

Supporting Statement for Offshore Supply Vessels – Title 46 CFR Subchapter L

OMB No.: 1625-0065
COLLECTION INSTRUMENTS: Instruction

A. Justification

1. Circumstances which make the collection of information necessary.

Under the authority of the Secretary found in 46 U.S.C. 3301 *et seq.*, the Coast Guard must prescribe necessary regulations and conduct inspections of offshore supply vessels (OSVs) to secure the safety of individuals and property on board. The regulations include the design, construction, alteration, repair, and operation of these vessels, including requirements for lifesaving and firefighting equipment, inspections, and tests. Based upon this mandate, the regulations in 46 CFR Subchapter L, Offshore Supply Vessels, include reporting and posting requirements to ensure safe operation, prevent emergencies to the extent reasonably possible, and ensure proper reaction when emergencies do occur.

Title 46 U.S.C. 3301 and 3305 require that every offshore supply vessel (OSV) be inspected before it is put into service to determine its structural adequacy; that it has suitable accommodations; and that it is in full compliance with applicable marine safety regulations. Title 46 USC 3306 directs the Secretary to make appropriate regulations for inspections and tests to ensure that OSVs comply with standards for structural strength, propulsion and auxiliary machinery, construction materials, safety and lifesaving equipment, accommodations arrangement, vessel stability, cargo gear and structural fire protection. Title 46 U.S.C. 3307 and 3308 requires the Secretary to examine each vessel subject to inspection at proper times to ensure [continued] compliance with the laws and regulations. Presently, these examinations are provided for in 46 CFR part 126. Title 46 CFR 126.530 provides ways of conducting alternative annual inspections of OSVs. In place of Coast Guard examinations, examination reports from vessel masters or from other owner's representatives acceptable to the Coast Guard, are needed by the Coast Guard to determine whether eligible OSVs remain in satisfactory condition and continue to be reasonably fit for their intended route and service.

2. Purpose of the information collection.

First, the notification requirements are generally intended to ensure that the Coast Guard is aware when significant maintenance or repair work is done on offshore supply vessels. If necessary, attendance by a Coast Guard inspector may be scheduled. Also listed under 'reporting burden' are plan submittal requirements for significant modifications to existing vessels. These plans are required to be submitted for technical review prior to the modification of the vessel to ensure that the structure, arrangement, stability, and outfitting are satisfactory for the intended service. The costs and burdens estimated are strictly administrative (reproduction, handling, mailing), inasmuch as the engineering and handling would be performed whether or not the plans were submitted.

Second, the recordkeeping and posting requirements are necessary for several purposes. They make readily apparent to the crew, offshore workers, boarding officers and inspectors that the vessel is currently in compliance with various regulations and treaties. The markings and placards, which are required to be posted, provide instructions to those on board of actions to be taken to prevent or respond to an emergency. Recordkeeping requirements provide inspectors with a means to verify compliance with routine operating requirements, and with a reliable means of identifying the vessel's condition, and the number of persons on board in the event of a casualty.

Finally, the reporting requirements in 46 CFR 126.530 provide a mechanism for the owners and operators of OSVs based overseas to submit certified examination reports and statements to the Coast Guard as an alternative to a Coast Guard annual inspection. By providing an alternative examination procedure, the Coast Guard estimates there is a potential of cost saving to OSV owners/operators.

3. Consideration of the use of improved technology.

Many of the requirements in Subchapter L may be satisfied by simple telephone calls or posting requirements. For information that must be submitted to the Officer in Charge, Marine Inspection (OCMI), it may be provided in writing or electronically via e-mail. Contact info for CG OCMI's can be found at—<https://www.uscg.mil/Units/Organization/>.

For plan review-related requirements, the information is vessel specific: they are one-time or on occasion submissions and generally take the form of vessel or equipment plans or operating manuals. The Coast Guard Marine Safety Center (MSC) has a Web site¹ that details how a respondent may submit plans electronically for review. Electronic submission is voluntary, and is done via e-mail.

We estimate that 50% of the reporting and recordkeeping requirements could be done electronically. At this time, we estimate that 30% of all requirements are done in electronic format.

4. Efforts to identify duplication.

There are no other Federal agencies with similar programs, thus there is no duplication of other Federal information collections.

5. Methods used to minimize burden to small business if involved.

Owing to the nature of the industry, recordkeeping requirements for small entities are generally proportionately less because of the smaller number of operations performed. In order to minimize the burden on the public, only the minimum information necessary for the Coast Guard to fulfill its regulatory functions is required to be recorded.

6. Consequences to the Federal program if collections were conducted less frequently.

Markings are needed to clearly indicate to crewmembers and vessel personnel where emergency equipment and exits are located. Reducing the frequency of collection for logbook entries would hinder or degrade the administration of the marine safety rules. Since the Coast Guard uses the information in the log books to enforce the regulations, it is imperative that the information be recorded accurately and in a timely manner.

For the reporting/recordkeeping requirements of 46 CFR 126.530, if information was submitted or recorded less frequently, no assurance could be given that vessels are operating within the applicable requirements that ensure marine safety. If the reporting or recordkeeping requirements are decreased, the Coast Guard would not be fulfilling its obligation to enforce the regulations. If this information is not collected, the Coast Guard could not offer the alternative annual inspection option.

7. Special collection circumstances.

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

8. Efforts to consult with persons outside the agency.

A 60-day Notice (See [USCG-2019-0256] May 3, 2019, 84 FR 19094) and 30-day Notice (July 12, 2019, 84 FR 33276) 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. Provide any payment or gift to respondents.

¹ For details on submitting information to the CG MSC, go to— <https://www.dco.uscg.mil/msc>.

The Coast Guard does not provide payment or gifts to respondents in exchange for a benefit sought.

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.gpo.gov/fdsys/pkg/FR-2009-06-25/html/E9-14906.htm>

11. Additional justification for any question of a sensitive nature.

There are no questions of sensitive language.

12. Estimate of annual hour and cost burden to respondents.

- The estimated annual number of respondents is 578.
- The estimated annual number of responses is 2,206.
- The estimated annual hour burden is 1,230.
- The estimated annual cost burden is \$65,169.

The burden to respondents is in Appendix A. There are 3 distinct burden elements to this collection—(1) plan review and records submissions; (2) recordkeeping & posting/marketing; and (3) alternative annual inspection submissions. We estimate that 5% of the existing OSV fleet and 100% of the new construction OSV fleet will submit plans per year. Additionally, we estimate that the existing OSV fleet will perform a recordkeeping/posting/marketing activity every 4 months, and that the new construction OSV fleet will perform a recordkeeping/posting/marketing activity every 2 weeks. We estimate that 1% of the OSV fleet will make alternative annual inspection submissions per year. The burden per response is 1 hour per plan review/records submission or alternative annual inspection, and 0.6 hours per recordkeeping/posting/marketing activity. We estimate that responses are completed by an OSV crew member or shore side technical specialist. The position of an OSV crew member or shore side technical specialist is equivalent to a GS-9. The wage rate used is in accordance with the current edition of COMDTINST 7310.1(series) for “Out-Government” personnel.

13. Total of annualized capital and start up costs.

There are no capital, start-up or maintenance costs associated with this information collection.

14. Estimate of annualized Federal Government cost.

The estimated annual Federal Government cost is \$10,109 (see Appendix B). We estimate that it will take about 2 hours by a GS-13 to review and process each plan/records submission. Additionally we estimate that a Chief Warrant Officer (W-2) will take about 3 minutes (0.05 hours) per recordkeeping & posting/marketing spot check, and about 3 hours to review and process an alternative annual inspection submission. For OSV recordkeeping & posting/marketing activities, we estimate that 50% of the annual responses are spot-checked. The wage rates used is in accordance with the current edition of COMDTINST 7310.1(series) for “In-Government” personnel.

15. Explain the reasons for change in burden.

The change in burden is an ADJUSTMENT due to a change (i.e., decrease) in the estimated annual number of respondents. There is no proposed change to the reporting and recordkeeping requirements of this collection. The reporting and recordkeeping requirements remain unchanged.

16. Plans for tabulation, statistical analysis and publication.

This information collection will not be published for statistical purposes.

17. Approval for not explaining the expiration date for OMB approval.

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

18. Exception to the certification statement.

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

B. Collection of Information Employing Statistical Methods

This information collection does not employ statistical methods.