

Appendix-A: Total Estimated Annual Burden on Industry

Respondents: Towing Vessels 5,343
 Towing Vessel Owners & Operators 1,236 **Total: 6,594**
 Third Party Organizations 15

46 CFR Part	Section	Section Title	Burden Hours Per Response	Wage Rate	Average Responses per Year	Total Annual Burden Hours	Total Annual Burden Cost
136	130e	Changing Options	0.5	\$65	79	39	\$2,559
	210	Obtaining or Renewing a Certificate of Inspection	0.5	\$65	1,100	550	\$35,754
	220	Posting	0.08	\$65	589	49	\$3,192
	235	Certificate of Inspection Amendment	0.5	\$65	171	85	\$5,548
137	135	Reports and Documentation Required for the Towing Safety Management System Option	1	\$65	2,593	2,593	\$168,547
138	305	TSMS Certificate	1	\$65	346	346	\$22,506
	500	Notification prior to audit	0.25	\$65	87	22	\$1,407
	505a	Submission of external management audits	0.25	\$65	346	87	\$5,626
	505b	Submission of external vessel audits	0.25	\$65	3,165	791	\$51,426
139	120	Application for Approval as a Third-party Organization	16	\$65	18	287	\$18,660
	135	Addition and Removal of Auditors and Surveyors	0.25	\$65	17	4	\$270
	140	Renewal of Third-party Organization Approval	8	\$65	36	287	\$18,660
	165	Documentation	1	\$65	179	179	\$11,663
140	400	Personnel records	0.02	\$65	6,358,170	105,970	\$6,888,018
	410	Safety orientation	0.25	\$65	1,710	428	\$27,789
	500	General - Recordkeeping of Health and Safety Plan	0.25	\$65	1,710	427	\$27,785
	515	Training requirements - Documentation	0.25	\$65	1,710	428	\$27,789
	615	Examinations and tests	0.03	\$65	12,198	407	\$26,428
	645b	Documentation of Navigational Safety Training	0.25	\$65	1,710	428	\$27,789
	820	Recordkeeping for towing gear	0.17	\$65	64,116	10,686	\$694,590
141	910	Towing vessel record or record specified by TSMS	0.17	\$65	5,343	891	\$57,883
	320	Inflatable survival craft placards	0.03	\$65	85	3	\$185
	340	Lifejackets	0.03	\$65	10,686	356	\$23,153
142	380	Emergency position indicating radio beacon (EPIRB)	0.02	\$65	98	2	\$106
	240	Semi-portable and Fixed Fire-Extinguishing Systems	0.25	\$40	5,343	1,336	\$53,430
143	555	Electrical power sources, generators, and motors	0.08	\$65	98	8	\$531
	605	Demonstration of Compliance	2	\$65	98	196	\$12,734
144	145	Procedures for Verification of Compliance with Design Standards	0.5	\$65	98	49	\$3,184
	155	Verification of compliance with design standards for a sister vessel	0.5	\$65	24	12	\$788
	160	Marking	3.5	\$65	92	322	\$20,961
	300	Stability Standards for an Existing Vessel	4	\$65	104	417	\$27,083

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	315	Weight and moment history requirements for a vessel with approved lightweight characteristics	0.08	\$72	103	9	\$617
	330	Review of a Vessel's Watertight and Weathertight Integrity	8	\$72	4	31	\$2,235
15	820a	Chief Engineer Training	0.3	\$65	18	5	\$344
				Total:	6,472,243	127,729	\$8,269,237

Appendix-B: Estimated Annual Federal Government Cost

46 CFR Part	Section	Section Title	Hours per Response	Wage Rate	Average Responses per Year	Annual Hours	Annual Cost
136	130e	Changing Options	4	\$87	113	450	\$39,152
	210	Obtaining or Renewing a Certificate of Inspection	8	\$87	5,441	43,528	\$3,786,906
	210	Obtaining or Renewing a Certificate of Inspection	0.25	\$87	5,441	1,360	\$118,341
	235	Certificate of Inspection Amendment	1.5	\$87	134	201	\$17,466
	235	Certificate of Inspection Amendment	0.5	\$87	134	67	\$5,822
	235c	Certificate of Inspection Amendment	1.5	\$87	80	119	\$10,379
	235c	Certificate of Inspection Amendment	0.5	\$87	80	40	\$3,460
138	500	Notification prior to audit	1	\$87	346	346	\$30,123
	505	Submission of external management audits	4	\$87	346	1,385	\$120,492
139	120	Application for Approval as a Third-party Organization	4	\$87	179	718	\$62,440
	120	Application for Approval as a Third-party Organization	0.5	\$87	179	90	\$7,805
	135	Addition and Removal of Auditors and Surveyors	4	\$87	18	74	\$6,413
144	145	Procedures for Verification of Compliance with Design Standards	0.25	\$87	98	24	\$2,131
	145	Procedures for Verification of Compliance with Design Standards	0.25	\$87	98	24	\$2,131
				Total:			\$4,213,059