

Department of Transportation
SUPPORTING STATEMENT
Effective U.S. Control (EUSC) Parent Company

INTRODUCTION

This is to request the Office of Management and Budget's (OMB) three-year approval clearance for the information collection entitled, Effective U.S. Control (EUSC) Parent Company (OMB Control No. 2133-0511), which is currently due to expire on July 31, 2019. This an extension without change of a currently approved collection. No changes or adjustments were reported in items 13 or 14 of OMB Form 83-I.

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The purpose of the collection is to aid in identifying oceangoing vessels that may be both useful and available to the Department of Defense for deploying U.S. military equipment (such as tanks and other tracked and wheeled vehicles) and the full range of supplies (including petroleum products and fuel) necessary to sustain a force in a foreign theater of operations. In order to identify "militarily useful" vessels, MARAD consults Lloyd's Register of Shipping (Lloyd's List). Lloyd's is the world's principal standard compendium of information on commercial cargo vessels. The publication describes, classifies, and registers vessels according to certain criteria of physical structure and equipment as well as ownership. Thus, Lloyd's is principally a list of vessels, not of persons. MARAD is satisfied that Lloyd's effectively captures all vessels which might be considered "militarily useful." MARAD is interested in persons to the extent that their nationality is relevant to a determination of the citizenship of the owners of a vessel.

In order for a vessel to be considered available for DOD use (other than a U.S. or foreign flag vessel hired [chartered] by DOD) it must be subject to requisition pursuant to US law, 46 U.S.C. 56301 (2007). This means that if the vessel in question is registered in a foreign country, it must be owned by U.S. citizens to be considered requisitionable. MARAD uses the names of vessel owners (most commonly corporations) identified in Lloyd's List as the starting point for a determination of the citizenship of the owners. Ownership (and the nationality of owners) is verified through direct contact with owners identified in Lloyd's List.

This collection of information enhances the Department of Transportation's strategic goal for security, preparedness and response.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The information is used by MARAD's Division of Sealift Operations and Emergency Preparedness for contingency planning for sealift capacity. Each respondent is requested to provide the following elements of information for vessels identified with the respondent.

- Vessel name
- Flag (country of registry)
- Vessel type (e. g., containership, tanker, bulk, roll-on/roll-off, breakbulk, refrigerated)
- International Maritime Organization (IMO) number
- Call sign
- Cargo capacity
- Year of launch
- Where built
- Dimensions (depth, breadth, length)
- Names of insurers
- Primary fuel type
- Speed
- Current beneficial owner

Incomplete or inaccurate information as to the ownership, flag, size, age, speed and tonnage could lead to invalid conclusions and faulty analysis.

The information should be submitted to Russell Krause, Chief, Division of Sealift Operations and Emergency Preparedness, either by email at russ.alan@dot.gov or by regular mail at Maritime Administration (MAR-612), 1200 New Jersey Avenue, SE, Washington, DC 20590.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology. Also, describe any consideration of using information technology to reduce burden.

MARAD offers a total electronic option for this collection.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in item 2 above.

We have identified Lloyd's Register of shipping as the primary source for information on vessel ownership and vessel characteristics. Because relevant information of vessel ownership, characteristics, and country of registry may change between periodic publication of updates to Lloyd's, we verify such information as necessary by direct contact with vessel owners, beginning with owners identified by Lloyd's.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

This information collection does not impact small businesses.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Mobilization plans would lack current information thereby reducing their accuracy.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**
- **requiring respondents to report information to the agency more often than quarterly;**
 - **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
 - **requiring respondents to submit more than an original and two copies of any document;**
 - **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
 - **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
 - **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
 - **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing data with other agencies for compatible confidential use; or**
 - **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances that require the collection of information to be conducted in a manner described above.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and record-keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The Maritime Administration published a 60-day notice and request for comments on this information collection in the Federal Register on March 21, 2019 (Vol. 84, No. 55, at 10572),

indicating comments should be submitted on or before May 20, 2019. No comments were received. In addition, a 30-day notice requesting comments was published in the Federal Register on July 23, 2019 (Vol. 84, No. 141, at 35452), indicating comment should be submitted on or before August 22, 2019.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payments or gifts are provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The information requested is not of a confidential nature and, consequently, no assurance of confidentiality need be given.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

Not applicable. There are no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated burden and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in item 13 of OMB Form 83-I.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in item 13 of the supporting statement and item #14 of the OMB Form 83-I.**

<u>Number of Respondents</u>	<u>Responses Per Respondent</u>	<u>Total Response Annually</u>	<u>Hours Per Response</u>	<u>Total Hours Annually</u>
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$$60 \times 1 = 60 \times 0.5 = 30$$

A determination of the estimated number of hours required per response was made after consultation with several respondents.

In addition, it is estimated that 2 employees in the below listed areas together spend 0.5 hours of their time collecting and assimilating the information submitted with each response. Given an average salary of \$45.00 per hour for the employees, the cost per response per year to each respondent is estimated as follows:

1 Accountant
1 Clerical Worker

Number of Respondents		Responses Per Respondent		Cost Per Hour		Hours Per Response		Total Cost Annually
60	x	1	x	\$55.17	x	0.5	=	\$1,655.10

Annually cost/plus benefits - \$1,655.10 x 1.4 = \$1,890.00
Total Respondents Burden Hour Costs is \$1,890.00

*The hourly wage used is a combined total of the mean hourly wage for an Accountants, 13-2011 (\$37.89 per hour) and an Administrative Assistants, 43-9000 (\$17.28 per hour). The wages were taken from the BLS May 2018 National Occupational Employment and Wage Estimates table. (https://www.bls.gov/oes/current/oes_nat.htm#00-0000).

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in items 12 and 14).

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**

- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

(a) Total Capital and Start-Up Costs Estimate: **None**

(b) Total Operation and Maintenance and Purchase of Services Estimate: **None**

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from items 12, 13, and 14 in a single table.

The total annual cost to the Federal Government for processing the collection is estimated as follows:

One-time Costs: \$ None

Annual Costs: \$2,040.06

One employee (GS-12 step 8) analyzes the primary service, requests the annual statement, receives the annual statement, incorporates the data, and files the statement. Time required for these tasks is 30 minutes and the average hourly rate is \$ 44.69.

<u>Number of Employees</u>		<u>Avg. Hourly Wage</u>		<u>Project Time</u>	=	<u>Cost Per Application</u>
1	x	48.19	x	0.5 hour	=	\$24.09

Times 60 responses times \$24.09 x 1.4 = \$2,023.56

Cost of materials and postage for annual mailing of verification letters to respondents:

30 letters x \$0.55 (postage)	= \$	<u>16.50</u>
		\$2,040.06

(Note: 30 requests sent by e-mail)

Maximum Total Annual Cost to Federal Government: \$2,040.06

15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of OMB Form 83-I.

No changes or adjustments were reported in items 13 or 14 of OMB Form 83-I.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates and other actions.

The schedule for collecting and publishing the data is as follows:

Analysis of Commercial Source		X	
Interoffice Consultation		X	
Preparation and Mailing of Verification Letters/e-mail	X		
Receipt of Responses		X	X
Follow-up on Delinquent Respondents			X X
Compilation of Data			X
Preparation of Publication		X	
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Information collected is used to determine which vessels are to be included in a table that shows the number of ships, gross tonnage and deadweight tonnage by vessel type and flag. The information is also included in a tabulation that exhibits the parent company, direct owner, vessel name, class of vessel, where built (country), year built, gross tonnage, deadweight tonnage, speed and flag of registry.

Publication is released annually in May based on survey data as of January 1.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Not applicable. We are not seeking to not display the expiration date for OMB's approval of the collection.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

Not applicable. There are no exceptions to the certificate statement.