

**JUSTIFICATION FOR CHANGE**  
**U.S. Department of Commerce**  
**National Oceanic & Atmospheric Administration**  
**Vessel Monitoring System Requirements for the Pacific Islands Fisheries**  
**OMB Control No. 0648-0441**

NOAA’s National Marine Fisheries Service (NMFS) is proposing a change to information collection 0648-0441 to remove the Position Reports from the collection as no burden is imposed on the respondent. In previous information collection submissions, Position Reports (or ‘pings’) were included as a collection of information. However, Position Reports are automatically generated by the Vessel Monitoring System (VMS) as required by regulation; the only burden to vessel owners is time taken for installation, operations, and maintenance. NOAA has recently standardized VMS collections to no longer include automated pings as collections of information. This information collection will otherwise remain unchanged.

As a result of this change, the burden is reduced as follows:

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	
Observe initial installation (new installation)	10	10	10	10	40	40	
Observe VMS replacement (current installation)	35	35	35	35	70	70	
Observe VMS unit maintenance and repair	40	40	40	40	60	60	
Position reports	0	180		1,576,800	0	0	
<b>Total for Collection</b>	<b>85</b>	<b>180</b>	<b>85</b>	<b>1,576,885</b>	<b>170</b>	<b>170</b>	Position report removed as the create no burden.
<b>Difference</b>	<b>-95</b>		<b>-1,576,800</b>		<b>0</b>		