

SUPPORTING STATEMENT
ATLANTIC HIGHLY MIGRATORY SPECIES DEALER, IMPORTER, OR EXPORTER
REPORTING FAMILY OF FORMS
OMB CONTROL NO. 0648-0040

A. JUSTIFICATION

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

This request is for revision and extension of previously approved information collections from seafood dealers regarding purchases, sales, imports, exports, or re-exports of Atlantic highly migratory species (HMS), including federally managed bigeye, albacore, yellowfin, and skipjack (BAYS) tunas, bluefin tuna (BFT), sharks, and swordfish (SWO). Transactions that are covered under this collection include purchases of Atlantic HMS from commercial fishermen and import/export of all BFT, frozen bigeye tuna (BET), southern bluefin tuna (SBT) or SWO, regardless of geographic area of origin. The information collected is used to monitor the harvest of domestic fisheries, and/or track international trade of internationally managed species. The one-time request for email addresses has mainly been addressed and will apply only to newly permitted dealers.

Domestic catch/landing data are necessary to effectively manage domestic fisheries. This information is used to monitor quotas, estimate fishing mortality, and identify the geographic and temporal distribution of fish and fisheries. Collection of this information for use in domestic fishery management is authorized under the [Magnuson-Stevens Fishery Management and Conservation Act](#) (16 U.S.C. 1801 *et seq.*) (MSA). Regulations at [50 CFR 635.5](#) implement domestic dealer reporting requirements. The domestic reporting covered by this collection includes domestic weekly or bi-weekly landings reports and negative reporting (*i.e.*, reports of no activity, when applicable), and bluefin tuna daily landings, including tagging of individual fish.

International trade tracking programs are required by both the International Commission for the Conservation of Atlantic Tunas (ICCAT) and the Inter-American Tropical Tuna Commission (IATTC). An overall goal of these programs is to reduce illegal, unreported and unregulated fishing for the covered species, and improve management of associated fisheries. The programs are designed to account for all international trade of covered species by requiring that a statistical document (SD) or catch document (CD) accompany each export from and import into a member nation, and that a re-export certificate (RXC) accompany each re-export. Collection of this information to implement certain international fishery management recommendations is authorized under the [Atlantic Tunas Convention Act](#) [ATCA; 16 U.S.C. 971(d)] and implemented in regulations at [50 CFR 300 Subpart M](#).

The United States (U.S.) is a member of ICCAT and authorized by ATCA to promulgate regulations, as necessary and appropriate, to implement recommendations adopted by ICCAT. ICCAT has adopted recommendations for the mandatory implementation of CD, SD and RXC trade tracking programs for BFT, frozen BET and SWO. U.S. regulations implementing ICCAT SD and CD programs require SDs and CDs for international transactions of the covered species from all ocean areas, so Pacific imports and exports must also be accompanied by SDs and CDs.

Since there are SD programs in place under other international conventions (*e.g.* the Indian Ocean Tuna Commission), an SD from another program may be used to satisfy the SD requirement for imports into the United States.

The U.S. is also a member of the IATTC, and required under the [Tunas Convention Act of 1950](#) (TCA; 16 U.S.C. 955) to implement recommendations adopted by IATTC. IATTC has mandated a trade tracking program for frozen BET, which the National Marine Fisheries Service (NMFS) has implemented for shipments of frozen BET from the Pacific Ocean.

Dealers who internationally trade SBT are required to participate in a trade tracking program implemented by the Commission for the Conservation of Southern Bluefin Tuna (CCSBT). This facilitates enforcement of ICCAT's BFT CD program by ensuring that imported Atlantic and Pacific BFT will not be intentionally mislabeled as SBT in order to circumvent reporting requirements. This action is authorized under ATCA, which provides for the promulgation of regulations as may be necessary and appropriate to carry out ICCAT recommendations.

In addition to SD, CD, and RXC requirements, this collection includes biweekly reports to complement trade tracking SDs by summarizing SD data and collecting additional economic information.

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.

Atlantic BFT Daily Landing Reports and Tagging

NMFS uses the information collected in this portion of the reporting package to monitor U.S. landings of Atlantic BFT in relation to the assigned quota, thereby ensuring that the United States complies with its international obligations to ICCAT. In addition, provisions of domestic regulations such as time/area closures, fishing seasons, and subquotas by gear type and/or user group are monitored through these reporting instruments. The data collected are also used to assess the status of the BFT resources. Data reports are reviewed by ICCAT annually, and provide the basis for ICCAT management recommendations that become binding on member nations.

This portion of the package describes daily Atlantic BFT daily reporting requirements. First, uniquely numbered tail tags must be affixed to each Atlantic BFT purchased from a fisherman. These tag numbers must be recorded on the Atlantic BFT Daily Landing Report, the Atlantic BFT IBQ Electronic Landing Report, and the Atlantic BFT Domestic Biweekly Dealer Landing and Trade Report (discussed below). Domestic landings of Pacific BFT are not recorded under this collection, and the use of tail tags is optional for trade of Pacific BFT. Second, the Atlantic BFT Daily Landing Report is used for daily, real-time quota monitoring. Dealers must FAX these reports to NMFS within 24 hours of purchasing an Atlantic BFT. Finally, because of the recent development of an individual bluefin quota (IBQ) management system (RIN 0648-BC09), dealers must also submit an Atlantic BFT Daily IBQ Electronic Landing Report, but only for purchases of Atlantic BFT from purse seine or pelagic longline vessels.

Atlantic BFT Daily Landing Report (FAX)

The following information is collected:

- 1) Dealer name and permit number;
- 2) Date the fish was landed;
- 3) Gear type used to capture the BFT - used for estimating catch per unit effort as part of stock assessment;
- 4) Length and weight of fish & measurement method (curved or straight length / round or dressed weight) - used to determine age of fish and population structure; weight used for quota management;
- 5) Tail tag number - identifies fish and provides cross reference with biweekly report, and is used in place of CD validation;
- 6) Area caught - provides information on spatial and temporal distribution of fish and fishing, and aids in enforcement of area closures;
- 7) Port landed - identifies principal ports for the fishery, temporal distribution of fish, and aids in enforcement;
- 8) Fisherman and vessel name, permit number and signature - provides vessel permit enforcement information.

Atlantic BFT Daily IBQ Electronic Landing Report (for purchases from pelagic longline or purse seine vessels only)

The following information is collected;

- 1) Vessel name;
- 2) Length and weight of bluefin tuna purchased;
- 3) Size class and number of all bluefin tuna discarded by vessel during trip;
- 4) Tail tag number for bluefin tuna purchased;
- 5) PIN for vessel IBQ account to verify purchase.

Atlantic BFT Biweekly Landing & Trade Reports

NMFS uses biweekly reports to monitor Atlantic BFT landings and to track the trade of Atlantic BFT. Information on the purchase, sale, and disposition of Atlantic BFT is collected. The following information is collected on the Atlantic BFT Biweekly Dealer Landing and Trade Report:

- 1) Biweekly reporting period;
- 2) Dealer name, Atlantic Tunas Dealer permit number, and name of person filling out report;
- 3) Date of landing;
- 4) Vessel permit I.D. number - used for enforcement purposes;
- 5) Tail tag number - used to identify the fish and cross-reference with daily landing report and BFT SD;
- 6) Weight of the fish (round or dressed) - used to cross-reference daily landing report information and collect economic information;
- 7) Nature of sale (dockside or consignment) - used in assessing the relative importance of the Japanese and U.S. domestic markets;
- 8) Price per pound - important for evaluating economic characteristics of the fishery;
- 9) Quality rating - assists in determining how regulations affect price of BFT; and

- 10) Destination of fish (domestic, import, export, or re-export) - used for assessing importance of foreign market, cross-referencing export data, and identifying variables that can affect all markets.

Non-BFT Electronic Landing Reports (e-Dealer Reporting)

Since January 2013, NMFS has required electronic reporting by all federally-permitted Atlantic HMS dealers (both in the Southeast and Northeast regions) for Atlantic SWO, BAYS tunas, and Atlantic sharks. This includes both positive and negative reports. Swordfish, shark, and BAYS tunas dealers must submit an electronic report for each trip that they purchase of these species from a vessel. At a minimum, electronic reports (including negative reports) must be submitted weekly. Electronic dealer reports collected through other Atlantic reporting systems (Standard Atlantic Fisheries Information System (SAFIS), trip tickets, etc.) are automatically sent to the HMS e-Dealer system and fulfill HMS weekly electronic reporting requirements. In addition, NMFS requires Atlantic HMS dealers to provide a current e-mail address where communications with dealers can be made through the HMS e-Dealer system. HMS dealers may submit their e-mail address via e-mail, fax, or phone. Dealers are also requested to provide a contact number in case there are any questions regarding their e-mail address.

The information collected through the electronic reporting system is used to account for domestic landings of managed species; track landings against Atlantic swordfish, BAYS tuna, and Atlantic shark quotas; and assess stocks of these species. This information may be submitted in conjunction with non-HMS species purchased during the same reporting period, thus reducing the reporting burden on dealers. If no HMS, or other federally-managed species, are purchased or accepted during the specified reporting period, a negative report must still be filed. This requirement clarifies for NMFS whether or not a report is pending from the dealer for the reporting period. The following information is required in the HMS electronic landing report:

- 1) Dealer information (including dealer name, dealer contact information, and dealer permit numbers);
- 2) Species-specific information (including which species purchased/accepted, state landed, grade and market information, purchase price and/or total sale information, weight of fish purchased by species, and information on shark fins);
- 3) Vessel information (including date landed, vessel documentation number, fishing vessel name (if applicable) the area where the fish was caught, fishing vessel logbook number, Southeast observer log identification, gear types used, name of port where fish landed, and trip number);
- 4) Report information (including date and time submitted and disposition of product);
- 5) Dealer explanations (including information regarding late reporting, modified data, and whether or not shark fins were naturally attached, and explanation for no fishing logbook ID, if applicable);
- 6) Negative reports (including the date and time submitted).

Voluntary Fishing Vessel and Catch Form

In order to assist dealers in completing the HMS Non-BFT Electronic Landing Report, NMFS has developed a voluntary form that dealers can obtain via the electronic reporting system and give to fishermen. Dealers can ask fisherman from whom they obtain fish to complete the form and return it to them. Otherwise, dealers would need to follow up with fishermen to collect

required information in their electronic HMS dealer reports. This provides a convenient tool for fishermen to convey catch information to HMS dealers, who are required to include such information in their HMS e-Dealer reports. The following types of information can be collected by the dealers on this form:

- 1) Fishing vessel trip information (contact name, phone number, and e-mail address; fishing vessel name and fishing vessel documentation number);
- 2) Date HMS were offloaded;
- 3) Indication if any landings came from the Atlantic shark research fishery;
- 4) Southeast Observer log ID number (if applicable);
- 5) Fishing vessel logbook ID number (or explanation if no logbook available);
- 6) Species landed (check from list);
- 7) Area where HMS were caught (fishermen can provide grid area code from included map);
- 8) Gear used to land HMS (select from list).

HMS Trade Biweekly Report

NMFS monitors international trade of BFT, SBT, frozen BET, and SWO on a biweekly basis. This information is used to cross-check and verify SD data (discussed below), as well as obtain economic information that is essential for domestic management policy and rulemaking with respect to management impacts on prices. The following information is required on the HMS Trade Biweekly Report:

- 1) Dealer Name;
- 2) HMS International Trade Permit number;
- 3) Contact name and phone number;
- 4) Report time period;
- 5) For each shipment/fish:
 - a. Species
 - b. Statistical document and re-export certificate (if applicable) number - cross checks trade documentation;
 - c. Entry number from U.S. customs form 7501 (import only) - allows for cross check of trade data with customs data;
 - d. Date of import or export;
 - e. Total weight of shipment (import only) - cross check with trade data;
 - f. Condition (fresh or frozen) and product form (round, headed, gutted, steaks, fillets, loins, dressed) - used to assess how regulations and other factors affect ex-vessel prices and gross revenues;
 - g. Weight of each fish (if available) - used to estimate gross revenues and cross-check trade data;
 - h. Price per kilogram - used to evaluate the status of the market and gross revenues;
 - i. State/landing document # - cross check used for non-government validation;
 - j. Tag number (if applicable) - cross checked with trade data for verification;
 - k. Destination of fish (import, domestic, export, re-export) - cross checks with trade data and customs data.

Catch Documents, Statistical Documents, and Re-export Certificates

Original CDs and SDs must accompany each export from, or import into, the United States, and must stay with a shipment until it reaches its final destination. Covered species include Atlantic BFT, Pacific BFT, SBT, swordfish, and frozen BET. If the shipment is re-exported, then a RXC may also be required. NMFS collects the documents and forwards the information to ICCAT or IATTC, which can then compare the data collected from all participating nations to cross-reference and verify trade and landings data. The program is designed to account for all trade of covered species. Trade data may be cross-referenced with each nation's landings quotas to help identify illegal or unreported landings.

A CD or SD is considered complete and approved for import, export, or re-export if it is identified by a number assigned by the issuing government and has all of the required information recorded, and, if applicable, is validated (see below). U.S. CDs and SDs are available from NMFS at <http://www.nmfs.noaa.gov/sfa/hms/compliance/itp/index.html> to accompany exports from the United States. Imports to the United States must be accompanied by a CD or SD issued by the flag country of the harvesting vessel. If needed, foreign exporters may obtain unnumbered CDs or SDs from the appropriate website (www.iccat.int; www.iattc.org; www.ccsbt.org; www.iotc.org) to accompany exports to the United States; a document number must be assigned by the country issuing the CD or SD. U.S. importers are required to complete the import section of the foreign CD or SD.

The following information is required on all SDs and is used for tracking the product unless otherwise noted:

- 1) The document number assigned by the country issuing the document;
- 2) The name of the country issuing the document, which must be the country whose flag vessel harvested the fish, regardless of where it is first landed;
- 3) The name of the vessel that caught the fish, the vessel's length, the vessel's registration number, and ICCAT record number, if applicable;
- 4) The point of export, which is the city, state or province, and country from which the fish is first exported;
- 5) The product type (fresh or frozen), time of harvest (month/year), and product form (round, gilled and gutted, dressed, fillet, or other);
- 6) The method of fishing used to harvest the fish (e.g., purse seine, trap, rod and reel) - used to gather socio-economic data on fishery regarding catch per sector;
- 7) The ocean area from which the fish was harvested (i.e., western Atlantic, eastern Atlantic, Mediterranean, or Pacific);
- 8) The weight of each fish (in kilograms for the same product form previously specified) or the net weight of each product type, as applicable;
- 9) The name and license number of, and signature of the exporter and date in the exporter's certification block;
- 10) The name and title of, and signature and date in the validation block by, the responsible government official of the country whose flag vessel caught the fish (regardless of where the fish are first landed) or by an official of an institution accredited by said government, with official government or accredited institution seal affixed, thus validating the information on the statistical document. (NOTE: Validation of an imported SD by a government official is not required if NMFS waives the requirement following a recommendation of the ICCAT Secretariat.); and,

- 11) If applicable, the name(s) and address(es), including the name of the city and state or province of import, and the name(s) of the intermediate country(ies) or the name of the country of final destination, and license number(s) of, and signature and date in the importer certification block by each intermediate dealer and final importer.

Bluefin Tuna Catch Documents. Bluefin Tuna CDs, to be deemed complete, in addition to the elements above, must also state:

- 1) Whether the fish was farmed or captured;
- 2) Identifying information regarding the owner of the trap that caught the fish or the farm from which the fish was taken, if applicable;
- 3) The identifying tag number, if landed by vessels from countries with bluefin tuna CD tagging programs or tagged by a U.S. dealer under the Atlantic BFT tagging program;
- 4) Documents for tagged fish do not have to be validated, except in the case of re-exports.

Southern Bluefin Tuna SDs. Southern Bluefin Tuna SDs, to be deemed complete, in addition to the elements above, must also state the name and address of the processing establishment, if applicable.

Bigeye Tuna SDs. Bigeye Tuna SDs, to be deemed complete, in addition to the elements above, must also state:

- 1) The name of the trap that caught the fish, if applicable;
- 2) The net weight of product for each product type (in kilograms for the same product form previously specified).

Swordfish SDs. Swordfish SDs, to be deemed complete, in addition to the elements above, must also certify by the exporter that the individual Atlantic swordfish included in the shipment are greater than 15 kilograms (33 lbs.) or if pieces, that the pieces were derived from a swordfish weighing more than 15 kilograms (33 lbs).

The following information is required on all RXCs and is used for tracking the product unless otherwise noted:

- 1) The document number assigned by the country issuing the document;
- 2) The name of the country issuing the document, which must be the country through which the product is being re-exported;
- 3) The point of re-export, which is the city, state, or province, and country from which the product was re-exported;
- 4) The description of the fish product as imported, including the product type (fresh or frozen), product form (round, gilled and gutted, dressed, fillet, or other), the net weight, flag country of the vessel that harvested the fish in the shipment, and the date of import to the country from which it is being re-exported, and the original SD or CD number;
- 5) The description of the fish product as re-exported, including the product type (fresh or frozen), product form (round, gilled and gutted, dressed, fillet, or other) and the net weight;
- 6) The name and license number (if applicable) of, and re-exporter's signature and date in the re-exporter's certification block;
- 7) If applicable, the name and title of, and be signed and dated in the validation block by, a responsible government official of the re-exporting country appearing on the certificate,

or by an official of an institution accredited by said government, with official government or accredited institution seal affixed, thus validating the information on the re-export certificate. (NOTE: Validation of a RXC by a government official is not required if NMFS waives the requirement based on a recommendation from the ICCAT Secretariat.);

- 8) If applicable, the name(s) and address(es), including the name of the city and state or province of import, and the name(s) of the intermediate country(ies) or the name of the country of final destination, and license number(s) of, intermediate and final exporters, signed and dated in the importer's certification block.

Bluefin Tuna RXCs. Bluefin Tuna RXCs, to be deemed complete, in addition to the elements described above must also state whether the fish for re-export was farmed, and the name and address of the farm, if applicable.

Validation - NMFS has worked with ICCAT with the intent of minimizing the public reporting burden for the government validation requirement. ICCAT/IATTC require that CDs, SDs, and RXCs be validated by a government institution at export. For example, in the United States, Atlantic BFT are tagged when landed, and the numbered tag stays with the carcass. ICCAT and U.S. regulations exempt tagged fish from validation requirements since the BFT data associated with the tag number must be provided to NMFS and can be tracked. In addition, NMFS has instituted a validation service which is available on a 24 hour/7 day per week basis to accommodate the requirement for government validation of RXC's covering products being re-exported from the United States. NMFS may also authorize non-governmental industry partners to validate CDs, once they have met the necessary requirements. The entity must apply for authorization in writing to NMFS, and indicate the procedures to be used for verification of information to be validated, list the names, addresses, and phone/fax numbers of individuals to perform validation, and provide an example of the stamp or seal to be applied to the statistical document or re-export certificate. Upon approval, NMFS will issue a letter specifying the duration of effectiveness and conditions of authority for validation. Authorization must be renewed annually.

Although the information collection described above is not expected to be disseminated directly to the public, it may be used to develop or review fishery management plans and associated regulatory documents, and is therefore subject to NOAA's Information Quality Guidelines. 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 response to Question10 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 NMFS 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.

Catch Documents; Statistical Documents; and Re-export Certificates:

SDs and RXCs under this collection are electronically fillable. Fillable forms for U.S. exports are available on the NMFS website (<http://www.nmfs.noaa.gov/sfa/hms/compliance/itp/index.html>). These may be emailed or faxed to NMFS. However, original paper documents must accompany the product. Bluefin tuna CDs are individually numbered, and NMFS does not yet have the ability to provide electronic access to pre-numbered forms. Electronic submission of all trade forms is being investigated domestically. In addition, the United States is pursuing development of electronic trade monitoring programs among regional fishery management organizations.

Atlantic BFT Daily Landing Reports:

BFT daily landing reports are required to be submitted via FAX, and some validation is provided via FAX. For Atlantic BFT purchased from Longline and Purse seine category vessels, dealers must submit an electronic version of the BFT daily landing report to support the management of IBQ shares. This will enable feasibility tests to be conducted regarding integrating data fields on the Atlantic BFT Daily and Biweekly Landing Reports into the e-Dealer reporting system.

Atlantic Swordfish, Sharks, and BAYS Tunas Electronic Landing Reports (e-Dealer):

HMS dealers of Atlantic swordfish, sharks, and BAYS tunas are required to report to NMFS using an electronic reporting system (e-Dealer). The availability of electronic form submissions reduces the overall cost and administrative burden to the public by providing access to electronic forms that can be completed on the computer and submitted electronically. The electronic reporting system for Atlantic swordfish, sharks, and BAYS tunas is available through the current SAFIS website based system (<http://safis.accsp.org/>), the Southeast electronic reporting system built and maintained by Bluefin Data LLC, an HMS-only system housed in the ACCSP environment, and through a customized electronic system used by large Atlantic Coast dealers, which is managed by the Northeast Fisheries Science Center. This reduces the need for dealers to report to multiple programs and reduces duplication of reporting (see also response to Question 4).

4. Describe efforts to identify duplication.

The impacts of the reporting requirements were analyzed prior to implementation through rulemaking processes including public review. In addition, a Federal Register Notice announced the extension of this reporting package. No duplicative efforts were identified and considerable effort has been put forth to utilize existing reporting systems and thereby avoid duplication. The HMS Management Division of NMFS works closely with other NMFS offices on reporting and permitting issues, and ensures that reporting regulations are not duplicative. Although daily and weekly landing reports, reporting forms, and SDs may include some of the same data fields, this information is necessary to cross reference and cross check reports. NMFS has attempted to

combine SDs with other reporting requirements into a single form in the past; however, ICCAT did not approve the use of forms other than those developed specifically by ICCAT. NMFS has combined its electronic reporting system for Atlantic swordfish, sharks, and BAYS tunas with the other three main electronic reporting systems used in the Greater Atlantic and Southeast regions in order to reduce the number of places dealers must report. In addition, the United States is participating in discussions through regional fishery management organizations to determine ways of using technology to reduce paperwork and improve the efficacy of trade monitoring programs.

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

Small businesses will be the respondents of this data collection and this collection will not have a significant impact on them. As described in Question 4, reporting requirements have been condensed as much as possible. In addition, electronic dealer reporting has been implemented, as discussed in Questions 3 and 4.

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

Atlantic BFT Landing Reports and Tagging - If reporting were conducted less frequently or not conducted at all, the United States could overharvest its internationally approved BFT quota, and would fall out of compliance with its international obligations under ICCAT, in violation of ATCA. In addition, the status of the resource would be indeterminable since approximately 55 percent of the western Atlantic BFT Total Allowable Catch is allocated for landing by U.S. fishermen. Inefficient quota monitoring or altogether loss of monitoring could result in overharvest of the ICCAT-recommended U.S. BFT quota, which would violate obligations under ICCAT and ATCA. Furthermore, it would be impossible for the United States to formulate domestic policy consistent with the Magnuson-Stevens Act, which is based on sound socio-economic and biological data and analyses. If BFT landings data were not included in the IBQ electronic reporting system, then NMFS would not be able to implement individual bluefin tuna quotas that were included as a management measure in Amendment 7 to the 2006 Consolidated HMS FMP. These quotas are awarded to individual pelagic longline and purse seine vessels and most of the pelagic longline quotas are less than one metric ton (mt). Timely and accurate electronic IBQ monitoring is vital for IBQ accounting purposes and thus, for implementation of the IBQ program.

Atlantic Swordfish, Sharks, and BAYS Electronic Landing Reports (e-Dealer) - The previous reporting frequency of two weeks, with an additional 10 days to submit reports, did not provide timely data for species with small quotas, such as Atlantic sharks. Thus, in order to effectively monitor quotas, NMFS determined that more frequent reporting was needed for Atlantic swordfish, sharks, and BAYS tunas. In 2013, NMFS implemented an electronic reporting system to streamline dealer reporting and allow for dealer data to be collected in a more real-time basis as described under Question 2 and to be consistent with reporting in both the Greater Atlantic and Southeast regions. Inefficient quota monitoring or altogether loss of monitoring could result in over-harvest of the ICCAT-recommended U.S. swordfish quota, which would

violate obligations under ICCAT and ATCA. Over-harvest of HMS quotas (including sharks) could negatively impact stocks and the fishing industry, and violate the Magnuson-Stevens Act. Lastly, this information is necessary for the development of domestic policy, since it provides socio-economic and biological data upon which policy decisions are based.

Catch Documents, Statistical Documents, and Re-export Certificates - If this information collection were not conducted, the United States would be out of compliance with its international obligations under ICCAT and IATTC, in violation of ATCA and TCA, respectively.

Without the authorization of non-government validation, NMFS would be required to individually validate each export and re-export, which would impose a greater reporting burden on industry. If authorization were not renewed annually, in the same manner that dealer and vessel permits are annually renewed, NMFS would not be able to effectively monitor implementation of the trade program.

Voluntary Fishing Vessel and Catch Form – This is a voluntary form that fishermen could leave with HMS dealers to help with their required electronic dealer reports. If this information were not collected via the form, dealers would need to follow up with fishermen to collect required information in their electronic HMS dealer reports.

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

The frequency with which data are collected in this package is inconsistent with OMB guidelines that respondents should not be required to report information more often than quarterly. To accurately monitor the domestic quota allocation among a diverse group of users, Atlantic BFT, swordfish, sharks, and BAYS tunas landings data must be collected on a real-time basis (or as close to real-time as possible). Failure to maintain the reporting frequency as described under Question 2 could jeopardize the agency's ability to close fisheries prior to exceeding a quota. (See Question 6 also regarding reporting frequency).

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 7418) solicited public comment regarding the renewal of this information collection. All of the reporting requirements 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 then sent to those constituents on April 9, 2015.

Two comments were received. One comment indicated that the HMS dealer reporting burden estimates provided in the Federal Register notice were accurate. The other comment indicated that weekly *e*-dealer reporting estimates were too low because fish prices are not always known at the time of landing, and dealers must go back to every report to put in the correct prices.

NMFS appreciates these comments and agrees that, for some HMS dealers, the estimate of 15 minutes per *e*-dealer response is too low. In particular, high volume dealers and dealers who utilize a “file upload” version of the *e*-dealer system would experience a longer response time.

For 2014, NMFS has determined that 1,792 reports (out of a total of 140,940 reports) were submitted utilizing the “file upload” version of the *e*-dealer system. This equates to approximately 1.27% of all reports. For these reports, a response time of 30 minutes is being assigned (instead of 15 minutes used for non-“file upload” version reporting). Additionally, this number is being rounded up to 2,050 reports to account for 2-3 high volume dealers.

The commenter also indicated that the current *e*-dealer system should have built-in defaults (for example, pre-filled fields) for the user to save time. Their company is in the process of integrating all necessary information to fulfill state, Federal, and regional reporting requirements so that they can submit their dealer reports directly from initial fish weigh-in information. NMFS intends to follow-up on the suggestion for built-in defaults and, if feasible, will consider the potential for adopting them at a future time. NMFS is also working with the commenter to better accommodate their proprietary software for dealer reporting.

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

No payments or gifts are to be offered as part of this information collection.

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

Pursuant to Section 402(b) of the Magnuson-Stevens Act, as amended in 2007, and consistent with [NOAA Administrative Order 216-100](#) (Confidentiality of Fisheries Statistics), NMFS does not release confidential information submitted in compliance with provisions of the MSA, other than in aggregate form and under circumstances required or authorized by law. Whenever data are requested or released to the general public, NOAA ensures that information on the financial business activity of a dealer is not identified.

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 information of a sensitive nature is requested in this collection of information.

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

For this collection, there are 9,585 respondents, 169,196 responses and 39,961 hours (responses and hours totals added from Tables 3 and 4). Total annual labor costs are \$599,415.

Burden hours associated with each reporting instrument are given in Table 1 and estimation of burden hours is discussed below by reporting requirement. All reports covered by this collection are required to be kept by the dealer for a period of 2 years. The burden hour estimate for each report includes the time required for filing and storing reports.

Table 1. Burden estimates for each reporting instrument included in this collection,

	Reporting Requirement	Burden
The	Atlantic BFT Daily Landing Reports	0.03 hrs (2 mins.)
	Tagging (for BFT domestic landing reporting)	0.02 hrs (1 min.)
	Atlantic BFT IBQ Daily Electronic Landing Reports (for landings from purse seine & pelagic longline vessels)	0.02 hrs (1 min.)
	HMS Electronic Landing Reports (e-Dealer)	0.25 hrs (15 mins.)
	HMS Electronic Landing Reports (e-Dealer) "file upload" version	0.50 hrs (30 mins.)
	Weekly Negative Reports (e-Dealer)	0.08 hrs (5 mins.)
	Submission of e-mail address (e-Dealer)	0.02 hrs (1 min.)
	Biweekly Landing & Trade Reports	0.25 hrs (15 mins.)
	Catch Document (CD); Statistical Document (SD); or Re-export Certificate (RXC) (includes all steps from export to import)	0.08 hrs (5 mins.)
	CD/SD/RXC validation by govt. official	0.25 hrs (15 mins.)
	Authorization for non-government validation	2 hours (120 mins.)
	Voluntary Fishing Vessel and Catch Form	0.25 hrs (15 mins.)

universe of respondents for this collection is identified in Table 2, and includes the following: all U.S. dealers importing or exporting BFT, frozen BET, SWO, or SBT (HMS International Trade Permit holders); U.S. Atlantic dealers that purchase Atlantic SWO, BAYS tuna, or sharks; all dealers purchasing BFT; and non-government institutions requesting validation authorization. Finally, an estimated number of international dealers is provided, because burden hours must be calculated for international respondents as well as domestic respondents. International dealers impacted by this collection include exporters that must fill out statistical documents and obtain

validation prior to exporting a shipment to the United States. The number of international dealer respondents was calculated by identifying the number of countries exporting BET (31), BFT, (16), SBT (5) or SWO (28) to the United States, and assuming that there were approximately 10 active exporters per country. This information was obtained from: <http://www.st.nmfs.noaa.gov/commercial-fisheries/foreign-trade/applications/monthly-product-by-countryassociation>.

Table 2 Estimated total number of respondents for this collection

Respondent Type	Number*
HMS International Trade Permits	253
Shark Dealer Permits	96
Swordfish Dealer Permits	195
Tuna Dealer Permits (BFT, BAYS or both), includes:	
BAYS only dealers	79
BFT only dealers	32
BAYS and BFT dealers	308
International Dealers	800
HMS commercially permitted fishermen (submitting voluntary fishing vessel and catch form)	7,812
Non-government Institutions for Validation	10
TOTAL	9,585

*numbers of Shark, Swordfish, and Tuna Dealer permits, International Trade permits, and HMS commercial fishing permits are based upon 2014 data (**Source**. 2014 Atlantic HMS SAFE Report).

Atlantic BFT Daily Landing Reports and Tagging

Atlantic BFT daily landing reports must be submitted to NMFS by FAX within 24 hours of purchase for each Atlantic BFT purchased by a dealer from a vessel, and each of those fish must be tagged. For Atlantic BFT purchased from Longline and Purse seine category vessels, dealers must also submit an Atlantic BFT IBQ Electronic Landing Report to support the management of IBQ shares. The burden associated with the Atlantic BFT daily landing report is estimated based upon the number of BFT landed in 2014 (2,923, and rounded to 3,000), as provided by the HMS Management Division in Gloucester, MA ((3,000 reports * 2 min./report)/60 = 100 hours).

Estimation of biweekly reporting for Atlantic BFT dealers is based upon the number of reports submitted in 2014 ((250 reports * 15 min./report)/60 = 62.5 hours). As described in the responses to Questions 2 and 6, dealers must also submit an Atlantic BFT IBQ Electronic Landing Report for landings from pelagic longline and purse seine vessels. About 50% of BFT landings come from pelagic longline and purse seine vessels; thus, there will be an additional one

minute for each of 1,500 reports, resulting in an added burden of 25 hours. These estimates are provided in Table 3.

Non-BFT Landings Reports (e-Dealer)

Non-BFT landings reports are to be submitted to NMFS through electronic dealer reporting systems. The burden associated with these reporting activities, in addition to a voluntary form that fishermen may fill out and leave with HMS dealers for their electronic dealer reports, are summarized in Table 3, and explained in detail below.

Swordfish, shark, and BAYS tunas dealers must submit an electronic report for each trip that they purchase of these species from a vessel. At a minimum, electronic reports (including negative reports) must be submitted weekly. Electronic dealer reports collected through other Atlantic reporting systems (SAFIS, trip tickets, etc.) are automatically sent to the HMS *e-Dealer* system and fulfill HMS weekly electronic reporting requirements. The individual reporting burden for persons issued an Atlantic swordfish, shark, and/or BAYS tuna dealer permit varies, depending upon the number of trips a dealer purchases. At a minimum, it is one hour per month (15 minutes/report * 4 reports/month), or 12 hours per year. The response burden for each report is estimated at 15 minutes per report, except that dealers utilizing the “file upload” version of the *e-dealer* system are estimated to need 30 minutes per report. Based upon the number of electronic reports submitted in 2014 by swordfish, shark, and BAYS tunas dealers, and received through the *e-Dealer* system (140,940 responses), the annual reporting burden is estimated at 35,748 hours ((138,890 responses * 15 minutes)/60 + (2,050 responses * 30 minutes)/60 minutes = 35,748 hours).

These burden estimates assume that permitted swordfish, shark, and BAYS tunas dealers would report purchases of each trip landing Atlantic swordfish, sharks, and/or BAYS tunas and other species. If no trips are purchased during a weekly reporting period, a negative report must be filed. Negative reports are estimated to take 5 minutes to complete and send to NMFS. The number of negative reports is based upon the number of negative *e-Dealer* reports submitted to NMFS in 2014. NMFS also requires Atlantic HMS dealers to provide an e-mail address where communications with dealers can be made through the HMS *e-Dealer* system. HMS dealers may submit their e-mail address via e-mail, fax, or phone. From 2007 to 2014, the total number of HMS dealers has fluctuated from 659 (in 2009) to 761 (in 2007). During that period, the largest increase in the number of HMS dealers between any two years (2009 – 2010) was 43. Thus, NMFS estimates that up to 43 new HMS dealers annually may need to provide their e-mail address. This requirement is estimated to take approximately one minute.

Voluntary Vessel and Catch Form

Fishermen may also fill out a voluntary form to provide dealers with fishing vessel and Atlantic swordfish, sharks, and BAYS tunas catch information. This form would take fishermen approximately 15 minutes to complete and would be completed on a trip basis. In 2014, 10,445 trips landed HMS and were reported through the *e-Dealer* system. Thus, NMFS estimates that 10,445 forms would be filled out by fishermen for a total of 2,612 burden hours per year (10,445 forms by 15 minutes).

Biweekly Landing & Trade Reports

The international trade biweekly reporting requirements for this collection occur on the HMS Trade Biweekly Dealer Report. Estimation of burden hours associated with this form was calculated by multiplying the number of responses submitted to the NSIL in Pascagoula, MS in 2014 (1,958 reports (rounded to 2,000)) by the estimated burden per response (15 minutes). The estimation of burden hours associated with the Atlantic BFT Biweekly Landing and Trade Report was calculated by multiplying the number of responses submitted to the HMS Management Division in Gloucester, MA in 2014 (249 reports (rounded to 250)) by the estimated burden per response (15 minutes).

Non-governmental Validation

Non-government institutions may apply for authorization to validate statistical documents or re-export certificates by applying in writing, indicating the procedures to be used for verification of information to be validated, the names and contact information of individuals that will perform the validation, and an example of the stamp or seal applied to the statistical document or re-export certificate. Authorizations must be renewed on an annual basis. In the past, one institution has been provided with validation authority for Pacific BFT. With the increase in need for validation based on the recent expansion of SD programs, it is estimated that approximately 9 other institutions may apply for this authority for a total of 10. Preparing the necessary application is expected to take approximately 2 hours. Total burden hours are given in Table 3.

Table 3. Domestic dealer reporting activities for this collection.

Instrument or Activity	Responses	Burden (hrs.) per response	Burden (hrs)
Domestic BFT Landing & Trade Reports			
Atlantic BFT Daily Landing Report	3,000	2 minutes	100
Atlantic BFT IBQ Daily Electronic Landing Report (for landings from purse seine & longline vessels)	1,500	1 minute	25
Atlantic BFT Landing Tag	3,000	1 minute	50
Atlantic BFT Biweekly Landing and Trade Report	250	15 minutes	63
Other HMS Landing & Trade Reports			
HMS Trade Biweekly Report	2,000	15 minutes	500
HMS Electronic Landing Report for Swordfish, Sharks, & BAYS Tuna (e-Dealer)	138,890	15 minutes	34,723
HMS Electronic Landing Report for Swordfish, Sharks, & BAYS Tuna (e-Dealer) "file upload" version	2,050	30 minutes	1,025
HMS Weekly Negative Reports (e-Dealer)	7,300	5 minutes	608
Submission of e-mail address (for new HMS dealers)	43	1 minute	1
Voluntary Form for Fishermen			
Fishing Vessel and Catch Form	10,445	15 minutes	2,611
Validation Authorization			
Non-governmental validation authorization	10	120 minutes	20
TOTAL	168,488		39,726

Total reporting burden for Atlantic BFT domestic reporting, all landings reports (including negative reports), voluntary forms, and non-governmental authorization for statistical document validation is estimated at **168,488 responses** and **39,726 hours** with an estimated opportunity cost of \$15/hour. This results in approximate labor costs of **\$595,890**.

Catch Documents, Statistical Documents, and Re-export Certificates

Burden estimates for CDs, SDs, RXCs, and validation are calculated in Table 4. The annual number of shipments by species for BFT, frozen BET, SBT, and SWO for each trade activity (import/export/re-export) for 2014 was provided by NMFS's Fishery Statistics Division

(<http://www.st.nmfs.noaa.gov/commercial-fisheries/foreign-trade/applications/monthly-product-by-countryassociation>), and is derived from U.S. Customs data.

ICCAT requires that exports (including some re-exports) associated with its SD programs are validated. This validation requirement is implemented by either tagging each fish in a shipment and maintaining the necessary records, or obtaining verification from a government official or their designee. The tagging option is currently available for Atlantic and Pacific BFT (Atlantic BFT are tagged upon landing (see above)). A FAX-in system is available for all other validation, whereby a dealer faxes a complete document to a NMFS contractor, and the document is returned to the dealer with the necessary validation stamp in place and a document number.

Table 4. International dealer trade reporting burden estimates for bigeye tuna (BET), bluefin tuna (BFT), southern bluefin tuna (SBT) and swordfish (SWO) statistical documents (SD), re-export certificates (RXC), and shipment certification. Estimates are given by species for imports (I), exports (E) and re-exports (R) and by coast (Atlantic - A, Pacific - P) for bluefin tuna.

Activity	# of CDs, SDs, or RXCs (based on # of shipments for 2014)	SD/RXC Response Hourly Burden (5 min per form) (less than 1 hour total rounded up to 1 hour)	Validation Burden (15 min. per shipment)		TOTAL HOURS
			Domestic	Foreign	
BET (frozen)					
I	7	1		2	3
E	13	1	3		4
R	13	1	3		4
BFT (Atlantic/Pacific)					
I (A)	80	7		20	27
E (A)	44	4	N/A ¹		4
R (A)	5	1	1		2
I (P)	77	7		20	27
E (P)	44	4	11		15
R (P)	5	1	1		2
SBT					
I	16	2		4	6
E	14	2	4		6
R	2	1	1		2
SWO					
I	319	27		80	107
E	43	4	11		15
R	26	3	7		10
TOTALS	708	66	42	126	234

¹: Domestically landed BFT are required to be tagged, which is used for certification of exports. Burden hours are calculated under the domestic portion of this collection (Table 3).

The total burden associated with catch and statistical documents, re-export certificates, and validation is estimated at **708 responses** and **234 hours**. Using \$15/hour as the opportunity cost, the reporting labor cost for these documents is estimated at **\$3,510**.

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 annual capital and recordkeeping/reporting costs are estimated at \$12,433 (excluding the value of burden hours discussed in Question 12).

Costs for the public resulting from this collection include the cost of submitting reports to NMFS either electronically, via U.S. mail, or via FAX. Electronic submission will not result in any additional cost to the public, except that new HMS dealers would have to purchase a computer and/or internet access if they do not already possess these as part of their regular business operations. Forms and tags are provided free of charge. Mailing costs are estimated in Table 5. In addition, non-government institutions approved for validating exports would spend approximately \$10 for a validation stamp and total costs are estimated in Table 5.

If new HMS dealers do not already have internet access and/or computers to conduct daily business, then they would need to purchase a computer and internet access in order to comply with electronic dealer reporting requirements for Atlantic BAYS, swordfish, and sharks. Because approximately 94 percent of businesses have at least one computer (Small Business Administration, 2010) with 95 percent of those possessing a computer also having internet access, most dealers are assumed to already have a computer and internet access as part of their regular business operations. The most inexpensive computer that would support the new system may have an average, one-time cost of \$615 (Worthen, 2010). Internet service rates may vary depending on a variety of factors. A report by the Small Business Administration (SBA) Office of Advocacy (2010) indicated that businesses pay an average of \$110 per month for internet service, with most paying between \$50 and \$99 per month. Therefore, if a new HMS dealer needed to purchase a computer, it would be a one-time cost of \$615. The average annual cost would be \$1,320 for internet services (assuming new dealers would pay the average monthly cost for internet services (\$110/month) to support NMFS's electronic reporting system (\$110*12 months=\$1,320/year). As such, during the first year, it would cost new HMS dealers \$1,935 (\$615 for computer + \$1,320 for internet service) for a computer and internet services, assuming that the new HMS dealer does not already have a computer and internet access as part of their regular business operations. After the first year, it would cost \$1,320 a year for internet service.

From 2007 to 2014, the total number of HMS dealers has fluctuated from 659 (in 2009) to 761 (in 2007). During that period, the largest increase in the number of HMS dealers between any two years (2009 – 2010) was 43. Therefore, to estimate the number of new HMS dealers that would need to purchase internet access and/or purchase a computer, NMFS estimated the number of new HMS dealers that would already have a computer (43 new HMS dealers * 0.94=40 dealers) and businesses with computers that already have internet access (40 new HMS dealers * 0.95 = 38 dealers). Using these estimates, there would be approximately 2 new HMS dealers

with computers, but without internet (40 - 38 = 2) and 5 without computer and internet services (43 - 38 = 5). The annualized cost of computers for new HMS dealers would be \$1,025 (\$615 * 5 dealers = \$3,075; \$3,075/3 years = \$1,025). Internet cost would be \$1,320 per year, so the average capital and start-up costs for new HMS dealers would be \$10,265 (\$1,320 * (5 + 2) dealers = \$9,240; \$9,240 + \$1,025 = \$10,265), which is rounded up to **\$10,300**.

Table 5. Costs to the public as a result of this collection, not including those associated with burden hours.

Reporting Instrument	Number of Responses	Submission		Total Cost (\$)
		Method	Cost per Item (\$)	
Atlantic BFT Daily Landing Report	3,000	FAX	0.15	450
Atlantic BFT IBQ Daily Electronic Landing Report (for landings from purse seine & longline vessels)	1,500	electronic	N/A	N/A
Atlantic BFT Landing Biweekly Report	250	mail	0.49	123
Atlantic BFT Landing Tag	3,000	N/A	N/A	N/A
HMS landings report (e-Dealer)	140,940	electronic	N/A	N/A
HMS negative reporting (e-Dealer)	7,300	electronic	N/A	N/A
Submission of e-mail address (for new HMS dealers)	43	mail, electronic, or FAX*	0.49	21
Voluntary vessel and catch form	10,445	N/A	N/A	N/A
HMS Trade Biweekly Dealer Report	2,000	Mail or electronic*	0.49	980
CDs, SDs, & RXCs	708	Mail or electronic*	0.49	347
Validation for CDs, SDs, & RXCs	Number of responses included in CDs, etc. (row above)	FAX	0.15	107
Non-governmental validation authorization (<i>total cost includes \$10/dealer for validation stamps</i>)	10	mail	0.49	105
TOTAL	169,196			2,133

*If mailed.

Total annual recordkeeping/reporting costs are now \$2,133.

Total capital costs are \$10,300.

Total recordkeeping/reporting and capital costs are = \$12,433.

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

Costs to the Federal government for this collection include the reproduction of documents and tags, and contracted validation services in addition to the initial cost to create the electronic reporting system for HMS dealers. For domestic BFT reporting, daily landing reports, tags, and biweeklies must be reproduced. Landing report books cost approximately \$5.06/book and approximately 340 (number of dealers with Atlantic BFT permits) will be needed for a total of **\$1,720**. Tags cost approximately \$.75 per tag and approximately 3,000 will be needed for a total of **\$2,250**. Since 2012, annual maintenance fees and enhancement costs associated with the electronic reporting system for Atlantic swordfish, sharks, and BAYS tunas have averaged **\$264,000** (including a major enhancement in FY 2015). For international reporting, SDs, and RXCs must be reproduced. At a cost of approximately \$.13 per copy and a total number of approximately 708 the total cost would be approximately **\$92**. The average cost of validation services is \$300 per month or approximately **\$3,600** per year.

Total cost to the Federal government for the items listed above is **\$271,662 plus staff time**.

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

Program Change: Submission of an email address for *e-Dealer* reporting responses decreased because it was a “one time” requirement for most HMS dealers. This removes 873 responses, 30 hours and \$116.

Adjustments: When available, actual 2014 data has been used to calculate the number of responses, number of respondents, and associated time and cost burden estimates. In many cases, the new estimates differ substantially from previous estimates. The primary reason for the difference is because previous estimates of the number of responses for HMS electronic landing reports (*e-dealer*), including negative reports and the voluntary vessel and catch form, utilized a method that multiplied the number of HMS dealers by the number of weekly annual reporting periods (48). In practice, all permitted swordfish, shark, and BAYS tunas dealers must submit an electronic HMS landing report for each trip that they purchase (including trips that did not land HMS). If HMS dealers did not purchase a trip during a weekly reporting period, a negative report must be filed. This change in methodology (*i.e.*, use of 2014 data) resulted in an increase of over 108,000 responses (HMS Electronic Landing Reports, Negative Reports, and Voluntary Vessel and Catch Forms). Daily BFT Landing Reports and Tagging also showed a moderate increase. Conversely, the use of 2014 data substantially decreased the number of responses for Atlantic BFT Biweekly Reports (- 8,096 responses); HMS Trade Biweekly Reports (- 4,580 responses); and, CDs, SDs, and RXCs (- 7,621 responses).

The number of respondents has increased primarily because of an increase in the number of permitted HMS dealers, and the number of actual trips landing HMS for which a Voluntary Vessel and Catch Form could be provided to a dealer.

Total annual costs have decreased primarily because currently permitted HMS dealers already must have a computer and internet access as part of their regular business operations. Thus, only

new HMS dealers that do not already possess a computer and/or internet access would be subject to these costs.

Correction: The \$10 cost for a validation stamp was overlooked in the last iteration of this ICR (included in cost description but not in total cost). This correction adds \$100 in recordkeeping/reporting costs.

Table 6. Program changes and adjustments

Program change/Adjustment Category	Previous	New Estimates	Program Adjustment	Program Change
Number of Respondents	7,061	9,585	+ 2,524	0
Number of Responses	78,942	169,196	+ 91,127	-873
Number of Burden Hours	18,700	39,960	+ 21,290	-30
Total Annual Costs	\$154,155	\$12,570	- \$151,906	-116

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

Results from data collection using the forms in this family are not planned for publication.

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.

Consistent with the last renewal of OMB approval for the BFT CD forms (OMB Control No.0648-0040), it is requested that the burden statement, expiration date, and OMB Control Number not appear on the CD form, but be provided in a cover letter to U.S. tuna dealers and importers. An example cover letter is included in this submission. The reason for this request stems from concerns expressed by other ICCAT members that U.S. CDs not differ from the format agreed to at ICCAT. Due to the confusion the PRA information presents to foreign dealers and customs officials, in the last renewal package for this collection, NMFS proposed to provide this information in a cover letter so that the form would match the generic form adopted by ICCAT. In addition, SDs and RXCs for SWO, BET, and SBT are available to dealers either from NMFS or from the internet websites of the different international commissions (ICCAT, IATTC, CCSBT, IOTC). NMFS wants dealers to be able to access the forms directly from these websites. Since all U.S. dealers will be required to have an international trade permit in order to import and/or export species requiring CDs or SDs, NMFS will be able to ensure that each dealer receives the cover letter. This will meet NMFS obligations under the PRA while reducing the likelihood of delays/problems in clearing customs in countries that are contracting parties to ICCAT.

NMFS already has a process in place for BFT CDs whereby individually numbered CDs are allocated to each dealer. The OMB Control Number is printed on each form, and the rest of the PRA information is included in a cover letter.

The BFT daily landing report is part of an optical character recognition (OCR) system which reads data from a hard copy and puts it in electronic format. Any text in addition to that required

for data fields would compromise the OCR system. However, these landing reports are distributed in a booklet form, and the booklet cover includes all the necessary PRA statements, including the OMB Control Number and expiration date.

18. Explain each exception to the certification statement.

There are no exceptions.

References

SBA. 2010. The Impact of Broadband Speed and Price on Small Business. Small Business Administration, Office of Advocacy. November, 2010. pp. 150.

Worthen, B. 2010. Rising Computer Prices Buck the Trend (Technology). Wall Street Journal. December 13, 2010. p.2.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection does not employ statistical methods.