

**Appendix-A: Total Estimated Annual Burden on Industry**

**Respondents:**

Towing Vessels	6,020		
Towing Vessel Owners & Operators	1,745	<b>Total:</b>	<b>7,782</b>
Third Party Organizations	17		

46 CFR Part	Section	Section Title	Burden Hours Per Response	Wage Rate	Average Responses per Year	Total Annual Burden Hours	Total Annual Burden Cost
136	130e	Changing Options	0.50	\$54	89	44	\$2,396
	210	Obtaining or Renewing a Certificate of Inspection	0.50	\$54	1,240	620	\$33,467
	220	Posting	0.08	\$54	664	55	\$2,988
	235	Certificate of Inspection Amendment	0.50	\$54	192	96	\$5,193
137	135	Reports and Documentation Required for the Towing Safety Management System Option	1.00	\$54	2,922	2,922	\$157,766
138	305	TSMS Certificate	1.00	\$54	390	390	\$21,066
	500	Notification prior to audit	0.25	\$54	98	24	\$1,317
	505a	Submission of external management audits	0.25	\$54	390	98	\$5,267
	505b	Submission of external vessel audits	0.25	\$54	3,566	891	\$48,137
139	120	Application for Approval as a Third-party Organization	16.00	\$54	20	323	\$17,467
	135	Addition and Removal of Auditors and Surveyors	0.25	\$54	19	5	\$252
	140	Renewal of Third-party Organization Approval	8.00	\$54	40	323	\$17,467
	165	Documentation	1.00	\$54	202	202	\$10,917
140	400	Personnel records	0.02	\$54	7,163,800	119,397	\$6,447,420
	410	Safety orientation	0.25	\$54	1,927	482	\$26,011
	500	General - Recordkeeping of Health and Safety Plan	0.25	\$54	1,927	482	\$26,008
	515	Training requirements - Documentation	0.25	\$54	1,927	482	\$26,011
	615	Examinations and tests	0.03	\$54	232,943	7,765	\$419,297
	645b	Documentation of Navigational Safety Training	0.25	\$54	1,927	482	\$26,011
	820	Recordkeeping for towing gear	0.17	\$54	72,240	12,040	\$650,160
	910	Towing vessel record or record specified by TSMS	0.17	\$54	6,020	1,003	\$54,180
141	320	Inflatable survival craft placards	0.03	\$54	96	3	\$173
	340	Lifejackets	0.03	\$54	12,040	401	\$21,672
	380	Emergency position indicating radio beacon (EPIRB)	0.02	\$54	110	2	\$99
142	240	Semi-portable and Fixed Fire-Extinguishing Systems	0.25	\$36	6,020	1,505	\$54,180
143	555	Electrical power sources, generators, and motors	0.08	\$54	110	9	\$497
	605	Demonstration of Compliance	2.00	\$54	110	221	\$11,920
144	145	Procedures for Verification of Compliance with Design Standards	0.50	\$54	110	55	\$2,980
	155	Verification of compliance with design standards for a sister vessel	0.50	\$54	27	14	\$738
	160	Marking	3.50	\$54	104	363	\$19,620
	300	Stability Standards for an Existing Vessel	4.00	\$54	117	469	\$25,350
	315	Weight and moment history requirements for a vessel with approved lightweight characteristics	0.08	\$78	116	10	\$753
	330	Review of a Vessel's Watertight and Weathertight Integrity	8.00	\$78	4	35	\$2,728
15	820a	Chief Engineer Training	0.30	\$54	20	6	\$322
<b>Total:</b>					<b>7,511,527</b>	<b>151,219</b>	<b>\$8,139,827</b>

## Appendix-B: Estimated Annual Federal Government Cost

46 CFR Part	Section	Section Title	Burden Hours Per Response	Wage Rate	Average Responses per Year	Annual Hours	Annual Cost
136	130e	Changing Options	4.00	\$74	127	507	\$37,521
	210	Obtaining or Renewing a Certificate of Inspection	8.00	\$74	6,130	49,043	\$3,629,178
	210	Obtaining or Renewing a Certificate of Inspection	0.25	\$106	6,130	1,533	\$162,455
	235	Certificate of Inspection Amendment	1.50	\$74	151	226	\$16,739
	235	Certificate of Inspection Amendment	0.50	\$106	151	75	\$7,992
	235c	Certificate of Inspection Amendment	1.50	\$74	90	134	\$9,946
	235c	Certificate of Inspection Amendment	0.50	\$106	90	45	\$4,749
138	500	Notification prior to audit	1.00	\$50	390	390	\$19,506
	505	Submission of external management audits	4.00	\$50	390	1,560	\$78,023
139	120	Application for Approval as a Third-party Organization	4.00	\$74	202	809	\$59,839
	120	Application for Approval as a Third-party Organization	0.50	\$106	202	101	\$10,714
	135	Addition and Removal of Auditors and Surveyors	4.00	\$50	21	83	\$4,152
144	145	Procedures for Verification of Compliance with Design Standards	0.25	\$50	110	28	\$1,380
	145	Procedures for Verification of Compliance with Design Standards	0.25	\$106	110	28	\$2,925
				<b>Total:</b>			<b>\$4,045,120</b>