

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
NOAA Fisheries Greater Atlantic Region Vessel Identification Requirements
OMB Control No. 0648-0350

Abstract

The National Oceanic and Atmospheric Administration's (NOAA's) National Marine Fisheries Service (NMFS) requests the approval of the Office of Management and Budget (OMB) for an extension of the existing collection of information under OMB Control Number 0648-0350 for Greater Atlantic Region Vessel Identification. Regulations at 50 CFR parts 648.8 and 697.8 require that vessels over 25 ft in registered length with Federal permits to fish in the Greater Atlantic region display the vessel's name and official number.

Justification

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

The success of fisheries management programs depends upon regulatory compliance. The vessel identification requirement, which is required of all federally permitted fishing vessels in the Greater Atlantic region, is essential to facilitate enforcement. The ability to link fishing or other activities to a vessel owner or operator is crucial to the enforcement of regulations issued under the authority of the Magnuson-Stevens Fisheries Conservation and Management Act (Magnuson-Stevens Act). When this information is clearly displayed, it enables enforcement personnel to easily identify Federal permit holders while engaged in fishing.

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

No information is submitted directly to NMFS, or to the public, as a result of this collection. Vessel identification information must be affixed to the vessel in the designated locations, as specified in the regulations, so as to be visible from enforcement vessels and aircraft. This identification allows law enforcement personnel, including U.S. Coast Guard, NMFS Office of Law Enforcement, and state enforcement agency marine patrols, to ascertain whether the vessel's observed activities coincide with those authorized for that vessel. Concerned fishermen also use the identification number to report suspicious activities that they observe on the water. Fishermen ultimately benefit from this requirement as unauthorized and illegal fishing is deterred, which reduces the need for more restrictive fishing regulations. All characters used in vessel identification (e.g., Federal permit number, the vessel's official number) are considered public information.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the

decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

The identification requirements facilitate the visual identification of fishing vessels. Although technologies have been developed to electronically identify and monitor vessels, this required form of vessel identification is indispensable. The visual collection of the vessel identification characters by the public and law enforcement personnel may involve binoculars, plain sight, or other sight enhancement technologies.

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

There is no duplication of this requirement with other collections by NMFS. However, the U.S. Coast Guard and state regulatory agencies may require the same identification of vessel name and official number. These requirements are complementary and do not create any additional nor duplicative requirements on the respondents.

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

Nearly all commercial fishing vessels subject to this information collection are categorized as small businesses. However, it is not anticipated that the information collection will have any significant impact on the operations of these small businesses.

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

If commercial fishing vessels were not identifiable by the National Marine Fisheries Service, U.S. Coast Guard, or any other cooperating enforcement agency the ability to enforce fishery regulations would be significantly impaired. The requirements of this collection are only repeated once the identification markings become illegible.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with OMB guidelines.

No special circumstances require the collection to be conducted in a manner inconsistent with the OMB guidelines.

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

A *Federal Register* notice was published on July 23, 2020, (85 FR 44524) soliciting public comments. The comment period closed on September 21, 2020. No comments were received.

NMFS reached out to several commercial fishing vessels who fall under this vessel identification requirement in an effort 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. No responses were received.

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

No payments or gifts are provided to respondents as a part of this collection.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

Vessel identification is not considered confidential information and thus no confidentiality is provided.

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

No sensitive questions are asked as part of this collection.

12. Provide estimates of the hour burden of the collection of information.

The regulations state that the vessel’s name must be affixed to the port and starboard sides of the bow and, if possible, on its stern. The official number must be displayed on the port and starboard sides of the deckhouse or hull, and on an appropriate weather deck so as to be clearly visible from enforcement vessels and aircraft. It is estimated that each vessel will require 45 minutes to apply (paint) this official information. Each vessel is expected to need repainting of identification information on an annual basis. Table 1 provides a summary of annual burden for vessel identification.

Table 1. Greater Atlantic Region Vessel Identification Burden Table

Information Collection	Type of Respondent (e.g., Occupational Title)	# of Respondents/year (a)	Annual # of Responses / Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Burden Hrs / Response (d)	Total Annual Burden Hrs (e) = (c) x (d)	Hourly Wage Rate (for Type of Respondent) (f)	Total Annual Wage Burden Costs (g) = (e) x (f)
0648-0350 Vessel Identification	45-0000 Farming, Fishing, and Forestry Occupations	3,893	1	3,893	0.75	2,920	15.07	44,001
Totals				3,893		2,920		44,001

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

The cost to respondents is minimal. Materials needed are paint and paintbrush, and possibly a stencil. Annual costs are estimated to be \$10 per respondent to purchase paint or other materials for repainting. Given natural weathering of the paint, it is estimated that the repainting process for vessel identification will need to be repeated on an annual basis. **This action affects a total of 3,893 entities, thus the annual cost burden to respondents is estimated at \$38,930.00 (3,893 x \$10).**

Information Collection	# of Respondents/year (a)	Annual # of Responses / Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Cost Burden / Respondent (h)	Total Annual Cost Burden (i) = (c) x (h)
0648-0350 Vessel Identification	3,893	1	3,893	10	38,930
TOTALS	3,893	1	3,893	10	38,930

***There are no capital costs or operating and maintenance costs associated with this information collection.**

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

There are no costs to the Federal government associated with the requirement to identify vessels.

15. Explain the reasons for any program changes or adjustments reported in ROCIS.

Changes reflect the most current information regarding the number of relevant vessels (respondents) estimated. The average number of respondents per year increased, due to the current number of permitted vessels currently listed in the permit database that are greater than or equal to 25 feet in overall length, creating minimal adjustments to burden estimates. The total number of respondents is now estimated to be 3,893 entities per year, up from 3,664 in the previous collection. All differences in burden are due to this minor adjustment and not to a program change.

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	
0648-0350 Vessel Identification	3,839	3,665	3,839	3,665	2,920	2,749	Adjustments
Total for Collection	3,839	3,665	3,839	3,665	2,920	2,749	
Difference	228		228		171		

Information Collection	Labor Costs		Miscellaneous Costs		Reason for change or adjustment
	Current	Previous	Current	Previous	
0648-0350 Vessel Identification	44,001	NA	38,930	36,650	Labor not previously calculated
Total for Collection	44,001	NA	38,930	36,650	
Difference	\$44,001		\$2,280		

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

No results from this publication will be published.

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

No forms are used in this information collection.

18. Explain each exception to the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”

The agency certifies compliance with [5 CFR 1320.9](#) and the related provisions of [5 CFR 1320.8\(b\)\(3\)](#).