

**SUPPORTING STATEMENT  
WESTERN ALASKA COMMUNITY DEVELOPMENT QUOTA (CDQ) PROGRAM  
OMB CONTROL NO. 0648-0269**

This action requests extension for this information collection.

**INTRODUCTION**

National Marine Fisheries Service (NMFS) manages the groundfish fisheries in the exclusive economic zone (EEZ) off Alaska. NMFS manages the groundfish and crab fisheries of the Bering Sea and Aleutian Islands management area (BSAI) under the Fishery Management Plan for Groundfish of the Bering Sea and Aleutian Islands Management Area and the Fishery Management Plan for Bering Sea/Aleutian Islands King and Tanner Crabs (FMPs). The North Pacific Fishery Management Council (Council) prepared the FMPs under the authority of the [Magnuson-Stevens Fishery Conservation & Management Act](#) (16 U.S.C. 1801 *et seq.*) as amended in 2006. The International Pacific Halibut Commission and NMFS manage fishing for Pacific halibut through regulations established under the authority of the Northern Pacific Halibut Act of 1982. Regulations implementing the FMPs appear at [50 CFR part 679](#).

The Western Alaska Community Development Quota (CDQ) Program is an economic development program associated with Federally managed fisheries in the BSAI. The CDQ Program receives apportionments of the annual catch limits for a variety of commercially valuable species in the BSAI, which are in turn allocated among six different non-profit managing organizations representing different affiliations of communities (CDQ groups). The CDQ Program redistributes a portion of commercially important BSAI fisheries species to adjacent communities. There are 65 communities participating in the program. CDQ groups use the revenue derived from the harvest of their fisheries allocations as a basis both for funding economic development activities and for providing employment opportunities. Thus, the successful harvest of CDQ Program allocations is integral to achieving the goals of the program.

**A. JUSTIFICATION**

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

The CDQ Program is an economic development program associated with Federally managed fisheries in the BSAI. The purpose of the CDQ Program is to provide western Alaska communities with the opportunity to:

- ◆ participate and invest in BSAI fisheries,
- ◆ support economic development in western Alaska,
- ◆ alleviate poverty and provide economic and social benefits for residents of western

Alaska, and

- ◆ achieve sustainable and diversified local economies in western Alaska.

The CDQ Program also is a catch share program that allocates a portion of the BSAI total allowable catch limits for specific target crab and groundfish species, a portion of the commercial catch limits for halibut, and portions of certain prohibited species catch (PSC) limits to the CDQ Program. These amounts are then further allocated among the six CDQ groups as allocations that may be transferred among the CDQ groups. The successful harvest of CDQ Program allocations is integral to achieving the goals of the CDQ Program and the community development plans of each CDQ group.

One of the most effective ways the CDQ groups provide benefits to residents of their CDQ communities is to use the CDQ allocations to create local small-scale commercial fisheries that provide opportunities for residents of the CDQ communities to earn income from the sale of the commercially harvested fish. Certain Federal regulations have CDQ groups receive royalties from the successful harvest of CDQ by commercial fishing companies, as well as access to employment and training opportunities for their communities' residents. Royalties and income from CDQ harvesting activities are used to fund economic development projects in CDQ communities. Based on the most recently available information, the CDQ groups received approximately \$60 million in royalties from the harvest of their CDQ allocations in 2009.

**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 applicable NOAA Information Quality Guidelines.**

**a. CDQ Vessel Registration System.**

The Western Alaska Community Development Quota (CDQ) vessel registration system provides a means for a CDQ representative to register catcher vessels greater than 32 ft length overall (LOA) and less than or equal to 46 ft LOA using hook-and-line gear that will be exempt from the requirement to obtain and carry an License Limitation Program (LLP) license under regulations at 50 CFR part 679. The CDQ representative may add vessels to the CDQ vessel registration list at any time by logging into the CDQ vessel registration system through eFISH.

The CDQ representative must register each hook-and-line catcher vessel less than or equal to 46 ft LOA to obtain the exemption from the LLP license requirements. Vessels that are less than or equal to 32 ft are already exempt from the LLP requirements, but still must be registered. CDQ vessel registration is accomplished through the NMFS Alaska Region Web site, eFISH, at <https://alaskafisheries.noaa.gov/webapps/efish/login>.

The CDQ group representative must log into the online system using the group's existing NMFS ID and password. Use of the NMFS Person ID and password certifies that all information is

true, correct, and complete. The CDQ group representative may add vessels to or remove vessels from the CDQ vessel registration system at any time during the year by logging into the online system. Through the CDQ registration system, each registered vessel is added to the CDQ vessel registration list on the NMFS Alaska Region Web site at <http://alaskafisheries.noaa.gov>. Once registered, a vessel will remain on the CDQ vessel registration list until removed by a CDQ representative.

The CDQ vessel registration system will provide a letter documenting that the vessel is eligible for the LLP exemption while groundfish CDQ fishing. The CDQ representative must provide a copy of the LLP exemption letter to each vessel operator. The vessel operator must maintain a legible copy of the LLP exemption letter on board at all times while that vessel is groundfish CDQ fishing. The LLP exemption letter documents that the vessel is eligible for the LLP exemption while groundfish CDQ fishing.

The CDQ vessel registration system will provide a printable confirmation that a vessel has been removed from the CDQ vessel registration list. Once a vessel is removed from the CDQ vessel registration list, that vessel is no longer exempt from the LLP requirements, even if the operator was still in possession of the LLP exemption letter. To remove a registered vessel from the CDQ vessel registration list, a CDQ group representative must:

- ◆ Provide notice to the operator of the registered vessel that the vessel is being removed from the vessel registration list;
- ◆ Certify at the time of removal that the vessel operator was given notice by the CDQ group that the vessel was going to be removed from the list; and
- ◆ Certify that the vessel was not groundfish CDQ fishing at the time of removal.

A vessel that is successfully removed from the CDQ vessel registration list is no longer exempt from the LLP requirements.

CDQ Vessel Registration must be submitted online through eFISH at:  
<https://alaskafisheries.noaa.gov/webapps/coopaccounts/Login>

Additional information is available from NMFS Sustainable Fisheries Division by telephone at 907-586-7228.

#### **CDQ Vessel Registration for LLP Exemption for Small Hook and line Vessels**

##### Type of Action

Indicate whether registration or removal of vessel

##### Block A --CDQ group information

Group Name or initials

CDQ group number.

Business Telephone Number

Business Fax Number

Business e-mail address  
 Representative's name and signature

**Block B – Vessel Information**

Vessel Name:  
 ADF&G Vessel Registration Number  
 Federal Fisheries Permit Number

**Block C – Vessel Owner Information**

Primary Owner's Name  
 Primary Owner's Permanent Business Address  
 Business Telephone Number  
 Business Fax Number  
 Business e-mail address  
 Name of managing company (if any)

**Block D – Certification**

operator was given notice that the vessel is being removed from the CDQ vessel registration list  
 the vessel is not groundfish CDQ fishing at this time.

Name of CDQ representative:  
 Signature of CDQ representative:  
 Date of Signature

<b>CDQ Vessel Registration, Respondent</b>	
<b>Number of respondents</b>	<b>6</b>
<b>Total annual responses</b>	<b>6</b>
Frequency of response = 1	
<b>Total burden hours (1.50)</b>	<b>2 hr</b>
5 minutes register x 9 = 45minutes	
5 minutes print letter x 9 = 45minutes	
<b>Total personnel cost (\$37/hr x 2 hr)</b>	<b>\$74</b>
<b>Total miscellaneous costs</b>	<b>0</b>
Submit online = 0	

<b>CDQ Vessel Registration, Federal Government</b>	
<b>Total annual responses</b>	<b>0</b>
<b>Total burden hours</b>	<b>0</b>
<b>Total personnel cost</b>	<b>0</b>
<b>Total miscellaneous cost</b>	<b>0</b>

**b. Groundfish/Halibut CDQ and Prohibited Species Quota (PSQ) Transfer Request**

This form should be completed and signed by a representative from each CDQ group proposing to transfer annual amounts of groundfish and halibut CDQ and Prohibited Species Quota (PSQ) except Bering Sea Chinook salmon

The halibut Prohibited Species Catch (PSC) allocation to the CDQ Program is managed as halibut Prohibited Species Quota (PSQ) that are transferable only among the CDQ groups. The CDQ Program is a catch share program that allocates a portion of the BSAI total allowable catch for specific target crab and groundfish species, a portion of the commercial catch limits assigned by the International Pacific Halibut Commission, and associated PSC limits to the CDQ Program and then among the CDQ groups as transferable allocations. The small vessel halibut PSC limit

is created by a transfer from a CDQ group's halibut PSQ to its small vessel halibut PSC limit.

Using the Groundfish/Halibut CDQ and PSQ Transfer Request, a CDQ group may transfer halibut PSQ from its primary halibut PSQ to its small catcher vessel halibut PSC limit. CDQ groups do not have to transfer any halibut PSQ to this account. Each CDQ group would, in collaboration with NMFS managers, decide the appropriate amount (if any) of halibut PSQ to transfer to the small catcher vessel halibut PSC limit based on the amount of groundfish CDQ it wants to allocate to the small hook-and-line catcher vessel fishery and the expected use of halibut PSC in those fisheries.

The transfer is not effective until approved by NMFS. In reviewing a request to transfer remaining halibut from the small vessel halibut PSC limit back to the CDQ group's halibut PSQ, NMFS will consider the status of CDQ fisheries through the end of the year and anticipated halibut PSC rates for any remaining groundfish CDQ fishing by vessels managed under the small vessel halibut PSC limit for the requesting CDQ group.

The completed transfer request may be submitted to NMFS via one of the following means:

By fax 907-586-7465

By mail Sustainable Fisheries Division  
NMFS Alaska Region  
PO Box 21668  
Juneau, AK 99802-1668

Online [eFISH](https://alaskafisheries.noaa.gov/webapps/efish/login)  
<https://alaskafisheries.noaa.gov/webapps/efish/login>

For questions or additional information, call NMFS Sustainable Fisheries at 907-586-7228.

**Groundfish/Halibut CDQ and PSQ transfer request**

**Block A --Transferring CDQ group information**

Group Name or initials  
CDQ group number.  
Business Telephone Number, Business Fax Number, and Business e-mail address  
Representative's name and signature

**Block B -- Receiving CDQ group information**

Group name or initials  
CDQ group number  
Business Telephone Number, Business Fax Number, and Business e-mail Address  
Representative's Name and signature

**Block C -- CDQ amount transferred.**

Species name or species category  
Area  
Amount  
Groundfish (to the nearest 0.001 mt)

Halibut (lb net weight)

Block D -- PSQ amount transferred.

Species name or species category

Crab Zone

Amount (number of animals)

Block E -- Halibut PSQ to Halibut PSC Transfers

Specify whether the halibut PSQ amount entered should be converted to halibut PSC

Block F -- Transfer year

Block G -- Certification of transferor

Non-electronic submittal

Transferor's representative printed name, signature, and date signed

Electronic submittal

Transferor's representative must log into the system and create a transfer request

Transferor's NMFS ID, password, and Transfer Key

Certification of transferee

Non-electronic submittal

Transferee's representative printed name, signature, and date signed

Electronic submittal

Transferee's representative must log into the system and complete a transfer request

Transferee's NMFS ID, password, and Transfer Key

<b>CDQ or PSQ transfer request, Respondent</b>	
<b>Number of respondents</b>	<b>12</b>
6 transferors	
6 transferees	
<b>Total annual responses</b>	<b>24</b>
Frequency of response = 2	
<b>Total burden hours</b> (35 minutes x 24)	<b>14 hrs</b>
<b>Total personnel cost</b> (\$37/hr x 14 hr)	<b>\$518</b>
<b>Total miscellaneous costs</b>	<b>\$0</b>
Online (0 x 12 = 0)	

<b>CDQ or PSQ transfer request, Federal Government</b>	
<b>Total annual responses</b>	<b>24</b>
<b>Total burden hours</b>	<b>8 hrs</b>
Time per response = 20 minutes	
<b>Total personnel cost</b> (\$37/hr x 8)	<b>\$296</b>
<b>Total miscellaneous cost</b>	<b>0</b>

**c. Application for Approval of Use of Non-CDQ Harvest Regulations**

NMFS interprets the statement “in a manner no more restrictive than for other participants in the applicable sector” from the Magnuson-Stevens Act to mean that the fishery management regulations associated with regulating the harvest of CDQ allocations should be no more costly, complex, or burdensome than those that apply to comparable non-CDQ sectors managed under IFQs or cooperative allocations. Vessels that are participating in a voluntary fishery cooperative in a non-CDQ sector are authorized to conduct groundfish CDQ fishing under the same regulations that apply while such vessels are used to directed fish in the non-CDQ fisheries and

are not required to comply with the CDQ operational regulations at § 679.32(c)(3)(i).

An authorized representative of a CDQ group, an association representing CDQ groups, or a voluntary fishing cooperative may submit an application to use alternative CDQ harvest regulations. A completed application consists of an application form and a copy of the cooperative contract or an affidavit.

An application requesting approval for the use of non-CDQ harvest regulations may be submitted to NMFS at any time. The use of alternative CDQ harvest regulations is effective as of the date of NMFS approval. The approval is effective until the requesting entity withdraws its application, or until there is a change in the membership of the voluntary cooperative, whichever occurs first.

The entity that received approval for use of non-CDQ harvest regulations must promptly notify NMFS of any changes in the voluntary fishing cooperative's membership. Amendments to an approved application to use alternative CDQ harvest regulations may be submitted to NMFS at any time.

The completed application may be submitted by one of the following methods:

By fax to: 907-586-7465

By mail to: Sustainable Fisheries Division  
NMFS Alaska Region  
PO Box 21668  
Juneau, AK 99802-1668

For questions or additional information, call NMFS Sustainable Fisheries at 907-586-7228.

**Application for Approval of Use of Non-CDQ Harvest Regulations**

Indicate type of application: new or amendment

**Block A – Voluntary Fishery Cooperative Information**

Name of Voluntary Cooperative

Name of Cooperative's Representative

Permanent Business Mailing Address

Business Telephone Number, Business Fax Number, and Business E-mail Address

**Block B – Applicant Information**

Check here if applicant is the same as the entity/person identified in Block A

**If YES**, proceed to Block C

Name of Organization

Name of Organization's Representative

Permanent Business Mailing Address:

Business Telephone Number, Business Fax Number, and Business E-mail Address

Block C– Certification

Printed Name and Signature of Representative and Date Signed

Block D. Cooperative Vessel Information

Vessel Name

Federal Fisheries Permit No.

License Limitation Program No.

**Attachment**

Voluntary fishing cooperative contract

Name of the authorized representative

Printed names and signatures of each vessel owner that is a party to the cooperative

Vessel name, FFP number, and LLP license number for each vessel managed under the cooperative

Target species, processing mode, gear types, and management area(s) associated with cooperative’s Federal fishing operations

If voluntary fishing cooperative contract does not contain this information, the applicant also must submit a written affidavit that provides all of the information that is not included in the cooperative contract

<b>Request to Use Non-CDQ Harvest Regulations, Respondent</b>	
<b>Number of respondents</b>	<b>1</b>
<b>Total annual responses</b>	<b>1</b>
Frequency of response = 1	
<b>Total burden hours</b> (5 hr x 1)	<b>5 hr</b>
<b>Total personnel cost</b> (\$37/hr x 5 hr)	<b>\$185</b>
<b>Total miscellaneous costs</b> (6.05)	<b>\$6</b>
Fax (\$6 x 1 = 6)	
Copy (0.05 x 1 = 0.05)	

<b>Request to Use Non-CDQ Harvest Regulations, Federal Government</b>	
<b>Total annual responses</b>	<b>1</b>
<b>Total burden hours</b>	<b>1 hr</b>
Time per response (1 hr x 1)	
<b>Total personnel cost</b> (\$37/hr x 1)	<b>\$37</b>
<b>Total miscellaneous cost</b>	<b>0</b>

**d. Appeals**

An appeals process provides for issue of an initial administrative determination (IAD). The IAD describes NMFS’ disapproval if the application is incomplete, the voluntary cooperative does not represent a majority of the vessels participating in the sector, or the CDQ harvest regulations are not more restrictive than the non-CDQ regulations for the applicable sector.

The Alaska Office of Administrative Appeals is now part of the National Appeals Office (NAO). NAO operates out of NOAA Fisheries’ headquarters in Silver Spring, MD and no longer maintains an office in NOAA Fisheries’ Alaska Regional Office. NAO is charged with processing appeals that were filed with the Office of Administrative Appeals, Alaska Region.

An applicant who receives an IAD disapproving an application may file a written appeal. Appeals must be in writing and must be mailed to the  
Chief, National Appeals Office



NOAA Fisheries  
 1315 East-West Hwy.  
 Silver Spring, MD 20910

Facsimile: (301) 713-2384.

The appeal must be filed not later than 60 days after the date the IAD is issued.

For each appeal, the NAO provides the decision to the appellant and relevant persons within NOAA. The NAO may publish its decisions on the Internet. The NAO maintains a database of current and historical caseload data and responds to requests for statistical data about appeals. NAO is responsible for drafting, publishing and applying procedural regulations consistent with due process requirements.

<b>Appeals, Respondent</b>	
<b>Number of respondents</b>	<b>1</b>
<b>Total annual responses</b>	<b>1</b>
Frequency of response = 1	
<b>Total burden hours</b> (4 hr x 1)	<b>4 hr</b>
<b>Total personnel cost</b> (\$37/hr x 4 hr)	<b>\$148</b>
<b>Total miscellaneous costs (0.95)</b>	<b>\$1</b>
Mail (\$0.90 x 1 = 0.90)	
Copy (0.05 x 1 = 0.05)	

<b>Appeals, Federal Government</b>	
<b>Total annual responses</b>	<b>1</b>
<b>Total burden hours</b>	<b>4 hr</b>
Time per response = 4 hr	
<b>Total personnel cost</b> (\$100/hr x 4)	<b>\$400</b>
<b>Total miscellaneous cost</b>	<b>0</b>

It is anticipated that the information collected will be disseminated to the public or used to support publicly disseminated information. 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. Prior to dissemination, the information will be subjected to quality control measures and a 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 CDQ or PSQ transfer request and Application for Approval of Use of Non-CDQ Harvest

Regulations are available in a fillable format on the NMFS Alaska Region website at <https://alaskafisheries.noaa.gov/fisheries-applications>. The Online Registration for Groundfish CDQ Fisheries for Exempted Vessels Using Hook & Line Gear must be submitted online through eFISH.

**4. Describe efforts to identify duplication.**

No duplication exists with other information collections.

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

The entities directly regulated are the six CDQ groups that participate in the halibut, sablefish, groundfish, and pollock CDQ fisheries in the BSAI. CDQ groups are considered to be small entities under the RFA's categorization of small, non-profit organizations; they are not significantly impacted.

In addition, a voluntary fishing cooperative consisting of vessels that participate in a non-CDQ sector as well as conduct groundfish CDQ fishing is not considered a small business.

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

The purpose of the CDQ Program is to provide Western Alaska communities a method to support regionally based, commercial seafood or other fisheries-related businesses. Under the CDQ Program, 65 eligible Western Alaska communities have organized into six separate CDQ groups. Without this program, these small communities would be economically devastated.

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

Not Applicable.

**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 July 16, 2016 (81 FR 45133) solicited public comments on the information collection. No comments were received.

A questionnaire requesting comments was prepared and submitted to representatives of each of

the six CDQ groups as well as the fishing cooperative whose vessels conduct CDQ and non-CDQ fishing. The comments and responses are presented below. The questionnaire is appended.

**Comment 1**

Sorry I missed the Friday deadline but I really didn't have any comments to add. "No Comment"

**Response**

NMFS acknowledges the comment.

**Comment 2**

No comment from me. Thank you.

**Response**

NMFS acknowledges the comment.

**Comment 3**

Couple of quick questions for you. I don't recall seeing the first form before. When would we have used that one? I can't think of a time when a CDQ group might have done that. Is it an older form that maybe we haven't been using post-2006 when the no-less-restrictive language kicked in?

**Response**

This was a result of the Coast Guard bill, where Congress ruled that CDQ fisheries cannot be more restrictive than comparable non-CDQ fisheries. This gives them an inseason means of changing the regulations to make it follow the statute. I think it is largely moot, because we have worked pretty hard to make sure the CDQ fisheries are not more restrictive.

But, this is still in regulation, so NMFS will keep the form in case a situation comes up where the CDQ fisheries are more restrictive than comparable non-CDQ fisheries.

**Comment 4**

The third form looks like it goes to the new CDQ small boat fishery which we have not yet participated in, is that correct?

**Response**

The commenter is correct. This form is new and is to be used for the new CDQ small boat fishery.

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

No payment or gift will be provided under this program.

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

As stated on the transfer form and in the regulations, the information collected is confidential under section 402(b) of the Magnuson-Stevens Act. It is also confidential under [NOAA Administrative Order 216-100](#), which sets forth procedures to protect confidentiality of fishery statistics.

All information collected is part of a system of records: NOAA #19, published April 17, 2008.

**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.**

Information collected for the CDQ Program does not include information of a private or sensitive nature.

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

Estimated total unique respondents: 13. Estimated total responses: 32. Estimated total burden: 25 hr. Estimated total personnel cost: \$925.

**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).**

Estimated total miscellaneous costs: \$7.

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

Estimated total responses: 26. Estimated total burden: 13 hr. Estimated total personnel cost: \$733, based on \$37/hr, the average wage equivalent to a GS-9 employee in Alaska, including COLA. Estimated total miscellaneous costs: \$0.

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

No program changes or adjustments are made in this action.

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

The information obtained from this collection is not expected to be published for statistical use.

**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**

This collection does not employ statistical methods.

## APPENDIX

Hello

It is time for NMFS to renew the Alaska CDQ Program information collection with the Office of Management & Budget (OMB) for another 3 years.

A *Federal Register* Notice was published on July 12, 2016 ([81 FR 45133](#)) to solicit public comments. Comment period ended September 12, 2016.

Here is another chance to offer suggestions to improve this program. Could you please help us by taking a few moments to provide comments on this program and on the forms you are familiar with in this collection: (click on the blue text to see the form)

- ◆ [Application for Approval of Use of Non-CDQ Harvest Regulations](#)
- ◆ [Groundfish/Halibut CDQ and Prohibited Species Quota \(PSQ\) Transfer Request](#)
- ◆ [CDQ Vessel Registration for LLP Exemption for Small Hook & Line Catcher Vessels](#)

Please let me know your views on the following:

- ◆ Availability of data,
- ◆ Frequency of collection,
- ◆ Clarity of instructions and record keeping,
- ◆ Disclosure or reporting format,
- ◆ Data elements to be recorded, disclosed, or reported, and
- ◆ Accuracy of time estimates

and comment on any other aspect of this information collection.

By the way, if you really have no comments, just say "no comment", since this will count as a comment!

Call me at [907-586-7008](tel:907-586-7008) if you have any questions or need more information. Thanks in advance for your help.

Please e-mail your responses to me at [patsy.bearden@noaa.gov](mailto:patsy.bearden@noaa.gov) by Friday, September 23, 2016.

Respectfully,

Patsy A. Bearden  
Sustainable Fisheries Division  
NMFS Alaska Region