

DEPARTMENT OF TRANSPORTATION
SUPPORTING STATEMENT
Maritime Administration Exercise Breakout Survey

An adjustment was made to the number of respondents decreasing by 50, and the burden hours were decreased by 2 based on the number of applications received.

INTRODUCTION

This is to request the Office of Management and Budget's (OMB) three-year approval clearance for a proposed new information collection entitled, Maritime Administration Exercise Breakout Survey, OMB Control No. 2133-0550, expiration April 30, 2022.

Part A. Justification.

1. Circumstances that make collection of information necessary. 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.

This is a survey conducted on a voluntary basis that provides vital information to the Ready Reserve Force Program. This exercise is designed to test MARAD's internal administrative procedures, as well as the coordination necessary for a complete activation of MARAD's Ready Reserve Force (RRF) and the Military Sealift Command (MSC) Surge Sealift Fleet to meet strategic sealift requirements. Periodic testing is necessary in view of the dynamics that affect the RRF program, which include changes in RRF fleet composition, readiness status, ship location as well as changes to the seafaring manpower base.

This information collection supports the DOT Strategic Goal of providing for the National Security of the country by providing surge sealift capabilities.

CFR 49 §1.92 (a): The Maritime Administration is responsible for fostering the development and maintenance of the United States merchant marine sufficient to meet the needs of the national security and of the domestic and foreign commerce of the United States.

2. How, by whom, and for what purpose is the information used. 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.

The purpose of the Exercise Breakout is to verify the capability of ship management companies and maritime labor unions to simultaneously crew the Surge Sealift vessels with qualified mariners. The Surge Sealift fleet includes all forty-one of MARAD's Ready Reserve Force (RRF) ships, and all eight vessels in the Military Sealift Command (MSC) Surge Fleet. The substance of this exercise is the verification of the mariners and their qualifications in order

to properly man all 49 Surge Sealift vessels. Crew billet spreadsheets were developed from MARAD's Ship Manager Contract and MSC's operating company contract requirements. Using the information provided in the spreadsheets by the ship managers, maritime unions, and MSC, MARAD HQ staff analyzed the mariner's qualifications for the 1,523 billets required to fully crew the Surge Sealift Fleet.

These mariners that are provided by the ship management companies and maritime labor unions to participate in the exercise are considered participants. They volunteer their names and contact information which allows the Exercise Coordinator to send each of them the Exercise Breakout survey.

The intent of this survey is to gauge the individual mariner training and military experience levels, willingness to participate in time of national need, and awareness of a contested environment.

This survey will be conducted via email only and the information gained will be analyzed and tabulated by MARAD and reported in the Exercise Breakout 2022 Final Report.

These results will be used to help formulate mariner training policy, and Ready Reserve Force ship activation training policy. This survey will only be sent to the mariners that participated in Exercise Breakout 2022 and that have submitted their email addresses. The information will be submitted voluntarily and will be anonymous. This is not a survey open to the public or mariners outside of the exercise.

3. Extent of automated information collection. 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.

This is a simple seventeen question survey with mostly 'yes/no' responses. It will be emailed to approximately 1,100 mariners. A member of the MARAD staff will be tabulating the results of the survey. There is no automated component to this survey.

4. Efforts to identify duplication. 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 ITEM 2 ABOVE.

Explain the availability of any similar information and why it cannot be used or modified.

The only way to collect this information is directly from the mariner. The MARAD staff will use the email address to verify that no survey results are duplicated. This information is not accessible through MARAD or the United States Coast Guard.

5. Efforts to minimize the burden on small businesses. **IF THE COLLECTION OF INFORMATION IMPACTS SMALL BUSINESSES OR OTHER SMALL ENTITIES, DESCRIBE ANY METHODS USED TO MINIMIZE BURDEN.**

If small businesses are included as part of the information collection, describe any methods used to minimize burdens.

This survey does not impact any small businesses.

6. Impact of less frequent collection of information. **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.**

The survey is a manifestation of MARAD's Division of Federal Sealift's desire to gauge the willingness of the mariners to participate in an activation of the entire MARAD Ready Reserve Force in a time of critical need. Should this survey not be completed, the exercise, which includes private industry and other government entities, would be ineffective. In other words, MARAD would know the number of mariners that have the required credentials to staff the ships but would not know if the mariners would voluntarily report for duty. Moreover, MARAD is requesting this information from the mariners to establish a baseline of skill and training of the mariners and what additional training may be necessary for MARAD to require ensuring the maximum effectiveness of the RRF.

7. Special circumstances. **EXPLAIN ANY SPECIAL CIRCUMSTANCES THAT WOULD CAUSE AN INFORMATION COLLECTION TO BE CONDUCTED IN A MANNER:**

- **REQUIRING RESPONDENTS TO REPORT INFORMATION TO THE AGENCY MORE OFTEN THAN QUARTERLY;**
- **REQUIRING RESPONDENTS TO PREPARE A WRITTEN RESPONSE TO A COLLECTION OF INFORMATION IN FEWER THAN 30 DAYS AFTER RECEIPT OF IT;**
- **REQUIRING RESPONDENTS TO SUBMIT MORE THAN AN ORIGINAL AND TWO COPIES OF ANY DOCUMENT;**
- **REQUIRING RESPONDENTS TO RETAIN RECORDS, OTHER THAN HEALTH, MEDICAL, GOVERNMENT CONTRACT, GRANT-IN-AID, OR TAX RECORDS FOR MORE THAN THREE YEARS;**
- **IN CONNECTION WITH A STATISTICAL SURVEY, THAT IS NOT DESIGNED TO PRODUCE VALID AND RELIABLE RESULTS THAT CAN BE GENERALIZED TO THE UNIVERSE OF STUDY;**
- **REQUIRING THE USE OF A STATISTICAL DATA CLASSIFICATION THAT HAS NOT BEEN REVIEWED AND APPROVED BY OMB;**

- **THAT INCLUDES A PLEDGE OF CONFIDENTIALITY THAT IS NOT SUPPORTED BY AUTHORITY ESTABLISHED IN STATUE OR REGULATION, THAT IS NOT SUPPORTED BY DISCLOSURE AND DATA SECURITY POLICIES THAT ARE CONSISTENT WITH THE PLEDGE, OR WHICH UNNECESSARILY IMPEDES SHARING OF DATA WITH OTHER AGENCIES FOR COMPATIBLE CONFIDENTIAL USE; OR**
- **REQUIRING RESPONDENTS TO SUBMIT PROPRIETARY TRADE SECRET, OR OTHER CONFIDENTIAL INFORMATION UNLESS THE AGENCY CAN DEMONSTRATE THAT IT HAS INSTITUTED PROCEDURES TO PROTECT THE INFORMATION'S CONFIDENTIALITY TO THE EXTENT PERMITTED BY LAW.**

There are no special reporting requirements from the responder. This is a 'yes/ no' survey that is voluntary and conducted annually. The information will be tabulated using simple statistical techniques.

8. Compliance with 5 CFR 1320.8: PROVIDE AN ELECTRONIC COPY AND IDENTIFY THE DATE, VOLUME NUMBER AND PAGE NUMBER OF THE PUBLICATION IN THE FEDERAL REGISTER OF THE AGENCY'S NOTICE (FOR A 60-DAY AND A 30-DAY 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 THOSE COMMENTS. SPECIFICALLY ADDRESS COMMENTS RECEIVED ON COST AND HOUR BURDEN.**
- **DESCRIBE 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 RECORD KEEPING, DISCLOSURE, OR REPORTING FORMAT (IF ANY), AND ON THE DATA ELEMENTS TO BE RECORDED, DISCLOSED, OR REPORTED.**

MARAD published a 60-day notice and request for comments on this information collection in the Federal Register on October 19, 2021; (FR 57892, Vol. 86, No. 199), indicating comments should be submitted on or before December 20, 2021. No comments were received in response to this notice. In addition, a 30-day notice for comments on this information collection was published in the Federal Register on January 26, 2022 (87 FR 4098) indicating comments should be submitted on or before February 25, 2022.

- **CONSULTATION WITH REPRESENTATIVES OF THOSE FROM WHOM INFORMATION IS TO BE OBTAINED OR THOSE WHO MUST COMPILE RECORDS SHOULD OCCUR AT LEAST ONCE EVERY 3 YEARS--EVEN IF THE COLLECTION OF INFORMATION ACTIVITY IS THE SAME AS IN**

PRIOR PERIODS. THERE MAY BE CIRCUMSTANCES THAT MAY PRECLUDE CONSULTATION IN A SPECIFIC SITUATION. THESE CIRCUMSTANCES SHOULD BE EXPLAINED.

9. Payments or gifts to respondents. EXPLAIN ANY DECISION TO PROVIDE A PAYMENT OR GIFT TO RESPONDENTS, OTHER THAN ENUMERATION OF CONTRACTORS OR GRANTEEES.

There are no gifts or payments to the respondents.

10. Assurance of confidentiality: DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS AND THE BASIS FOR THE ASSURANCE IN STATUTE, REGULATION, OR AGENCY POLICY.

The survey is voluntary, and the results are aggregated for use. The Exercise Coordinator does not include any identifying information in the results.

11. Justification for collection of sensitive information: 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. 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.

There are no questions on the survey that would be considered sensitive in nature or require personal information to be submitted.

12. Estimate of burden hours for information requested: PROVIDE ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION. THE STATEMENT SHOULD:

- **INDICATE THE NUMBER OF RESPONDENTS, FREQUENCY OF RESPONSES, CALCULATION FOR THE INDIVIDUAL BURDENS AND FOR THE TOTAL ANNUAL HOUR BURDEN, AND AN EXPLANATION OF HOW THE BURDEN WAS ESTIMATED. UNLESS DIRECTED TO DO SO, AGENCIES SHOULD NOT CONDUCT SPECIAL SURVEYS TO OBTAIN INFORMATION ON WHICH TO BASE HOUR BURDEN ESTIMATES. CONSULTATION WITH A SAMPLE (FEWER THAN 10) OF POTENTIAL RESPONDENTS IS DESIRABLE. IF THE HOUR BURDEN ON RESPONDENTS IS EXPECTED TO VARY WIDELY BECAUSE OF DIFFERENCES IN ACTIVITY, SIZE, OR COMPLEXITY, SHOW THE RANGE OF ESTIMATED HOUR BURDEN, AND EXPLAIN THE REASONS FOR THE VARIANCE. GENERALLY, ESTIMATES SHOULD NOT INCLUDE BURDEN HOUR FOR CUSTOMARY AND USUAL BUSINESS PRACTICES.**

- **IF THIS REQUEST FOR APPROVAL COVERS MORE THAN ONE FORM, PROVIDE SEPARATE HOUR BURDEN ESTIMATES FOR EACH FORM AND AGGREGATE THE HOUR BURDENS IN ITEMS 13 OF OMB FORM 83-I.**
- **PROVIDE ESTIMATES OF ANNUALIZED COST TO RESPONDENTS FOR THE HOURLY BURDENS FOR COLLECTIONS OF INFORMATION, IDENTIFYING AND USING APPROPRIATE WAGE RATE CATEGORIES. THE COST OF CONTRACTING OUT OR PAYING OUTSIDE PARTIES FOR INFORMATION COLLECTION ACTIVITIES SHOULD NOT BE INCLUDED HERE. INSTEAD, THIS COST SHOULD BE INCLUDED IN ITEM 14.**

2021 Exercise Breakout Survey Results:

- 1,018 surveys were sent out.
- 120 responses were received (11%).
- 86% responded yes to understanding that some cargo voyages for DOD may inhibit their ability to communicate. 90% would be willing to surrender their personal communication devices for security purposes.
- 87% are willing to receive vaccinations from the military to protect from disease.
- 94% are aware that they can earn danger pay for some military cargo missions and 58% would be influenced by danger pay to accept a Contested Environment mission.
- Of the 120 responses, 115 answered the question pertaining to the last time they completed CBRD training. Results: 17% never completed the course; 24% completed the course in the last 6 months; 9% completed the course in the last year; 34% completed the course in the last five years; and 16% completed the course greater than 5 years ago.
- Of the 120 responses, 114 answered the question pertaining to the last time they completed Damage Control training. Results: 20% never completed the course, 11% completed the course in the last 6 months, 9% completed the course in the last year, 35% completed the course in the last five years, and 25% completed the course greater than 5 years ago.
- 49% answered the questions pertaining to officers in charge of a navigational watch (OICNW). Of these officers, 79% are familiar with Operational Security (OPSEC), 38% are familiar with electronic emissions control (EMCON), 24% have experience on a merchant ship operating in coordination with Naval Cooperation and Guidance for Shipping (NCAGS), 44% are familiar with Military Deception (MILDEC), and 58% have experience maneuvering merchant ships in a convoy.
- 16% of the responders had prior experience as a U.S. Navy Officer and 2% had prior experience as a U.S. Coast Guard Officer. Most of these officers had accrued 6 month or less of sea time.
- 64% of the responders have a current security clearance with the U.S. Government. 67% of those have a Secret clearance.
- 5% of the responders have attended the National Sealift Training Program and 50% have completed Cybersecurity for Mariners.

The exercise coordinator sent the initial email with the survey out to the various mariners that provided their names and email addresses. After the initial email was sent out, there was a reminder notice that went out to the individuals who didn't initially respond. There were only five more responders who replied to the reminder email. We used these survey results to provide information to U.S. Transportation Command (MARAD's Program Sponsor) in the MARAD Breakout Exercise Final Report.

For 2022, it's estimated that between 1,000 – 1,200 surveys will be sent out. It is estimated that MARAD will receive between 200-250 responses.

For the respondents, this survey should not take more than 3-5 minutes. No documentation is required, and the survey is in the form of an email that can be just filled out and sent. No additional burdens are involved.

Number of Respondents <u>Annually</u>		Responses Per <u>Respondent</u>	=	Total Responses <u>Annually</u>		Hours Per <u>Response</u>	=	Total <u>Hours</u>
150	x	1		150	x	0.05		7.5

*The estimated hourly wage for respondents is \$35.35/hr, mean hourly for Water Transportation Worker (53-5000). (May 2020 BLS table; [Overview of BLS Wage Data by Area and Occupation : U.S. Bureau of Labor Statistics](#)).

The estimated burden cost (time/labor) for respondents is provided below:

<u>Total</u> <u>Hours</u>		<u>Cost</u> <u>per</u> <u>Hour</u>	=	<u>Total</u> <u>Cost</u> <u>Annually</u>		<u>Benefits</u>	=	<u>Estimated</u> <u>Total Cost</u> <u>per Respondent</u>
0.05	x	\$ 35.35		\$1.76	x	1.4		\$2.46

The estimated respondents burden cost is \$369 (150 x \$2.46 = \$369).

13. Estimate of total annual costs to respondents. PROVIDE AN ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS OR RECORDKEEPERS RESULTING FROM THE COLLECTION OF INFORMATION. (DO NOT INCLUDE THE COSTS OF ANY HOUR BURDEN SHOWN IN ITEMS 12 AND 14).

- **INCLUDE A BREAKDOWN FOR TOTAL CAPITAL/START-UP COSTS AND OPERATION/MAINTENANCE. THE COST ESTIMATES SHOULD BE SPLIT INTO TWO COMPONENTS: (A) A TOTAL CAPITAL AND START-UP COST COMPONENT (ANNUALIZED OVER IT EXPECTED USEFUL LIFE); AND (B) A TOTAL OPERATION AND MAINTENANCE AND PURCHASE OF SERVICES COMPONENT. THE ESTIMATES SHOULD TAKE INTO ACCOUNT COSTS ASSOCIATED WITH GENERATING, MAINTAINING, AND DISCLOSING OR PROVIDING THE INFORMATION. INCLUDE DESCRIPTIONS OF METHODS USED TO ESTIMATE MAJOR COSTS**

FACTORS INCLUDING SYSTEM AND TECHNOLOGY ACQUISITION, EXPECTED USEFUL LIFE OF CAPITAL EQUIPMENT, THE DISCOUNT RATE(S), AND THE TIME PERIOD OVER WHICH COSTS WILL BE INCURRED. CAPITAL AND START-UP COSTS INCLUDE, AMONG OTHER ITEMS, PREPARATIONS FOR COLLECTING INFORMATION SUCH AS PURCHASING COMPUTERS AND SOFTWARE; MONITORING, SAMPLING, DRILLING AND TESTING EQUIPMENT; AND RECORD STORAGE FACILITIES.

- **IF COST ESTIMATES ARE EXPECTED TO VARY WIDELY, AGENCIES SHOULD PRESENT RANGES OF COST BURDENS AND EXPLAIN THE REASONS FOR THE VARIANCE. THE COST OF PURCHASING OR CONTRACTING OUT INFORMATION COLLECTION SERVICES SHOULD BE A PART OF THIS COST BURDEN ESTIMATE. IN DEVELOPING COST BURDEN ESTIMATES, AGENCIES MAY CONSULT WITH A SAMPLE OF RESPONDENTS (FEWER THAN 10), UTILIZE THE 60-DAY PRE-OMB SUBMISSION PUBLIC COMMENT PROCESS AND USE EXISTING ECONOMIC OR REGULATORY IMPACT ANALYSIS ASSOCIATED WITH THE RULEMAKING CONTAINING THE INFORMATION COLLECTION, AS APPROPRIATE.**

- **GENERALLY, ESTIMATES SHOULD NOT INCLUDE PURCHASES OF EQUIPMENT OR SERVICES, OR PORTIONS THEREOF, MADE (1) PRIOR TO OCTOBER 1, 1995, (2) TO ACHIEVE REGULATORY COMPLIANCE WITH REQUIREMENTS NOT ASSOCIATED WITH THE INFORMATION COLLECTION, (3) FOR REASONS OTHER THAN TO PROVIDE INFORMATION OR KEEP RECORDS FOR THE GOVERNMENT, OR (4) AS PART OF CUSTOMARY AND USUAL BUSINESS OR PRIVATE PRACTICES.**

There is no start-up cost to the respondents. For the recordkeeper, this is part of the core job function.

14. Estimate of cost to the Federal government. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT. ALSO, PROVIDE A DESCRIPTION OF THE METHOD USED TO ESTIMATE COSTS, 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. AGENCIES ALSO MAY AGGREGATE COST ESTIMATES FROM ITEMS 12, 13, AND 14 IN A SINGLE TABLE.

Include salary costs based on hours, overhead, printing, payment to contractors, and the like.

Tabulation of the results is a core function of the Exercise Coordinator. The survey results tabulation is estimated to take about 8- 9 hours of work time at the GS-13 level. This estimate was calculated from experience and the survey design. The opening of the respondent's email and tabulating the results should take about 10-15 minutes each. Since the survey responses would not arrive at the same time, this time burden will be borne over several days.

It is estimated that 1 employee (GS-13-2), assigned as the Exercise Coordinator, will receive the surveys and review and tabulate responses. Time required for these tasks is estimated at 12 minutes per response and the hourly rate is \$52.89.

Hourly Project # of Employees	Cost Per Wage	# of Time	Total Response	Responses	Cost
1 x	\$52.89	x 0.2	= \$10.58	x 150	= \$1,587

*The estimated cost to the Government is \$1,587 x 1.4 (benefits) = \$2,222

The hourly wage above is based on the 2022 GS pay scale for the locality pay area of Washington-Baltimore-Arlington, DC-MD-VA-WV-PA. https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/DCB_h.pdf

15. Explanation of program changes or adjustments. EXPLAIN THE REASONS FOR ANY PROGRAM CHANGES OR ADJUSTMENTS REPORTED IN ITEMS 13 OR 14 OF THE OMB FORM 83-I.

An adjustment was made to the number of respondents decreasing by 50, and the burden hours were decreased by 2 based on the number of applications received.

16. Publication of results of data collection. 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.

The results of this survey will not be public. The Exercise Breakout 2022 Final Report will be issued to government agencies, business partners, and within MARAD. The exercise begins in April with the final report published in August of the same year.

17. Approval for not displaying the expiration date of OMB approval. IF SEEKING APPROVAL TO NOT DISPLAY THE EXPIRATION DATE FOR OMB APPROVAL OF THE INFORMATION COLLECTION, EXPLAIN THE REASONS THAT DISPLAY WOULD BE INAPPROPRIATE.

MARAD is not seeking this exemption.

18. Exceptions to certification statement. EXPLAIN EACH EXCEPTION TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19, "CERTIFICATION FOR PAPERWORK REDUCTION ACT SUBMISSIONS," OF OMB FORM 83-I.

There are no exceptions to Item 19 on the "Certification for Paperwork Reduction Act Submissions," of OMB FORM 83-I.

