



## Laurel Anders, Pennsylvania Fish & Boat Commission

This is a Comment on the **Coast Guard (USCG) Notice: Agency Information Collection Activities; Proposals, Submissions, and Approvals (Federal Register Publication)**

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### Comment

Thank you for the opportunity to comment on the U.S. Coast Guards submission of an Information Collection Request (ICR) regarding OMB Control Number: 1625-NEW. It is important that the States being required to comply with this collection of information have an opportunity to comment on its utility and suggest ways to minimize the burden of providing the required information. As a State that numbers vessels, administers recreational boating safety funds and is a member of the National Association of State Boating Law Administrators (NASBLA), please find my comments below.

The ICR should be granted since the information sought is used for the purpose of normalizing recreational boating fatality rates across the nation and is necessary for the Department of Treasurys calculations regarding tax revenues and distributions of the Sport Fish Restoration and Boating Trust Fund. As a point of clarification, the Coast Guards tabulation of State numbered vessels as a result of this ICR cannot be used to measure risk as stated in the supplemental Paperwork Reduction Act Submission that accompanies this ICR, especially since there are numerous recreational boating accidents and fatalities that occur in vessels not required to be numbered and not reflected in this collection of information.

As noted in the Federal Register, in accordance with 33 CFR 174.123, each State that has an approved numbering system must prepare and submit Coast Guard Form CGHQ-3923, Report of Certificates of Number Issued to Boats, to the Coast Guard. Although OMB No. 1625-NEW reflects the revised vessel type terminology resulting from the Coast Guards 2012 issuance of the Final Rule on Changes to Standard Numbering System, Vessel Identification System, and Boating Accident Report Database (Docket No. USCG-2003-14963), it does not accurately reflect the CFRs terminology in its title or instructions (i.e., all references to the approved numbering system, state numbered boats and

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certificates of number have been replaced with registration and registered).

Also of concern is the fact that OMB No. 1625-NEW is dated 6/2014 inferring that is already in use (or may be required for use). Because States are currently in various stages of implementation of the Final Rule (with final implementation required by 1/1/2017), States cannot be compelled to begin using OMB No. 1625-NEW prior to 1/1/2017. Any required deviation from the use of CGHQ-3923 prior to 1/1/2017 will result in additional (and in some cases, significant) burden and cost to the States.

Again, thank you for the opportunity to comment on this collection of information request.