

**SUPPORTING STATEMENT**  
**U.S. Department of Commerce**  
**National Oceanic & Atmospheric Administration**  
**Western Alaska Community Development Quota (CDQ) Program**  
**OMB Control NO. 0648-0269**

This action requests extension for this information collection.

**INTRODUCTION**

National Marine Fisheries Service (NMFS) and the North Pacific Fishery Management Council (Council) manage the groundfish fisheries in the exclusive economic zone (EEZ) off Alaska under the authority of the Magnuson-Stevens Fishery Conservation and Management Act (16 U.S.C. 1801 *et seq.*) (Magnuson-Stevens Act). The groundfish fisheries in the Bering Sea and Aleutian Islands are managed under the Fishery Management Plan for Groundfish of the Bering Sea and Aleutian Islands Management Area (BSAI FMP).

The Western Alaska Community Development Quota (CDQ) Program is an economic development program authorized under Magnuson Stevens Act to provide eligible western Alaska villages with the opportunity to participate and invest in fisheries in the Bering Sea and Aleutian Islands Management Area (BSAI); to support economic development in western Alaska; to alleviate poverty and provide economic and social benefits for residents of western Alaska; and to achieve sustainable and diversified local economies in western Alaska.

**A. JUSTIFICATION**

**1. Explain the circumstances that make the collection of information necessary. Cite all applicable authorities for this information collection.**

The Magnuson-Stevens Act allocates a portion of the annual catch limit for each directed fishery of the Bering Sea and Aleutian Islands management area among six non-profit corporations (CDQ groups) representing 65 western Alaska villages. The CDQ groups and the villages associated with each of the groups are specifically named in section 305(i)(1) of the Magnuson-Stevens Act. The CDQ groups are the Aleutian Pribilof Island Community Development Association, the Bristol Bay Economic Development Corporation, the Central Bering Sea Fishermen’s Association, the Coastal Villages Region Fund, the Norton Sound Economic Development Corporation, and the Yukon Delta Fisheries Development Association. The CDQ groups’ boards of directors and staff manage and administer CDQ allocations, investments, and economic development projects. The person authorized and required to submit information to NMFS on behalf of a CDQ group is a “CDQ representative.”

This information collection contains four components necessary to manage the CDQ fisheries.<sup>1</sup>

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<sup>1</sup> The CDQ groups also are required under Section 305(i)(1)(E)(v) to submit an Annual Statement of Compliance to the Secretary of Commerce. Because this statement is required by statute, it does not require OMB approval or inclusion in this supporting statement or information collection budget.

## **CDQ Vessel Registration System**

Participation in most federally managed groundfish fisheries in the BSAI require that catcher vessels greater than 32-ft in length overall (LOA) must be named on a License Limitation Program (LLP) license. Only a limited number of licenses were issued and people or entities like the CDQ groups who want to use a vessel that is not named on an LLP license must obtain an LLP license by transfer, generally at a cost. Through Amendment 109 to the BSAI FMP, the Council authorized the CDQ groups to use catcher vessel up to 46-ft LOA in the BSAI groundfish fisheries without an LLP license, under certain circumstances. More information about the small vessel groundfish CDQ fisheries authorized under Amendment 109 is in the final rule for this action (81 FR 26738; May 4, 2016).

The CDQ Vessel Registration System is the means through which NMFS maintains a list of vessels that have received exemptions from the LLP license requirements. The information requirements for the CDQ Vessel Registration System are described at 50 CFR § 679.32(c)(3) (iii) and § 679.5(m).

## **Groundfish/Halibut CDQ and Prohibited Species Quota (PSQ) Transfer Request**

The CDQ Program is a catch share program that allocates a portion of the BSAI total allowable catch limits for specific groundfish species, a portion of the commercial catch limits for halibut, and portions of certain prohibited species catch (PSC) limits to the CDQ Program. These amounts are then further allocated among the six CDQ groups as allocations that may be transferred among the CDQ groups. The transferable allocations of the groundfish species or halibut are called groundfish CDQ or halibut CDQ. The transferable allocation of the prohibited species are called “prohibited species quota” or PSQ.

The CDQ/PSQ transfer request is described at 50 CFR § 679.5(n).

## **Application for Approval of Use of Non-CDQ Harvest Regulations**

Section 305(i)(1)(B)(iv) of the Magnuson-Stevens Act requires that “the harvest of allocations under the program (the CDQ Program) for fisheries with individual quotas or fishing cooperatives shall be regulated by the Secretary in a manner no more restrictive than for other participants in the applicable sector, including with respect to the harvest of nontarget species.” NMFS interprets the statement “in a manner no more restrictive than for other participants in the applicable sector” to mean that the fishery management regulations associated with regulating the harvest of CDQ allocations should be no more costly, complex, or burdensome than those that apply to comparable non-CDQ sectors managed under individual fishing quotas (IFQs) or cooperative allocations. The harvest regulations that apply to non-CDQ sectors for IFQs or cooperative allocations that are regulated by NMFS are described in Federal regulations. However, in rare cases, a group of fishing vessel owners may form a voluntary cooperative that is not licensed or permitted by NMFS. The Application for Approval of Use of Non-CDQ Harvest Regulations provides the information NMFS needs to verify that a voluntary cooperative exists. This information is needed before NMFS can authorize the use of non-CDQ harvest regulations for these vessels. More information about this provision of the CDQ Program is in

the final rule that implemented the authorizing regulations (77 FR 6492; February 8, 2012).

The requirements for this application are at 50 CFR § 679.32(e).

### **Appeals**

The decision to approve or disapprove an Application for Approval of Use of Non-CDQ Harvest Regulations is an administrative determination. NMFS must provide an opportunity for an administrative appeal if NMFS issues an initial administrative determination to deny such an application.

An explanation of the right to an administrative appeal are at 50 CFR § 679.32(e). The instructions for filing an administrative appeal are at 15 CFR part 906.

**2. Explain how, by whom, how frequently, and for what purpose the information will be used. 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 applicable NOAA Information Quality Guidelines.**

The following table summarizes how, by whom, and how frequently each of the components of this collection are submitted.

Component	How is the Information Submitted? <sup>1/</sup>	Who Submits the Information?	How Frequently is the Information Submitted?
CDQ Vessel Registration System	Electronically through online system “eFISH”	CDQ representative	As needed. None have been received since the program was implemented in 2016.
Groundfish/Halibut CDQ and Prohibited Species Quota (PSQ) Transfer Request	Electronically through online system eFISH. Mail and fax also allowed.	CDQ representative	As needed whenever a CDQ group wants to transfer CDQ or PSQ to another CDQ group.
Application for Approval of Use of Non-CDQ Harvest Regulations	Mail, fax	CDQ representative	As needed. One application was received in 2012, none since then.
Appeals	Fax, mail, or delivery <sup>2/</sup>	CDQ representative	By choice of the CDQ group if NMFS were to disapprove an Application for Approval of Use of Non-CDQ Harvest Regulations. NMFS has not disapproved any applications to date.

<sup>1/</sup> eFISH: <https://alaskafisheries.noaa.gov/webapps/efish/login>

Mail: NMFS Alaska Region, Sustainable Fisheries Division, P.O. Box 21668, Juneau, AK 99802-1668

Fax: (907) 586-7131

<sup>2/</sup> Appeals—Fax: (301) 713-2384; Mail or delivery: National Appeals Office, 1315 East-West Highway, Silver Spring, MD 20910.

**The following addresses the purpose for which the information is collection and some additional information about how the information is collected.**

### **CDQ Vessel Registration System**

The CDQ Vessel Registration System is necessary for the CDQ to register with NMFS those vessels that will be participating in groundfish CDQ fisheries in the BSAI under an LLP exemption and under different and less restrictive prohibited species catch requirements and observer coverage requirements.

The CDQ representative may add vessels to the CDQ vessel registration list at any time by logging into the CDQ vessel registration system through eFISH. eFISH is NMFS's online application used to perform many information collection functions for the NMFS Alaska Region. The CDQ group representative must log into the online system using the group's existing NMFS Person ID and password. Use of the NMFS Person ID and password certifies that all information is true, correct, and complete. The CDQ group representative may add vessels to or remove vessels from the CDQ vessel registration system at any time during the year by logging into the online system. Through the CDQ registration system, each registered vessel is added to the CDQ vessel registration list on the [NMFS Alaska Region Web site](#). Once registered, a vessel will remain on the CDQ vessel registration list until removed by a CDQ representative.

For those vessels that are eligible for an LLP exemption, the CDQ vessel registration system provides a letter documenting that the exemption applies while the vessel is groundfish CDQ fishing. The CDQ representative must provide a copy of the LLP exemption letter to each vessel operator. The vessel operator must maintain a legible copy of the LLP exemption letter on board at all times while that vessel is groundfish CDQ fishing.

To remove a registered vessel from the CDQ vessel registration list, a CDQ group representative must:

- ◆ Provide notice to the operator of the registered vessel that the vessel is being removed from the vessel registration list;
- ◆ Certify at the time of removal that the vessel operator was given notice by the CDQ group that the vessel was going to be removed from the list; and
- ◆ Certify that the vessel was not groundfish CDQ fishing at the time of removal.

If a vessel is removed from the CDQ vessel registration list, eFISH will provide a printable confirmation that a vessel has been removed. Once a vessel is removed from the CDQ vessel registration list, that vessel is no longer exempt from the LLP requirements, even if the operator was still in possession of the LLP exemption letter.

To date, since this exemption opportunity was implemented in 2016, NMFS has received no registrations through the CDQ Vessel Registration System. The CDQ groups requested this program because they wanted the opportunity to develop small boat fisheries without having to

purchase potentially expensive LLP licenses or to comply with some of the other catch monitoring requirements that apply in the CDQ fisheries. The Council approved and NMFS implemented this program. However, thus far, the CDQ groups have not wanted to use vessels in their groundfish fisheries that needed an LLP license exemption. Therefore, no information has yet been collected by NMFS through this system.

### **Groundfish/Halibut CDQ and Prohibited Species Quota (PSQ) Transfer Request**

All of the CDQ groups are annually issued account balances for amounts of groundfish and halibut that may be harvested by vessels fishing on behalf of the group that year. In addition, all of the CDQ groups are issued annual account balances for halibut PSQ. These allocations may be transferred among the CDQ groups. If a CDQ group wishes to transfer groundfish CDQ, halibut CDQ, or halibut PSQ to another CDQ group, it must submit a transfer request to NMFS. The transfer request provides NMFS with the necessary information to transfer the CDQ or PSQ from one CDQ group's account to another.

The transfer request may be submitted electronically through eFISH or by mail or fax. All CDQ transfer requests in the last three years have been submitted electronically through eFISH. For online transfer requests, the transferor's and transferee's designated representative must log into the system and create a transfer request following the instructions on the computer screen. By using the transferor's NMFS Person ID, password, and Transfer Key and submitting the transfer request, the designated representative certifies that all information is true, correct, and complete. The information that is required in eFISH is the same information that is indicated on the form associated with this collection.

### **Application for Approval of Use of Non-CDQ Harvest Regulations**

The information required to be submitted in the Application for Approval to Use Non-CDQ Harvest Regulations is necessary for NMFS to identify the fishing sector that may have formed a voluntary cooperative and may be eligible to fish in the CDQ fisheries under regulations developed for a non-CDQ fishing sector.

An authorized representative of a CDQ group, an association representing CDQ groups, or a voluntary fishing cooperative may submit an Application for Approval to Use Non-CDQ Harvest Regulations. A completed application consists of an application form and a copy of the cooperative contract or an affidavit. A copy of the [application form](#) is available on NMFS webpage. This application may be submitted to NMFS at any time.

NMFS approves the application if it contains of the information required in 50 CFR § 679.32(e), the vessels listed on the application form represent a majority of vessels participating in an applicable sector, and the CDQ harvest regulations are more restrictive than the non-CDQ regulations for the applicable sector. NMFS documents approval of an application through a letter to the applicant.

If NMFS determines that the application is deficient, NMFS will notify the applicant in writing to identify the discrepancies and provide the applicant with an opportunity to correct them. If the

applicant fails to address the deficiencies, NMFS will issue an initial administrative determination (IAD) denying the application. The applicant may appeal this IAD under the process described below for “Appeals.”

Only one application has been received in 2012, and it was submitted by a representative of the CDQ groups. NMFS approved this application and the vessels in the Freezer Longline Cooperative have been fishing under non-CDQ Program harvest regulations since mid-2012.

## **Appeals**

Appeals of any NOAA initial administrative determination are handled by the NOAA’s National Appeals Office (NAO). The appeal component of this information collection is provided in case NMFS were to deny an Application for Approval to Use Non-CDQ Harvest Regulations in the future. The information required to be submitted for an appeal is necessary to provide the NAO with the information that the appellant wishes NAO to consider in its appeal of NMFS’s IAD.

The instructions for filing an administrative appeal are at 50 CFR part 906. These regulations require that appeals shall be submitted to NOA via facsimile, unless the person does not have access to a fax machine, in which case he or she may file by regular mail or commercial carrier.

**The following section addresses whether the information collected will be disseminated to the public or used to support information that will be disseminated to the public and how the collection complies with all applicable Information Quality Guidelines.**

The list of vessels that have been granted an exemption to the LLP license requirement to participate in the groundfish CDQ fisheries is maintained through the CDQ Vessel Registration List. If a CDQ group registers a vessel under this provision in the future, the name of that vessel would be posted on the NMFS Alaska Region webpage so that information about the exemption is readily available to the public and law enforcement. Because no vessel registrations have been received by NMFS, to date, no information actually has been disseminated to the public from this system.

Information about individual CDQ or PSQ transfers are not disseminated to the public. Information summarizing the number of transfers or the types of transfers may be included in analysis of proposed management measures under consideration by the North Pacific Fishery Management Council. If this information were to be provided in summary form, the identify of the CDQ groups transferring CDQ or PSQ and the actual amounts transferred would not be disseminated to the public.

For the single Application for Approval of Use of Non-CDQ Harvest Regulations that NMFS received in 2012, NMFS issued a letter approving the application and providing a list of vessel names and associated LLP license numbers. None of the information included in NMFS’s approval letter is considered confidential.

The National Appeals Office posts its appeal decisions on its website. However, it redacts any

information that would identify the appellant or any identifying information about the appeals case. Therefore, no information from respondent's submission is disseminated to the public.

Section 515 of Public Law 106-554 (the Information Quality Act) requires NMFS to ensure the quality, objectivity, utility, and integrity of information it publicly disseminates. If data submitted under this collection is released to the public, it either is not confidential information or it is aggregated, synthesized, summarized, and presented in a non-confidential format to the public.

Public dissemination of these data is governed by NOAA's information quality guidelines, which were issued on October 30, 2004

([http://www.cio.noaa.gov/services\\_programs/IQ\\_Guidelines\\_103014.html](http://www.cio.noaa.gov/services_programs/IQ_Guidelines_103014.html)).

Reports and analyses prepared using the information obtained through the CDQ and PSQ transfer request generally fall under NOAA's information quality category "synthesized products." These products have been developed through analysis of original data by applying methods that require some scientific evaluation and judgment; however, these methods of analysis generally are well documented and relatively routine. Therefore, peer review is generally not required for reports and analyses prepared using these data.

Reports and analyses undergo internal agency review by people familiar with the underlying data and fisheries being described. In addition, analyses presented to the North Pacific Fishery Management Council are reviewed by its Scientific and Statistical Committee.

**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.**

The CDQ Vessel Registration System and the Groundfish/Halibut CDQ and Prohibited Species Quota (PSQ) Transfer Request are submitted through NMFS Alaska Region's online application eFISH. The Application for Approval of Use of Non-CDQ Harvest Regulations is required to be submitted by mail or fax because, in addition to the form, the submission likely would involve a written description of a set of circumstances that are conveyed to NMFS by letter and may contain additional attached documents. The National Appeals Office must require the submission of documents by fax, mail, or delivery to provide the appropriate record for legal proceedings.

**4. Describe efforts to identify duplication.**

NMFS has reviewed this information collection and identified no duplication with other information collections.

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



The CDQ groups are considered small entities under the Regulatory Flexibility Act because they are non-profit corporations. In most cases, use of the online application eFISH to submit applications and requests is the preferred and most cost effective method for the CDQ groups to submit information to NMFS. Allowing the back-up method of submitting a form by fax or mail provides options in the case of internet outages or other operational difficulties.

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

Most of the components of this collection were established at the request of the CDQ groups and the North Pacific Fishery Management Council and are not used frequently, if at all. Although some of the components of this collection are mandatory if a CDQ group wants to invoke a provision allowed in regulation, none of them have a specific deadline. They all may be submitted at any time that the CDQ group wishes to apply for a beneficial provision of the program or a CDQ or PSQ transfer that they wish to have completed by NMFS.

If these information collections were not established, NMFS would not have a reliable way to collect the information necessary to evaluate a CDQ group's request or application for a particular program component or quota transfer.

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

There are no special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

**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.**

A *Federal Register* Notice published on October 3, 2019 (84 FR 52872) solicited public comments. The comment period ended December 2, 2019. No comments were received.

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

No payment or gift will be provided under this program.

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

The information collected is confidential under section 402(b) of the Magnuson-Stevens Act. It

is also confidential under [NOAA Administrative Order 216-100](#), which sets forth procedures to protect confidentiality of fishery statistics.

All information collected is part of a system of records: NOAA #19, published April 17, 2008.

**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.**

Information collected for the CDQ Program does not include information of a private or sensitive nature.

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

Information Collection	Type of Respondent (Occupational Title)	# of Respondents	Annual # of Responses / Respondent	Total # of Annual Responses	Burden Hrs / Response	Total Annual Burden Hrs	Mean Hourly Wage Rate (for Type of Respondent) <sup>6/</sup>	Total Annual Wage Burden Costs
CDQ Vessel Registration System <sup>1/</sup>	CDQ group representative	1	1	1	10 min.	1 <sup>5/</sup>	\$54.13	\$54
Groundfish/Halibut CDQ and Prohibited Species Quota (PSQ) Transfer Request	CDQ group representative	6	12	72	30 min.	36	\$54.13	\$1,949
Application for Approval of Use of Non-CDQ Harvest Regulations <sup>2/</sup>	CDQ group representative	1	1	1	5 hrs	5	\$54.13	\$271
Appeals <sup>3/</sup>	CDQ group representative	1	1	1	4 hrs	4	\$54.13	\$217
<b>Totals</b>		<b>6<sup>4/</sup></b>		<b>75</b>		<b>46</b>		<b>\$2,491</b>

<sup>1/</sup> NMFS has not received any registrations through the CDQ Vessel Registration System since it was implemented in 2016. For purposes of this information collection, NMFS is assuming it is possible that it may receive one registration from one respondent in each of the next three years.

<sup>2/</sup> NMFS received one Application for Approval of Use of Non-CDQ Harvest Regulations in 2012. NMFS does not expect to receive any additional applications in the next three years. However, for purposes of this information collection, NMFS is assuming it is possible it may receive one application from one respondent in each of the next three years.

<sup>3/</sup> NMFS has not received any administrative appeals related to this collection because NMFS has not issued any disapprovals of an Application for Approval of Use of Non-CDQ Harvest Regulations, nor does NMFS expect to in the future. The opportunity to submit an administrative appeal must be provided in our regulations, but it is very rarely used except for issuance of initial allocations or permits for Alaska Region catch share programs. However, for purposes of this information collection, NMFS is assuming it is possible it may receive one appeal from one respondent in each of the next three years.

<sup>4/</sup> Some participants in the CDQ Program submit more than one instrument in this information collection. Therefore, the number of unique respondents is used to show the estimated number of individual participants who are expected to annually submit information during the renewal period for this information collection. The estimated number of unique respondents consist of the representatives of the six CDQ groups.

<sup>5/</sup> Rounded up from 0.17 hrs.

<sup>6/</sup> The mean hourly wage for the CDQ group representative is based on U.S. Bureau of Labor Statistics wage estimates for Occupation Code 11-1021 (General and Operations Managers). [May 2018 Occupational Employment Statistics Research Estimates, Alaska.](#)

**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).**

Information Collection	# of Respondents	Annual # of Responses / Respondent	Total # of Annual Responses	Cost Burden / Respondent	Total Annual Cost Burden
CDQ Vessel Registration System	1	1	1	\$0 <sup>1/</sup>	\$0
Groundfish/Halibut CDQ and Prohibited Species Quota (PSQ) Transfer Request	6	12	72	\$0 <sup>1/</sup>	\$0
Application for Approval of Use of Non-CDQ Harvest Regulations	1	1	1	\$20 <sup>2/</sup>	\$20
Appeals	1	1	1	\$234 (attorney) \$20 (mail or delivery) <sup>3/</sup>	\$254
<b>TOTALS</b>			<b>75</b>		<b>\$274</b>

<sup>1/</sup>Submission of information for the CDQ Vessel Registration System and the CDQ and PSQ Transfer Request are all done online and assumed to have zero additional cost burden to the respondent because the costs of using the internet to submit this information through eFISH would not change their overall annual costs for internet services.

<sup>2/</sup> This application may be submitted by mail or fax. This cost estimate is for mailing.

<sup>3/</sup> In addition to the 4 hours that are estimated for a CDQ group representative to prepare and submit information necessary for an appeal, the CDQ also would be likely to hire an attorney to prepare the actual appeal documents. NMFS estimates that preparation of the appeal would take 4 hours of an attorney time. The mean hourly wage for the attorney is based on U.S. Bureau of Labor Statistics wage estimates for Occupation Code 23-1011 (Lawyers; \$58.50/hr). [May 2018 Occupational Employment Statistics Research Estimates, Alaska](#).

#### **14. Provide estimates of annualized cost to the Federal government.**

The following provides additional explanation for the estimated 15 hours of time per year by a Fishery Management Specialist in the NMFS Alaska Region, Sustainable Fisheries Division to support the components of this information collection. A table summarizing estimated costs to the Federal government are on the following page.

NMFS incurred considerable costs to develop the CDQ Vessel Registration System, however, those development costs were incurred prior to or during 2016. The CDQ Vessel Registration System is now an established component of eFISH. NMFS does not incur recurring costs associated with the CDQ Vessel Registration System because the CDQ groups have not yet used this system and, based on experience of the last few years, are unlikely to do so in the future. However, for purposes of this information collection, NMFS is assuming it is possible that it may receive one registration from one respondent in each of the next three years. NMFS assumes that it could take one staff person approximately **1 hour** to explain the CDQ Vessel Registration System and confirm that the registration is displayed properly on NMFS's website.

NMFS incurs costs for answering questions about and addressing minor issues with the online transfer application and process for the Groundfish/Halibut CDQ and Prohibited Species Quota (PSQ) Transfer Request. NMFS estimates that this takes one staff person approximately **10 hours** per year.

NMFS also does not expect to incur future costs for the Application for Approval of Use of Non-CDQ Harvest Regulations or related appeals. The one voluntary cooperative that exists in the BSAI groundfish fisheries submitted its application in 2012 and has not submitted any amendments or withdrawn its application since then. However, for purposes of this information collection, NMFS is assuming it is possible that it may receive one application from one respondent in each of the next three years. Answering questions, reviewing, and preparing a NMFS letter of approval for the application is estimated to take one staff person approximately **4 hours**.

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
<b>Federal Oversight</b>					
Fishery Management Specialist	GS12 step 10	\$164,253	15 hrs or 1%		\$1,181
Appeals Attorney	GS14 step 10	\$231,575	4 hr or .2%		\$444
<b>Contractor Cost</b>					\$0
<b>Travel</b>					\$0
<b>Other Costs:</b>					\$0
<b>TOTAL</b>					<b>\$1,625</b>

GS 12 step 10 salary (capped out ZP-3 in Juneau, AK) = \$108,061. Loaded salary: add 52% of salary (\$108,061 \* 1.52 = \$164,253).

Assuming 2,087 hours in a Federal work year, the loaded hourly salary is \$78.70 (\$164,253 / 2,087).

To calculate % of effort: 15 hrs/2,087 hrs = 0.0072 or about 1% of effort.

Total cost to government = \$78.70 x 15 = \$1,181.

GS 14 step 10 2019 salary for Silver Spring = \$152,352. Loaded salary: add 52% of salary (\$152,352 \* 1.52 = \$231,575).

Assuming 2,087 hours in a Federal work year, the loaded hourly salary is \$110.96/hour (\$231,575 / 2,087).

To calculate % of effort: 4 hrs/2,087 hrs = 0.0019 or .2% of effort.

Total cost to government = \$110.96 x 4 = \$444.

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

The following tables show the changes and in the number of respondents, responses, time estimates, labor costs, and miscellaneous costs; and explains the reasons for these changes.

Information Collection	Respondents		Responses		Burden Hours		Reason for change or adjustment
	Current Renewal / Revision	Previous Renewal / Revision	Current Renewal / Revision	Previous Renewal / Revision	Current Renewal / Revision	Previous Renewal / Revision	
CDQ Vessel Registration System	1	6	1	6	1	2	Adjusted the estimate of the number of registrations because we have received no registrations since the provision was implemented in 2016.
Groundfish/Halibut CDQ and Prohibited Species Quota (PSQ) Transfer Request	6	12	72	24	36	14	Adjusted the number of respondents to reflect that the 6 CDQ groups are the only respondents. Adjusted the number of responses based on the average number of transfers requested in the last three years. Adjusted time per response from 35 min to 30 min. to reflect the accuracy at which we can project the average time per response.
<b>Total for Collection</b>	<b>6<sup>1/</sup></b>	<b>13</b>	<b>75</b>	<b>32</b>	<b>46</b>	<b>25</b>	

<sup>1/</sup>Some participants in the CDQ Program submit more than one instrument in this information collection. Therefore, the number of unique respondents is used to show the estimated number of individual participants who are expected to annually submit information during the renewal period for this information collection. The estimated number of unique respondents consist of the representatives of the six CDQ groups.

Information Collection	Labor Costs		Miscellaneous Costs		Reason for change or adjustment
	Current	Previous	Current	Previous	
CDQ Vessel Registration System	54	74	0	0	Adjusted estimated number of burden hours and used a more recent wage rate estimate.
Groundfish/Halibut CDQ and Prohibited Species Quota (PSQ) Transfer Request	1,949	518	0	0	Adjusted estimated number of burden hours and used a more recent wage rate estimate.
Application for Approval of Use of Non-CDQ Harvest Regulations	271	185	20	6	Adjusted based on a more recent wage rate estimate. Increased estimate for mailing costs to allow for the possibility that the application will be delivered by a carrier other than the U.S. mail.
Appeals	217	148	254	1	Adjusted based on a more recent wage rate estimate. Included the possibility that the CDQ group would need to hire an attorney to assist with the appeal and used an estimate of \$20 for mailing or delivery charges.
<b>Total for Collection</b>	<b>2,491</b>	<b>925</b>	<b>274</b>	<b>7</b>	

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

The information obtained from this collection will not be tabulated or published in a report specifically about this data collection. Some of the information may be summarized qualitatively or quantitatively in general reports about the CDQ Program or for analyses of proposed revisions to CDQ Program regulations in the future. This information may be provided to the North Pacific Fishery Management Council or the public with appropriate application of confidentiality requirements.

**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.**

The expiration date will be displayed for this information collection.

**18. Explain each exception to the certification statement.**

There are no exceptions for compliance with provisions in the certification statement.

**B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS**

This collection does not employ statistical methods.