



Ohio Department of Natural Resources

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Docket Management Facility (M-30)
U.S. Department of Transportation
West Building Ground Floor, Rm W12-140
1200 New Jersey Ave, SE
Washington DC 20590-0001

RE: Docket No. USCG-2014-0713

On behalf of the Ohio Department of Natural Resources, Division of Watercraft, I am writing to comment on the U.S. Coast Guard's Notice of Intent to Submit an Information Collection Request to the Office of Management and Budget regarding State Registration Data.

It is our understanding that the primary purpose of this Notice is to solicit public comment on the utility and other aspects of this data collected under 33 CFR 174.123 (Annual Report of Numbered Vessels) and that is submitted by the states to the Coast Guard on Form CGHQ-3923. We know that the content of the certificates of number—which are issued by the states and form the basis for this annual collection—is being affected by regulatory amendments cited in the Final Rule on Changes to Standard Numbering System [SNS], Vessel Identification System [VIS], and Boating Accident Report Database [BARD] ("final rule") issued March 28, 2012. We have also been made aware that on December 16, 2012, the Coast Guard received OMB approval for the SNS information collection (OMB control number 1625-0108) that was amended by the regulatory action. Our assumption is that the Coast Guard, in order to enforce the annual collection of the resulting registration data from the states, must now also seek OMB approval for this collection and for issuance of a valid control number.

In that context, we have reviewed the Notice, giving particular attention to the supporting statement and revised Form CGHQ-3923 presented in the agency's Paperwork Reduction Act Submission. Having remained aware of the regulatory amendments cited in the Final Rule on Changes to Standard Numbering System [SNS], Vessel Identification System [VIS], and Boating Accident Report Database [BARD], we do not have any comments regarding the terminology associated with the vessel types, primary operation, or vessel length categories that appear on the revised form. We do have some general comments to offer, and we are seeking clarification on certain key points.

“Start Date” for state use of the revised Form CGHQ-3923

We have been made aware that the version of Form CGHQ 3923 currently in use (REV 12/90) is presented at http://www.uscgboating.org/grants/state_grants.aspx, and that the version included in the supplemental material for USCG-2014-0713 is dated 06/14 and already appears online at <http://www.uscg.mil/forms/hq.asp> (without an OMB control number and without a form expiration date).

At this time, the state of Ohio is still in the process of transitioning to the new requirements cited in 33 CFR 174.19 (which we are required to implement by January 1, 2017). That being the case, what are the Coast Guard’s intentions with regard to the version of the reporting form we will need to use to make our annual reporting in 2015 and beyond? Will we have the option to use the “older” version of the reporting form until such time that we have transitioned to the new requirements? And, if required to use the new form prior to that transition, how will the Coast Guard view any incomplete data that might not be able to be generated in the new format prior to completion of the transition?

“Scope of Information” requested on revised Form CGHQ-3923

In comparison of the two versions of Form CGHQ 3923, there appears to be only one aspect that is the same—the vessel length categories. Otherwise, there are significant format and content differences. Some, like the vessel type terms that appear on the revised Form, were anticipated as they are authorized in the revised CFR. However, while the “old” version of the Form further segments vessels by hull material and engine drive, the revised Form does not do so even though hull material and engine drive are still required by CFR and their terminology and definitions were standardized in the final rule.

Knowing that hull type, and more importantly engine drive information, can be important details in better identifying and understanding the boating demographics within a state, what is the rationale for omitting this information in this revised collection form?

Also, do the estimates of the form completion burden account for any initial burden in transitioning to this revised reporting scheme?

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"Title" of revised Form CGHQ-3923

While the old CGHQ 3923 is titled "Report of Certificates of Number Issued to Boats," in accordance with the language of 33 CFR 174.123, the title of the revised CGHQ 3923 is "State Registration Data."

What is the reason for the title change? Is there any relationship between this revision and anticipated efforts to bring CFR into agreement with the Uniform Certificate of Titling Act for Vessels (UCOTA-V)?

Thank you for the opportunity to provide comment and please feel free to contact me by phone at 614/265-6474 or via e-mail at Mike.Miller@dnr.state.oh.us if you have any questions regarding this submission.

Sincerely,



Michael R. Miller, Chief
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Division of Watercraft