

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
Southeast Region Logbook Family of Forms
OMB Control No. 0648-0016

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

The Magnuson-Stevens Fishery Conservation and Management Act ([Magnuson-Stevens Act](#)) requires that the National Marine Fisheries Service (NMFS) and regional fishery management councils prevent overfishing and achieve the optimum yield from federally managed fish stocks on a continuing basis. These mandates are intended to ensure that fishery resources are managed for the greatest overall benefit to the nation, particularly with respect to providing food production and recreational opportunities, and protecting marine ecosystems. To further this goal, the Magnuson-Stevens Act requires the collection of reliable data essential to the effective conservation, management, and scientific understanding of the nation's fishery resources.

The South Atlantic Fishery Management Council (South Atlantic Council) and the Gulf of Mexico Fishery Management Council (Gulf Council) submitted the For-hire Reporting Amendment to NMFS for approval and implementation. The For-hire Reporting Amendment includes Amendment 27 to the Fishery Management Plan for Coastal Migratory Pelagic Resources of the Gulf and Atlantic Region (CMP FMP), Amendment 9 to the FMP for the Dolphin and Wahoo Fishery off the Atlantic States (Dolphin Wahoo FMP), and Amendment 39 to the Snapper-Grouper FMP of the South Atlantic Region (Snapper-Grouper FMP). This request is for a revision to an approved information collection resulting from the final rule to implement management measures in the For-hire Reporting Amendment. The final rule is identified by Regulation Identifier Number (RIN) 0648-BG75.

The final rule implementing the For-hire Reporting Amendment establishes and revises electronic reporting requirements for federally permitted charter vessels and headboats (for-hire vessels), respectively, in Atlantic and South Atlantic fisheries. The final rule describes a *new requirement* for charter vessels with federal charter vessel/headboat permits for Atlantic coastal migratory pelagic fish, Atlantic dolphin and wahoo, or South Atlantic snapper-grouper to submit electronic fishing reports at weekly intervals, or at shorter intervals if notified by NMFS, through NMFS-approved hardware and software. Information collected includes fishing location and effort, fish harvested and discarded, as well as socio-economic and other data. The final rule also reduces the time allowed for headboats to submit an electronic fishing report after the end of each reporting week. The change makes the reporting deadline for headboats consistent with the reporting deadline for charter vessels. The purpose of the final rule is to increase and improve fisheries information collected from federally permitted for-hire vessels in the Atlantic. The information is expected to improve recreational fisheries management of the for-hire component in the Atlantic.

NMFS has existing regulations that require specific types of recordkeeping and data submissions. These data collection and submission regulations are intended to provide reliable and accurate information from the fishing industry and communities that support scientifically based management actions to achieve NMFS' stewardship responsibilities. Before the final rule, only one data collection program within the Southeast Logbook Family of Forms, the headboat survey trip report, used an electronic data collection - the Southeast Region Headboat Survey (SRHS).

The headboat survey trip reports, and now the SRHS, have been used to collect catch and fishing effort data from the headboat portion of the for-hire component of the recreational sector since 1972. These trip report data have been extremely valuable in stock assessments of reef fishes and pelagic species in the southeast region (North Carolina through Texas).

The final rule changes the deadline for headboats to submit an electronic fishing report after the end of a reporting week, which runs from Monday through Sunday. Headboats will continue to submit electronic fishing reports through the SRHS on a weekly basis, or at intervals shorter than a week if notified by NMFS. Electronic fishing reports are due by the Tuesday following a reporting week; in other words, within 2 days after a reporting week ends. The final rule makes the reporting deadline for headboats consistent with the reporting deadline for charter vessels. No other aspect of the existing headboat reporting program changes because of the final rule.

Trip reports from charter vessels in Atlantic CMP, dolphin and wahoo, and South Atlantic snapper-grouper fisheries are monitored through the survey of charter vessels by the Marine Recreational Information Program (MRIP), which is managed by NOAA's Office of Science and Technology. Fishing effort is calculated based on a monthly phone sample of 10 percent of federally permitted charter vessels. Catch rate observations and catch sampling are provided through dockside monitoring, also conducted by MRIP. This charter vessel catch information is reported to NMFS 2 months at a time, with preliminary reports available approximately 45 days after the end of each 2-month period. The MRIP survey of charter vessels will continue to validate the data collected through the South Atlantic electronic reporting program.

Accurate and reliable fisheries information about catch, effort, and discards are critical to stock assessment and management evaluations. In addition, catch from charter vessels represents a substantial portion of the total recreational catch for some South Atlantic Council-managed fish species. The South Atlantic Council determined that weekly electronic reporting for federally permitted charter vessels will provide more timely information than the current MRIP survey, and more accurate and reliable information for many species with low catches, small annual catch limits (ACLs), or for species that are only rarely encountered by fishery participants. The South Atlantic Council has determined that weekly electronic reporting by all federally permitted charter vessels will enhance data collection efforts for potentially better fisheries management, such as through more data-rich stock assessments.

2. 1 Explain how, by whom, how frequently, and for what purpose the information will be used. 1 If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

The data requested on logbooks as part of OMB Control No 0648-0016 are used by various offices of NMFS, regional fishery management council staff, the U.S. Coast Guard, and state fishery agencies under contract to NMFS to develop, implement, and monitor fishery management strategies. Analyses and summarizations of logbook data are used by NMFS, the regional fishery management councils, the Departments of State and Commerce, OMB, the fishing industry, Congressional staff, and the public to answer questions about the nature of the Nation's fishery resources.

These data serve as input for a variety of uses, such as biological analyses and stock assessments; Executive Order 12291¹ regulatory impact analyses; quota and allocation selections and monitoring; economic profitability profiles; trade and import tariff decisions; allocations of grant funds among states; identify ecological interactions among species. NMFS would be significantly hindered in its ability to fulfill the majority of its scientific research and fishery management missions without these data.

The logbook family of forms has evolved as a means of collecting data from specific user groups within fisheries that are managed under federally implemented FMPs. The Southeast Fisheries Science Center (SEFSC) has the responsibility for both preparation of stock assessments (estimation of maximum sustainable yield or other indexes of biomass) and collection of the scientific data that are required to perform the assessments. A secondary data collection responsibility is to provide information that is necessary to routinely monitor and evaluate the conditions in the fisheries under federal management.

Similar data elements are required for most of the logbook forms or electronic reporting systems in this family of forms, although a few variables may be specific to one fishery or type of management technique controlling harvest.

a) Information such as name and address of a vessel operator and owner is used to identify the respondent and the legal entity controlling the fishing practices of the vessel. The legal entity requirement is essential in monitoring the compliance of the reporting requirement, where revocations of the operators permit or fines are involved. Because many vessels are owned by corporations, identification of an owner and operator on the logbook form allows NMFS to sanction the company as well as the individual vessel operator as necessary or required by the regulations. Information on the permit is obviously essential to monitoring reporting compliance.

b) Data on date of departure, date returned, days fished, duration of tows or sets, units of gear and mesh size used are all designed to quantify actual fishing effort. Fishing effort is needed to standardize differences in productivity among vessels or fishing grounds by establishing a rate of catch per unit time. These data allow comparisons over time, area and gear type of catches made by a variety of harvesters. Comparisons of catch and catch per unit effort (CPUE) over time are significant indicators of the biological status of the fisheries. Declining CPUE, especially if data on fishing effort are sufficiently detailed to adjust for changes in effort, can provide critical information on the status of the stock, i.e., that the level of harvest is beyond the level that is sustainable by growth and reproduction of the stock.

¹ Executive Order 12291 (1981) is a Presidential requirement for cabinet-level Departments to conduct a benefit-cost analysis for major changes in rules.

c) Area fished, depth of fishing, and latitude and longitude are variables that are used to establish fishing locations. This information can be related to other oceanographic and biological information to predict species availability and likely future abundance. For example, location of capture can be correlated to sea surface temperature measured by satellite to predict possible migration patterns. In addition, area or zone fished is used to cross reference locations where fishing is not permissible (such as closed spawning areas).

d) Species information such as landings, discards, and sizes of fish is the basic measure of fishing success, from which fishermen, biologists and economists infer conclusions about the status of the fishery. Landings information is also needed because controlling the quantity of fish harvested is often the means for ensuring that harvests can be replenished over time.

e) The name of a buyer, dealer number, and port of landing are data used to cross reference the quantity of fish caught with the quantity that is handled (processed) by the market. The important cross reference is between the total amount of catch, and the respective sizes of individual fish. It would be impossible for fishermen to measure individual fish as they are being caught and stored on board the vessels. However, many species of fish, especially the large pelagic species, are individually weighted by the dealers and these weights are recorded as part of the sales transactions. By knowing the dealer that purchased the fish, cross references can be made between data submitted by the dealers and the data from the logbooks. Combining the data in this manner provides greater precision on the CPUE estimates and more information on the sizes of catches by location and time.

f) Trip cost information such as fuel, tackle, bait, ice, labor, and miscellaneous expenses associated with the effort data for individual trips is use for evaluating regulatory proposals and to better understand how the cost of fishing varies with changes in fishing effort. With a better quantitative understanding of these relationships, NMFS can provide better estimates of the potential impacts of management regulations on fishing effort.

g) A separate form or response is required for many of the logbook reporting forms in 0648-0016 when a vessel does not fish during an entire calendar month or another defined period. The requirement to file a “no-fishing” report also applies to charter vessels under the 0648-BG75 final rule. These no-fishing report forms are necessary to assure NMFS that the vessel did not fish instead of failing to report. The information on the no-fishing form is minimal, i.e., only the vessel ID, vessel name, the month, or other period, in which the vessel did not fish, and the federal permits that vessel has been issued (a check box is provided for ease of identifying the permits). Most no-fishing forms are located in the back of the logbook booklets and are to be submitted via mail in the self-addressed, stamped envelopes provided by NMFS. Because of the nature of the reporting, no-fishing reports are not required for the headboat trip report, the live rock report, the annual fixed cost survey, the cost-earnings form (this information is included on the regular coastal logbook form), and the supplemental discard form.

NMFS and the respective state fishery agency retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. See response #10 of this supporting statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Prior to

dissemination, the information will be subject to quality control measures and a pre-dissemination review pursuant to Section 515 of the Public Law 106-554.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

Before the final rule for 0648-BG75, electronic reporting was being utilized only by owners and operators of federally permitted headboats in the Gulf of Mexico and South Atlantic. These fishermen report detailed, trip level data for the SRHS trip report. This electronic reporting platform is accessible through a computer or mobile device with internet access. Sample screenshots of the SRHS are included in this revision package for reference.

The final rule for 0648-BG75 requires owners and operators of all for-hire vessels with federal permits for Atlantic CMP species, Atlantic dolphin and wahoo, or South Atlantic snapper-grouper to submit electronic fishing reports at weekly intervals, or at shorter intervals if notified by NMFS, through NMFS-approved hardware and software. NMFS-approved hardware includes electronic devices such as computers, tablets, and smartphones that allow for internet access and are capable of operating approved software. Many software applications are available for data collection and submission including web, smart phone, and tablet-based technology. NMFS has evaluated potential software applications for the electronic reporting program, including those already being used by partners in the region, including eTRIPS online and eTRIPS mobile, which are products developed by the Atlantic Coastal Cooperative Statistics Program. NMFS may eventually approve a number of reporting software programs that can maintain the required minimum data standards and security protocols. While the appearance of each software application may vary by vendor, each vendor's software will satisfy the same data collection requirements and specifications. Hardware and software that meet the NMFS type approval will be posted on the NMFS Southeast Region website upon the publication of the final rule to implement the electronic reporting program.

The final rule also extends other provisions to federally permitted charter vessels that currently apply to headboats for reporting during catastrophic conditions. During catastrophic conditions, NMFS may accept paper reporting forms, and can modify or waive reporting requirements.

The SEFSC is investigating various methods of recording and reporting CPUE data from vessels in other fisheries. However, the large number of vessels involved in the affected fisheries and the cost per participant for the electronic and telecommunication equipment must be considered before mandating its use by fishermen. These costs significantly limit the options available for electronic reporting by vessels.

4. Describe efforts to identify duplication.

The Magnuson-Stevens Act's operational guidelines require each FMP and FMP amendment to evaluate existing state and federal laws that govern the fisheries in question, and the findings are made part of each FMP. The membership of each fishery management council is comprised of state and federal officials responsible for resource management in their area. This joint participation enables identification of other collections that may be gathering the same or similar

information. In addition, each FMP and FMP amendment undergoes extensive public comment periods where potential applicants review the proposed management measures. Therefore, NMFS is confident it would be aware of similar collections if they existed.

Detailed information on catch, effort, and species composition by gear and area is not available from other sources. Some states, notably Florida, Georgia, Louisiana and North Carolina, have programs to collect landings by species for individual fishing trips (i.e., operational trip ticket programs), but these programs do not include the detailed information on location and effort that are required in the reporting requirements for this OMB request. Furthermore, these programs collect the data from seafood processors, and not fishermen, whereas logbooks are submitted directly by the fishermen.

In an effort to reduce duplicative reporting by charter vessels, the final rule for 0648-BG75 requires fishermen with federal charter vessel/headboat permits with electronic reporting requirements in other regions, such as the Mid-Atlantic and as proposed by the Gulf Council in the Gulf, to comply with the electronic reporting program that is more restrictive, regardless of where they are fishing. A headboat with federal charter vessel/headboat permits for applicable fisheries in both the Atlantic and the Gulf would continue to be required to comply with the electronic reporting standards in effect based on where they are fishing, e.g., in the Atlantic or the Gulf.

5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

Because all applicants are considered small businesses, separate requirements based on size of business have not been developed. Only the minimum data to meet the analytical needs of NMFS will be requested from respondents.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

The purpose of the final rule for RIN 0648-BG75 is to increase and improve recreational fisheries information collected from federally permitted for-hire vessels in the Atlantic. The additional information is expected to improve recreational fisheries management of the for-hire component in the Atlantic. If this revision request is not implemented or implemented to include fewer vessels, NMFS would be unable to make changes recommended in the For-hire Reporting Amendment and the final rule.

Accurate and reliable fisheries information is important to fulfill the management obligations of the South Atlantic Council and NMFS. The South Atlantic Council has determined that weekly electronic reporting for federally permitted charter vessels will provide more timely information than the current MRIP survey, and more accurate and reliable information for many species with low catches, small ACLs, or for species that are only rarely encountered by fishery participants. The South Atlantic Council has determined that weekly electronic reporting by all federally permitted charter vessels will enhance data collection efforts for potentially better fisheries management, such as through more data-rich stock assessments.

The consequence of not having more detailed catch, effort, and socio-economic data could hinder the ability of NMFS to decrease the uncertainty associated with stock assessments and other management evaluations that inform sound management decisions. The trip report data provide critical information on the type and amount of effort. Without these data, NMFS cannot determine whether changes in total catch are due to changes in fishing effort or changes in the abundance of the resource, or both.

Not having discard data could also hinder NMFS' ability to decrease the uncertainty associated with the stock assessments. Furthermore, many federally managed fisheries lack scientifically collected information on discards, and consequently, it is difficult to determine whether a significant problem exists.

If the economic data were collected less frequently or not at all, then economists would be less able to estimate the effects of regulations on financial performance or fishermen's expected reactions to regulatory changes. Another consequence of not having representative economic data could be judicial remand of conservation regulations challenged on grounds of inadequate analysis of economic impacts.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

No special circumstances are associated with this information collection.

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the 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 recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

On April 4, 2018, NMFS published the proposed rule for RIN 0648-BG75 in the *Federal Register* to solicit public comment on the information collection, coincident with this request (83 FR 14400). NMFS did not receive any public comments directed to the proposed revision of the collection of information requirements, and therefore, NMFS made no changes to the information collection as a result of public comment.

Because these data collection programs are part of FMPs, the fishery management councils' scientific and statistical committees and constituent advisory committees have reviewed all aspects of the programs. Furthermore, comments and suggestions from fishermen are routinely submitted, reviewed, and considered. Experience with the various programs, some of which have been operating for many years, provides a continual feedback mechanism to NMFS on issues and concerns to the applicants.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

There are no payments or other remunerations to respondents.

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

As stated on the forms, data collected for OMB Control No. 0648-0016 are treated as confidential in accordance with [NOAA Administrative Order 216-100](#), Protection of Confidential Fisheries Statistics. Reports are considered confidential under the [Trade Secrets Act](#). In addition, landings statistics are considered to be in an entrepreneurial capacity and will be exempt from the Privacy Act concerns. It is NMFS' policy that confidential data are not to be released to non-authorized users, other than in aggregate form, as the Magnuson-Stevens Act protects (in perpetuity) the confidentiality of those submitting data. Whenever data are requested, NMFS ensures that information identifying the financial business activity of a particular vessel is not identified.

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 revision request will not collect sensitive information.

12. Provide an estimate in hours of the burden of the collection of information.

The time burden for the SRHS information collection (headboats) is estimated to be 4,527 hours annually. Responses are separated between an average of 10 minutes per response for completing fishing forms and 2 minutes per response to submit a no-fishing report.

The number of respondents normally fluctuates both intra- and inter-annually, because all three federal permits that the final rule includes are not limited in numbers (open access permits). It is normal for the number of valid permits to vary during a year as permits are issued and expire. Therefore, the number of respondents and responses here is based on the number of issued permits given in the proposed rule.

In 2016, there were 2,182 vessels with at least 1 valid Federal charter vessel/headboat permit to fish for Atlantic CMP species or Atlantic dolphin and wahoo, or South Atlantic snapper-grouper species. The final rule for RIN 0648-BG75 is expected to directly affect all of these vessels. Although the application for a federal charter vessel/headboat permit collects information on the primary method of vessel operation (charter vessel or headboat), the permit issued does not identify the vessel as either a charter vessel or headboat and vessels may operate in either capacity on separate trips. As of February 2017, 63 federally permitted for-hire vessels operating in the South Atlantic were identified as primarily operating as headboats and were reporting to the SRHS. Among the 2,182 vessels estimated to be directly affected by the final rule, at least 63 of them are expected to primarily operate as headboats, and 2,119 are estimated to primarily operate as charter vessels. **These 2,119 respondents are new for this collection, and are added to the 3,484 respondents already approved in OMB Control No. 0648-0016.**

As a result of the final rule, NMFS expects no change to the annual time burden for headboats,

including the time burden per response for submitting fishing and no-fishing responses.

NMFS estimates the same time burden that applies to headboats for submitting fishing and no-fishing responses will apply to charter vessels. Because NMFS has no prior data to estimate the ratio of fishing responses to no-fishing responses on charter vessels, NMFS assumes the same ratio of no-fishing responses from headboats of approximately 11 percent of total headboat responses. See the table below for the additional time burden estimate for charter vessels resulting from the final rule.

Primary vessel type	No. of Respondents	Fishing Responses	Time per Response (min)	Total Time (hr)	No-fishing Responses	Time per Response (min)	Total Time (hr)	Total Burden (hr)
Charter vessel	2,119	150,438	10	25,073	16,548	2	552	25,625

Current, approved response numbers are 119,148 and hours, 16,908. **Thus, for all of 0648-0016 the new respondent total will be 5,603; responses, 286,134, and hours, 42,533.**

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in Question 12 above).

Currently under 0648-0016, there are no anticipated costs beyond the opportunity cost of completing the logbook forms. NMFS provides respondents with addressed, postage-paid envelopes for respondents to return the completed forms.

Charter Vessel Costs	# of Respondents	Cost/Respondent	Total Cost	Annualized over 3-year Period
Start Up Costs	212	\$ 300.00 (one time)	\$ 63,600.00	\$ 21,200.00
Operation & Maintenance	212	\$ 600.00 (annual)		\$ 127,200.00
TOTAL			\$63,600.00	\$ 148,400.00

For the revision of this information collection associated with the final rule for 0648-BG75, NMFS expects the South Atlantic electronic reporting program to accommodate a range of commonly used electronic devices and transmission methods for program access and report submission. In 2010, the Small Business Administration estimated that approximately 94 percent of businesses used a computer and 95 percent of these had internet service. These utilization rates are expected to be transferable to or inclusive of the use of other electronic communication devices, such as tablets and smartphones, expected to be included in the reporting options for electronic reporting. As a result, the majority of the charter vessels expected to be affected by the final rule will be expected to utilize one or more of these devices and services and not need to incur new operational expenses to acquire the technology necessary for the electronic reporting program.

of Respondents: NMFS estimates the final rule will affect 2,119 federally permitted charter vessels. NMFS conservatively estimates that 10% of businesses (212) do not currently have a suitable device or associated service.

Start Up Costs: Basic computer systems under \$300 (2016 dollars) are commonly available and tablets can be purchased for as little as approximately \$120 (2016 dollars). Although more expensive models are available, smartphones can be purchased for less than some computers or tablets. NMFS assumes \$300 for a new computer system.

Operation & Maintenance: A basic internet connection (computer, tablet, or smartphone) is expected to be available for under \$50 per month (2016 dollars), or approximately \$600 per year.

As a result, a complete new system is estimated to cost approximately \$900 for the first year (computer and internet services), and approximately \$600 per year thereafter (internet service only). Alternatively, free computer use and internet access is commonly available at public libraries.

The start-up cost is estimated to be \$63,600 - annualized over 3 years is \$21,200 per year. Associated operations and maintenance costs are estimated to be \$127,200 each year. NMFS estimates the total annual costs will be \$148,400 for the first 3-year reporting period.

As a result of the final rule, NMFS expects no change to the annual cost burden for headboats.

14. Provide estimates of annualized cost to the Federal Government.

Currently, the annual cost of the information collection under OMB Control No. 0648-0016 to the Federal Government is estimated to be \$1,750,000 per year. Many of these programs share resources such as program staff and computer support. Therefore, these calculations were made for all the programs combined, and include a) printing costs which includes the cost of the postage-paid envelopes of approximately \$100,000 annually, b) program staff and sight review and data entry of approximately \$1,100,000 annually that includes 10 full-time employees and 5 part time contractors, c) form development, and program management costs of approximately \$550,000 annually that includes 2 full time employees and approximately 2 contracts for computer related support.

NMFS expects the final rule for 0648-BG75 will increase annual costs to the Federal Government, because there will be an increased administrative burden, as all federally permitted charter vessels will be required to submit electronic reports to NMFS. This is a large increase in the number of vessels reporting electronically. Currently, no SEFSC application is configured to accept this information, so a software platform and database will also have to be developed or existing programs modified. NMFS is currently planning to minimize these costs by working through an existing program, by having data submitted through Atlantic Coastal Cooperative Statistics Program, also known as ACCSP. However, the details of the data collection program required to implement the final rule, as well as the estimated costs are still to be determined.

15. Explain the reasons for any program changes or adjustments.

Adjustments: Not applicable. For headboats, NMFS does not expect the individual response time or cost to change because of the final rule for 0648-BG75.

Program Changes: This will be a new information collection program for federally permitted charter vessels in the applicable Atlantic fisheries.

16. For collections whose results will be published, outline the plans for tabulation and publication.

The results from this collection are expected to be published, but will be used as empirical input to stock assessments, economic analyses, and other analyses of proposed or existing fishery management regulations prepared by NMFS.

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

Not applicable.

18. Explain each exception to the certification statement.

Not applicable.