SUPPORTING STATEMENT - PART A

Facilities Available for the Construction or Repair of Ships – OMB Control Number 0703-0006

Summary of Changes from Previously Approved Collection

- Increase in respondent burden due to increase in average hourly wage of respondents.
- Increase in overall labor burden to federal government due to increase in average hourly wage of government labor.

1. Need for the Information Collection

Standard Form 17, "Facilities Available for the Construction or Repair of Ships Data Collection" is used to determine and assess shippard capabilities for ship construction and repair for Maritime and U.S. Navy ships. The responsibilities for data collection relative to shipbuilding capabilities were initially assigned by the Merchant Marine Act of 1936 to the Department of Transportation and eventually the U.S Maritime Administration (MARAD). This collection is authorized and prescribed by 46 U.S.C, Shipping.

MARAD, in conjunction with the Secretary of the Navy shall at least once each year survey the existing privately owned shipyards capable of merchant ship construction to determine whether their capacity for merchant ship construction, including facilities and skilled personnel, provides an adequate mobilization base at strategic points for purposes of national defense and national emergency. Title 46 of U.S.C states that this collection of information will be conducted with the advice of, and in coordination with, the Secretary of the Navy.

2. <u>Use of the Information</u>

The SF-17, "Facilities Available for the Construction or Repair of Ships", is designed to be sent to businesses in the shipbuilding and repair industry. This collection of information is a broad based request designed to go out to the majority of the shipbuilding industrial base. This request for information is a collaborative effort between MARAD and the Naval Sea Systems Command (NAVSEA), intended to help measure the capabilities and capacities of the U.S. Shipbuilding Industrial Base.

MARAD is the primary agency responsible for performing this annual collection of information, processing all returns and shares the results with the U.S. Navy. MARAD, with input from the U.S. Navy, identifies the private U.S. shipyards to be solicited and populates the forms and as well as a survey letter, that serves as an invitation to participate in the

solicitation and an electronic communication request form that respondents may use to indicate a desire to participate via electronic submission.

MARAD then sends the SF-17 packages out to the shipyards along with a timeline for completion. Invitations to participate are included in the originating packet mailed, via USPS to the shipyard point of contact. Respondents complete the form electronically or, print and complete by hand. Respondents return the completed SF-17 by email, fax or mail. Respondents vary depending on the size of the shipyard; typical respondents in past surveys have consisted of shipyard presidents, vice presidents, facility engineers, general managers, and human resource officers. The agency disclosure notice is listed on top of the form so when the survey process is complete, MARAD can provide NAVSEA with copies of all the returned data. MARAD process all returned surveys for MARAD and provides copies to NAVSEA, which will then process this data individually.

MARAD and NAVSEA have databases designed to store and utilize the collected information. The collected information's end users vary, but primarily provide a critical data set used in report development for various U.S. Government agencies, the U.S. Congress and the Department of Defense. NAVSEA Headquarters utilizes the data for conducting Master Ship Repair Agreement (MSRA), Agreement for Boat Repair (ABR) and Pre-Award Surveys. The data is also used by the NAVSEA Shipbuilding Support Office (NAVSHIPSO) and by NAVSEA shipbuilding program offices to perform industrial base assessment to determine the capability of private shipyards to perform U.S. Navy new construction and ship repair work.

MARAD uses the SF-17 data to conduct industrial capability analysis and to respond to frequent requests for shipyard facility data from various concerns, both public and private. MARAD also uses the SF-17 data to provide critical input in determining which facilities will be used during the reactivation of the reserve fleets maintained by MARAD and the U.S. Navy. This data is also utilized to assess individual shipyard capabilities as well as measuring increases or declines in shipbuilding and repair capabilities.

The successful effect of this collection of information is to provide MARAD and the U.S. Navy with both an economic and national defense large-scale view of the U.S. Industrial Shipbuilding and Repair Base.

3. <u>Use of Information Technology</u>

The SF-17 is a fillable PDF sent to respondents by email. An estimated 80% of respondents return the SF-17 by e-mail or fax. 20% of respondents choose to return their responses by mail. MARAD makes every effort to allow for maximum use of IT to ease the burden and cost to the respondent.

4. <u>Non-duplication</u>

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. Burden on Small Businesses

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. <u>Less Frequent Collection</u>

Collection of this information cannot be conducted less frequently. The Merchant Marine Act of 1936, as amended, requires an annual survey to be conducted. No other information source provides a comprehensive listing of private sector shipyard construction, repair capabilities and limitations including launch ways, dry docks, piers, shops, cranes and workforce, among other items, that can provide a comprehensive data set to help maintain an up to date measurement of the U.S. shipbuilding industrial base.

7. <u>Paperwork Reduction Act Guidelines</u>

This collection of information does not require the collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection published on Monday, August 30, 2021. The 60-Day FRN citation is 86 FRN 48407.

A 30-Day Federal Register Notice for the collection published on Monday, October 25, 2021. The 30-Day FRN citation is 86 FRN 58899.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the 60-Day Federal Register Notice was conducted for this submission.

9. <u>Gifts or Payment</u>

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. <u>Confidentiality</u>

A Privacy Act Statement is not required for this collection because we are not requesting individuals to furnish personal information for a system of records.

A System of Record Notice (SORN) is not required for this collection because records are not retrievable by PII.

A Privacy Impact Assessment (PIA) is not required for this collection because PII is not being collected electronically.

The data collected is considered "Business Sensitive" and is stored in locked file cabinets and the electronic version will be secured behind the firewall. This information is kept indefinitely. Information no longer used is disposed of in accordance with agency policy regarding the disposition of sensitive material.

11. Sensitive Ouestions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

a. Estimation of Respondent Burden

1. Standard Form 17, Facilities Available for the Construction or Repair of Ships

- a. Number of Respondents: 200
- b. Number of Responses Per Respondent: 1
- c. Number of Total Annual Responses: 200
- d. Response Time: 4 hours
- e. Respondent Burden Hours: 800 hours

2. Total Submission Burden

- a. Total Number of Respondents: 200
- b. Total Number of Annual Responses: 200
- c. Total Respondent Burden Hours: 800 hours

b. Labor Cost of Respondent Burden

1. Standard Form 17, Facilities Available for the Construction or Repair of Ships

- a. Number of Total Annual Responses: 200
- b. Response Time: 4 hours
- c. Respondent Hourly Wage: \$52.30
- d. Labor Burden per Response: \$209.20
- e. Total Labor Burden: \$41,840

2. Overall Labor Burden

a. Total Number of Annual Responses: 200

b. Total Labor Burden: \$41,840

The Respondent hourly wage was determined by using the Department of Labor Wage Website ([(https://www.bls.gov/oes/current/oes nat.htm). Occupational code 11-3051.

13. Respondent Costs Other Than Burden Hour Costs

About 20% of respondents return their responses by mail; postage is estimated to costs \$1.64. Total estimated postage costs to respondents is \$65.60.

14. Cost to the Federal Government

a. Labor Cost to the Federal Government

${\bf 1.\,Standard\,Form\,\,17,\,Facilities\,\,Available\,for\,\,the\,\,Construction\,\,or\,\,Repair\,\,of\,\,Ships}$

- a. Number of Total Annual Responses: 200
- b. Processing Time per Response: 4 hours
- c. Hourly Wage of Worker(s) Processing Responses: \$65.93
- d. Cost to Process Each Response: \$263.72
- e. Total Cost to Process Responses: \$52,744

2. Overall Labor Burden to Federal Government

- a. Total Number of Annual Responses: 200
- b. Total Labor Burden: \$52,774

b. Operational and Maintenance Costs

- a. <u>Equipment</u>: \$0
- b. Printing: \$4,845.00
- c. Postage: \$0
- d. Software Purchases: \$0_
- e. Licensing Costs:\$0
- f. Other: \$17.943
- g. <u>Total</u>: \$22,788
- 1. Total Operational and Maintenance Costs: \$ 22,788
- 2. Total Labor Cost to the Federal Government: \$52,774
- 3. Total Cost to the Federal Government: \$75,562

15. Reasons for Change in Burden

The burden has increased since the previous approval due to increased average wage rates for the expected respondents and government labor costs. The collection instrument used previously, SF-17, "Facilities Available for the Construction or Repair of Ships" will be

converted to a Common Form. This change is per the terms of clearance in the last Notice of Action issued by OMB for 0703-0006 on June 23, 2017.

16. <u>Publication of Results</u>

The results of this information collection will not be published.

17. <u>Non-Display of OMB Expiration Date</u>

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.