50 CFR 660.707, or high seas fishing permit under 50 CFR 300.13.

Since the original proposed rule stage, NMFS revised the VMS requirements to reduce the burden on vessels by allowing an additional condition to authorize a vessel owner or operator to shut down a VMS unit. If a vessel owner or operator receives verbal or written authorization by the AD, the VMS unit may be shut down, if, after the end of the fishing season, the vessel will no longer be engaging in fishing activities in the Convention Area for which either a Pacific highly migratory species permit or a high seas fishing permit is required.

Comment 3: VMS requirements for other U.S. fisheries enable vessels to call in to declare the type of fishing trip, which creates a VMS requirement on a trip-by-trip basis. Providing additional flexibility to vessels for trips in which they do not pursue any of the species for which the IATTC has established conservation and management measures could reduce administrative costs and the potential for unintended losses in fishing opportunity.

Response: NMFS does not agree that only requiring VMS operation when on specific trips for tuna or tuna-like species and providing declaration reports would provide an adequate monitoring system or reduce burden on vessel owners and operators. As described in responses

to Comment 2, NMFS believes that allowing more VMS unit power-downs, aside from the in-port and after a fishing season exemptions as provided in the rule, could also encourage non-compliance and compromise the integrity of the VMS. In addition, there may be fees associated with shutting down and powering back on VMS units that could ultimately increase the cost burden on vessel owners and operators. Using a declaration system could also increase administrative burdens by increasing the number of activation and deactivation reports and approvals of requests from NOAA OLE.

NMFS notes that, since the original proposed rule, an additional condition to authorize a vessel owner or operator to shut down a VMS unit was added to the rule. In this final rule, if a vessel owner or operator receives verbal or written authorization by the AD (or designee), the VMS unit may be shut down, if, after the end of the fishing season, the vessel will no longer be engaging in fishing activities in the Convention Area for which either a Pacific highly migratory species permit or a high seas fishing permit is required.

For these reasons, NMFS believes that the benefits of requiring position reports everywhere at sea, aside from the exceptions provided in the rule, outweigh the burden.

Comment 4: The commenter asked for clarification as to whether VMS requirements apply to vessels that did not fish for tuna in the last year.

Response: Regardless of whether the vessel fished for tuna or tuna-like species in the Convention Area in a previous calendar year or fishing season, the VMS requirements of the rule apply to any vessel engaging in fishing activities for tuna or tuna-like species in the Convention Area, and for which either a Pacific highly migratory species permit or high seas fishing permit is required.

Comment 5: The commenter requested clarification as to the confidentiality of the information collected under the VMS rule and asked if it could be utilized for any purposes by: State law enforcement, state fishery managers (e.g., for fisheries managed by the State), or federal fishery managers and enforcement (e.g., for investigations or management decisions in fisheries other than tuna). In addition, the commenter asked for publically available information that relates to how the VMS information is collected and used.

Response: Information collected under the VMS requirements of this rule will be handled in accordance with 16 USC 1881(b)(1) and NOAA Administrative Order 216-100 for confidential fisheries data. NOAA will keep all VMS data confidential (not identifiable with any person) unless disclosure is authorized under an applicable exemption at 16 USC 1881(b)(1). The vessel owner and operator must make the vessel's position data obtained from the VMS unit or other means immediately and always available for inspection by NOAA personnel, U.S. Coast Guard (USCG) personnel, and authorized officers. If the vessel owner or operator is under investigation, or an enforcement action has been initiated for violation of federal or state marine natural resource laws, then the VMS data can be used by fishery officials for the purpose of verifying information related to the investigation and as evidence of the violation.

Comment 6: The commenter asked for further clarification as to how the data collection for VMS works and how often the VMS data is being collected. The commenter also asked about the ability to detect the location of a vessel outside of the hourly ping rates.

Response: The data (or position reports) will be transmitted to NOAA-approved mobile

communications service providers, which will then be transmitted to the NOAA OLE, the USCG, and other authorized entities to receive and relay position reports. NMFS is authorized to set up the default reporting interval of the VMS unit as once per hour. However, NOAA OLE can request to increase VMS polling when necessary for enforcement purposes.

Comment 7: The proposed rule would require automated position reports to occur hourly. The commenter expressed concern that more frequent reports would be required given recent judicial rulings and asked who would be responsible for paying the increases in cost.

Response: NMFS is not planning to increase the hourly reporting frequency of the VMS requirements that are in this final rule for all applicable vessels. Any change to this default reporting frequency would include opportunities for stakeholder input and public comment. NMFS would implement any such change through a proposed and final rulemaking, which would also include the opportunity for public comment. However, as described in the response to Comment 6, NOAA OLE can request to increase VMS polling when necessary for enforcement purposes. If NOAA is paying for the VMS-associated costs because the VMS unit is carried and operated under a requirement of part 300 of this title, part 660 of this title, or part 665 of this title, the vessel owner and operator shall not be responsible for costs that those regulations specify are the responsibility of NOAA.

Comment 8: The proposed rule states that a vessel cannot leave the port until receiving “verbal or written confirmation from the AD that proper transmissions are being received from the VMS unit.” There is no flexibility given which would allow a vessel to turn the unit back on while away from port. For example, if a vessel is participating in a non-HMS, non-high seas fishery, and receives information that tuna or tuna-like species have appeared in catchable volume within the Convention Area, the vessel operator would have to return to port and receive written confirmation from the AD that the unit is transmitting. There is no guarantee that by the time the operator complies with the proposed rule’s requirements, the fish will be within range and in a catchable amount. Neither the AD nor NOAA OLE’s VMS Helpdesk are available 24-hours a day and are closed on weekends, thus it is likely a vessel operator will suffer economic harm as a result of the inability to turn on the VMS unit remotely. The commenter asked if there a system in place to generate the required confirmation during non-business hours.

Response: The referenced requirement applies in the case that the vessel owner and operator have chosen to shut down the VMS unit while at port or otherwise not at sea, or after the end of the fishing season. NMFS requires vessels to turn on VMS units before leaving port to ensure that the transmissions are being received from the VMS unit and any technical issues are resolved before a vessel engages in fishing activities for tuna or tuna-like species. NMFS notes such power-up notifications from vessel owners or operators to the AD or the NOAA OLE’s VMS Helpdesk may take place after office hours, although the AD acknowledgement of receipt will take place during business hours. The AD makes best efforts to minimize delays in its responses to vessel owners or operators. NMFS recognizes that the office hours of the AD do not always coincide with fishing operations, but notes that the owner and operator of a fishing vessel need not wait until immediately prior to the port departure time to turn on the VMS unit and submit the on/off report to NOAA.

As described in responses to Comments 2 and 3, NMFS revised the VMS requirements since the original proposed rule stage, to allow an additional condition to authorize a vessel owner or

operator to shut down a VMS unit. If a vessel owner or operator receives verbal or written authorization by the AD, the VMS unit may be shut down if, after the end of the fishing season, the vessel will no longer be engaging in fishing activities in the Convention Area for which either a Pacific highly migratory species permit or a high seas fishing permit is required.

Comment 9: The commenter asked NMFS to clarify if emails need to be sent to NOAA OLE from port every night before turning the VMS unit off. The commenter also asked if these messages could be sent from a smart phone, or if a telephone call would be sufficient as opposed to written request.

Response: Vessel owners or operators are required to notify the AD or the NOAA OLE's VMS Helpdesk via facsimile, email, or web-form prior to shut-down of VMS units. Currently, voice calls from telephones are not an authorized communication method to notify the AD when shutting down the VMS unit because NOAA prefers to have a written record of the request. The type-approved VMS units for the final rule are capable of two-way communication, which includes the ability to send emails. Notices to the AD or NOAA OLE's VMS Helpdesk can also be sent by any device that is capable of these forms of communication, such as a smart phone. If and when the VMS unit is subsequently turned back on, NOAA must be notified and the vessel operator must receive confirmation from the AD that the VMS unit is functioning properly prior to leaving port. If the vessel will not be in port for an extended period of time, then the vessel may opt to leave the VMS unit turned on while in port. This may help to alleviate timing conflicts that could arise when waiting for confirmation from NOAA that the VMS unit is functioning properly before leaving port.

Vessel owners and operators should also be aware of fees charged by communication service providers to shut down VMS units and to reactivate the VMS units after they are powered off.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

No payments or gifts are provided.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.

As stated in the regulations, all data are collected by NMFS and will also be available to the U.S. Coast Guard and, as well as other parties that receive authorization to receive and use the data pursuant to applicable policies and procedures (per NOAA Directive 06-101 *VMS Data Access and Dissemination Policy*, and NOAA Administrative Order (NAO) 216-100 *Protection of Confidential Fisheries Statistics*). Any of the collected information used by NMFS in the preparation of publicly disseminated information would first be aggregated and /or summarized to maintain the confidentiality of the information pertaining to the individual vessels.

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 questions are asked of a sensitive nature.

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

To estimate the number of affected entities, the number of vessels authorized to fish for highly migratory species in the EPO through fishing permits was considered a reasonable proxy. The permits used to estimate affected entities were those issued under the authority of the Magnuson-Stevens Fishery Conservation and Management Act (16 U.S.C. 1801 *et seq.*) through regulations codified at 50 CFR 660.707 and permits under the authority of the High Seas Fishing Compliance Act of 1995 (16 U.S.C. 5501 *et seq.*) through regulations codified at 50 CFR 300.13. Vessels under 24 meters in overall length and vessels already subject to the existing VMS requirements at 50 CFR part 300.219, 50 CFR part 660, or 50 CFR part 665, compliance with which would satisfy this new requirement, were excluded from the estimate of impacted entities. As of September 2013, approximately 15 vessels did not have VMS units installed, and 2 vessels have VMS units installed that are not type-approved for these regulations (Table 1). Therefore, 17 vessels would be subject to new VMS regulations. This number is subject to fluctuate as more vessels apply for permits and the permits of other vessels expire.

The estimated average time per response is 4 hours, one time, to install a VMS unit and 1 hour annually to maintain or repair a VMS unit. The vessel owner or representative generally observes the initial installation, which is projected to involve a total of about 23 hours, annualized (estimated initial installations on 17 replacement vessels x 4 hours per vessel/3). The vessel owner or representative may also observe any maintenance and repair at 17 hours annually (17 vessels x 1 hours per vessel). Thus, the annual burden is 40 hours.

Annual Estimates:

17 vessels x 4 hours per vessel to install unit, annualized to 6 responses and 23 hours.

17 vessels x 1 hours per year maintenance and repair = 17 responses and 17 hours.

Total estimated responses and burden hours = 23 and 40.

Note: Time estimates for VMS installation and maintenance were developed by NOAA OLE Pacific Islands Division.

For installation/activation reports the estimated response time for respondents to prepare and submit reports is estimated to be 5 minutes per report. Because 17 vessels are anticipated to submit installation/activation reports, the total burden hours is estimated to be about 1 hour (this would be over a period of three years, annualized to 6 responses but the annualized time is still rounded to 1 hour). For “on-off” reports, the estimated response time to prepare and submit each report is also 5 minutes. If all vessels submitted one “on/off” report each year, the total responses would be 17, and burden hours would be 1 hour. Total: 23 responses and 2 hours.

Note: time estimates for VMS reports were developed by NMFS, Pacific Island Regional Office, Honolulu, Hawaii VMS PRA (OMB Control Number 0648-0596).

Total responses and hours: 46 and 42.

Hourly position reports are automatic, and no responses or burden are calculated for them.

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in Question

12 above).

Total annualized cost burden for the VMS unit installation and operation is presented in Table 1 below. In addition, the estimated cost for sending NMFS installation/activation reports is estimated to cost \$3 per fax. Therefore the total cost for respondents to send NMFS this report is \$51, annualized to \$17. “On-off” reports, at \$3 per fax, would cost \$51 annually. This adds \$68 annually to the total annualized costs in the table below of \$36,227: \$36,295.

Table 1. Estimated costs of compliance with VMS requirements.

| Year | Descriptions of the Compliance Costs | Formula | Unit | Rate | Total |
|--------------------|---|---------|----------------|------------|------------|
| Per Vessel: | | | | | |
| Year 1 | VMS Purchase and professional Installation per vessel | A | Lump sum | \$4,000.00 | \$4,000.00 |
| Year 1 | Daily position report costs per vessel (Hourly, 24/day; and 24 reports/day) | B | Per Day | \$1.50 | - |
| Year 1 | Annual position report cost per vessel (\$1.50/day * 365 days/year) if operated year round. | C | Per Annum | \$547.50 | \$547.50 |
| Year 1 | Annual maintenance cost per vessel | D | Per Annum | \$250.00 | \$250.00 |
| Year 2 and on | Recurring position reports and VMS maintenance cost per vessel (Year 2 and beyond) | E=C+D | Per Annum | | \$797.50 |
| Year 1 | Initial total cost per vessel (Year 1; unit + installation + position reports+ maintenance) | F=A+E | Per Annum | | \$4,797.50 |
| Year 1 to 3 | Cumulative costs based on total 3 year life of the VMS unit | G=F+2E | Per Three Year | | \$6,392.50 |
| | Annual VMC Compliance cost per vessel | H=G/3 | Annualized | | \$2,131 |
| For Fleet: | | | | | |
| | Number of affected vessels | I | Number | | 17 |
| Initial Cost | Initial total cost for the fleet (Year 1; total cost per vessel * number of affected vessels – including maintenance and messaging) | J=I*G | Per Annum | | \$81,558 |
| Annualized Cost | Average of Years 1-3 | | Per Annum | | \$36,227 |

The analysis assumes that vessels will pay for VMS. However, federal funds are available for reimbursement of type-approved units up to \$3,100. The availability of these funds for reimbursement for the cost of purchasing a VMS unit is not guaranteed, but is anticipated to be available on a first-come first-served basis. If all vessel owners utilize available federal funds for reimbursement of type-approved units, then costs per vessel can be reimbursed up to \$3,100, for a total of \$17,566 annually. This could reduce estimated total annual cost from \$36,224 to \$18,649 annually.

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

NMFS is required to ensure that VMS units have been installed properly and are operational. In addition, review of the data transmissions are required to maintain the integrity of the restricted conservation areas. The majority of tuna fishing vessels 24 meters or more in length in the eastern Pacific Ocean already participate in the U.S. VMS program. Therefore costs to the Federal government associated with monitoring VMS units can be accomplished by using existing resources (e.g., cost of maintaining the base station, and NMFS employees dedicated to maintaining the system).

These resources have been accounted for in previous PRA documents, OMB Control Number 0648-0478, for VMS regulations. NMFS has five full-time employees who are dedicated to monitoring the system annual labor costs are \$461,636. Recurring operational costs for equipment are \$8,364. The estimated cost of the total program is \$470,000 a year. The total annualized cost into the future is expected to range between \$450,000 and \$500,000.

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

This is a new program for U.S. commercial fishing vessels that are 24 meters or greater in overall length and engaged in fishing activities for tuna or tuna-like species in the eastern Pacific Ocean.

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

No formal scientific publications based on these collections are planned at this time. NMFS and the Council will use the data for management reports and fishery management plan amendments and evaluations. However, subsequent use of the data collected over a series of years may include scientific papers and publications.

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.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

No statistical methods are employed.