

## SUPPORTING STATEMENT – PART A

(Vessel Operation Reporting ~ 0710-0006)

### 1. Need for the Information Collection

The authority for the U. S. Army Corps of Engineers (USACE) to collect data on vessel operations and cargo movements is given by Section 11 of 42nd Stat 1043; Rivers and Harbors Appropriation Act of 1922 as amended by PL 99-662. The Rivers and Harbors Appropriation Act states:

SEC.11. “That owners, agents, masters, and clerks of vessels and other craft plying upon the navigable waters of the United States, and all individuals and corporations engaged in transporting their own goods upon the navigable waters of the United States, shall furnish such statements relative to vessels, passengers, freight, and tonnage as may be required by the Secretary of War: Provided, That this provision shall not apply to those rafting logs except upon a direct request upon the owner to furnish specific information.

That every person or persons offending against the provisions of this section shall, for each and every offense, be liable to a fine of not more than \$5,000 or imprisonment not exceeding two months, to be enforced in any district court in the United States within whose territorial jurisdiction such offense may have been committed. In addition the Secretary may assess a civil penalty of up to \$2,500, per violation, against any person or entity that fails to provide timely, accurate statements required to be submitted pursuant to this section by the Secretary.”

The enactment of PL 99-662, the 1986 Water Resources Development Act, has mandated the Department of the Treasury to collect user fees from shippers using Federal navigation projects. The shipper's name, IRS number, and exemption code were added to provide Treasury a means of verifying the collection of this user fee.

### 2. Use of the Information

This is an effort to combine OMB Control No 0710-0006, *Vessel Operation Report* and 0710-0005, *Record of Arrivals and Departures of Vessels at Marine Terminals*. The information collected on (currently known as) 0710-0005 is used as a quality control instrument by comparing the data collected on the forms associated with the (currently known as) 0710-0006.

The instruments under (currently known as) 0710-0006 are:

- ENG Form 3925, *Vessel Operation Report – Statement of Freight and Passengers Carried – Coastwise, Deep Draft, and Towboat Traffic*
- ENG Form 3925B, *Vessel Operation Report – Statement of Freight and Passenger Carried – Shallow Draft Inland Traffic*
- ENG Form 3925C, *Vessel Operation Report – Statement of Containers Carried*
- ENG Form 3925P, *Vessel Operator Report – Statement of Passengers and Vehicles Carried*

The respondents for these forms are “Owners, agents, masters and clerks of vessels, and other craft plying upon the navigable waters of the United States, and all individuals and corporations engaged in transporting their own goods upon the navigable waters of the United States...”

[River and Harbor Act of September 22, 1922 (42 Stat. 1043)].

The instrument under (currently known as) 0710-0005 is ENG Form 3926, *Record of Arrivals and Departures of Vessels*. The respondents of this form are the owners of marine/docks and terminals engaged in handling waterborne commerce. While this report is purely voluntary, many dock/marine terminal owners choose to provide the requested information.

Together, the data from these reports allow the Waterborne Commerce Statistics Center (WCSC) to create the most holistic view of what actually happens at docks/marine terminals and what is moving on U.S. waterways. The different respondents are to ensure maximum collection of data from which USACE compiles and publishes waterborne commerce statistics. The data is used not only to report to Congress, but also to perform cost benefit studies for new projects, rehabilitation projects, and operations and maintenance of existing projects. It is also used by other Federal agencies involved in transportation and security. This data collection program is the sole source for domestic navigation statistics. If this data collection effort is not performed, domestic waterborne commerce statistics will not be available. Beginning April 1, 1987, the data has been given to the U. S. Customs and Border Protection to verify receipts of the Harbor Maintenance Tax. *Note: The Supreme Court has held that the Harbor Maintenance Tax is unconstitutional for exported but not imported or domestic cargo.*

The information collected on ENG Form 3926 enables WCSC to identify significant movements of vessels and tonnage. One example of where this information is valuable is where petroleum is being shipped out of Valdez, Alaska. Without the information furnished on the ENG Form 3926, millions of tons of petroleum shipments would go unreported each year. This situation exists because there are many vessel operating companies moving crude petroleum from Valdez to points south. Unless we know who is moving the crude oil, we cannot enforce the law that requires them to report to WCSC. This represents the largest and most critical tonnage in domestic waterborne trade. The information also enables WCSC to monitor the cargo movements at several East Coast ports as well as Great Lakes ports. It also enables WCSC to monitor the continuity (i.e., port to port movements) of deep draft vessels engaged in general cargo trade.

WCSC may provide the vessel owners and marine dock owners the forms via email or send them hard copies in the mail (with an addressed, postage paid return envelope included). The vessel owners can also access the 3925 series forms online at the WCSC website:

<http://www.navigationdatacenter.us/wcsc/form3925.htm>. Vessel owners have three options for returning the 3925 series forms: mail (using the addressed, postage paid return envelope), email, or fax. The marine dock owners return the ENG Form 3926 via mail (using the addressed, postage paid return envelope) or via email. WCSC sends out reminder cards via email or U.S. mail, depending on owner/operator preference, to the vessel owners on/about the third week of each month to ensure maximum reporting in accordance with the River and Harbors Appropriation Act of 1922. If they still haven't received the monthly report after sending out a reminder card, WCSC will call the vessel owners to check on the status of the previous months reporting. ENG Form 3926 respondents are asked to voluntarily submit forms monthly, within ten days after the close of each month. Although the ENG Form 3926 is voluntary, WCSC will conduct follow-up emails and phone calls to the marine dock owners. Data collected using ENG Form 3926 is not released to the public; it is entered into the Waterborne Application for Report Processing (WARP) database and used to augment and verify data submitted by vessel owners/operators (3925 series forms).

The 3925 series forms collect very similar information to the 3926 form: vessel name, vessel type, ship/receive date, and cargo tonnage (if any). They differ in that the 3925 forms also require port and dock information; that is unnecessary for the 3926 because the respondent is a dock owner, cargo (if any) type, waterway information, the vessel's U.S. Coast Guard identification number, and the total number of trips the vessel took to/from the specific location. This information allows the WCSC to pinpoint vessel and cargo (commodity) movements, which is taken into consideration by outside entities when analyzing port, dock, and waterway usages. The 3926 form differs from the 3925 forms in that it annotates whether cargo (if any) was loaded at a foreign or domestic port. It also provides an area for the dock/marine terminal owner to include remarks on particular vessels' movements, cargo, etc.

When replies from respondents are received, they are either electronically processed via in-house application or hand-typed into the WARP database. For the 3925 series forms, the data is ran through daily quality control programs to ensure data is accurate and not duplicated. When errors are flagged, edits to the information are completed in WARP by WCSC personnel. For ENG Form 3926, a "Dock Report" that matches docks to reported vessel movements is pulled from WARP on a monthly basis.

- A 3925 series quality control example: A common error is that an owner/operator turns two separate reports for the same vessel during the same month. The editing program will note that there are duplicates and send warnings to WCSC staff. The WCSC member responsible for that owner/operator will then analyze the error, look at the reports that were submitted, and realize that two copies of the same thing were submitted. At that point, the extra, unnecessary data are deleted. The quality control program will run through the update data again and ensures there are no more duplicates.
- An ENG Form 3926 example: The Dock Report is analyzed by the team leader for data outliers. If a marine dock owner annotated a ship, e.g., an oil tanker, passed through their dock but no report (from the 3925 series) exists for that vessel, then the WCSC employee responsible for that vessel's owner/operator contacts the company to research that particular vessel's movements during that specific time period. It could be that the vessel

owner/operator did not turn in a report for that month or that line of data was not recorded in the submitted report.

The ENG Form 3926 is an excellent tool WCSC personnel use to ensure accuracy of reporting on the Vessel Operation Reports (3925 series forms).

The end result of using both the 3925 series and ENG Form 3926, despite collecting very similar data, is to ensure WCSC is able to paint a complete picture of vessel movements and cargo carried on U.S. waterways. Each set of data produced from the forms allows WCSC to ensure accuracy and completeness. The data are used to annually publish *Waterborne Commerce of the United States (WCUS) Ports and Waterways* which presents detailed data on the movements of vessels and commodities at the ports and harbors and on the waterways and canals of the United States and its territories. It also provides statistics on the foreign and domestic waterborne commerce moved through the U.S. waters. Congress receives this annual report, and the data contained therein are used in cost-benefit analyses for new projects, rehabilitation projects, and operations and maintenance of existing projects. It is also used by other Federal agencies involved in transportation and security. Researchers and private organizations also use the data regularly to help decide on which locales are best models for their studies/needs. In conclusion,

“The WCSC and the LPMS databases are the sole government sources for information in the United States on domestic waterborne commerce and lock or canal operation. The Army Corps of Engineers is the agency charged with the collection of this data due to its responsibility for the planning, design, construction, rehabilitation, operation, and maintenance of the inland waterway systems, the Great Lakes, and the channels of the coastal ports.

The aggregate data collected under these programs are published in the annual publications, *Waterborne Commerce of the United States, Parts 1-5*, *Lock Performance Monitoring System Quarterly Reports*, and *Waterborne Transportation Lines of the United States*. Each data base and publication provide essential information for an understanding of the utilization of our Nation’s navigation systems and the fleet using these systems. The data bases provide essential information to those with the responsibilities over the physical system or to those involved in shipping or moving commodities on the Nation’s waterways.” [River and Harbor Act of September 22, 1922 (42 Stat. 1043)]<sup>3</sup>.

### 3. Use of Information Technology

Record of Arrival and Departure: Terminal operators with adequate computer resources are encouraged to consider submission of their reports in electronic format via email because this represents a significant reduction in burden hours. WCSC currently receives approximately 75% of these reports electronically via email rather than manual coding. WCSC works with respondents to assist in the conversion from manual to electronic automated reporting procedures.

VOR: The reporting procedures for selected companies with adequate computer resources have been automated. These companies submit coded reports on electronic media. The percent of records from automated companies is approximately 80%. Companies who submit automated reports have greatly reduced the burden hours for providing the government data. Forms can be downloaded from the Waterborne Commerce Statistics Center webpage: (<http://www.navigationdatacenter.us/wcsc/form3925.htm>). The WCSC continues to assist vessel operating companies in providing data using automation.

#### 4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source. The WCSC is the sole authorized collector of data on domestic waterborne commerce and provides same to Maritime Administration (MARAD), Department of Energy (DOE), the Coast Guard, State taxing agencies, U. S. Customs and Border Protection, and the Internal Revenue Service.

The information collected on ENG Form 3926 is used as a quality control instrument for verification of data collected on ENG Forms 3925, 3925B, 3925C, and 3925P. There is no other source for the origin, destination, commodity, and tonnage data collected on ENG Forms 3925, 3925B, 3925C, and 3925P.

#### 5. Burden on Small Business

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

#### 6. Less Frequent Collection

If the data collection program being conducted voluntarily on ENG Form 3926 were discontinued, then the accuracy of the statistics collected on ENG Forms 3925, 3925B, 3925C, and 3925P would be negatively impacted. The most significant impact would be on the movement of crude oil at Valdez, Alaska. Millions of tons of crude oil would go unreported because there would be no way to identify the vessels and associated companies moving the crude oil. It could also result in underpayment of the Harbor Maintenance Tax and the Inland Waterway Fuel Tax.

A monthly collection interval is the minimum frequency WCSC requires to be able to accurately process and use the information provided on 3926. WCSC personnel need to collect and record the data from the 3926 data and then use it as a quality control check against ENG Forms 3925, 3925B, 3925C, and 3925P. WCSC also uses 3926 data to identify new vessels or previously unreported vessels. Unreported vessel movements and commodity quantities seriously erode the usefulness of published waterborne commerce statistics. WCSC manages the data for nearly 3,000 operators and 79,000 vessels. Allowing operators more than 30 days to report detracts from WCSC personnel processing schedules and prevents timely publishing of mandatory data and statistics.

The data collected on ENG Forms 3925, 3925B, 3925C, and 3925P provides the sole source for waterborne commerce statistics on domestic waterways. The ability to use waterborne commerce statistics to perform mandatory cost/benefit studies is essential for a rational, defensible allocation of USACE annual navigation budget which is over \$1.7 billion.

The WCSC does require that respondents report vessel movements on a monthly basis rather than quarterly. 33 CFR Part 207 (Attachment) specifies on page 3, paragraph 207.800, (5) that timely means monthly submissions.

#### 7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

#### 8. Consultation and Public Comments

##### Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection published on Tuesday, June 11, 2019. The 60-Day FRN citation is 84 FRN 27097.

No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice for the collection published on Friday, August 30, 2019. The 30-Day FRN citation is 84 FRN 45738.

##### Part B: CONSULTATION

USACE has been working closely with the waterborne transportation industry. The WCSC staff attended several industry meetings such as the Inland Rivers Ports and Terminals 2017 Annual Conference (25-27 April, 2017, Kansas City, MO), Transportation Research Board meeting (17-18 May 2017, Irvine, CA), Warrior-Tombigbee Waterway Association Annual Meeting (7-9 June, 2017, Birmingham, AL). The individuals in attendance at these meetings have access to WCSC staff to discuss any problems they might have had with their program.

In addition, WCSC has been meeting with industry representatives at least 3 times per year for the past 3 years as part of the Federal / Industry Logistics Standardization (FILS) group. This group is made up of representatives of USACE, Coast Guard, Customs and Border Protection, IRS, and members of the barge and towing industry (American Commercial Lines, Ingram Barge Lines, AEP, and Marathon Oil Company). The goal of this group is to standardize dock identification, vessel identification, and commodity identification to facilitate reporting between government agencies and industry and among industry themselves; thereby making reporting less burdensome on industry and to reduce data inconsistencies and misinterpretations. Every effort has been made to minimize the impact on private industry. Throughout calendar year 2017,

WCSC staff has met with the Port of Morgan City and terminal operators in Morgan City to facilitate the receipt of ENG Form 3926 information.

If requested, the staff of the Enforcement Office, WCSC, conducts training to the vessel operator's staff in the correct completion of ENG Forms 3925, 3925B, 3925C and 3925P. In the past, this training could be conducted on-site (face-to-face); however, due to budget the training is now over-the-phone (script included). This also provides the staff of WCSC an excellent opportunity to discuss the availability of data, frequency of collection, clarity of instructions, etc. with the respondent.

#### 9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

#### 10. Confidentiality

A System of Record Notice (SORN) is not required for this collection because records are not retrievable by PII.

The records under this collection are maintained under record number 335-2-1g (approved by NARA). Records will be kept in the current file area until event occurs and then until no longer needed for conducting business, but not longer than 6 years after the event, then the records may be destroyed in accordance with Army Regulation 25-400-2, Army Records and Information Management Program.

The data collected on the ENG Form 3926 are not released. It is only used internally by the Corps to ensure complete reporting by vessel operating companies on ENG Forms 3925, 3925B, 3925C, and 3925P. The Corps of Engineers policy on the release of commercial statistics is given in 33 CFR 209.320 which are given in its entirety below:

“The collection of commercial statistics pertaining to rivers, harbors, and waterways, and annual reports thereof to Congress, required by the River and Harbor Act of June 23, 1866 (14 Stat. 70), the act of February 21, 1891 (26 Stat. 766), the River and Harbor Act of June 13, 1902 (32 Stat. 376), The River and Harbor Act of July 25, 1912 (37 Stat. 201), The River and Harbor Act of September 22, 1922 (42 Stat. 1043), and Pub. L. No. 16, February 10, 1932 (47 Stat. 42). It is the policy of the Department to hold in strict confidence any data or information that has been furnished by shippers and others upon the understanding that it will not be disclosed and will only be used in the compilation of port or waterway statistics. In case Federal or State agencies or local interests request other than general information made permissible hereunder, their attention will be called to the policy indicated in this section.”

ENG Forms 3925 series: Release of Commercial Statistics, Trade Secrets, Disclosure of Confidential Information.

(a) Commercial Statistics. USACE policy on the release of commercial statistics is given in 33 CFR 209.320, referenced above.

On the reverse side of the cover of each pad of ENG Forms 3925/3925B/3925P/3925C the following passage is printed:

“Data specific to individual reporting companies are considered confidential and protected from unauthorized disclosure under the Trade Secrets Act (18 U.S.C. Chapter 93, Section 1905) unless otherwise authorized by law. In order to minimize the reporting burden on vessel operating companies, the Corps of Engineers will furnish data to other Federal agencies in accordance with the Paperwork Reduction Act (44 U.S.C. 3510(a)).”

(b) Confidential Information. Title 18, U.S. Code Chapter 93 Sec. 1905 – Disclosure of Confidential Information states:

“Whoever, being an officer or employee of the United States or of any department or agency thereof, published, divulges, discloses, or makes known in any manner or to any extent not authorized by law any information coming to him in the course of his employment or official duties or by reason of any examination or investigation made by, or return, report or record made to or filed with, such department or agency or officer or employee thereof, which information concerns or relates to the trade secrets, processes, operations, style of work, or apparatus, or to the identity, confidential statistical data, amount or source of any income, profits, losses, or expenditures of any person, firm, partnership, corporation, or association; or permits any income return or copy thereof or any book containing any abstract or particulars thereof to be seen or examined by a person except as provided by law; shall be fined not more than \$1,000, or imprisoned not more than one year, or both; and shall be removed from office or employment. June 25, 1948, c. 645, 62 Stat. 791.”

On the reverse side of each (ENG Form 3925/3925B/3925C/3925P) the following passage is printed:

“**PRIVACY ACT STATEMENT:** Submission of an Internal Revenue Service Number or a Social Security Number is mandatory for cargo moves subject to the harbor maintenance fee. These identification numbers are solicited under the authority of Executive Order 9397 and Public Law 99-662. The identification number provides unique identification of the party liable for payment of the Harbor Maintenance Tax. The number will be given to the U.S. Customs Service to compare the information provided on the ENG Form 3925/3925P with information submitted on summary sheets accompanying the payment of the fee. Failure to submit the appropriate identification number can result in a fine of not more than \$5,000.00 or imprisonment not to exceed A2 months and/or an assessment of a civil penalty up to \$2,500.00 per



violation. (Section 11 of the Rivers and Harbors Appropriation Act of 1922 as amended by PL 99-662, 33 USC 555).”

(c) Rule of Three. The Rule-of-Three is used to screen data when released to the general public. The rule states that it is required that at least three vessel operating companies carry a particular commodity from an area of origin to an area of destination in order to release it to the public. If there are less than three operators carrying the commodity then that commodity is grouped with some other commodity to form a more general commodity that satisfies the Rule-of-Three.

(d) Petroleum Product Movement Data. PL 99-662, The 1986 Water Resources Development Act, Section 919 requires that USACE release petroleum product movement data to the State taxing agencies upon request. Since the WCSC is the sole source for domestic waterborne commerce, it is obligated to share this data. The statistics are released to the general public in aggregated form. All other released are screened on a need-to-know basis.

## 11. Sensitive Questions

Submission of an Internal Revenue Service Number FA is mandatory for cargo moves subject to the harbor maintenance fee. This collection of Social Security Numbers is covered under the approved SORN Civil Works Business Intelligence (<http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/637880/n05220-1/>). These identification numbers are solicited under the authority of Executive Order 9397 (<https://www.ssa.gov/foia/html/EO9397.htm>) and Public Law 99-662 (<https://www.congress.gov/bill/99th-congress/house-bill/6>). The identification number provides unique identification of the party liable for payment of the Harbor Maintenance Tax. The number will be given to the U.S. Customs Service to compare the information provided on the ENG Form 3925/3925P with information submitted on summary sheets accompanying the payment of the fee. The above statement is printed on the reverse side of each (ENG Form 3925/3925B/3925C/3925P) Form.

## 12. Respondent Burden, and its Labor Costs

### a. Estimation of Respondent Burden

#### 1. [ENG Form 3926]

- a. Number of Respondents: 2,000
- b. Number of Responses per Respondent: 12
- c. Number of Total Annual Responses: 24,000
- d. Response Time: 0.5 hour
- e. Respondent Burden Hours: 12,000 hours

#### 2. Total Submission Burden

- a. Total Number of Respondents: 2,000
- b. Total Number of Annual Responses: 24,000
- c. Total Respondent Burden Hours: 12,000 hours

#### 1. [ENG Form 3925/3925B/3925C/3925P]

- a. Number of Respondents: 840
    - b. Number of Responses per Respondent: 12
    - c. Number of Total Annual Responses: 10,080
    - d. Response Time: 0.333 hours
    - e. Respondent Burden Hours: 3,360 hours
  - 2. Total Submission Burden
    - a. Total Number of Respondents: 840
    - b. Total Number of Annual Responses: 10,080
    - c. Total Respondent Burden Hours: 3,360 hours
- b. Labor Cost of Respondent Burden
- 1. **[ENG Form 3926]**
    - a. Number of Total Annual Responses: 3,600
    - b. Response Time: 0.5 hour
    - c. Respondent Hourly Wage: \$19.88
    - d. Labor Burden per Response: \$9.94
    - e. Total Burden: \$238,560
  - 2. Overall Labor Burden
    - a. Total Number of Annual Responses: 24,000
    - b. Total Labor Burden: \$238,560
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- 1. **[ENG Form 3925/3925B/3925C/3925P]**
    - a. Number of Total Annual Responses: 10,080
    - b. Response Time: 0.333 hours
    - c. Respondent Hourly Wage: \$19.88
    - d. Labor Burden per Response: \$6.62
    - e. Total Burden: \$66,730
  - 2. Overall Labor Burden
    - a. Total Number of Annual Responses: 10,080
    - b. Total Labor Burden: \$66,730

It is expected that the forms will be completed by an office clerk with duties equivalent to a GS-06. The equivalent of a GS-06 step 5 was used to estimate an hourly wage of \$19.88.

The respondent hourly wage was determined by using the OPM General Schedule website: ([https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/RUS\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/RUS_h.pdf))

### 13. Respondent Costs Other than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection. The Government provides respondents a self-addressed, prepaid postage envelope for returning these forms.

### 14. Cost to the Federal Government Record of Arrivals and Departures

- a. Labor Cost to the Federal Government
  - 1. [ENG Form 3926]

- a. Number of Total Annual Responses: 3,600 (Containing 500,000 automated lines and 250,000 manual lines)
- b. Processing Time per line: 4.8 minutes (manual); 1.25 minutes (electronic)
- c. Hourly Wage of Worker(s) Processing Responses: \$27.48 (GS-9 step 5 rest of the United States)
- d. Cost to Process Each Line: \$2.20 (manual); \$0.57 (electronic). Assumes equivalent of 9.6 full time employees processing manual and 5.0 full time employee equivalent automatic processing.
- e. Total Cost to Process Responses: \$550,000.00 (manual); \$285,000 (electronic); \$835,000 (total)
- 2. Overall Labor Burden to Federal Government
  - a. Total Number of Annual Responses: 3,600
  - b. Total Labor Burden: \$835,000
- b. Operational and Maintenance Costs
  - a. Equipment: \$0.00
  - b. Printing: \$8,000.00
  - c. Postage: (combined with item b)
  - d. Software Purchases: \$0.00
  - e. Licensing Costs: \$10,000.00
  - f. Other: \$211,000.00 (ACE-IT costs for network, communications, and servers.)  
 \$350,000 WARP support and maintenance (application to process the data)
  - g. Total: \$579,000.00
- 1. Total Operational and Maintenance Costs: \$579,000.00
- 2. Total Labor Cost to the Federal Government: \$835,000
- 3. Total Cost to the Federal Government: \$1,414,000

Vessel Operation Report

a. Labor Cost to the Federal Government

1. [ENG Form 3925/3925B/3925C/3925P]
  - a. Number of Total Annual Responses: 165,165
  - b. Processing Time Per Response: 1 minute for automated, 20 minutes for manual
  - c. Hourly Wage of Worker(s) Processing Responses: \$19.88 (GS-6, step 5)
  - d. Cost to Process Each Response: \$6.23
  - e. Total Cost to Process Responses: \$293,837
2. Overall Labor Burden to Federal Government
  - a. Total Number of Annual Responses: 165,165
  - b. Total Labor Burden: \$293,837

b. Operational and Maintenance Costs

- a. Equipment: \$0.00
  - b. Printing: \$8,000.00
  - c. Postage: (combined with item b)
  - d. Software Purchases: \$0.00
  - e. Licensing Costs: \$5,000.00
  - f. Other: \$211,000.00 (ACE-IT costs for network, communications, and servers)
  - g. Total: \$224,000.00
1. Total Operational and Maintenance Costs: \$224,000.00
  2. Total Labor Cost to the Federal Government: \$293,837
  3. Total Cost to the Federal Government: \$517,837

15. Reasons for Change in Burden

The overall burden for 0710-0006 has increased due to merging 0710-0005 with 0710-0006. More specifically, the burden increased for ENG Form 3926 (since the previous approval under 0710-0005) due to the wrong GS-level and hourly pay rate used in calculations. Furthermore, there has been an increased burden due to the net increase of manual respondents for ENG Form 3925 series (in comparison to the previous approval for 0710-0006).

16. Publication of Results

The results of the information collected on ENG Form 3926 will not be published.

The data collection for ENG Forms 3925, 3925B, 3925C, and 3925P operates on an annual cycle January – December of each year. The first reports for a new calendar year are not due until the end of February of the next year, however, many vessel operating companies submit their reports in the month for the previous month. WCSC will close out the year with the March/April time frame trying to collect delinquent reports. A technical review is then performed. Distribution can then be made of the data in electronic form in database format. Printing follows the technical review as early as possible. WCSC reports to Congress through the “Waterborne Commerce of the United States (WCUS) Parts 1-5”. These publications contain statistics for ports and waterways by commodity, traffic, and tonnage. Even before the printed copies are made, the data is placed on our web page for easy access.

17. Non-Display of OMB Expiration Date

WCSC is not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

WCSC is not requesting any exemptions to the provisions stated in 5 CFR 1320.9.