SUPPORTING STATEMENT

U.S. Department of Commerce

National Oceanic & Atmospheric Administration Electronic Logbook: PCTC Program Catcher Vessels Less Than 60 Ft. LOA OMB Control No. 0648-0812

Abstract

This is a resubmission, with the final rule, of a request by the National Marine Fisheries Service (NMFS), Alaska Regional Office, for a new temporary collection. This request is due to a final rule to implement Amendment 122 to the Fishery Management Plan for Groundfish of the Bering Sea and Aleutian Islands Management Area, which establishes a new limited access privilege program, the Pacific Cod Trawl Cooperative Program (PCTC Program) (RIN 0648-BL08). The rule adds regulatory requirements that necessitate revision to an existing information collection, OMB Control Number 0648-0515. Due to a concurrent action for -0515, NMFS is submitting this request to create a temporary collection for this revision to -0515. After publication of the final rule for this action and the concurrent rule that affects -0515, and after OMB approves the associated information collection requests, NMFS will submit a request to merge this temporary collection with -0515.

This rule also affects information collection requirements approved under OMB Control Numbers 0648-0213, -0318, -0334, -0678, and -0711, and would add a new information collection for the PCTC Program under a new OMB control number, 0648-0811. NMFS is submitting separate requests for these collections.

Due to the rule, a small number of catcher vessels less than 60 feet length overall that do not currently submit a logbook will need to begin submitting a logbook if they choose to participate in the PCTC Program. This logbook requirement increases the total respondents, responses, and burden for the catcher vessel electronic logbook, which is approved under OMB Control Number 0648-0515. This logbook requirement is added in this new temporary collection.

A change was made to this collection from the proposed rule to the final rule. In response to comments received during the proposed rule, NMFS added a reporting requirement for the PCTC Program for the mothership electronic logbook, which is approved under OMB Control Number 0648-0515. This does not change the respondents, responses, or burden because all motherships currently submit this logbook. This logbook requirement is added in this new temporary collection.

Justification

1. 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.

NMFS, Alaska Region, manages the groundfish and crab fisheries in the exclusive economic zone (EEZ) of the Bering Sea and Aleutian Islands Management Area (BSAI) and the groundfish fisheries of the Gulf of Alaska (GOA) under fishery management plans (FMPs) for the respective areas. The North Pacific Fishery Management Council prepared, and NMFS approved, the FMPs under the authority of the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C. 1801, *et seq.* Regulations implementing the FMPs appear at 50 CFR parts <u>679</u> and <u>680</u>.

Collecting reliable data is essential to the effective conservation, management, and scientific understanding of the fishery resources. NMFS requires vessels and processors participating in federally managed groundfish and crab fisheries off Alaska to provide information on catch, production, effort, and other information necessary for conservation and management of the fisheries.

Daily logbooks are required in the groundfish, crab, and halibut fisheries. Information collected on a logbook is necessary to provide data about where and when fishing effort occurs, track results and timing of flow scale tests, and record discard information of prohibited species. NMFS Office for Law Enforcement (OLE) and the United States Coast Guard (USCG) use logbook information during vessel boardings and site visits to ensure conservation of groundfish, compliance with regulations, and reporting accuracy by the fishing industry. The logbooks are an important source of information for NMFS to determine where (vessel position coordinates) and when fishing activity occurs and the number of sets and hauls.

Electronic logbooks, landing reports, and production reports are part of the Alaska Interagency Electronic Reporting System (IERS), which is a fisheries data collection system that enables the management of commercial fisheries off Alaska and is supported through a partnership among NMFS, Alaska Department of Fish and Game (ADF&G), and the International Pacific Halibut Commission. The IERS provides the Alaska fishing industry with a consolidated, electronic means of reporting commercial fish and shellfish information to multiple management agencies. Compared with paper forms and conventional logbooks, the IERS is a more convenient, accurate, and timely method of fisheries reporting. Benefits of the IERS include improved data quality, automated processing of data, improved process for correcting or updating information, availability of more timely data for fishery managers, and reduction of duplicative reporting of similar information to multiple agencies. The recordkeeping and reporting requirements for the IERS are located at 50 CFR 679.5.

The final rule will implement Amendment 122 to the Fishery Management Plan for Groundfish of the Bering Sea and Aleutian Islands Management Area, which establishes a new limited access privilege program, the Pacific Cod Trawl Cooperative Program (PCTC Program) for the harvest of Pacific cod in the BSAI trawl catcher vessel sector (RIN 0648-BL08). The PCTC Program allocates Pacific cod harvest quota to qualifying groundfish License Limitation Program license holders and qualifying processors. This rule is necessary to increase the value of the fishery, minimize bycatch to the extent practicable, provide for the sustained participation of fishery-dependent communities, ensure the sustainability and viability of the resource, and promote safety in the harvesting and processing sectors.

This rule also affects information collection requirements approved under OMB Control Numbers -0213 (Alaska Region Logbook and Activity Family of Forms); -0318 (North Pacific Observer Program); -0334 (Alaska License Limitation Program for Groundfish, Crab, and Scallops); -0678 (North Pacific Fishery Management Council Cooperative Annual Reports); -0711 (Alaska Cost Recovery and Fee Programs); and adds a new information collection for the PCTC Program under a new OMB control number, 0648-0811. Concurrent with this temporary information collection request, NMFS is submitting separate requests for these collections.

This rule adds new regulations at 50 CFR 679.134(f) that are part of a suite of monitoring and enforcement provisions necessary to track quota, harvest, and use caps for harvesters and processors participating in the PCTC Program. These requirements include the following:

- Operators of catcher vessels must submit a daily fishing logbook for trawl gear as
 described in § 679.5. They will have the option of using either the electronic logbook,
 approved under OMB Control Number 0648-0515 (Alaska Interagency Electronic
 Reporting System [IERS]), or the paper logbook, approved under OMB Control Number
 0648-0213 (Alaska Region Logbook and Activity Family of Forms).
- Operators of catcher/processors must use the catcher/processor trawl gear electronic logbook and eLandings to record and report groundfish and PSC information as described in § 679.5 to record PCTC Program landings and production.
- Managers of shoreside processors that receive Pacific cod in the PCTC Program must use eLandings or NMFS-approved software as described in § 679.5(e) to record PCTC Program landings and production.
- Operators of catcher/processors that receive and purchase landings of PCTC CQ must submit a production report as described in § 679.5(e)(10).

Electronic logbooks, eLandings, and production reports are approved under OMB Control Number 0648-0515. This new temporary information collection is necessary because the rule will necessitate revising OMB Control Number 0648-0515. Concurrent with this rule, -0515 is being revised and renewed by another rule (RIN 0648-BL69). Once the final rules for RINs 0648-BL08 and 0648-BL69 have published and OMB has approved the information collection requests, this temporary collection will be merged into OMB Control Number 0648-0515 and then discontinued.

This rule requires that all vessels submit logbooks when fishing in the PCTC Program. All catcher vessels greater than or equal to 60 feet (ft) length overall (LOA) currently submit logbooks. Some catcher vessels that may participate in the Aleutian Islands Pacific cod fishery are less than 60 ft LOA and already file logbooks when fishing for Pacific cod. Many already complete logbooks based on their participation in other programs. However, a small number of catcher vessels less than 60 ft LOA that do not currently submit a logbook will need to begin submitting a logbook if they choose to participate in the PCTC Program. This logbook requirement increases the total respondents, responses, and burden for the catcher vessel electronic logbook, which is approved under OMB Control Number 0648-0515. This logbook requirement is added in this new temporary collection.

The other regulatory requirements listed above that the rule adds at § 679.134(f) do not necessitate any changes to -0515. All catcher/processors and shoreside processors expected to be authorized as PCTC processors currently submit the logbooks and reports to NMFS because of their participation in other programs. Therefore, no additional respondents or responses are expected for the catcher/processor electronic logbook, landings reports, and production reports due to this rule.

Change from the Proposed Rule to Final Rule

In response to comments received during the proposed rule, NMFS changed the method used to assign Pacific cod from catcher vessels delivering unsorted codends to motherships in the PCTC Program. A new regulation is added at § 679.5(c) that requires a mothership to report the catcher vessel's observer haul number in the mothership electronic logbook. This requirement does not change the respondents, responses, or burden for the mothership electronic logbook, which is approved under OMB Control Number 0648-0515. Information on this change is provided in Question #2 under the heading "Mothership Electronic Logbook" and in Question #8, which summarizes the comments received and NMFS's response.

2. 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.

Each day by 2400 hours Alaska local time, the previous day's hauls must be recorded in the logbooks. The electronic logbook is submitted online through eLandings, the interagency electronic reporting system for commercial fishery landings in Alaska, at https://elandings.alaska.gov/.

Catcher Vessel Electronic Logbook

The rule adds a new regulation at 50 CFR 679.134(f)(1)(i) that requires operators of catcher vessels participating in the PCTC Program fishery to maintain a daily fishing logbook for trawl gear as described in § 679.5(c)(4). Currently, catcher vessels greater than or equal to 60 ft LOA are required to submit a logbook. NMFS estimates up to seven catcher vessels less than 60 ft LOA will likely need to begin submitting a logbook if they choose to participate in the PCTC Program.

Vessels may submit either the electronic logbook or the paper logbook (§ 679.5(f)(1)(i) and (f) (1)(iii)). Use of the electronic logbook increases the speed and accuracy of data transmission to NMFS and assists in providing more accurate quota monitoring. Some basic hardware requirements need to be met, such as having a laptop or personal computer on the vessel with a current Windows Operating system, and a printer to print daily copies of the electronic logbook.

The rule does not change the data collected by the logbook. The catcher vessel electronic logbook is used by the operator of a catcher vessel to report fishing effort, fishing location, and discarded catch. NMFS uses this information to provide data about where and when groundfish fishing effort occurs and record discard information of prohibited species.

The vessel operator must account for each day of the fishing year, January 1 through December 31, in the electronic logbook and indicate whether the vessel was active or inactive during that period. The following data is submitted for trawl gear in the catcher vessel electronic logbook.

- Printed name and signature of operator
- ADF&G vessel registration number
- Federal Fisheries Permit number
- Gear type
- Dates of inactivity
- Dates of activity
- Whether harvest occurred in *C. opilio* Bycatch Limitation Zone or Red King Crab Savings Area (if applicable)
- Federal reporting area of catch
- Management program
- Management program identification number (if applicable)
- Number of observers onboard
- Name and cruise number of observer
- Crew size
- Set number
- Target species code
- Hail weight
- Time of gear deployment
- Date hauled, time hauled
- Begin latitude and longitude of haul
- Average sea depth
- Average gear depth
- Date and time of haul retrieval
- Begin latitude and longitude of haul
- Average sea depth
- Average gear depth
- Date and time of haul retrieval
- End latitude and longitude of haul
- Check mark if moved to avoid Chinook salmon bycatch (if applicable)
- Improved Retention/Improved Utilization and prohibited species catch

Mothership Electronic Logbook [Change from Proposed Rule to Final Rule: Added new reporting requirement for the PCTC Program]

NMFS received comments regarding the methodology used to assign Pacific cod from catcher vessels delivering unsorted codends to motherships in the PCTC Program. In response, NMFS changed the proposed method from what was described in the proposed rule. Instead of any unsorted codend delivered to a mothership during the applicable PCTC season that is in the Pacific cod target fishery being considered cooperative quota, NMFS will implement a method similar to the regulations used for assigning an unsorted codend to a CDQ group.

The final rule adds a new regulation at 50 CFR 679.5(c)(6) for the PCTC Program that requires a mothership to record the observer's haul number in the mothership electronic logbook. The haul number must be recorded for each catcher vessel delivery of an unsorted codend by 2400 hours, Alaska local time, each day to record the previous day's delivery information. This change is necessary to accurately account for PCTC catch separate from other management programs.

All motherships currently submit this logbook; therefore, no changes are made to the respondents or responses due to the rule. No change was made to the burden due to the rule because the estimate allows for differences in the time needed to complete and submit the information.

The mothership electronic logbook is used by the operator of a mothership to report groundfish delivery information and record and report the results and timing of daily flowscale tests to NMFS. NMFS uses this information to provide data about where and when groundfish deliveries to a mothership occur, and to track results and timing of flow scale tests.

The rule does not change any other data collected by the logbook. The operator of a mothership that is required to have an FFP under § 679.4(b) must use a NMFS-approved mothership electronic logbook to record and report the following information:

- Page number
- Printed name and signature of operator
- Vessel information
 - O Name of mothership
 - o FFP or FPP number
 - o ADF&G processor code
- Date
- Crew size
- Gear type
- Federal reporting areas
- COBLZ or RKCSA area
- Number of Observers onboard
- Name of observer
- Observer cruise number
- Management program
- Delivery information
 - O Type of delivery (catcher vessel or tender vessel)
 - O Non-Submittal of discard report
 - Name of vessel
 - o ADF&G vessel registration number
 - Receipt time
 - O Beginning position of receipt of fish (lat/long coordinates)
 - O Hail weight
 - o IR/IU species
 - ADF&G fish ticket number

In addition, motherships must use a NMFS-approved electronic logbook to daily record and report the results and timing of daily flowscale tests to NMFS. The respondent must enter the information from all scale tests, including failed tests, within 24 hours of the test.

3. 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.

The electronic logbook is submitted online through eLandings, the interagency electronic reporting system for commercial fishery landings in Alaska, at https://elandings.alaska.gov/. For motherships that do not have reliable Internet service, a Desktop Client Application (seaLandings) can be used to generate report files for submitting via email.

4. 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 Question 2

Logbook information is collected electronically in eLandings, the interagency electronic reporting system (IERS). The IERS provides the Alaska fishing industry with a consolidated means of reporting commercial fish and shellfish information to NMFS, ADF&G, and the International Pacific Halibut Commission (IPHC). A result of the IERS has been to reduce or eliminate duplicative reporting of the same information to multiple agencies. Prior to the IERS, there were State and Federal requirements to report the same information, and each agency had their own data collection systems. The IERS provides a single data entry point that allows the data to be entered once and then ADF&G, NMFS, and IPHC can all access the reports and extract the data necessary to meet their management mandates.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

NMFS attempts to minimize the burden of this collection on all respondents. NMFS (in cooperation with ADF&G and IPHC) provides a variety of resources to reduce the impact of this collection:

- Multiple NMFS and ADF&G staff dedicated to IERS User support are available to answer questions via email and telephone. A centralized support email address ensures that an agency response can occur quickly.
- In addition to agency support staff, two Help Desk phone numbers are manned outside of business hours.
- An online <u>User's Manual</u> provides comprehensive step-by-step instructions for Users to follow when reporting and submitting information in the IERS.
- IERS training events are held every year in several locations throughout Alaska and in Seattle to provide Users with information about the application and to provide an opportunity for hands-on practice.

- Users can access a Training instance of the IERS application along with published <u>training scenarios</u> so they can practice using the software at any time.
- The agencies supporting the IERS send out regular email notifications and newsletters to share information on new features, regulatory changes, upcoming training events, and tips and tricks.

6. 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.

Landings and processing data are collected on a trip basis as required for all harvest and processing in Federal fisheries off Alaska. This data collection is necessary for NMFS to continue efficient monitoring and effective management practices for the fisheries of the exclusive economic zone off Alaska. If this collection were not conducted, the quality of NMFS fishery data would be greatly reduced and negatively impact NMFS management of fisheries, resulting in adverse impacts on the long-term biological stability and economic yield of the groundfish resource, the efficiency and economic viability of the domestic groundfish industry, and the credibility of the fishery management process itself.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with OMB guidelines.

This collection may require respondents to report information to the agency more often than quarterly. Electronic logbooks must be submitted by the required time following harvest, which could result in information being submitted more often than quarterly. NMFS uses this information for inseason and inter-season management decisions and is necessary to monitor and manage the fisheries.

8. If applicable, provide a copy and identify the date and page number of publications in the Federal Register of the agency's 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 these comments. Specifically address comments received on cost and hour burden.

A proposed rule (88 FR 8592) soliciting public comments published on February 9, 2023. The comment period ended on March 13, 2023. No comments were received on the catcher vessel logbook requirement. However, comments received from industry participants resulted in the change from the proposed rule to the final rule for the mothership electronic logbook that was added to this temporary collection. In response to the comments, NMFS added the PCTC Program requirement to record the catcher vessel's observer haul number in the mothership logbook each day for the previous day's delivery information. The comments and NMFS' response from the final rule are summarized below.

Comment: A mothership vessel operator receiving an unsorted codend or "haul" should be allowed to assign the appropriate management program code rather than NMFS determining that

the catch would be assigned to the PCTC Program based on the retained catch composition as proposed in regulations at § 679.20. Allowing the vessel operator to designate which hauls are PCTC Program hauls would be consistent with the current practice of evaluating the catch composition prior to determining if a haul is CDQ or non-CDQ (open access).

Response: NMFS agrees. Based on this comment, NMFS changed § 679.5(c)(6). Rather than considering cooperative quota as any unsorted codend that is delivered to a mothership during the applicable PCTC Program season that is in the Pacific cod target fishery, NMFS would implement a method similar to how catch in an unsorted codend is assigned to a CDQ group.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payment or gift to respondents is provided under this program.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

All information collections by NMFS, Alaska Region, are protected under confidentiality provisions of section 402(b) of the Magnuson-Stevens Act as amended in 2006 (16 U.S.C. 1801, *et seq.*) and under NOAA Administrative Order 216-100, which sets forth procedures to protect confidentiality of fishery statistics.

The System of Records Notices (SORNs) that cover this information collection is COMMERCE/NOAA-6, Fishermen's Statistical Data.

The Privacy Impact Assessment that covers this information collection is <u>NOAA NMFS Alaska</u> Region Local Area Network (NOAA4700).

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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.

This information collection does not involve information of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information.

The rule (RIN 0648-BL08) adds requirements for catcher vessels in the PCTC Program fishery to submit a logbook. As all catcher vessels greater than or equal to 60 ft LOA already submit logbooks, this collection adds only the catcher vessels less than 60 ft LOA as new respondents for the catcher vessel electronic logbook. As the catcher vessel electronic logbook is currently approved under OMB Control Number 0648-0515, to avoid double counting, the numbers for this logbook for this new temporary control number presented in the table below are only for the new respondents due to this rule. The tables in Question 15 show how the totals for the catcher vessel electronic logbook will change due to the rule when this temporary collection is merged into -0515.

NMFS estimates up to seven catcher vessels less than 60 ft LOA will likely need to begin submitting a logbook if they choose to participate in the PCTC Program. As these seven catcher vessels may use the paper logbook approved under OMB Control Number 0648-0213 instead of this electronic logbook, they are also being added to OMB Control Number 0648-0213. Future supporting statements for these collections will show the actual number of vessels that choose to use each type of logbook after this rule is effective.

The hourly wage rate is the same rate that has been used for this logbook in -0515. NMFS has received public comment during a previous extension that this rate is appropriate.

The rule also adds a new reporting requirement for the mothership electronic logbook for the PCTC Program. All motherships already submit this logbook, and the rule does not result in any change to the respondents, responses, burden hours, or costs for this logbook. Therefore, no estimates for the mothership electronic logbook are included in the table below.

Information Collection	Type of Respondent (e.g., Occupational Title)	# of Respondents/ year (a)	Annual # of Responses / Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Burden Hrs / Response (d)	Total Annual Burden Hrs (e) = (c) x (d)	Hourly Wage Rate (for Type of Respondent) (f)	Total Annual Wage Burden Costs (g) = (e) x (f)
Catcher vessel electronic logbook	Fishing Vessel Owner/Operator	7	244	1,708	15 min.	427 hrs	\$37	\$15,799
Totals				1,708		427		\$15,799

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

The public completes an electronic form in the IERS and then prints a copy of the report.

Information Collection	# of Respondents/ year (a)	Annual # of Responses / Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Cost Burden / Respondent (h)	Total Annual Cost Burden (i) = (c) x (h)
Catcher vessel electronic logbook	7	244	1,708	Photocopy: 0.10 x 1 copy = 0.10	\$171
Totals	7		1,708		\$171

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, 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.

A cost recovery program will be in effect for the PCTC Program. Under this cost recovery program, NMFS is authorized to collect direct program costs from the CQ holders in the PCTC Program fishery. Therefore, the information collection requirements of the PCTC Program will not impose a cost on the Federal Government. Direct program costs are the costs NMFS will incur to manage, collect data from, and enforce the PCTC Program.

15. Explain the reasons for any program changes or adjustments reported in ROCIS.

This request is for a new temporary information collection due to the timing of this rulemaking (RIN 0648-BL08) and one rule (RIN 0648-BL69) that renews and revises -0515. This rule adds a requirement for catcher vessels that choose to participate in the PCTC Program to submit a daily logbook. The rule also adds a new reporting requirement for the mothership electronic logbook for the PCTC Program.

The rule increases the total annual respondents, responses, and burden for the catcher vessel electronic logbook because catcher vessels less than 60 ft LOA that choose to participate in the program will need to submit a logbook. There are no changes to the respondents, respondents, or burden for the mothership electronic logbook due to the rule. The tables below show how the total respondents, responses, burden hours, and costs for the catcher vessel electronic logbook will be revised due to this rule once this temporary collection is merged into -0515 following publication of the final rules.

	Respondents		Responses		Burden Hours			
Information Collection	Current Renewal / Revision	Previous Renewal / Revision	Current Renewal / Revision	Previous Renewal / Revision	Current Renewal / Revision	Previous Renewal / Revision	Reason for change or adjustment	
Catcher vessel electronic logbook	16	 9 	3,904	 2,196 	976 hrs	549 hrs	Program Change: The requirement for catcher vessels participating in the PCTC Program fishery to submit this logbook adds up to 7 catcher vessels less than 60 ft LOA as new respondents for this logbook, which increases the total annual responses and burden hours.	
Difference	7		1,708		427 hrs			

	Labor Costs		Miscellaneous Costs			
Information Collection	Current	Previous	Current	Previous	Reason for change or adjustment	
Catcher vessel electronic logbook	el electronic logbook \$36,112 \$20,313 \$391 \$220		 \$220 	Program Change: The new requirement for vessels to submit this logbook increases the respondents, which increases the labor costs and miscellaneous costs to this collection.		
Difference	\$15,799		\$171			

16. 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 information collected will not be published.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

18. Explain each exception to the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

The agency certifies compliance with 5 CFR 1320.9 and the related provisions of 5 CFR 1320.8(b)(3).