

**Supporting Statement  
for  
Great Lakes Pilotage**

OMB CONTROL No.: 1625-0086  
COLLECTION INSTRUMENTS: CG-4509 and Instruction

**A. Justification.**

This collection of information relating to the Rate-making requirements is required pursuant to 46 CFR parts 401 and 404 and discussed in the following paragraphs.

1. Circumstances that make the collection of information necessary.

Pursuant to 46 CFR part 404, the Director of the Great Lakes Pilotage is required to set pilotage rates on the Great Lakes. In meeting this requirement, the Director requires that pilot associations provide data relating to bridge hours; vessel delay, detention, cancellation, and movage; pilot travel; revenues; and pilot availability. Presently this data is being recorded and provided to the Office of Great Lakes Pilotage via hard copy source forms that each pilot association prepares immediately following each completed pilot assignment. Copies of the source forms are mailed to the Office of Great Lakes Pilotage on a monthly basis. Pilot availability is reported monthly on a separate form. In an effort to improve the timeliness and accuracy of the data collection and to utilize enhanced data collection technology, the Director mandated the use of electronic data collection.

In March 2006, the Office of Great Lakes Pilotage commenced its use of electronic data collection with the implementation of the Great Lakes Electronic Pilot Management System software. A web based system, it provides the three U.S. pilot associations electronic capabilities in entering and storing pilotage data relating to bridge hours; vessel delay, detention, cancellation, and movage; pilot travel; revenues; and pilot availability. This software also makes this data readily available and retrievable by the Office of Great Lakes Pilotage for use in the course of daily operational oversight and rate-making.

Additionally, the Office of Great Lakes Pilotage oversees pilot registration in accordance with 46 CFR part 401. To meet these requirements, the office collects mariner credentialing information to verify eligibility for registration as a Great Lakes Registered Pilot.

2. By whom, how and for what purpose the information is to be used.

The Director uses the data stored in the Great Lakes Electronic Pilot Management System and on form CG-4509 to carry out operational and rate making oversight of pilotage activities on the Great Lakes.

3. Considerations of the use of improved technology.

The Office of Great Lakes Pilotage has commenced electronic tracking of vessels and pilot assignments on the Great Lakes using real time data via the Great Lakes Electronic Pilot Management System. This system enables the program to accurately and quickly answer queries from pilots, industry, or the general public regarding operations and/or retrieve information that

previously was not always readily available. Additionally, the use of the pilot age software program enables the Office of Great Lakes Pilotage to access and view all foreign vessel traffic in the Great Lakes and to determine pilot availability at any given time. The three U.S. pilots association have unlimited access to the Great Lakes Electronic Pilot Management System through the use of a username and secured passwords. The Great Lakes Pilot Management System (GLEPMS) uses the Klein Systems Group "KleinPilot" software <http://glpms.saabtech.cap> specifically tailored to meet the needs and business practices of each of the three Great Lakes Pilot Associations and provides real-time pilotage data and information to users. The application does not have a standalone web address but rather consists of an online database accessed through a specific program. Furthermore, the system has added firewall security measures that allow the host server to recognize only those remote servers with pre-registered IP addresses. The five (5) screen shots named below are provided as separate files to indicate the capabilities of the system:

Screen Shot No. 1 – Vessel Table

Screen Shot No.2 – Vessel Scheduling and Dispatch with Window of Vessel Specifics

Screen Shot No.3 – Summary Dispatch Report

Screen Shot No. 4 – Map of the Great Lakes with Real Time Location of Vessels and Job Status Window

Screen Shot No. 5 – Pilot Rotation Window

Form CG-4509 will be posted to the internet for easy access at: Office of Waterways and Ocean Policy – Great Lakes Pilotage Division. It is a fillable pdf that can be printed, signed and scanned to the Office of Great Lakes Pilotage via a dedicated email address ([GreatLakesPilotage@uscg.mil](mailto:GreatLakesPilotage@uscg.mil)). Form CG-4509 can also be mailed to: Commandant (CG-WWM-2), Great Lakes Pilotage Division, 2703 Martin Luther King Jr Ave SE, Stop 7509, Washington, DC 20593-7509

4. Efforts to identify duplication. Why similar information available cannot be used.

The database information is not collected in any form, and therefore is not duplicated elsewhere. The Office of Great Lakes Pilotage is currently discussing elimination of CG-4509 with the National Maritime Center after the necessary information is moved to the CG-719B. However, the specific information captured on the CG-4509 is not captured on any form currently used by the National Maritime Center.

5. Methods used to minimize the burdens of small business if involved.

To minimize the burden of this collection, the three U.S. pilot associations have been provided on site training on the Great Lakes Pilot Management System and will be provided follow-on training and site-visits to ensure continued proficiency with the pilot software program. The Coast Guard has set up a dedicated email for the CG-4509 and will continue to respond to any inquiries regarding the form or its instructions.

6. Consequences to the Federal program if collection were conducted less frequently.

The Coast Guard pilotage regulations require annual reviews of pilotage rates and the creation of a new rate at least once every five years, or sooner, if the annual review shows a need. To facilitate this process, the Office of Great Lakes Pilotage must rely on the pilot associations to submit timely and accurate data that includes financial reports; bridge hours; vessel delay, detention, cancellation, and moveage; pilot travel; revenues; and pilot availability. From an operational standpoint, quick access of the pilotage data on a daily basis allows the Director to make accurate assessments and

informed decisions on pilotage activities on the Great Lakes immediately. Similarly, from a rate making standpoint, immediate entry, access, and retrieval of the pilotage data allows the Office to calculate and make proper adjustments to pilotage rates as required.

The CG-4509 must be collected in a timely manner to ensure that Great Lakes Registered Pilots and mariners interested in becoming certified as such meet the registration requirements specified in 46 CFR part 401.

7. Special Collection Circumstances.

This information collection is conducted in manner consistent with the guidelines in 5 CFR 1320.5(d)(2)

8. Consultation.

A 60-Day Notice (See [USCG-2016-0801], November 29, 2016, 81 FR 85984) and 30-Day Notice (July 24, 2017, 82 FR 34318) were published in the Federal Register to obtain public comment on this collection. The Coast Guard has not received any comments on this information collection.

9. Provide any payment or gift to respondents.

There is no offer of monetary or material value for this information collection.

10. Assurances of confidentiality provided to respondents.

There are no assurances of confidentiality provided to the respondents for this information collection. This information collection request is covered by the Merchant Mariner Licensing and Documentation System 2011 (MMLDS) Privacy Impact Assessment (PIA) and Great Lakes Registered Pilot and Applicant Pilot Eligibility System of Records Notice (SORN). Links to the MMLDS PIA and Great Lakes Registered Pilot and Applicant Pilot Eligibility SORN are provided below:

- <https://www.dhs.gov/sites/default/files/publications/privacy-pia-uscg-015-MMLDS-2011.pdf>
- <https://www.gpo.gov/fdsys/pkg/FR-2014-12-16/html/2014-29380.htm>

11. Additional justification for any questions of a sensitive nature (e.g. sexual behavior, attitudes, religious beliefs, other private information).

There are no questions of sensitive nature.

12. Estimate of the hour burden of collection of information.

It takes an estimated 18 minutes to fill out the Form CG-4509. Each year we receive an average of six new applications and an average of three renewal applications. This puts an estimated total burden hour for Form CG-4509 at 3 (rounded up) hours each year.

It is estimated that 54 individuals enter the data in the Great Lakes Pilot Management System. It is estimated at each entry takes 30 minutes to enter the data. For 2016, it is estimated there were 3600 entries put into GLPMS. Also, there are estimated 20 administrative individuals that view the 3600 entries put in GLPMS. It is estimated each entry view takes 10 minutes. The total burden hour for

GLPMS is figured by; multiplying number of entries (3600) X (40) minutes = (144,000) minutes divided by (60) minutes = (2,400) hours.

Total burden hours for this collection (1625-0086) is: 2,403 (rounded up) each year.

Total burden costs for this collection (1625-0086) is: \$139,374.

We use BLS wage rates for industry, and then multiply it by a wage factor to account for benefits. The most current mean hourly wage rate for captains, mates, and pilots of water vessels is \$38.93 (May 2017, <https://www.bls.gov/oes/2017/may/oes535021.htm>). We find the load factor using BLS Employer Costs for Employee Compensation, found in Table 9 at [https://www.bls.gov/news.release/archives/ecec\\_09082017.pdf](https://www.bls.gov/news.release/archives/ecec_09082017.pdf). The loaded wage factor is equal to the total compensation of \$27.16 divided by the wages and salary of \$18.26. Values for the total compensation, wages, and salary are for all private service-providing industry workers in the transportation and material moving occupations, 2017 3rd quarter.

So multiplying the \$38.93 wage rate by 1.49 gives us a loaded wage rate of \$58.00.

The total burden cost for this collection is figured by; multiplying number of burden hours (2403) x loaded wage rate (58) dollars = \$139, 374.

13. Estimate of total annualized capital and start-up cost.

The Great Lakes Pilot Management System is being provided to the three U.S. Great Lakes Pilot associations at no cost to the associations with respect to equipment, software, and training. These expenses are absorbed by the Office of Great Lakes Pilotage located at Coast Guard Headquarters, Washington, DC. Because the management system is web-based, the three U.S. Great Lakes pilot associations use their existing computer equipment to execute the management system program. There are no record keeping, capital, start-up or maintenance costs associated with this information collection.

14. Estimate of annualized cost to the Federal Government.

Annualized cost, minus the initial cost of system acquisition of \$150,000, of the Great Lakes Pilotage Management System is estimated at \$25,000. This amount is an agreed upon figure listed in the performance contract between the U.S. Coast Guard and the Saab Technologies, Ltd., and it covers the cost of server support of 24 hours a day and maintenance related to the up keep of the system.

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

The change in burden is an ADJUSTMENT due to a change (i.e., increase) in the estimated responses and annual burden time. There has been an increase of 3 responses and increase in the burden time per response by 8 minutes for the CG-4509. Thus increasing the annual burden time by 2 hours. There has been an increase of 3,540 responses and an increase in the burden time by 10 minutes for the Great Lakes Management System. Thus increasing the annual burden time by 400 hours. There is no proposed change to the reporting or recordkeeping requirements of this collection. The reporting and recordkeeping requirements, and the methodology for calculation burden, remain unchanged.

16. Plans for tabulation, statistical analysis and publication.

This information collection will not be published for statistical purposes.

17. Approval for not explaining the expiration date for OMB approval.

The Coast Guard will display the expiration date for OMB approval of this information collection.

18. Exception to the certification statement.

USCG does not request an exception to the certification of this information collection.

**B. Collection of Information Employing Statistical Methods**

This information collection does not employ statistical methods.