

Supporting Statement
for

CG-2554 Private Aids to Navigation Application and CG-4143 Application for Class I Private
Aids to Navigation on Artificial Islands and Fixed Structures

OMB No.: 1625-0011
COLLECTION INSTRUMENTS: Instruction, CG-2554 and CG-4143

JUSTIFICATION

1. Circumstances Which Make the Collection of Information Necessary.

Under 14 USC 81, the Coast Guard is authorized to establish aids to navigation. 14 USC 83 prohibits establishment of aids to navigation without permission of the Coast Guard. 33 CFR 66.01-5 provides a means for private individuals to establish privately maintained aids to navigation. Under 43 USC 1333, the Coast Guard has the authority to promulgate and enforce regulations concerning lights and other warning devices relating to the promotion of safety of life and property on artificial islands, installations, and other devices on the outer continental shelf involved in the exploration, development, removal, or transportation of resources there from. 33 CFR 67.35-1 prescribes the type of aids to navigation that must be installed on artificial islands and fixed structures.

To obtain approval to establish a private aid to navigation, applicants must submit either CG 2554 (Private Aids to Navigation Application) or CG Form 4143 (Application for Class 1 Private Aids to Navigation on Artificial Islands and Fixed Structures). The forms collect information about the private aid to navigation (type, color, geographic position), charts or sketches of the desired location, copies of U.S. Army Corps of Engineers permits, and the applicant's contact information. The information is stored in the Coast Guard's United States Aids to Navigation Information Management System (USAIMS); formerly known as the Integrated Aids to Navigation Information System (I-ATONIS). USAIMS is the Coast Guard's comprehensive database for managing information about aids to navigation.

This information collection supports the following strategic goals:

Department of Homeland Security

- Manage Risks to Critical Infrastructure

Coast Guard

- Maritime Safety
- Maritime Mobility
- Protection of natural resources

2. Purpose of the Information Collection

Applicants range from owners of small businesses such as a marina to large corporations. Collecting the applicant's contact information is important because it allows the Coast Guard to contact the applicant should there be a discrepancy or mishap involving the permitted private aid to navigation. Certain discrepancies create hazards to navigation and must be responded to and immediately corrected or repaired.

This information is used by the Coast Guard to:

- 1) Determine if the private aid is effective for navigational purposes.
- 2) Notify the maritime public of the location and characteristics of the private aids through the issuance of notices to mariners.
- 3) At no time is the applicant's contact information made public.

3. Consideration of the Use of Improved Information Technology to Reduce the Burden.

The use of improved information technology has been considered and it has been determined that it will reduce the burden of information collection. The forms are fillable PDF documents that can be completed, saved, and forwarded to the appropriate Coast Guard district office. The forms may also be printed and submitted by postal mail. The forms may also be hand delivered if the applicant is near the district office. The Coast Guard is experimenting with an electronic submission utilizing a First Coast Guard District website. The website collects the same information as collected on the PDF forms. At this time, 100% of the respondents in the First Coast Guard District use the website. Pending receipt of funding, the Coast Guard expects to transition to 100% electronic collection of the PATON applications within three years.

4. Efforts to Identify Duplication.

No other Federal agency is authorized to permit the establishment of private aids to navigation on the navigable waters of the United States. There is no similar information available which could be used or modified for this purpose. Each collection is specific and unique.

Depending on the type of private aid to navigation the applicant plans to establish, modify or remove, the applicant would complete one of the two forms. Each contains necessary information for processing by the Coast Guard. These private aid forms need to be submitted only when a private aid to navigation is established, modified, relocated, removed, or ownership is changed.

5. Methods Used to Minimize the Burden to Small Business.

The burden upon small businesses is minimal because the applications need only be submitted when establishing, modifying, relocating, removing, or changing ownership of a private aid to navigation.

6. Consequences to the Federal Program if Collection Were Not Done or Conducted Less Frequently.

The information is only collected when an applicant wishes to establish a private aid to navigation or make changes to a previously approved permit. Current requirements do not lend themselves to collecting this information less frequently. If the forms were submitted less frequently or not at all, the Coast Guard would not be able to ensure the private aids to navigation are appropriate, nor would the Coast Guard be able to ensure the public is notified, through the issuance of notices to mariners, of new or changed private aids to navigation, hence compromising safety.

7. Special Circumstances that Require Collection to be Conducted in an Inconsistent Manner.

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

8. Solicitation of Comments.

A 60-day Notice (See [USCG-2017-0952], December 14, 2017, 82 FR 58819) and 30-day Notice (March 2, 2018, 83 FR 9009) were published in the *Federal Register* to obtain public comment on this collection. The Coast Guard received one comment associated with this information collection. The commenter stated that it's their belief that the current system of the Coast Guard with respect to the new owner or transfer of ownership, should be at the discretion of the system that has always been in place. Coast Guard response: Nothing about the private aid to navigation process is changing and therefore we have not revised this information collection request in response to the comment. Accordingly, no changes have been made to the Collections.

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 General Contacts List Privacy Impact Assessment (PIA) and Mailing and Other Lists System, System of Records Notice (SORN). Links to the aforementioned PIA and SORN are provided below:

- <https://www.dhs.gov/sites/default/files/publications/privacy-pia-dhs-gcl-august2017.pdf>
- <https://www.gpo.gov/fdsys/pkg/FR-2008-11-25/html/E8-28053.htm>

The contact information is stored in the USAIMS database. USAIMS features a centralized database with multi-user access, source on-line updating, user implemented database query capability, database product and report retrieval and delivery to authorized USCG aids to navigation personnel. Aids to navigation personnel must request and be granted access. Once granted, a Common Access Card (Smart Card) is required for access.

The contact information is only available to Coast Guard aids to navigation personnel and contact is only initiated if the private aid to navigation becomes discrepant or in need of repair. An approved PTA follows. In addition to Coast Guard access, several cartographers at the National Oceanic and Atmospheric Administration (NOAA) have access for the purposes of updating nautical charts with the PATON information. NOAA personnel have the same access requirements as Coast Guard personnel.

11. Additional Justification for any Questions of a Sensitive Nature.

There are no questions of a sensitive nature.

12. Estimate of annual hour and cost burden.

Nationwide, there are approximately 40,000 private aids to navigation. Annually, about 1,709 new requests are submitted, of which 881 use form CG-2554 and 828 use form CG-4143. The type of form used depends on the type of private aid to navigation the applicant wishes to establish or is required to establish, modify, relocate, remove, or change ownership.

CG-2554

It is estimated that it would take an applicant who is equivalent to a GS-12 and who is familiar with the private aids to navigation regulations (33 CFR 66) and with marine navigation approximately one hour to complete the form. Since approximately 881 CG-2554s are submitted annually, the estimated public burden is 881 hours. Using a labor cost of \$68 per hour (COMDTINST 7310.IM), the estimated annual cost to the public would be approximately \$59,908.

CG-4141

It is estimated that it would take an applicant who is equivalent to a GS-12 and who is familiar with the private aids to navigation regulations (33 CFR 67) and with marine navigation approximately one hour to complete the form. Since approximately 828 CG-4143s are submitted annually, the estimated public burden is 828 hours. Using a labor cost of \$68 per hour (COMDTINST 7310.IM), the estimated annual cost to the public would be approximately \$56,304.

Therefore, the estimated average annual cost to prepare both forms would be \$116,212, as described below:

PERSONNEL	FORM	PER REQUEST			TOTAL (PER YEAR)		
		Hourly Rate*	Hours	Total	# of Requests	Hours	Cost
Equivalent to (GS-12)	CG-2554	\$68	1	\$68	881	881	\$59,908
Equivalent to (GS-12)	CG-4143	\$68	1	\$68	828	828	\$56,304
TOTALS					1,709	1,709	\$116,212

*Based on hourly rates for government personnel in Enclosure (2) to COMDTINST 7310.1Q

13. Provide an Estimate of the Annualized Capital/Start-up Costs to Respondents.

Applications can be submitted electronically; however, some applicants may elect to submit their application via U.S. mail. The postal cost for one submission is \$0.49 (49¢). Approximately 276 forms (CG-2554 and CG-4143) were submitted via U.S. mail. The estimated annual cost for postage is \$135.24.

14. Estimates of Annualized Cost to the Federal Government.

CG-2554

It is estimated to take Coast Guard personnel approximately 1.4 hours to completely process a CG-2554. Form processing includes: (1) review of proposed aid characteristics, (2) review of aid location, (3) distributing information to the public, (4) notifying owner of private aid status, and (5) filing. With approximately 881 CG-2554s submitted annually, the estimated burden on the Coast Guard is 1,233.4 hours. Using a labor cost of \$68 per hour (COMDTINST 7310.1M), the estimated annual cost to the public would be approximately \$117,419.68.

CG-4141

It is estimated to take Coast Guard personnel approximately 1.5 hours to completely process a CG-4143. Form processing includes: (1) review of proposed aid characteristics, (2) review of aid location, (3) distributing information to the public, (4) notifying owner of private aid status, and (5) filing. With approximately 828 CG-4143's submitted annually, the estimated burden on the Coast Guard is 1,242 hours. Using a labor cost of \$68 per hour (COMDTINST 7310.1M), the estimated annual cost to the public would be approximately \$126,684.00.

Therefore, the estimated annual cost to the Coast Guard for processing 1,709 forms (CG-2554 and CG-4143) is \$244,103.68, as described below:

PERSONNEL	FORM	PER REQUEST			TOTAL (PER YEAR)		
		Hourly Rate*	Hours	Total	# of Requests	Hours	Cost
GS-12	CG-2554	\$68	1.4	\$95.20	881	1,233.4	\$117,419.68
GS-12	CG-4143	\$68	1.5	\$102.00	828	1,242	\$126,684
TOTALS							\$244,103.68

*Based on hourly rates for government personnel in Enclosure (2) to COMDTINST 7310.1Q

15. Reason for Changes or Adjustments in the Burden.

The change (i.e., decrease) in burden is an ADJUSTMENT due to a decrease in the estimated annual number of responses. Polling of all Coast Guard district offices for applications received

in CY 2016 produced updated totals. In addition, the hourly rate for government personnel is lower than the previous submission. The reporting and recordkeeping requirements, and methodology for calculating 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 to Explain the OMB Expiration Date.

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

18. Exception to the Certification Statement.

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

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This information is not collected through the use of statistical methods.