

**Supporting Statement
for
Applications for Vessel Inspection, Waiver and Continuous Synopsis Record**

OMB No.: 1625-0002
COLLECTION INSTRUMENTS: CG-2633, CG-3752, CG-6039

A. JUSTIFICATION

1. Circumstances that make the collection of information necessary.

This collection of information is comprised of three elements:

a. Application for Inspection of U.S. Vessel (CG-3752):

Title 46 CFR 31.01-15, 91.25-5, 105, 126.420, 169.205, and 189.25-5 authorize this reporting requirement. The owner, operator, agent, or master of a vessel is required to make application in writing to the Coast Guard prior to the commencement of the inspection for certification. The application provides the Coast Guard with basic vessel information, which is necessary for the initial planning and scheduling of inspection. The application is submitted to the Officer in Charge, Marine Inspection in or nearest the port at which the inspection is to be made.

b. Application for Waiver or Waiver Order (CG-2633):

Title 33 CFR 19 and 46 CFR 6 authorizes this reporting requirement. The owner, operator, agent, or master of a vessel, or the representative of any interested U.S. Government agency is required to make application in writing when, in the interests of national defense, a waiver is desired from the requirements of navigation and vessel inspection laws and regulations. The application is made to the Coast Guard District Commander or his designated representative at the port or place where the vessel is located. Applications having general applicability must be submitted to the Commandant. In case of extreme urgency, the application may be made orally. The application provides the Coast Guard with information necessary to analyze the particular circumstances of the waiver being requested and determine if the waiver should be granted.

c. Application for Continuous Synopsis Record (CG-6039):

Title 33 CFR 101.115 and 104.297 authorize this reporting requirement. The owner, operator, agent or master of a vessel is required to make application in writing to the Coast Guard for issuance of a Continuous Synopsis Record (CSR) required by the International Convention for the Safety of Life at Sea, 1972 (SOLAS) Chapter XI-1, Regulation 5. The application provides the Coast Guard with basic vessel information necessary for the issuance of the Continuous Synopsis Record. The application is submitted to the National Vessel Documentation Center.

The statutory authority for these requirements is 46 U.S.C. 501, 3306, 3309 and 70034.

2. Purposes of the information collection.

a. The "Application for Inspection of U.S. Vessel" is used by vessel owners, operators, agents, or masters to notify the Coast Guard that an inspection for certification is desired on a given vessel. The frequency of submission is 1-year or 5-years depending upon the type of vessel. The information collected provides the Coast Guard with the information necessary to schedule and plan for inspections for certification, and minimizes the need for additional contact with the vessel representatives prior to the inspection. If the form is not used, any requests for inspection require additional follow-up to obtain necessary information. This would result in additional burdens being placed on vessel representatives and the Coast Guard.

b. The "Application for Waiver and Waiver Order" is used by vessel owners, operators, agents, masters, or interested U.S. Government representatives when waivers are required in the interest of national defense for a given vessel. This information collection provides the Coast Guard with the information

necessary to analyze requests for waivers. Without the form, efficient administration of requests of this nature would not be realized, possibly resulting in unnecessary delays to vessels laden with vital national defense cargo.

c. The "Application for Continuous Synopsis Record" is used by vessel owners, operators, agents, masters to request the issuance of a Continuous Synopsis Record. The frequency of submission is once per vessel. The information collected provides the Coast Guard with the information necessary to issue a CSR. If the form is not used, incomplete and inaccurate formats of data may be submitted; this could delay the issuance of a Continuous Synopsis Record.

3. Consideration of the use of improved information technology.

This information may be sent by mail, phone, fax or electronically submitted via e-mail to—

- the Officer in Charge, Marine Inspection (OCMI) at a CG Sector Office, for a vessel seeking an inspection. Use form CG-3752.
- the District Commander, for a vessel seeking a national defense waiver. Use form CG-2633. In cases of extreme urgency, the application can be made orally.
- the National Vessel Documentation Center (NVDC), for a vessel seeking a CSR. Use form CG-6039.

All application and forms are posted at <https://www.dcms.uscg.mil/forms>. A comprehensive list of contact info for Coast Guard units can be found at: <https://www.uscg.mil/Units/Organization/>. At this time, we estimate that 80 percent of the responses are collected electronically.

4. Efforts to identify duplication.

There are no other forms or similar information available elsewhere for these purposes.

5. Methods to minimize the burden to small businesses if involved.

Consideration has been given to the burden imposed upon small businesses. The forms are designed to minimize the burden for both large and small businesses. It takes a respondent about 15 minutes to fill out and submit the "Application for Inspection" and 30 minutes to fill out and submit the "Application for Waiver" and "Application for Continuous Synopsis Record."

6. Consequences to the Federal program if collection were conducted less frequently.

a. This requirement is concerned with the safety of personnel, equipment, and the vessels on which they are found. It is designed to coincide with a particular event, i.e., the inspection for certification for which specific time intervals have been required by law. The reporting requirement is considered necessary to ensure the safety of lives and property. Any changes to the frequency would require a change to the law.

b. The reporting requirement is designed to coincide with a particular event, i.e., when a waiver is desired from inspection laws and regulations for which specific time intervals have been required by law. The reporting requirement is considered necessary to ensure the safety of lives and property. If this information were not required, there would be no available means for vessel owners, agents, masters, or interested U.S. Government agencies to request a waiver of inspection laws due to national defense requirements. As a result, there would be undue vessel delays and/or increased costs, either of which could be detrimental to national defense considerations.

c. The "Application for Continuous Synopsis Record" needs to be submitted once per vessel. Less frequent reporting would inhibit the issuance of a CSR.

7. Special collection circumstances.

This information collection is conducted in manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

8. Consultation.

A 60-day Notice was published in the Federal Register to obtain public comment on this collection (See [USCG-2020-0098]; July 24, 2020, 85 FR 44914) and 30-Day Notice (October 5, 2020, 85 FR 62750) were published in the Federal Register to obtain public comment on this collection. The Coast Guard has not received any comments on this information collection.

9. Provide any payments or gifts to respondents.

There is no offer of monetary or material value for this information collection.

10. Describe any assurance of confidentiality provided to respondents.

There are no assurances of confidentiality provided to the respondents for this information collection. This information collection request is covered by the Marine Information for Safety and Law Enforcement (MISLE) Privacy Impact Assessment (PIA) and System of Records Notice (SORN). Links to the MISLE PIA and SORN are provided below:

- https://www.dhs.gov/sites/default/files/publications/privacy_pia_uscg_misle.pdf
- <https://www.gpo.gov/fdsys/pkg/FR-2009-06-25/html/E9-14906.htm>

11. Additional justification for any questions of a sensitive nature.

There are no questions of sensitive language.

12. Estimate of annual hour and cost burdens to respondents.

- The estimated number of annual respondents is 2,926.
- The estimated number of annual responses is 2,951.
- The estimated hour burden is 745 hours.
- The estimated cost burden is \$73,755.

The annual reporting hour and cost burdens on Industry are summarized in Appendix A and are based on the following information:

Respondents: The annual number of respondents is equal to the annual number of Applications for Inspections. This is because an Application for Continuous Synopsis Record is typically submitted in conjunction with a vessel's initial Application for Inspection. Furthermore, it is reasonable that the majority of vessels owners seeking a waiver would do so in conjunction with their inspection for certification.

Responses:

a. Inspection applications: The estimated annual number of applications for inspection takes into account 4 distinct populations of US domestic vessels: (1) Existing large passenger vessels and small passenger vessels carrying more than 12 passengers on international voyages, (2) Commercial fishing vessels dispensing petroleum, which comply with 46 CFR 105, (3) All other existing inspected vessels, and (4) Newly constructed inspected vessels.

(1) All large passenger vessels and small passenger vessels carrying more than 12 passengers on international voyages are required to make an application for inspection annually. Large passenger vessels fall under subchapter H, while small passenger vessels carrying more than 12 passengers on international voyages must be SOLAS certified and either fall under subchapter K or T.

(2) Commercial fishing vessels dispensing petroleum, which comply with 46 CFR 105, are required to submit an application for inspection either annually or biennially so long as they wish to continue these operations. Those that have temporarily installed cargo tanks for the petroleum products must apply for, and go through, an inspection annually, while those with permanently installed tanks must

receive one biennially. There is further variance in this population due to the vessels halting petroleum dispensing operations, and therefore causing a lapse in the Applications for Inspection. However, due to the small size of this population, and to ensure the most conservative estimate, the shortest interval is assumed; once per year.

(3) All other existing vessels are required to submit an application and complete an inspection once every five years. These include subchapter K or T vessels that are not subject to SOLAS. For estimating the annual number of applications for inspection, it is assumed that one-fifth of this population reports on average in a given year.

(4) Newly constructed inspected vessels are required to submit an application for inspection so that they can receive their initial Certificate of Inspection. For this reason, this population is treated as a one-off per year, rather than recurring in the manner of (1) and (2) above. It is estimated by taking a recent multi-year average of the number of all US inspected vessels built.

The estimated annual number of Applications for Inspection is, therefore, equal to the sum of the populations (1), (2), (4), and one-fifth of the population (3).

b. Waiver applications: Applications for waivers are not submitted on a regular basis, and historically the Coast Guard receives one per year.

c. CSR applications: CSRs need only be submitted once per vessel. The annual number of responses in this category represents a multi-year average of the number of CSRs issued based on recorded CSR issue dates.

Hour Burden and Wage Rate: We estimate that it takes a vessel representative about 15 minutes per Application for Inspection and 30 minutes for an Application for Waiver or CSR. The position of a vessel representative is analogous to that of a Lieutenant Junior Grade (LTJG, O-2). The wage rate used is in accordance with the current edition of COMDTINST 7310.1(series) for "Out-Government" personnel.

13. Total annualized capital and start-up costs.

There are no recordkeeping, capital, start-up or maintenance costs associated with this information collection.

14. Estimates of annualized Federal Government costs.

The estimated annual Federal Government cost is \$52,150 (see Appendix B). We estimate that it takes a LTJG about 15 minutes to review an Application for Inspection and about 30 minutes to review an Application for Waiver or CSR. The wage rate used is in accordance with the current edition of COMDTINST 7310.1(series) for "In-Government" personnel.

15. Reasons for changes in burden.

The change in burden (i.e., increase) is an ADJUSTMENT due to an increase in the estimated annual number of responses. The reporting requirements, and methodology for calculating burden, remain unchanged.

Additionally, to streamline the application for inspection of a U.S. vessel process, the Coast Guard updated form CG-3752, Application for Inspection of U.S. Vessel. The updated form combines CG form CG-3752 – Application for Inspection of U.S. Vessel and CG-3752A – Application for Inspection of U.S. Vessel (New Construction) into a new single two-page form. The second page of the form is only used if a U.S. vessel is New Construction or Entering Certificated Service. The updated form reduces redundancy, increases efficiency, and streamlines form completion with necessary values to align with the Coast Guard's database. It includes embedded hyperlinks, dropdowns, electronic signatures, and manual entry options if needed. The estimated burden for the updated form remains unchanged.

16. Plans for tabulation, statistical analysis, and publication.

This information collection will not be published for statistical purposes.

17. Approval for not explaining the expiration date for OMB approval.

The Coast Guard will display the expiration date for OMB approval of this information collection.

18. Exception to the certification statement.

The Coast Guard does not request an exception to the certification of this information collection.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection does not employ statistical methods.