Supporting Statement A
Instrument(s) for Navigation Improvement Survey(s)
OMB Control Number XXXX-XXXX

Justification

1. **Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. (draft complete)**

Information from the questionnaire items for the collection of planning data is needed: 1) to formulate and evaluate alternative water resources development plans in accordance with the *Principles and Guidelines for Water Related Land Resources Implementation Studies*, promulgated by the U.S. Water Resources Council, 1983, which specifically identifies interviews with shippers, carriers and port officials as well as commodity consultants and experts to; identify commodity types, study area, commodity flow, estimate transportation cost and forecast waterway use. In the Corps of Engineers Engineering Regulation 1105-2-100, *Planning Guidance Notebook (April, 2000, available at http://www.publications.usace.army.mil/Portals/76/Publications/EngineerRegulations/ER_1105-2-100.pdf)* benefits are defined as transportation cost reduction benefits, including shift of mode and shift of origin-destination and new movement benefits. Failure to gather this information would result in Corps studies relying on incomplete or dated information regarding the cost and use of the navigation systems and the impacts of proposed capital improvements.

2. **Indicate how, by whom, and for what purpose the information is to be used.**

The Army Corps of Engineers operates and maintains much of the nation's inland navigation infrastructure of locks, dams and channels. Inland navigation improvement studies conducted by the Corps typically use surveys of shippers, carriers and others to estimate the impacts on waterway traffic of alternative capital and operations and maintenance investment strategies. The data are used to estimate, among other things, alternative mode cost, shipper response to changes in waterway transportation cost and reliability. This information is used in planning studies for plan formulation and evaluation of the projected benefits associated with various plans. The survey type (in person, phone, mail, electronic etc) will be determined on a case by case basis based on the needs of that particular collection. The survey instrument type will dictate how the survey is administered, returned, and how the appropriate disclosures are provided.

The Army Corps of Engineers also maintains and improves navigation channels at the nation's major ports. Coastal navigation improvement studies use survey information to estimate changes in vessel operations, vessel sizes and total transportation cost resulting from alternative capital improvement plans. This information is used in planning studies for plan formulation and evaluation of the projected benefits associated with various plans.

The Army Corps of Engineers also provides harbor improvement for commercial fishing fleets. Surveys of fishing fleets are used to estimate fish capture cost, fishing practices, and damages to vessels, docks and other infrastructure. Survey information is used to estimate changes to these cost resulting from alternative capital improvements. This information is used in planning studies for plan formulation and evaluation of national economic development impacts of each plan.

The following describes the type of information to be collected:

Carriers are surveyed in anticipation of and/or during a lock outage. This includes inquires about permanent changes in operations as a result of an outage. This information is used to estimate national economic development impacts caused by lock closures.

Carriers are also questioned to profile each company as to their size of operation and most frequent origin, destination commodity movements. Questions concerning shipment size and rate data, capacity utilization rates for barges and tows as well as operational data such as backhauls and operating costs are used in comparison to alternative mode cost to estimate benefits of alternative investment plans.

Shippers are surveyed regarding commodities shipped and received at a dock, the annual size of the shipments, origins and destinations as well as mode of shipment. Also sought is information on land side shipper facilities, the commodities shipped or received at each facility and the destination for each commodity.   This information is used to develop an industry profile of shipper waterside facilities and there operations.

Surveys of shippers are also used to estimate shipper response to changes in changes in transportation system attributes. These questions focus on the shipper's last shipment and requests information regarding the attributes of that shipment such as commodity, size, mode(s), shipping time and rates. Questions then ask the respondent to consider how that shipment would have changed under a variety of attribute changes such as the mode not being available, changes to the cost and travel time. Questions also seek the characteristic of the shipping firm and the operator's perception of the most important attributes influencing the shipping decision. It is designed in part to estimate shipper response (elasticity of demand) to changes to inland waterway cost, transit times and reliability.

Some survey questions are designed for specific events, such as a lock closure. These questions seek information on impacts to waterway users operations due to lock closures, either scheduled or unscheduled. Questions are designed to gather information on both short and long term responses (permanent changes in operations). This information help the Corps estimate impacts expected from future outages.

Survey questions directed at companies providing liner service at coastal ports seek information regarding the operational capacity of companies offering liner service. Their annual tonnage carried, ports serviced and user opinions on the adequacy of port capacity related to the channel and how their operations may change with added capacity. This information is used in coastal port planning studies for plan formulation and evaluation of national economic development impacts of each plan.

Surveys of commercial fishing operators seek information on vessels capacity, operations; fisheries participated in, cost of operations, vessel restriction of existing channel capacities, nd method of crew compensation. This information is used to estimate fish harvesting cost and changes to fish harvesting cost attributable to harbor improvements.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.

Survey data collection will primarily be through in person interviews. Due to the nature of the surveys and the respondent pool, the surveys are often not suited for electronic submittal. However, electronic surveys will be used whenever deemed appropriate. It is anticipated that 1/3 of the surveys will be conducted electronically (325 annually). In addition, survey administrators will be encouraged to use laptop computers or tablets to minimize data recording and for better quality control and assurance. Survey administrators may combine these methods to ensure needed response rates.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

This effort does not duplicate any other survey being done by Federal agencies. No other Federal agency systematically collects information for the purpose of estimating real resource cost of water transportation and commercial fishing. This data is often proprietary data only shared with the Corps under assurances of confidentiality. No other sources for this data exist.

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

Some of the surveys, especially those at smaller or shallow draft harbors may require the interviewing of small businesses such as commercial fishermen or charter boat captains. When appropriate, the burden on such establishments is alleviated by such actions as: 1) pre-survey contacts to determine the most advantageous time such surveys can be conducted; 2) provision of pre-survey materials to inform the entities what information will be needed to expedite the survey process; 3) pre-population of publicly available business profile information questions; and 4) assistance from experienced and trained staff to complete necessary questionnaires. The information being collected in these surveys is, for the most part, readily available to the respondent from their participation in insurance claims, and tax purposes.

6. **Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

If the needed information could not be collected for these occasions, the feasibility of nationally critical navigation projects or their effectiveness could not be determined with data gathered directly from users of harbors or inland navigation facilities. As a result, data from previously conducted Corps studies would likely be used. However, this data could be outdated, or specific to another location that differs significantly from the current study. As a result, there is a high chance that not conducting the collection would result the usage of inaccurate or inappropriate data that could lead to incorrectly identifying project benefits associated with navigation projects and thus incorrectly identifying the best alternative for navigation projects that frequently have costs in excess of $100 million.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner:**
    a. **requiring respondents to report information to the agency more often than quarterly;**
    b. **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
    c. **requiring respondents to submit more than an original and two copies of any document;**
    d. **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
    e. **in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
    f. **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
    g. **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
    h. **requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

This request contains no special circumstances with respect to 5 CFR 1320.5 (2). At times we will ask respondent to respond within 30-days, but there is no requirement to do so. On these types of surveys, respondents normally will respond rather quickly if they intend to respond at all. These are voluntary surveys and respondents are not obligated to respond.

8. If applicable, provide a copy and identify the date and page number of publication in the *Federal Register* of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

A 60 Day public notice was published in the Federal Register on July 21, 2015 (80 FR 43068). No comments were received.

A 30 Day public notice was published in the Federal Register on December 7, 2015 (80 FR 76001). No comments were received.

In addition, a number of outside sources were consulted in preparation of this package. These sources are summarized in Part B of the supporting statement.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Incentives, remuneration, and gifts are generally deemed inappropriate as part of plans for information collections conducted within the scope of USACE sponsored surveys. No gifts or payments will be made to any survey respondents.

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

The Corps of Engineers Civil Works Program does not have the statutory authority to protect confidentiality or to exempt a survey from a request under the Freedom of Information Act. However, respondents will be told that their answers will be used only for statistical purposes. They will also be told that any reports prepared from this study will summarize findings across samples so that responses will not be associated with any specific individuals. Respondents will be informed further that the Corps will not provide information that identifies respondents, except as required by law. Personally identifying information (telephone numbers, e-mail addresses, and postal addresses) is typically stripped from data files before the files are made available to other parties. Therefore, the administration of surveys conducted under this program is essentially anonymous. The collection will not require a PIA or SORN.

A statement will be included at the beginning of each collection instrument defining PII and indicating that this information should not be provided. In addition, the individual questions that may lead to a respondent providing PII will also have a note reminding the respondent not to include this information. A note will also be included at the beginning of the survey outlining Exemption #4 of the FOIA and that the information provided by respondents is protected by this exemption.

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. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The questions used in these surveys will not be of a sensitive nature commonly considered private.

12. Provide estimates of the hour burden of the collection of information. The statement should:

Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.

Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under "Annual Cost to Federal Government."

Based on historical frequency and expected planning activity for navigation studies, including research the annual burden is estimated by respondent group. We estimate the total dollar value of the annual burden hours for collection of this information to be $36,100. By respondent group this included $18,500 for shippers, $ 8,300 for carriers, $1,900 for liner services and $7,400 for commercial fishers. We arrived at this figure by multiplying the estimated burden hours by $55.21 valuation of respondent's time. This wage figure is for management professional and included the multiplier for benefits and is based on the National Compensation Survey: Occupational Wages in the United States published by the Bureau of Labor Statistics (BLS) Occupation and Wages for average full compensation for private industry, (hour costs based on BLS news release USDL-11-849 for Employer Costs for Employee Compensation—June 8, 2011 at: http://www.bls.gov/news.release/ecec.htm, dated June 2014).–

CORPS OF ENGINEERS NAVIGATION SURVEYS PUBLIC HOUR AND PUBLIC COST BURDEN					
	Minutes/ Survey	**Portion of Hour**	**Completed Survey Forms per Year**	**Public Burden Hours**	Public Burden Costs
Survey of Shipper	40	0.67	500	335	$ 18,500
Survey of Carriers	40	0.67	225	151	$ 8,300
Survey of Liner Services	40	0.67	50	34	$ 1,900
Survey of Commercial Fishers	40	0.67	200	134	$ 7,400
TOTALS	40		975	653	$ 36,100

13. Provide an estimate of the total annual non-hour cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

This data collection effort requires no additional record keeping or time commitment on the part of the population being surveyed then what is required in the estimated time to complete the questionnaires.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

Each survey or collection will be developed and designed on a case-by-case basis using one or more of the four approved questionnaires depending on the populations involved. The program staff will determine if it is more efficient and cost effective to develop, distribute, collect, and analyze these surveys in-house or to turn to private or other non-government entities to provide that service. Based on historical cost of conducting these types of surveys, it is estimated that to design the survey instrument, execute the survey and analyze the results each effort will cost between $40,000 and $125,000 depending on the size and type of survey conducted. Thus, including materials and travel, the estimated maximum annual cost to the Federal government is estimated at $861,500 per year.

Survey Administration Costs to the Government Navigation Related Suveys					
	Maximum Surveys per year	**Labor Costs**	**Travel Costs**	**Equipment & Materials**	**Cost to Government**
Commercial Fishing	2	$80,000	$5,000	$2,000	$87,000
Shipper Surveys	3	$375,000	$7,500	$3,000	$385,500
Carrier Surveys	3	$300,000	$7,500	$3,000	$310,500
Liner Service Surveys	1	$75,000	$2,500	$1,000	$78,500
TOTALS		$830,000	$22,500	$9,000	$861,500

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

No programmatic changes have occurred that would require a major change in the annual burden hours. The number of required burden hours for navigation surveys has not increased.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Most of the data collection efforts will generally not be published, but will be summarized and used to support planning study economic analyses. This summary information will be presented in the Corps reports evaluating capital improvement opportunities. Each information collection survey considered under this clearance will describe how the data will be analyzed and used. Each information collection survey will provide OMB with information on the specific tabulation methods used to collect and analyze the data.

Most analyses of surveys conducted under this program will involve simple tabulations to address concrete management and planning issues. These include response frequencies, means, standard deviations, confidence intervals, and breakdowns of these by important sub-groups of respondents. It is expected that regression analysis will be used to model the results for future application. Shipper response estimates are made using econometric techniques that mix reveal preference and stated preference methods.

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.

We will display the OMB approval number and expiration date on the information collection instruments.

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

No administrative exemptions are required for this survey package.