SUPPORTING STATEMENT
ALASKA INTERAGENCY ELECTRONIC REPORTING SYSTEM (IERS)
OMB CONTROL NO. 0648-0515

INTRODUCTION

This action is a request for extension of an existing collection.

National Marine Fisheries Service (NMFS), Alaska Region manages the groundfish and crab fisheries in the exclusive economic zone (EEZ) of the Bering Sea and Aleutian Islands Management Area (BSAI) and the groundfish fisheries of the Gulf of Alaska (GOA) under fishery management plans (FMPs) for the respective areas. The North Pacific Fishery Management Council prepared, and NMFS approved, the FMPs under the authority of the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C. 1801 et seq. Regulations implementing the FMPs appear at 50 CFR parts 679 and 680.

The collection of reliable data is essential to the effective conservation, management, and scientific understanding of the fishery resources. NMFS requires vessels and processors participating in federally managed groundfish and crab fisheries off Alaska to provide information on catch, production, effort, and other information necessary for conservation and management of the fisheries.

The Interagency Electronic Reporting System (IERS) is a fisheries data collection system that enables the management of commercial fisheries off Alaska and is supported through a partnership among NMFS, Alaska Department of Fish and Game (ADF&G), and the International Pacific Halibut Commission (IPHC). The IERS provides the Alaska fishing industry with a consolidated, electronic means of reporting commercial fish and shellfish information to multiple management agencies. The agencies worked together to implement a system that enables the seafood industry to report landings, production, and effort to fishery management agencies through a single application.

When compared with paper forms and conventional logbooks, the IERS is a more convenient, accurate, and timely method of fisheries reporting. Some of the benefits of the IERS include improved data quality, automated processing of data, improved process for correcting or updating information, availability of more timely data for fishery managers, and reduction of duplicative reporting of similar information to multiple agencies. (For more information on the goals of the IERS and progress in achieving those goals, see: https://elandings.atlassian.net/wiki/download/attachments/74809357/IERSReviewNEIFinal.pdf?api=v2.)

Additionally, the IERS provides continuous online access to individual accounts by participants. These provisions make recordkeeping and reporting requirements less burdensome by allowing participants to more efficiently monitor their accounts and fishing activities.

A. JUSTIFICATION

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

Information collected through the IERS promotes the goals and objectives of fishery management plans, the Magnuson-Stevens Fishery Conservation and Management Act, and other applicable laws. NMFS must have the best available biological and socioeconomic information with which to carry out its responsibilities for conserving and managing groundfish resources, as well as other fish resources, such as crab, halibut, and salmon, that are incidentally caught in the groundfish fishery.

Through the IERS, NMFS collects information on landings, production, and effort for groundfish and crab species to support the agency's management responsibilities. In general, landing reports document the harvest of fish and shellfish that is sold, discarded, or retained by the fisherman; production reports provide information on the amount of processed product that is generated by processors; and logbooks provide information about where and when fishing effort occurs. Information collected in the IERS is used for making inseason and inter-season management decisions that affect the fishery resources and the fishing industry that utilizes them. Collecting information from fishery participants is necessary in order to promote successful management of groundfish, crab, Pacific halibut, and salmon resources.

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.

All U.S. vessels harvesting fish in the EEZ and processors receiving EEZ fish are required to hold a Federal permit and thus comply with recordkeeping and reporting requirements. Information is entered into the IERS by participants of the commercial fishing industry, which are collectively referred to as the "Users" of the system. A User, for purposes of the IERS, means an individual representative of a Registered Buyer; a Registered Crab Receiver; a mothership or catcher/processor that is required to have a Federal Fisheries Permit (FFP) under § 679.4; a shoreside processor or Stationary Floating Processor (SFP) and mothership that receives groundfish from vessels issued an FFP under § 679.4; any shoreside processor or SFP that is required to have a Federal processor permit under § 679.4; and his or her designee(s).

Users enter information electronically into the IERS using three main components; depending on their internet access and transmission capability (see https://alaskafisheries.noaa.gov/fisheries/electronic-reporting for more information):

- eLandings provides web-based access for shoreside and stationary floating processors to submit landings and production information. The web system is also used by some catcher/processors and motherships who have access to the internet to submit their data.
- seaLandings is a fishery harvest reporting software program that functions without constant Internet connectivity and is installed on computer workstations. The seaLandings interface targets at-sea vessels with limited access to the web (typically for catcher/processors and motherships which report at sea). Landings, production, and eLog

information can be sent from seaLandings via direct transmission (a report file is zipped up and sent over the Internet and processed behind the scenes) or via email. The file is attached to an email that is sent to the email server, elecrep@noaa.gov.

- tLandings is a USB-installed program that tenders with no web access can use to enter landings information.

There are four information collections through the IERS: 1) registration, 2) landing reports, 3) production reports, and 4) electronic logbooks (eLogs). In some cases there are several types of forms within a collection; for example, there are two types of production reports: shoreside production report and at-sea production report. Table 1 and the following sections provide more detail on each of the collections and the associated forms.

Table 1. Four information collections in the IERS and the associated forms.

Collection Title	Form	Regulation Section	Who Submits	When Submitted	How Submitted
Registration	eLandings Registration	679.5(e)(2)	New eLandings Users	One instance, prior to using the eLandings system	Electronic
Landing Reports (LR)	Shoreside Processors LR	679.5(e)(5)	The manager of a shoreside processor, SFP, or community quota entity floating processor that receives groundfish from a catcher vessel issued an FFP under § 679.4 and that is required to have an FPP under § 679.4(f)	By 1200 hours, Alaska local time (A.l.t.), of the day following completion of the delivery	Electronic
	Registered Buyer LR and Manual LR (as paper back up)	679.5(e)(7)	A person who is issued a Registered Buyer permit under § 679.4(d)(3) and who receives individual fishing quota (IFQ) halibut or IFQ sablefish from an IFQ permit holder or who receives community development quota (CDQ) halibut.	Within six hours after all IFQ halibut, CDQ halibut, and IFQ sablefish are offloaded.	Electronic and Paper back-up
	Registered Crab Receiver LR and Manual LR (as paper back up)	679.5(e)(8)	A person who is issued an RCR permit under § 680.4(i) and who receives IFQ crab from a crab IFQ permit holder or crab IFQ	Within 6 hours after all crab is offloaded from the harvesting vessel.	Electronic and Paper back-up

			hired master.		
	Out-of-State LR	679.5(e)(5) and 679.5(e)(7)	Non-Alaska shoreside processors that receive groundfish harvested in the Bering Sea, Aleutian Islands, or the GOA from catcher vessels.	By 1200 hours, A.l.t., of the day following the delivery.	Fax
	Mothership LR	679.5(e)(6)	The operator of a mothership that is issued an FFP under § 679.4(b) that receives groundfish from a catcher vessel required to have an FFP under § 679.4	By 2400 hours, A.l.t., of the day following the delivery.	Electronic
	Catcher/ Processor LR	679.5(e)(13)	The operator of a catcher/processor in the partial observer coverage category under § 679.51(a)(3) must submit a catcher/processor landing report to NMFS for each fishing trip.	By 2400 hours A.l.t., on the day after the end of the fishing trip.	Electronic
	Tender LR	679.5(e)(14)	The operator of a tender vessel taking delivery of groundfish that is required to be reported to NMFS on a landing report and the User at the shoreside facility that receives the transferred fish.	By 1200 hours, A.l.t., of the day following completion of the delivery.	Electronic
Production Reports	Shoreside Processor PR	679.5(e)(9)	The manager of a shoreside processor or SFP that is required to have a Federal Processing Permit (FPP) under § 679.4(f)	By 1200 hours A.l.t., each day to record the previous day's production	Electronic
	At-Sea PR	679.5(e)(10)	The operator of a catcher/processor that is issued an FFP under § 679.4 and that harvests groundfish	By 2400 hours A.l.t., each day to record the previous day's production	Electronic
Electronic	Catcher	679.5(f)(1)(i)	The operator of a	By 2400 hours	Electronic

Logbooks (eLog)	Vessel eLog		catcher vessel using longline and pot gear or trawl gear	A.l.t., each day to record the previous day's hauls	
	Catcher/ Processor eLog	679.5(f)(1)(ii)	The operator of a catcher/processor using longline and pot gear or trawl gear	By 2400 hours A.l.t., each day to record the previous day's hauls	Electronic
	Mothership eLog	679.5(f)(1)(v)	The operator of a mothership receiving groundfish	By 2400 hours A.l.t., each day to record the previous day's hauls	Electronic

a. Registration

Before using the IERS, a User must request authorization to use the system, create a unique User ID, and obtain a password. This information is necessary to identify the participant and to provide authorization for the participant to use eLandings.

The Registration is completed using online at the eLandings registration page available at: https://elandings.alaska.gov/elandings/Register. The User must enter the following information:
- Operation type
- Operation name
- ADF&G processor code
- Federal permit numbers:
  - If a shoreside processor or SFP, enter FPP number
  - If a catcher vessel, catcher/processor, or mothership, enter FFP number
  - If a Registered Buyer, enter the Registered Buyer permit number
  - If a Registered Crab Receiver, enter the RCR permit number
- Port code
- Vessel ADF&G registration number (if applicable)
- Vehicle license number (if applicable)
- Primary User:
  - If user is already registered, enter User ID and password.
  - Otherwise, enter all data including User ID and password, and a new userID will be created:
    - User ID
    - Password
    - Confirm Password
    - Company name
    - User name
    - City and state
    - Business telephone number, fax number, and e-mail address
    - Security question

- ▪ The answer to the security question

Entering information in the eLandings registration form generates an Operation Authorization Form that needs to be printed, signed, and submitted to NMFS to enable the operation. The User's signature on the registration form means that the User agrees to the following terms:
- Use eLandings access privileges only for submitting legitimate fishery landing reports, production reports, and eLogs;
- Safeguard the User ID and password to prevent their use by unauthorized persons; and
- Ensure that the User is authorized to submit landing reports, production reports, and eLogs for the permit number(s) listed.

The User must submit the signed original Operation Authorization Form using one of three methods:
- Mailing it to NMFS Sustainable Fisheries Division, P. O. Box 21668, Juneau, AK 99802-1668
- Faxing it to (907) 586-7131 Attn: eLandings Registration
- Delivering it to the NMFS Sustainable Fisheries office at 709 W. 9th Street, Suite 401, Juneau, AK 99801

Upon receipt of the registration information, NMFS verifies that all of the required information is provided in the correct format. NMFS will email confirmation to indicate that the User is registered, authorized to use eLandings, and that the User ID and User's account are enabled.

This process is completed one time for each new operation with an estimated 17 respondents per year (see Table 4). Once registered, the User is not required to register again unless ownership changes. New ownership requires a new Federal permit and ADF&G processor code.

b. Landing Reports

Information collected on landing reports is needed to identify the fishery participants, to monitor the deliveries of fish to the fish processing facilities, as well as record discard and disposition of species, and for management of groundfish and shellfish fisheries. There are seven types of landing report forms that are required of Users in particular situations and guided by different data entry time limits. The following sections provide more details on landing reports, and Table 2 summarizes the data elements that are completed on each of the landing report forms. Once data are entered and submitted, Users receive a printed fish ticket and/or an IFQ landing report as a receipt.

Table 4 (under Question 12) provides an estimate of the number of respondents and annual responses for landing reports.

i. Shoreside Processor Landing Report (non-IFQ)

Shoreside Processor Landing Reports are required in groundfish fisheries per 50 CFR 679.5(e)(5). NMFS requires all Federal Processing Permit (FPP)-holding shoreside or stationary floating processors to use eLandings or other NMFS-approved software to submit landing reports for all groundfish species.

Users must submit shoreside processor landing reports containing the information listed in Table 2 for each groundfish delivery from a specific vessel by 1200 hours A.l.t., of the day following completion of the delivery. If the landed scale weight is not available by this deadline, the user must transmit an estimated weight for each species by 1200 hours, A.l.t., of the day following completion of the delivery and must submit a revised landing report with the landed scale weight for each species by 1200 hours, A.l.t., of the third day following completion of the delivery.

ii. Registered Buyer Landing Report for IFQ/CDQ

Registered Buyer Landing reports are required for each halibut and sablefish IFQ landing per 50 CFR 679.5(e)(7). Registered Buyers electronically submit landing reports for IFQ species online using eLandings or eFISH. If the eLandings or eFISH systems and/or the Internet are unavailable, Registered Buyers must complete the Manual Landing Report form. The Manual Landing Report for Halibut & Sablefish IFQ/CDQ is available online https://alaskafisheries.noaa.gov/sites/default/files/ifqlandrpt.pdf. The manual landing report must be used until network connections are restored. When the network is restored, the User must enter this same information into eLandings.

Registered Buyer Landing reports must be submitted within six hours after all IFQ halibut, CDQ halibut, and IFQ sablefish are offloaded from a specific vessel and prior to shipment or transfer of said fish from the landing site. Table 2 details the information that is required on a Registered Buyer Landing Report.

iii. Registered Crab Receiver Landing Report for IFQ/CDQ

NMFS requires all Registered Crab Receivers to use eLandings or other NMFS-approved software to submit Registered Crab Receiver Landing reports for each crab IFQ landing per 50 CFR 679.5(e)(8). If the eLandings system and/or the Internet is unavailable, Registered Crab Receivers must complete a manual landing report. The Crab Manual Landing Report form is available online: https://alaskafisheries.noaa.gov/sites/default/files/crabmanualanding.pdf. The manual landing report must be used until network connections are restored. When the network is restored, the User must enter this same information into eLandings.

Registered Crab Receiver Landing reports must be submitted within six hours after all crab is offloaded from the vessel. Table 2 details the information that is required on a Registered Crab Receiver Landing Report.

iv. Out of State Landing Report

If a shoreside processor or Registered Buyer is not located in Alaska, the manager or permit holder must complete and submit to NMFS an Out-of-State Landing Report for each shipment of groundfish, halibut, or sablefish. The Registered Buyer or manager of a shoreside processor must enter information from a specific vessel by noon of the day following completion of the delivery and submit the completed Out-of-State Landing Report to NMFS by fax to 907-586-7131.

The Out-of-state Landing Report form is available online. https://alaskafisheries.noaa.gov/sites/default/files/outofstateelandings.pdf and Table 2 details all of the information that is required on an Out-of-State Landing Report Landing Report.

v. Mothership Landing Report

NMFS requires all motherships that hold a FFP to submit mothership landing reports per 50 CFR 679.5(e)(6). Table 2 lists the information that operators of a mothership enter on a mothership landing report, which must be submitted by 2400 hours, A.l.t., of the day following the delivery from the catcher vessel.

vi. Catcher/Processor Landing Report

The operator of a catcher/processor placed in the partial observer coverage category must submit a catcher/processor landing report to NMFS for each fishing trip conducted while that catcher/processor is in the partial observer coverage category. Table 2 details the information that is required on a catcher/processor landing report.   A catcher/processor landing report can be generated in eLandings or seaLandings through a feature called the consolidated report that merges all of the information from the At-sea Production Reports for the period the vessel operator defines as the fishing trip.

NMFS uses information from the catcher/processor landing report to link catch data with observer data, to determine how to appropriately assign at-sea discard rates and PSC rates to unobserved catcher/processors in the partial observer coverage category, and to monitor compliance with the requirement for catcher/processors placed in the partial observer coverage category to log all fishing trips in the Observer Declare and Deploy System (ODDS).

The operator of a catcher/processor placed in the partial observer coverage category must submit a catcher/processor landing report to NMFS by 2400 hours, A.l.t., on the day after the end of the fishing trip. For purposes of the catcher/processor landing report, fishing trip means the period of time that begins when the vessel departs a port to harvest fish until the vessel returns to port and offloads all processed product.

vii. Tender Landing Report

The operator of a tender vessel taking a delivery of groundfish that is required to be reported to NMFS on a landing report under 50 CFR 679.5(e)(5), must submit a tender landing report per 50 CFR 679.5(e)(14). The operator must use tLandings to enter information about each landing of groundfish to a tender. The tLandings application is used locally on the tender and was developed for tender vessels without web access. Tender landing reports are created electronically and stored on a USB drive. Table 2 lists the information that is required on a Tender Landing Report. The tLandings application creates a printable fish ticket, which is printed on board the tender vessel and signed by the delivering catcher vessel operator.

Once the tender trip is completed, the USB drive is provided to the processor for upload into the eLandings database and submission to NMFS. The tender vessel operator must make the USB drive containing the tender landing report information available to the processor upon commencement or offload of groundfish from the tender vessel to the processor. The processors must upload the tLandings information by 1200 hours, A.l.t., of the day following the completion of the tender offload.

Table 2. Data fields completed on Landing Reports. A check-mark (✔) indicates that the field is submitted by the user on the form.

Data Field	Landing Report (LR) Type						
	Shoreside Processor LR	Registered Buyer LR	Registered Crab Receiver LR	Out-of-State LR	Mothership LR	Catcher/ Processor LR	Tender LR

ADF&G vessel number	✔	✔	✔	✔	✔	✔	✔
ADF&G vessel gear code	✔	✔	✔	✔	✔	✔	✔
Crew size	✔	✔	✔	✔	✔	✔	✔
Number of observers onboard	✔	✔	✔	✔	✔	✔	✔
Date fishing began, Days fished, Date of landing	✔	✔	✔	✔	✔	✔	✔
Number of observers onboard	✔	✔	✔	✔	✔	✔	✔
Date fishing began, Days fished, Date of landing	✔	✔	✔	✔	✔	✔	✔
ODDS trip number (if applicable)	✔	✔				✔	✔
Port of landing	✔	✔	✔	✔	✔	✔	✔
Discard report	✔	✔			✔	✔	✔
IFQ reported manually (if applicable)		✔					
ADF&G Processor code	✔	✔	✔	✔	✔	✔	✔
Federal Processor Permit	✔			✔	✔	✔	
Registered buyer permit		✔		✔			
Registered Crab Receiver			✔				
CFEC permit(s)	✔	✔	✔	✔	✔	✔	✔
Partial delivery (if applicable)			✔				
NMFS ID & IFQ/CDQ permits		✔	✔				
Management program and ID number (if applicable)	✔	✔	✔	✔	✔	✔	✔
ADF&G statistical area(s) fished	✔	✔	✔	✔	✔	✔	✔
Itemized catch information (species, weights, conditions and disposition codes)	✔	✔	✔	✔	✔	✔	✔
IFQ report		✔	✔			✔	

c. Production Reports

Production reports are required for groundfish, and information collected on a production report is necessary to identify the participant, to monitor the discards and disposition product, and to monitor the product leaving the facility. Table 4 (under question 12) provides an estimate of the number of respondents and annual responses for production reports.

i. Shoreside processor or SFP Production Report

Shoreside Processor Production Reports are required in groundfish fisheries per 50 CFR 679.5(e)(9). NMFS requires all FPP-holding shoreside or stationary floating processors to submit production reports by 1200 hours, A.l.t, each day to document the previous day's production.

The User must enter the following information on a Shoreside Processor Production Report:
- Automatic information for eLandings production report
  - User name
  - Company name
  - email address
  - Telephone number
  - FPP number
  - ADF&G processor code
- Production information
  - Reporting date
  - Number of observers onsite
- Area of harvest (GOA or BSAI)
  - Product description -- Product by species code, product type, and product code
  - Product weight – actual scale weight (to the nearest pound)
  - Whether no production or no deliveries for the day

ii. At-sea production reports (for catcher/processors and motherships)

At-sea Production Reports are required in groundfish fisheries per 50 CFR 679.5(e)(10). NMFS requires all FPP-holding catcher/processors to submit production reports by 2400 hours, A.l.t, each day to document the previous day's production.

The User must enter the following information on an At-Sea Production Report:
- Automatic information for eLandings/seaLandings production report
  - User name
  - Company name
  - email address
  - Telephone number
  - FFP number and vessel name
  - ADF&G vessel number
- Production information
  - Reporting date (mm/dd/yyyy)
  - At-Sea Port Code
  - Federal Permit Number
  - Crew size (including operator)
  - Management program
  - Gear type of harvester
  - Federal reporting area of harvest
  - ADF&G statistical area

- o If harvest with trawl gear, whether *C. Opilio* Bycatch Limitation Zone (COBLZ) or Red King Crab Savings Area (RKCSA)
- o Product by species code, product type, and product code
- o Product weight (to nearest 0.001 mt)
- o Whether no production for the day
- Discard or disposition information
  - o Record discard disposition that occurred Prior to, during, or after production
  - o Species code and disposition code
  - o Discard weight of groundfish and PSC herring (to nearest 0.001 mt)
  - o Discard number of PSC Pacific salmon, steelhead trout, Pacific halibut, king crab, and Tanner crab)

d. Electronic logbooks (eLogs)

Electronic logbooks (eLogs) are required for groundfish, and information collected on a logbook is necessary to provide data about where and when fishing effort occurs, track results and timing of flow scale tests, as well as record discard information of prohibited species. Table 4 (under question 12) provides an estimate of the number of respondents and annual responses for eLog reports.

i. Catcher vessel eLog

Catcher vessels greater than or equal to 60 ft length overall (LOA) are required to submit fisheries information to NMFS through use of a paper Daily Fishing Logbook (DFL, see OMB Control No. 0648-0213). NMFS is now offering optional use of the eLog for trawl and longline catcher vessels through seaLandings or a NMFS-approved electronic logbook software application. If the catcher vessels use the eLog, the operator is not required to record and submit fisheries information on the paper DFL. Use of the eLog increases the speed and accuracy of data transmission to NMFS and assists in providing more accurate quota monitoring. Some basic hardware requirements need to be met, such as having a laptop or personal computer on the vessel with a current Windows Operating system, and a printer to print daily copies of the eLog.

The operator must account for each day of the fishing year, January 1 through December 31, in the eLog and indicate whether the vessel was active or inactive during that time period.

ii. Catcher/processor eLog

The operator of the following specified groundfish catcher/processors must record all the fields listed in Table 3 on catcher/processor eLogs:
- An American Fisheries Act (AFA) catcher/processor
- Any catcher/processor harvesting pollock in a Western Alaska CDQ fishery
- Any trawl catcher/processor participating in the rockfish fishery
- A hook-and-line catcher/processor named on a License Limitation Program (LLP) license with a Pacific cod catcher/processor hook-and-line endorsement for the Bering Sea, Aleutian Islands, or both the Bering Sea and Aleutian Islands and direct harvesting Pacific cod

In addition, any catcher/processor that is required to weigh catch on a NMFS-approved scale must use a NMFS-approved eLog to record and report the results and timing of daily flowscale tests to NMFS. This allows NMFS staff to continuously monitor daily flowscale tests by vessels when they are at sea and to work with vessel crew to ensure that any bias in the daily tests is discovered and corrected quickly. Allowing NMFS to identify potential scale problems during, rather than after a fishing year, would result in more effective analysis of overall trends in scale testing. The respondent must first manually enter the daily flow scale test information onto the paper Record of Daily Scale Tests form (see OMB Control No. 0648-0330). Then the following information from all scale tests, including failed tests, must be reported in the eLog within 24 hours of the testing:

- Time of test
- Flow scale weight (kg)
- Platform scale weight (kg)
- Percent error (the software does the math)
- Observer present
- Comments (optional)

Table 3. Data fields completed on catcher vessel and catcher/processor eLogs. A check-mark (✔) indicates that the field is submitted by the user on the form.

	Electronic Logbook Type			
	Catcher Vessel		Catcher/Processor	
Data Field	Longline	Trawl	Longline	Trawl
Page number	✔	✔	✔	✔
Printed name and signature of operator	✔	✔	✔	✔
ADF&G vessel registration number	✔	✔	✔	✔
FFP number	✔	✔	✔	✔
Federal Crab vessel permit number (if longline)	✔		✔	
IFQ permit number and Operator name	✔		✔	
CDQ permit number and group number	✔		✔	
Gear type	✔	✔	✔	✔
Gear details (including skate length, book size, hook spacing)	✔		✔	
Dates of inactivity	✔	✔	✔	✔
Dates of activity	✔	✔	✔	✔
Whether harvest occurred in COBLZ or RKCSA (if applicable)		✔		✔
Federal reporting area of catch	✔	✔	✔	✔
Management program	✔	✔	✔	✔
Management program ID (if applicable)	✔	✔	✔	✔
Number of observers onboard	✔	✔	✔	✔
Name and cruise number of observer	✔	✔	✔	✔
Crew size	✔	✔	✔	✔
Set number	✔	✔	✔	✔
Date set, time set	✔		✔	
Date retrieved, time retrieved	✔		✔	
Begin latitude and longitude of set	✔		✔	
Begin and end buoy or bag number (not required)	✔		✔	
End latitude and longitude of set	✔		✔	
Begin and end depth of gear	✔		✔	
Number of skates or pots set and lost	✔		✔	
Target species code	✔	✔	✔	✔
CDQ/IFQ halibut & IFQ sablefish weight in pounds	✔		✔	

IFQ sablefish condition code	✔		✔	
Hail weight	✔	✔	✔	✔
Bird avoidance gear	✔		✔	
CR crab	✔		✔	
Flow scale weight			✔	
Haul number		✔		✔
Time of gear deployment		✔		✔
Date hauled, time hauled		✔		✔
Begin latitude and longitude of haul		✔		✔
Average sea depth		✔		✔
Average gear depth		✔		✔
Date and time of haul retrieval		✔		✔
End latitude and longitude of haul		✔		✔
Check mark if moved to avoid Chinook salmon bycatch (If applicable)		✔		✔
IRIU and prohibited species catch	✔	✔	✔	✔

iii. Mothership eLog

The operator of a mothership that is required to have an FFP under § 679.4(b) must use a NMFS-approved mothership eLog to record and report the following information:
- Page number
- Printed name and signature of operator
- Vessel information
    o Name of mothership
    o FFP or FPP number
    o ADF&G processor code
- Date
- Crew size
- Gear type
- Federal reporting areas
- COBLZ or RKCSA area
- Number of Observers onboard
- Name of observer
- Observer cruise number
- Management program
- Delivery information
    o Type of delivery (CV or TV)
    o Non-Submittal of discard report
    o Name of vessel
    o ADF&G vessel registration number
    o Receipt time
    o Beginning position of receipt of fish (lat/long coordinates)
    o Hail weight

- o IR/IU species
- o ADF&G fish ticket number

In addition, motherships must use a NMFS-approved eLog to daily record and report the results and timing of daily flowscale tests to NMFS. The respondent must enter the following information from all scale tests, including failed tests, within 24 hours of the testing using the eLog:
- Time of test
- Flow scale weight (kg)
- Platform scale weight (kg)
- Percent error (the software does the math)
- Observer present
- Comments (optional)

NOAA 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.

This collection is estimated to be 99% electronic. The eLandings registration, landing report, production reports, and eLogs are submitted via the Internet at https://elandings.alaska.gov/. For catcher/processors and motherships that do not have reliable Internet service, a Desktop Client Application (seaLandings) can be used to generate report files for submitting via email. Tender vessels that do not have access to email or the Internet can enter the information electronically on a USB drive that is later uploaded to eLandings over the Internet.

4. Describe efforts to identify duplication.

The IERS provides the Alaska fishing industry with a consolidated means of reporting commercial fish and shellfish information to NMFS, ADF&G, and the IPHC. A result of the IERS has been to reduce or eliminate the duplicative reporting of the same information to multiple agencies. Prior to the IERS, there were State and Federal requirements to report the same information, and each agency had their own data collection systems. The IERS provides a single data entry point that allows the data to be entered once and then ADF&G, NMFS, and IPHC can all access the reports and extract the data necessary to meet their management mandate.

Catcher vessels greater than or equal to 60 ft LOA are required to submit fisheries information to NMFS through use of a paper DFL (see OMB Control No. 0648-0213). Under the IERS collection, NMFS now offers optional use of the eLog, and if the operator completes an eLog, then they are not required complete the paper DFL.

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

NMFS (in cooperation with ADF&G and IPHC) provides a variety of resources to reduce the impact of this collection on small entities:
- There are multiple NMFS and ADF&G staff dedicated to User support for the IERS that are available to answer questions via email and telephone. A centralized support email address ensures that an agency response can occur quickly.
- In addition to agency support staff, two Help Desk phone numbers are manned outside of business hours; one is available 24/7 and provides first-level support; and a second help desk is available from 6 a.m. to midnight every day and provides targeted assistance for Registered Crab Receiver, Registered Buyer, and Manual Landing Reports to support the short submission time requirements for these reports.
- An online User's Manual provides comprehensive step-by-step instructions for Users to follow when reporting and submitting information in the IERS.
- The IERS training events are held every year in several locations throughout Alaska and in Seattle to provide Users with information about the application and to provide an opportunity for hands-on practice.
- There is a Training instance of the IERS application along with published training scenarios that Users can access so they can practice using the software at any time.
- The agencies supporting the IERS send out regular email notifications and newsletters (for example: https://elandings.atlassian.net/wiki/spaces/tr/pages/8817068/FishWire+-+the+on-line+eLandings+Newsletter) to share information on new features, regulatory changes, upcoming training events, and tips and tricks.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.
This action is necessary to improve recordkeeping and reporting efficiency for processors and to improve the quality of data obtained by NMFS, ADF&G, and IPHC for fishery management purposes. Advances in technology, public expectations, Congress's mandate in the Government Paperwork Elimination Act, and Administration policy all require that agencies of the United States government move expeditiously to adopt electronic processes. If this collection were not conducted, the quality of NMFS fishery data would be greatly reduced and negatively impact NMFS management of fisheries.

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

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 June 6, 2017 (82 FR 26061), which solicited public comment. The comment period ended on Aug 7, 2017. In addition, NMFS solicited input from users of the IERS. NMFS received four comment letters from the public that contained 12 unique substantive comments. The comments and NMFS' responses are presented below.

Comment #1: The estimated amount of time to complete Shoreside Processor, Registered Crab Receiver, and Registered Buyer Landing Reports is longer than the estimated 10 minutes and number of paper copies is higher for these reports. The Registered Crab Receiver and Registered Buyer Landing Reports, in particular, can take much longer due to the complexities of the IFQ permits and more copies are needed because of the IFQ receipt.

Response: NMFS has increased the estimated time it takes to complete these reports; Registered Crab Receiver and Registered Buyer Landing Reports are now estimated to take 60 minutes to complete and Shoreside Processor Landing Reports are now estimated to take 30 minutes (see Table 4). NMFS also has increased the estimated number of copies for the different landing reports (see Table 5).

Comment #2: The submission deadlines for Registered Buyer and Catcher/Processor Landing report and the definition of a fishing trip need to be clarified.

Response: Submission deadlines for these reports and the definition of end of a fishing trip are all specified in regulations:

	Regulation Reference	**Deadline/Definition**
• Submission requirement for Registered Buyer Landing Report	§ 679.5(e)(7)(iii)(C)	The User for the Registered Buyer must submit an IFQ landing report within six hours after all IFQ halibut, CDQ halibut, and IFQ sablefish are offloaded from a specific vessel and prior to shipment or transfer of said fish from the landing site.
• Submission requirement for Catcher/processor Landing Report	§ 679.5(e)(13)(iv)	The vessel operator must submit the catcher/processor landing report to NMFS by 2400 hours, A.l.t., on the day after the end of the fishing trip.
• Fishing trip (for purposes of the catcher/processor	§ 679.2, paragraph (3) (iii)	For a catcher/processor in the partial observer coverage category, fishing trip means the period of time that begins when the vessel departs a port to

18

landing report)   harvest fish until the vessel returns to port and offloads all processed product.

Comment #3: Registered Buyer Landing Reports are complicated for catcher/processors to complete and difficult at the end of a trip. It can be especially hard to finish within 6 hours of the start of the offload if something goes wrong during the offload. NMFS should increase the time-limit for and allow Registered Buyers to submit their landing reports from 6 hours at least 24 hours.

Response: For clarification, as was explained in the response to comment #2, the submission deadline for Registered Buyer Landing Report is within six hours *after* all IFQ halibut and sablefish are offloaded, not within 6 hours of the *start* of the offload.

Expanding the time limit for Registered Buyer Landing Reports would require a change to regulation and larger analysis process that is outside the scope of this Paperwork Reduction Act collection renewal. However, at this time, NMFS does not support the suggestion to change the regulations to expand the 6-hour time limit to 24 hours or longer. Under section 303A of the Magnuson-Stevens Act, Limited Access Privilege Programs, such as the IFQ program, are directed to include an effective system of monitoring and enforcement. The harvesting privileges created under the IFQ program require specialized management, monitoring, and enforcement elements. Unlike other limited access programs that require monitoring tools such as full observer coverage and Vessel Monitoring Systems, the principle monitoring and enforcement provisions of the IFQ program occur at the dock where the catch is offloaded and IFQ reporting occurs. The requirement that all retained IFQ catch must be weighed, reported, and debited from the appropriate IFQ account within 6 hours of the end of the offload ensures timely and proper catch reporting in the IFQ Program and enables other program features such as quota transfers and leasing. The timely submission of landings data also enables effective dockside enforcement of the IFQ program.

Comment #4: The process for modifying and editing a Registered Buyer Landing report once it has been submitted can be time consuming since the processor has to contact NOAA Office of Law Enforcement. It would be better if users got warnings in the system and were able to make the changes to the report without contacting NOAA.

Response: As users create a Registered Buyer Landing report in eLandings/seaLandings, there are a number of automated data checks and warnings that are generated so the users have the opportunity to fix errors before they submit the report. For example, the system checks IFQ permit numbers and will generate an error if the number that was entered is not a valid IFQ permit. Once the Registered Buyer Landing Report has been submitted to NMFS, however, it is not possible for the user to go back in and edit the report. As was explained in response to comment #3, a rights-based quota fishery like the IFQ program requires sufficient safeguards to ensure compliance with regulations and reliable quota accounting. In other limited access fisheries in Alaska, quota accounting is accomplished through data collected by independent observers. In the IFQ fishery, however, the quota accounting is done though industry self-reported data that is submitted on the Registered Buyer Landing Report; any edits to these reports require communication with NOAA Office of Law Enforcement. This process helps

ensure that reports are less vulnerable to mis-reporting, IFQ quota accounting is reliable, and that the IFQ program is enforceable.

Comment #5: There are a number of labels and layout modifications that should be made to the Manual Landing Report form that would assist Users in accurately completing the form.

Response: Based on this comment, NMFS has modified the Manual Landing Report form to incorporate a number of the specific labeling and layout suggestions, including adding "Landing" to the date, time and location; adding more lines to the form; and adding the IFQ Permit Holder Name. Other suggestions, such as changing the term Product Weight Sold to Scale Weight so that the terminology used on the form is consistent with the term in eLandings, will require more time and analysis. NMFS will consider these changes prior to the next collection renewal.

Comment #6: NMFS' estimate of time that it takes to complete an At-Sea Production Report assumes that the vessel information (vessel name, permit number, crew size, and fishing area) are auto-populated in eLandings/seaLandings. This is not the case and it would shorten the time to complete the report if all of this information was filled in automatically.

Response: NMFS agrees that auto-populating some information in electronic forms can reduce the burden of completing forms. The User name, company name, phone number, email address, vessel name, vessel permits (FFP and ADF&G number), report date, and at-sea port code are all auto-populated on an At-Sea Production Report based on the registration information for the IERS operation. However, fields such as crew size and fishing area change from day-to-day and therefore need to be completed by the vessel operator on each report in order to be accurate.

Comment #7: The estimated time of 10 minutes to complete a Shoreside Production Report is accurate.

Response: NMFS acknowledges this comment.

Comment #8: It seems overly burdensome to complete a Shoreside Production Report on days when there is no production, and NMFS should require completion of this form only on days when there is product.

Response: NMFS would need to make a change to regulations to implement this suggestion. Currently, § 679.5(e)(9) provides an allowance for processors to wait until Monday to submit the Shoreside Production Reports for Saturday and Sunday if they are not taking deliveries over a weekend. NOAA Office of Law Enforcement requires that processors that hold an FPP to submit a check in/check out form documenting periods of SFP activity. If Users did not have to submit a report on days without production, law enforcement would not be able to determine whether the plant was active or not. NMFS is looking into a simple checkbox option to electronically capture production days where there were no deliveries in order to minimize the amount of time spent filling out and submitting the report. The agency will consider making this modification prior to the next collection renewal.

Comment #9: The estimated labor cost per hour of $37 is accurate, but additional clarification about the components of labor costs that are included in the estimate would be useful.

Response: The Alaska Region uses the estimate of $37 per hour to estimate labor costs in all of our information collection supporting statements for people who work on vessels, in processing plants, and in industry offices and submit data about catch, production, and other aspects of fishing and processing activity. This estimate is based on the salary of Federal government workers who perform similar tasks and is intended to cover all elements of the labor costs for an employee including salary, benefits, and other elements of administrative overhead.

Comment #10: The previous Supporting Statement for the IERS collection did not include any information about reducing the burden to small entities or an assessment of cost to the industry to attend eLandings training events and complete training scenarios. In addition, the previous statement showed zero burdens on the Federal Government, which seems unlikely given that agency staff are providing on-going support and system improvements. The agency should provide information on these aspects of the IERS collection.

Response: NMFS has added information to this Supporting Statement in response to this comment: Question #5 provides information on approaches that NMFS has taken to reduce the burden to small entities; an estimate of cost to the public to attend trainings and complete training scenarios is provided in the response to Question #13; and the most recent estimate of agency costs has been provided in the response to Question #14.

Comment #11: It will be challenging to get feedback from a wide variety of the IERS users using the Federal Register notice process and the commenter suggests soliciting feedback during the eLandings training events and also conducting interviews with users of the system.

Response: In addition to the Federal Register notice, NMFS sent emails to users of the IERS highlighting the opportunity to provide comment and soliciting their feedback. NMFS agrees that the training events are another good forum for the agency to receive input on the IERS, and NMFS uses these meetings to get specific suggestions for improvements and comments on usability of the system. These suggestions are regularly incorporated into enhancements and improvements of the system. There have also been unique opportunities where NMFS has solicited feedback on the IERS. For example, in 2015 NMFS partnered with ADF&G and Northern Economics to complete a qualitative evaluation of the IERS (Northern Economics, 2015). A comprehensive survey of the IERS users was not feasible during the project; however, informal interviews with a few stakeholders contributed valuable information to the report.

NMFS agrees that a structured interview/survey process could potentially be another way to gather information on the burden of the IERS collection. However, adding a regular interview procedure would require a new information collection, and this process would, in itself, impose burden and cost to respondents. It would be important to weigh the benefit of additional information compared to the increased burden to the public of providing more detail items such as costs and reporting times. NMFS acknowledges the comment, but would need to solicit feedback from a broader range of the public before implementing an additional collection to survey the IERS users.

Comment #12: Reporting of product movement on a Product Transfer Report is burdensome, and it is not clear why NMFS needs to gather this information in such detail.

Response: The Product Transfer Report (PTR) is not part of the IERS collection and is part of the Alaska Region Logbook Family of forms collection (OMB Control No. 0648-0213). That collection will be evaluated during the renewal process in 2018. The information collected on PTRs is important for NOAA Office of Law Enforcement and enables the agency to monitor movement of product in and out of the processor on a timely basis. During the collection renewal, however, NMFS will consider the tradeoff of the value of the PTR data to NMFS and burden to the industry.

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

No payment or gift is provided under this program.

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

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.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

This information collection does not involve information of a sensitive nature.

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

The estimated number of unique respondents is 206 (75 shoreside and stationary floating processors; 11 motherships; 73 catcher/processors; 35 tender vessels; and 12 catcher vessels), which decreased from 273.

The total number of estimated responses for the collection is 61,660 (Table 4), which decreased from 73,171. The total estimated annual burden hours are 22,850 (Table 4), which increased from 16,865. The total estimated personnel cost is $845,398 (Table 4), which increased from $624,005.

Table 4. Total annual responses, burden hours, and labor costs for the IERS collection.

Collection Title	Form	Number of respondents[1]	Total annual response	Estimated Time per Response	Total annual	Total Labor Cost

			s	(mins)	burden (hours)	($37/hr)
Registration	eLandings Registration	17	17	15	4.3 (4)	$157
Landing Reports (LR)	Shoreside Processor LR	57	9,929	30	4,964.5 (4,965)	$183,687
	Registered Buyer LR & Manual LR	108	4,871	60	4,871	$180,227
	Registered Crab Receiver LR & Manual LR	38	857	60	857	$31,709
	Out-of-State LR	2	21	20	7	$259
	Mothership LR	7	2,949	10	491.5 (492)	$18,186
	Catcher/Processor LR	5	24	30	12	$444
	Tender LR	35	1232	35	718.7 (719)	$26,591
Production Reports (PR)	Shoreside Processor PR	53	11,353	10	1,892.2 (1,892)	$70,010
	At-Sea PR	77	17,145	20	5715	$211,455
Electronic Logbooks (eLog)	Catcher Vessel eLog	12	2,184	15	546	$20,202
	Catcher/Processor eLog	54	8,262	15	2,065.5 (2,066)	$76,424
	Mothership eLog	11	2,816	15	704	$26,048
Total For Collection		**206 unique**	**61,660**		**22,850**	**$845,361**

[1]For production reports, shoreside processor, registered buyer, registered crab receiver, and mothership landing reports the number of respondents was based on average per year using data from the past 5 years. The average number of respondents for logbook reports was based on averages per year since 2013, when logbook regulations were modified. The number of respondents for tender and catcher/processor landing reports was based on data from 2016, since the regulations requiring that report went into effect in 2016.

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 estimated miscellaneous costs are: $5,638.75 for printing and postage (see Table 5).

The estimate of miscellaneous costs does not include any equipment, based on the assumption that respondents have purchased computers and printers as part of regular business operations.

Table 5. Total annual estimated costs for printing and postage

Collection Title	Form	Description of cost	Misc Costs
Registration	eLandings Registration	Photocopy: 0.05 x 1 copy x 17 = $0.85 Postage: 0.45 x 17 =$ 7.65	$8.50
Landing Reports (LR)	Shoreside Processor LR	Photocopy: 0.05 x 3 copies x 9,929 responses	$1,489.35
	Registered Buyer LR	Photocopy: 0.05 x 6 copies x 4,871 responses	$1,461.30
	Registered Crab Receiver LR	Photocopy: 0.05 x 6 copies x 857 responses	$257.10
	Out-of-State LR	Photocopy: 0.05 x 1 copy x 21 responses	$1.05
	Mothership LR	Photocopy: 0.05 x 1 copy x 2,949 responses	$147.45
	Catcher/Processor LR	Photocopy: 0.05 x 1 copy x 24 responses	$1.20
	Tender LR	Photocopy: 0.05 x 1 copy x 1,232 responses	$184.80
Production Reports (PR)	Shoreside Processor PR	Photocopy: 0.05 x 1 copy x 11,353 responses	$567.65
	At-Sea PR	Photocopy: 0.05 x 1 copy x 17,145 responses	$857.25
Electronic Logbooks (eLog)	Catcher Vessel eLog	Photocopy: 0.05 x 1 copy x 2,184 responses	$109.20
	Catcher/Processor eLog	Photocopy: 0.05 x 1 copy x 8,262 responses	$413.10
	Mothership eLog	Photocopy: 0.05 x 1 copy x 2,816 responses	$140.80
Total			**$5,638.75**

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

The most recent evaluation of the total agency cost for the IERS was completed in 2015 and is estimated to be about $2.6 million (Northern Economics, 2015). The agency costs are not solely borne by the Federal Government and instead are divided among the three partner agencies that support the IERS: NMFS, ADF&G, and IPHC. Agency costs include salaries and benefits for approximately 19 employees that provide help-desk support, user support, and training; application development; system architecture, and project management. Other agency costs include travel for eLandings training events, server hosting, server hardware, and software licenses.

The Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) authorizes and requires the collection of cost recovery fees for the Community Development Quota (CDQ) Program and limited access privilege programs. Limited access privilege programs are those that allocate a percentage of the total allowable catch of a fishery for exclusive use by a person. Cost recovery fees recover the actual costs directly related to the management, data collection, and enforcement of the programs. The IERS supports data collection under the CDQ and other limited access programs including IFQ, crab IFQ, Amendment 80, and American Fisheries Act (AFA). Thus NMFS recovers some of the costs associated with IERS under cost recovery programs associated with these management programs. The NMFS portion of the

total estimated agency cost of IERS minus the funds recovered through cost recovery is $922,776.

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

Adjustments to Collection Titles:
Since the last renewal of this collection, NMFS has streamlined the collection titles and form names. The information that is being collected remains the same; this adjustment just changes the titles and form names. Table 6 shows the previous collection titles and how those match up to the new titles and forms.

Table 6. Previous collection titles and adjusted collection titles and forms.

Previous Collection Title	Adjusted Collection Title	Form Name	Explanation of the adjustment
Alaska Interagency Electronic Reporting System - Registration	**Registration**	eLandings Registration	Changed the collection title. The forms remain the same.
eLandings/seaLandings Landing Report	**Landing Reports**	• Shoreside Processor Landing Report • Registered Buyer Landing Report & Manual Landing (paper backup) • Registered Crab Receiver Landing Report & Manual Landing (paper backup) • Out of State Landing Report • Mothership Landing Report	Combined 3 collection titles into a single collection.
tLandings		Tender Landing Report	
Catcher/processor landing report		Catcher/processor landing report	
eLandings Production Report	**Production Reports**	• Shoreside Processor Production Report • At-Sea Production Report	Changed the collection title. The forms remain the same.
Catcher/Processor electronic logbook	**Electronic Logbooks**	Catcher/Processor eLog	Combined 3 collection titles into

Catcher vessel elogbook pilot		Catcher vessel eLog	a single collection. Merged the 2 catcher vessel eLog collections into 1 form. Other forms remain the same.
Catcher vessel eLog			
Mothership elog		Mothership eLog	

Adjustments to the forms:
In response to comment, NMFS adjusted field titles on the Manual Landing Report for Halibut & Sablefish IFQ/CDQ and added more space to make it easier for users to enter the information.

Adjustments to respondents, responses, and cost:
eLandings registration
- Decrease of 2 respondents and responses, 17 instead of 19
- Decrease of 0.8 hours burden, 4.3 hours instead of 5 hours
- Decrease of $28 personnel costs, $157 instead of $185

Landing Reports
- Increase of 95 respondents, 252 instead of 157
- Decrease of 1,911 responses, 19,883 instead of 21,794
- In response to public comment:
    o Increase of 50 minutes to the time to complete Registered Crab Receiver and Registered Buyer Landing Reports, 60 minutes instead of 10 minutes.
    o Increase of 20 minutes to the time to complete Shoreside Processor Landing Report, 30 minutes instead of 10 minutes.
- Increase of 8,214.7 hours burden, 11,921.7 instead of 3,707
- Increase of $303,943 personnel costs, $441,102 instead of $137,159

Production Reports
- Decrease of 116 respondents, 130 instead of 246
- Increase of 2,572 responses, 28,498 instead of 25,926
- Increase of 765.2 hours burden, 7,607.2 hours instead of 6,842 hours
- Increase of $28,311 personnel costs, $281,465 instead of $253,154

Electronic Logbooks
- Decrease of 63 respondents, 77 instead of 140
- Decrease of 12,170 responses, 13,262 instead of 25,432
- Decrease of 2,995.5 hours burden, 3,315.5 hours instead of 6,311 hours
- Decrease of $110,834 personnel costs, $122,674 instead of $233,507

Miscellaneous costs
- Total estimated miscellaneous costs for the collection are $5,638.75, which increased from $2,870.
- There was also an adjustment to remove $7,200 in training costs that had been included in error in the previous submission's supporting statement, although not in the ROCIS submission.

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

The information collected will not be published.

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.