

**SUPPORTING STATEMENT  
Standard Numbering System**

OMB Control No.: 1625-0108

Collection Instrument: None

**A. JUSTIFICATION:**

**1. Circumstances that make the collection of information necessary.**

Subsection 12301(a) of Title 46, United States Code, requires undocumented vessels equipped with propulsion machinery of any kind to be numbered in the State where the vessel is principally operated. In 46 U.S.C. 12302(a), the statute authorizes the Secretary to prescribe, by regulation, a Standard Numbering System (SNS) that may be implemented by the States to perform this function on behalf of the Federal Government with systems approved by the Secretary. This authority has been delegated to the U.S. Coast Guard. The regulations requiring the numbering of undocumented vessels are in 33 CFR Part 173; regulations establishing the SNS for States to carry out this function are contained in Part 174.

In States that do not have an approved system, the Federal Government (U.S. Coast Guard) must administer the vessel numbering system. Currently, all 56 States and Territories have approved numbering systems. The approximate number of undocumented vessels registered by the States in 2017 was nearly 12 million.

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

The SNS collects information on undocumented vessels and vessel owners. States submit reports annually to the Coast Guard on the number, size, construction, etc., of vessels they have numbered. That information is used by the Coast Guard in 1) publication of an annual "Boating Statistics" report required by 46 U.S.C. 6102(b), and 2) for allocation of Federal funds to assist States in carrying out the Recreational Boating Safety (RBS) Program established by 46 U.S.C. Chapter 131.

On a daily basis or as warranted, Federal, State, and local law enforcement personnel use SNS information from the States' numbering systems for enforcement of boating laws or theft and fraud investigations. In addition, when encountering a vessel suspected of illegal activity, information from the SNS increases officer safety by assisting boarding officers in determining how best to approach a vessel. Since the September 11, 2001 terrorist attacks on the United States, the need has increased for identification of undocumented vessels and their owners for port security and other missions to safeguard the homeland, although the statutory requirement for numbering of vessels dates back to 1918.

**3. Consideration of the use of improved information technology.**

Although the Coast Guard created the SNS, and published regulatory requirements for information collected in State systems, implementation of the program in a State is not mandatory and the regulations do not prescribe how the States are to maintain the system. Each State creates and maintains its own system for numbering of undocumented vessels. Currently, there is no way to determine the percentage of registration documents submitted electronically or how much of the system in its entirety is electronic, although we are aware of an increasing number of States moving toward an electronic function for renewals. Aggregate vessel population information is electronically transmitted by the States to the Coast Guard.

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

The information required by the SNS is not available from any other source. The information collection meets the statutory requirement of 46 U.S.C. 12301 and 12302, as well as requirements for performing the homeland security mission, by providing identifying information on undocumented vessels.

**5. Methods to minimize the burden to small businesses if involved.**

The information required by the SNS is the minimum necessary to properly implement the statutory requirement for numbering of undocumented vessels propelled by machinery, and is applied uniformly to all owners. Small businesses operating as liveries for rental of recreational and certain undocumented vessels provide the same information on their vessels as any individual owner. There is no burden on other small businesses unless they have been authorized by the States to voluntarily act as agents of the State to collect the information, e.g., a boat dealer provides the application to a new boat buyer and sends the application to the State for processing.

**6. Consequences to the Federal program if the collection(s) was conducted less frequently.**

As required by statute and the SNS regulations (46 U.S.C. 12304(a); 33 CFR 173.79 and 174.27), a vessel registration must be renewed at least once every three years. Each State has the option under the program to do so more frequently and some States require annual or biannual renewal. From a law enforcement/homeland security perspective, annual renewals would be preferable but cannot be required under current law.

**7. Explain any special circumstances that would cause the information collection to be conducted in a manner inconsistent with guidelines.**

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-2018-0793], October 31, 2018, 83 FR 54759) and 30-day Notice (March 1, 2019, 84 FR 7092) 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. Explain any decision to provide any payment or gift to respondents.**

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

## **10. Describe any assurance 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 Marine Information for Safety and Law Enforcement (MISLE) Privacy Impact Assessment (PIA) and System of Records Notice (SORN). Links to the MISLE PIA and SORN are provided below:

- [https://www.dhs.gov/sites/default/files/publications/privacy\\_pia\\_uscg\\_misle.pdf](https://www.dhs.gov/sites/default/files/publications/privacy_pia_uscg_misle.pdf)
- <https://www.gpo.gov/fdsys/pkg/FR-2009-06-25/html/E9-14906.htm>

## **11. Additional justification for any questions of a sensitive nature.**

There are no questions of sensitive nature.

## **12. Estimates of Annualized Burden Hours and Labor Cost**

The paperwork burden from the SNS program is based on a three-year registration cycle where approximately 1,232,000 boats will be initially registered and registrations for approximately 10,668,000 boats will be renewed. The initial registration figure is based on the three-year average of new and used boat sales, as reported by the National Marine Manufacturers Association. The registration renewal figure is based on the average of the registered vessel population over the last three years minus the initial registrations. The true number of registrations will vary according to actual growth in numbered vessels as reported by States. At .083% of an hour (5 minutes) to affix state registration numbers ( $[1,232,000 * 5] / 60 = 102,667$  hours) and .0625% of an hour (3.75 minutes) to fill out each application or renewal for a number ( $[10,668,000 * 3.75] / 60 = 666,750$ ), the total burden over the next three years is 769,417 hours ( $102,667 + 666,750$ ). The annual burden will be approximately 256,472 hours each year.

Labor cost estimates are based on a GS-03 wage \$14.44 per hour and 5 minutes per initial registration and 3.75 minutes per re-registration. The total cost associated with 1,232,000 newly registered boats over three years is about \$1,482,507 or \$494,169 in each year. The total cost associated with 10,668,000 re-registered boats over three years is about \$9,627,870 or \$3,209,290 in each year. The total annual cost to initial issue and renewal of vessel registrations is \$3,121,630. See Table 1: Summary.

Table 1: Summary

Number of Respondents	11,900,000
Number of Responses	11,900,000
Total Burden Hours	769,417
Total Labor Cost	\$9,627,870

**13. Estimates of annualized capital and start-up costs.**

There are no capital and start-up costs, record keeping costs or maintenance costs for the respondents. Each State's system is unique, so system costs vary from State to State. The cost to States is the cumulative cost associated with all State SNS systems and likely \$28,000,000 to \$56,000,000 for all 56 systems that cost in the range of \$500,000 to \$1,000,000 per system.

**14. Estimates of annualized Federal Government costs.**

Collection costs to the Federal Government for the SNS are negligible, because States implement the program. The Coast Guard does receive aggregate vessel population numbers from the States as a result of this collection, but time spent receiving and reviewing this data is minimal.

**15. Explain the reasons for the change in burden.**

The change in burden hours is an ADJUSTMENT due to a change (i.e., decrease) in the estimated annual number of respondents. There is no proposed change to the recordkeeping requirements of this collection. The recordkeeping requirements, and the methodology for calculating burden, remain unchanged. Cost burden was removed due to the inaccurate reporting of labor costs as start-up costs, resulting in duplicative burden estimates in the past ICR submission.

**16. For collections of information whose results are planned to be published for statistical use, outline plans for tabulation, statistical analysis, and publication.**

States report the number of vessels to the Coast Guard each year. These reports are compiled in the annual "Boating Statistics" report, and are used in the annual allocation of Federal financial assistance available for State boating safety programs.

**17. Explain the reasons for seeking not to display the expiration date for OMB approval of the collection of information.**

USCG will display the expiration date for OMB approval of this information collection

**18. Explain each exception to the certification statement.**

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

**B. COLLECTION OF INFORMATION EMPLOYING STATISICAL METHODS**

This information collection does not employ statistical methods.