

**SUPPORTING STATEMENT**  
**GROUNDFISH TRAWL CATCHER/PROCESSOR ECONOMIC DATA REPORT**  
**(EDR) OMB CONTROL NO. 0648-0564**

**A. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS**

**1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local governmental units, households, or persons) in the universe and the corresponding sample are to be provided in tabular form. The tabulation must also include expected response rates for the collection as a whole. If the collection has been conducted before, provide the actual response rate achieved.**

Entity Type	Sample Size
30 catcher/processors in GOA	100%

Groundfish harvest includes both the GOA and BSAI; therefore groundfish activity from both areas is included. Each catcher/processor is required to have one Amendment 80 QS permit and one LLP license, or an LLP groundfish license. Owners of multiple licenses and associated vessels are required annually to submit one EDR for each licensed vessel. In 2016, 30 entities submitted an EDR, and 16 of those were Amendment 80 catcher/processors.

**2. Describe the procedures for the collection, including: the statistical methodology for stratification and sample selection; the estimation procedure; the degree of accuracy needed for the purpose described in the justification; any unusual problems requiring specialized sampling procedures; and any use of periodic (less frequent than annual) data collection cycles to reduce burden.**

The sample selection method is an annual census of all 30 catcher/processors, as any other sampling methodology would produce too few observations to estimate representative levels of cost, earnings, and other outputs required for this collection. As the EDR is a mandatory collection, and valuable fishing privileges will be withheld if an EDR is not submitted, we anticipate a 100 percent response rate from QS holders. QS and LLP licenses that designate participation in the GOA trawl fisheries are issued to entities, rather than vessels, and specific provisions require that each participant is responsible for including data from any acquired vessel in this sector.

Given that a maximum of 30 catcher/processors will be participating in this fishery, it is not feasible to generate enough observations on any one of the variables without applying this collection annually. And, random sampling from this population is not a viable option for statistical reasons. Based upon the degrees of freedom and number of observations required for estimating the statistical relationship among the variables in this collection, data in the Annual Trawl Catcher/Processor EDR may be pooled to create a time-series of cross-sectional data in order to generate sufficient observations for economic and statistical analysis. Although the strata to be used in preparing analyses (either deterministic or statistical) of management actions

for this fleet will depend on the specific questions of interest, vessels are commonly stratified by vessel length and the distribution and amount of catch, by species.

**3. Describe the methods used to maximize response rates and to deal with non-response. The accuracy and reliability of the information collected must be shown to be adequate for the intended uses. For collections based on sampling, a special justification must be provided if they will not yield "reliable" data that can be generalized to the universe studied.**

Each of the owners and leaseholders in the catcher/processor sector are required to annually submit the EDR. Therefore, the response to mandatory data requirements should be very high. Those individuals who do not submit their EDR by the submission date will receive a follow-up phone call from Pacific States. If a solution cannot be reached at that point, their information will be referred to the NOAA Office of Law Enforcement. Therefore, we anticipate response rates of 95 to 100 percent.

Enforcement of the GOA Trawl EDR Program with regard to non-compliance has been different from enforcement programs used to ensure that accurate landings are reported. The economic data are not be used for in-season management; persons submitting the data are given an opportunity to correct omissions and errors before any enforcement action is taken.

Giving the person submitting data a chance to correct problems is important because of the complexities associated with generating these data. Only if the agency and the person submitting the data cannot reach a solution will the enforcement agency be contacted. The intent of this program is to ensure that accurate data are collected without being overly burdensome on industry for unintended errors.

**4. Describe any tests of procedures or methods to be undertaken. Tests are encouraged as effective means to refine collections, but if ten or more test respondents are involved OMB must give prior approval.**

Since the GOA Trawl EDR Program has been in place, informal testing has taken place by meeting with EDR submitters to discuss ways in which the forms used to request information could be improved. The accountants that perform the data quality audits, as well as Pacific States (who administers the data collection), also document ways in which the EDRs could be clarified, and this information is used to clarify instructions and variable definitions for this EDR.

**5. Provide the name and telephone number of individuals consulted on the statistical aspects of the design, and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.**

Brian Garber-Yonts, Ph.D. [statistical design and analysis of data]  
Research Economist  
NOAA/NMFS, Alaska Fisheries Science Center PH: (206) 526-6301  
Email Address: [Brian.Garber-yonts@noaa.gov](mailto:Brian.Garber-yonts@noaa.gov)

Stephanie Warpinski [specialist on EDR regulations]  
NOAA/NMFS, Alaska Region  
PH: (907) 586-7234  
Email Address: [stephanie.warpinski@noaa.gov](mailto:stephanie.warpinski@noaa.gov)

Geana Tyler [collection of data, verification of accuracy of data]  
Pacific States Marine Fisheries Commission  
PH: (503) 595-3100  
Email Address: [gtyler@psmfc.org](mailto:gtyler@psmfc.org)

Tracy Buck [permits, permit data]  
Supervisor of Permits  
PH: (907) 586-7889  
NOAA/NMFS, Alaska Region  
Email Address: [tracy.buck@noaa.gov](mailto:tracy.buck@noaa.gov)

Steve Whitney [administers Amendment 80 Program]  
NOAA/NMFS, Alaska Region  
PH: (907) 586-7269  
Email Address: [steve.whitney@noaa.gov](mailto:steve.whitney@noaa.gov)