

**SUPPORTING STATEMENT**  
**U.S. Department of Commerce**  
**National Oceanic & Atmospheric Administration**  
**Alaska Region Permit Family of Forms**  
**OMB Control No. 0648-0206**

**SUPPORTING STATEMENT PART A**

**Abstract**

The National Marine Fisheries Service Alaska Region requests extension of this currently approved information collection that contains requirements for obtaining a Federal Fisheries Permit (FFP), a Federal Processing Permit (FPP), and an Exempted Fishing Permit (EFP).

An FFP is required for U.S. vessels used to fish for groundfish in the Gulf of Alaska or Bering Sea and Aleutian Islands. An FFP is also required for vessels used to fish for any non-groundfish species and are required to retain any bycatch of groundfish. An FFP is required for stationary floating processors and for shoreside processors that receive and/or process groundfish harvested from Federal waters (or from any federally permitted vessels).

An EFP is issued for limited experimental purposes to support a project that could benefit fisheries and the environment. Information collected as part of an EFP is used to inform future fishery management decisions and guide future EFPs.

Permit issuance is essential in fishery resources management for identification of the participants and expected activity levels and for regulatory compliance. This collection allows for continued efficient, science based, and minimal impact harvesting of Alaska fishery resources.

Based on a comment received, the response to question #13 has been revised to include additional costs that may be incurred for the EFP application.

**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.**

Under the [Magnuson-Stevens Fishery Conservation and Management Act](#) 16 U.S.C. 1801 *et seq.* (Magnuson-Stevens Act), the Secretary of Commerce is responsible for the conservation and management of marine fishery resources within the exclusive economic zone (EEZ) of the United States through the National Oceanic and Atmospheric Administration/National Marine Fisheries Service (NOAA/NMFS). NMFS Alaska Region manages the groundfish fisheries in the EEZ of the Bering Sea and Aleutian Islands Management Area (BSAI) and Gulf of Alaska (GOA) under the Fishery Management Plan for Groundfish of the Bering Sea and Aleutian Islands Management Area and the Fishery Management Plan for Groundfish of the Gulf of Alaska, respectively. The Council developed the fishery management plans. Regulations implementing the fishery management plans appear at [50 CFR part 679](#).

Section 303(b)(1) of the Magnuson-Stevens Act specifically recognizes the need for permit issuance. Requiring a permit for marine resource users—mandated by 50 CFR [679.4\(b\)](#), [679.4\(f\)](#), [679.6](#), and [600.745\(b\)](#)—is one of the regulatory steps taken to carry out conservation and management objectives. Permit issuance is essential in fishery resources management and necessary for identification of participants and expected activity levels and for regulatory compliance (e.g., withholding of permit issuance pending collection of unpaid penalties).

This information collection contains the applications for the Federal Fisheries Permit (FFP), Federal Processor Permit (FPP), and Exempted Fishing Permit (EFP).

**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.**

The table below summarizes information about the requirements in this information collection. The statute that applies to all of the collection instruments is the Magnuson-Stevens Act (16 U.S.C. 1801 *et seq.*). Additional information on the requirements in this collection is provided in the subsections below. The permit application forms and template for the EFP are available on the NMFS Alaska Region website.<sup>1</sup> No changes have been made to this information collection since the previous renewal was approved by OMB in 2021.

Requirement	Regulation (50 CFR)	Who the information is collected from	Submission method	Form #	Frequency	Needs and Uses
Federal Fisheries Permit (FFP)	<a href="#">679.4(b)</a>	Vessel owner or authorized representative	mail, courier, or fax	Yes	3-year renewal cycle	NMFS uses this information for fisheries management and regulatory compliance by NMFS Sustainable Fisheries Division, NMFS Restricted Access Management Division, North Pacific Observer Program, NOAA Office of Law Enforcement, the U.S. Coast Guard (USCG), and the Council.
Federal Processor Permit (FPP)	<a href="#">679.4(f)</a>	Owner or authorized representative	mail, courier, or fax; online renewal only	Yes	1-year renewal cycle	NMFS uses this information for fisheries management and regulatory compliance by NMFS Sustainable Fisheries Division, NMFS Restricted Access Management Division, North Pacific Observer Program, NOAA Office of Law Enforcement, the USCG, and the Council.
Exempted Fishing Permit (EFP)	<a href="#">600.745(b)</a> and <a href="#">679.6</a>	EFP applicant	mail, courier, email, or fax	No – template posted on the NMFS AKR website	1 year or less (depending on the duration of the permit)	NMFS uses this information for fisheries management and regulatory compliance by NMFS Sustainable Fisheries Division, NMFS Restricted Access Management Division, North Pacific Observer Program, NOAA Office of Law Enforcement, the USCG, and the Council.

<sup>1</sup> The FFP and FPP applications are available as fillable PDFs at <https://www.fisheries.noaa.gov/permit/alaska-federal-fisheries-permit-and-federal-processor-permit-applications>. The FPP may be renewed online using eFISH, the NMFS Alaska Region’s online Fisheries Information System, at <https://alaskafisheries.noaa.gov/webapps/efish/login>. The EFP template is available at <https://www.fisheries.noaa.gov/alaska/commercial-fishing/exempted-fishing-permit-application-process-alaska>.

## **Dissemination of Information**

The information collection is designed to yield data that meet all applicable information quality guidelines. Prior to dissemination, the information will be subjected to quality control measures and a pre-dissemination review pursuant to Section 515 of Public Law 106-554 (the Information Quality Act), which requires NMFS to ensure the quality, objectivity, utility, and integrity of information it publicly disseminates. Public dissemination of data collected by this information collection is governed by [NOAA's information quality guidelines](#), which were issued on October 30, 2014.

It is anticipated that the information collected will be disseminated to the public or used to support publicly disseminated information. NMFS will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. See response to Question 10 of this Supporting Statement for more information on confidentiality and privacy.

## **Application for Federal Fisheries Permit (FFP)**

A vessel owner or authorized representative must complete the FFP application to request a new or amended FFP, to renew an FFP, or to surrender an FFP.

FFPs are non-transferable, 3-year permits, issued on request and without charge to vessel owners. An FFP is required for U.S. vessels used to fish for groundfish in the GOA and BSAI. The FFP is also required for vessels that must retain any bycatch of groundfish under 50 CFR part 679.

In addition, if the owner of a vessel plans to participate in the directed fisheries for Pacific cod, pollock, and/or Atka mackerel in the GOA or BSAI with any gear other than jig gear, the FFP must be endorsed for these species by gear type used. Vessels endorsed for these directed fisheries in the EEZ off Alaska are required to have on board an active Vessel Monitoring System (see OMB Control No. 0648-0445) while the directed fisheries for which the permit is endorsed are open, regardless of where the vessel is fishing at the time (including Alaska State waters) or what the vessel is targeting.

Only persons who are U.S. citizens are authorized to receive or hold an FFP.

If ownership in Block A of the application has changed or if this is an application for a vessel to which an FFP has never been issued, documentation of vessel ownership must be provided with this application. To demonstrate vessel ownership you must provide the following:

- For U.S. Coast Guard (USCG) documented vessels, a copy of the USCG Abstract of Title or Certificate of Documentation
- For undocumented vessels, a copy of the State of Alaska Department of Fish & Game (ADF&G) vessel license or registration

The information collected on an FFP application includes the type of request (new, renewal, amendment, or surrender) and a current FFP number if renewing, amending, or surrendering an existing FFP. An FFP application has five sections, Blocks A through E that collect information about the applicant, business details, vessel specifications and permit numbers, the species endorsements that are requested, and a signature of the applicant.

## **Application for Federal Processor Permit (FPP)**

An owner or authorized representative of a shoreside processor, stationary floating processor (SFP), or community quota (CQE) floating processor must complete the FPP application to obtain, amend, renew, or surrender an FPP.

FPPs are non-transferable, 1-year permits, issued to owners on request and without charge. An FPP is required for SFPs (processing vessels that operate solely within Alaska State waters) and for shoreside processors that receive and/or process groundfish harvested from Federal waters (or from any federally permitted vessels). An FPP is required before the manager of a shoreside processor, SFP, or a CQE floating processor may receive, process, purchase, or arrange to purchase unprocessed groundfish harvested in the GOA or BSAI (see 50 CFR 679.4(f)).

Only persons who are U.S. citizens are authorized to receive or hold an FPP.

A shoreside processor, SFP, or CQE floating processor that is issued an FPP under 50 CFR 679.4(f) must use eLandings (see OMB Control No. 0648-0515) or other NMFS-approved software to daily record and report groundfish harvest. For more information on eLandings, see <https://elandings.atlassian.net/wiki/spaces/doc/pages/79659055/eLandings+Reporting+System+FAQ+s>.

Persons holding an FPP may be required to pay an ex-vessel value-based observer fee to NMFS to support the funding and development of observers on vessels and in plants in the partial coverage category under the North Pacific Observer Program (see OMB Control No. 0648-0711; 50 CFR 679.55). This fee is intended to be split evenly between the vessel owner and the processor or registered buyer. However, the owner of a shoreside processor or SFP named on an FPP and the registered buyer are responsible for collecting the fee, including the vessel's portion, at the time of landing and remitting the full fee amount to NMFS. Additional information on the observer fee is available on the NMFS Alaska Region website at <https://www.fisheries.noaa.gov/alaska/commercial-fishing/observer-fee-collection-and-payment-north-pacific-groundfish-and-halibut>.

An FPP permit holder who has incurred an observer fee must pay the fee to NMFS by February 15 of the year following the calendar year in which the landing was made. For an FPP application to be considered complete, all observer fees due to NMFS per § 679.55 must be paid.

For an SFP, a GOA inshore processing endorsement is required to process GOA inshore pollock and Eastern GOA inshore Pacific cod. An SFP that wishes to receive GOA inshore processing endorsements must complete number 11 of Block B on the FPP application. An SFP that holds an inshore processing endorsement is prohibited from processing GOA pollock and GOA Pacific cod in more than one single geographic location during a fishing year and is also prohibited from operating as a catcher/processor in the BSAI. Vessels holding the GOA inshore processing endorsement face additional operating restrictions (see 50 CFR 679.7). Once issued, a GOA inshore processing endorsement cannot be rescinded for the duration of a fishing year. It may be changed for the next fishing year by submitting an FPP application to amend the permit prior to the beginning of that fishing year.

The information collected on an FPP application includes the processor category the application is for and whether the request is new, a renewal, an amendment or a surrender. If requesting to renew, amend, or surrender an existing FPP, an FPP number must be provided. An FPP application has four sections, Blocks A through D, that collect information on the shoreside processor, SFP, or CEQ; ownership of the shoreside processor or vessel; the applicant's signature; and, if requesting a new FPP or if changing the ownership, requires the attachment of the USCG Abstract of Title or Certificate of Documentation.

## Exempted Fishing Permit (EFP) application

For limited experimental purposes, the Regional Administrator may authorize, after consulting with the Council, an EFP to allow the target or incidental harvest of species managed under a fishery management plan or fishery regulations that would otherwise be prohibited. EFPs are issued to support projects that could benefit fisheries and the environment and result in gathering information not otherwise available through research or commercial fishing operations. EFPs allow for science based, monitored research on new ways to harvest resources. No exempted fishing may be conducted unless authorized by an EFP issued by the Regional Administrator to the participating vessel owner in accordance with the criteria and procedures.

Examples of past projects supported by EFPs include the development of new gear types for an underutilized fishery and development of devices that reduce prohibited species bycatch. NMFS Alaska Region, NMFS Alaska Fisheries Science Center, and the Council all use information collected as part of EFPs to inform future fishery management decisions and guide future EFPs.

EFPs are issued without charge and expire at the end of a calendar year unless otherwise provided. This expiration requirement is necessary to avoid situations where information obtained from the fishing experiments might not be made available for several years, thereby denying the fishing industry information obtained from the experiment. The process to issue an EFP takes 6 to 12 months depending on the complexity of the project and the Council's meeting schedule.

There is no application form for this application; however, NMFS posts a template for a suggested EFP design on its Alaska Region website at <https://www.fisheries.noaa.gov/alaska/commercial-fishing/exempted-fishing-permit-application-process-alaska>. The applicant need not be the owner or operator of the vessel(s). The EFP design must—

- be approved by the Alaska Fisheries Science Center;
- be presented at a Council meeting; and
- must include observers, if required by the Regional Administrator, and a description of accommodations and work space for the observer(s).

For each EFP application, NMFS—

- may write an environmental analysis to determine the impacts of the EFP prior to awarding the permit. This analysis would support the decision-making and inform the public of the effects of the EFP project.
- must consult with the Council. This includes filing a *Federal Register* notice announcing receipt of the EFP application and notifying the public of which meeting NMFS will consult with the Council on the application.
- upon deciding to issue the EFP, develops the EFP. The EFP includes project-specific terms and conditions that must be met for the permit holder to be exempted from the stated regulations, and the timing, area, and vessel(s) to which the EFP applies.
- disseminates EFP project data and results when available. Through the release of information from NMFS and the EFP participants, other interested parties in the fishing industry could make use of information obtained and not duplicate efforts already expended by those who initially received an EFP.

An EFP application includes information on the applicant, a description of the project design including how it will vary from current fishing regulations, the species affected and targeted, when and where the

fishing will take place, the vessel that will be used, a provision for public release of all obtained information, and a signature of the applicant(s).

Although an EFP application may be submitted to NMFS by mail, email, or fax, since the 2015 renewal/revision of this collection, all have been sent electronically and we expect this to continue.

**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 FFP and FPP applications are posted on the NMFS Alaska Region website at <https://www.fisheries.noaa.gov/permit/alaska-federal-fisheries-permit-and-federal-processor-permit-applications>. The applications may be completed online using the fillable PDF forms and then printed and faxed to the NMFS Alaska Region permits office. The FPP application may be renewed online through eFISH.

[eFISH](#) is the NMFS Alaska Region online Fisheries Information System. eFISH provides an online method to submit applications and access to participants' NMFS permit accounts. Permit holders access eFISH through a User ID and password issued by NMFS. Instructions for using eFISH are posted on the NMFS Alaska Region website at <https://alaskafisheries.noaa.gov/node/30749>.

The EFP template is posted on the NMFS Alaska Region Website at <https://www.fisheries.noaa.gov/alaska/commercial-fishing/exempted-fishing-permit-application-process-alaska>. EFP applications may be submitted to NMFS Alaska Region Sustainable Fishery staff by email or fax.

NMFS Alaska Region is working toward offering more online services. The current data entry and retrieval system is nearing the end of its life, and a new database is in development. NMFS is working on a new system whereby all of the permit applications will be entered online and submitted directly and automatically into a database.

**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**

None of the information collected as part of this information collection duplicates other collections. Section 303(b)(1) of the Magnuson-Stevens Act specifically recognizes the need for permit issuance, and there are no alternate means or methods to perform the functions laid out in this supporting statement.

In general, Alaska Region information collections are prepared and reviewed by staff familiar with all of the information collection requirements for the region. Staff work together to develop information collection requirements for new programs. In addition, NMFS staff work closely with the staff of the Alaska Department of Fish and Game and the International Pacific Halibut Commission to reduce duplication in information collection requirements to the extent possible given overlapping jurisdictions and complex fisheries. Senior staff at the Alaska Region, NMFS headquarters, and the Department of Commerce General Counsel review all new and revised information collection requirements that are associated with rulemakings. This process minimizes the potential for duplication of information collection requirements for participants in the Federal fisheries off Alaska.

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

The information collection affects small entities. NMFS attempts to minimize the burden of this collection on all respondents by collecting only information necessary to manage the Federal fisheries, by providing options for submitting the information when possible, and by providing help to participants by phone and through online help options and user guides.

The FFP and FPP applications are available online as fillable pdfs and may be submitted by fax. The FFP has a 3-year renewal cycle, so participants are not required to submit an application every year. The EFP template is available online, and example EFP applications are provided on the NMFS EFP webpage. The required information for the EFP may be submitted by email or fax. For help or more information on the FFP, FPP, or EFP, persons may contact NMFS staff through email and toll-free phone numbers.

**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.**

The permit system is an integral part of the management of Federal fisheries in the Alaska Region. It would not be possible to carry out the mandates of the Magnuson-Stevens Act and other laws if approval to continue these previously approved collections were to be denied. The yearly application for the FPP ensures that all participants are up to date in payment of their observer fees, which in turn ensures a high quality of data into NMFS's catch accounting systems, which ultimately feeds into future stock assessments. EFP applications are only required if fishing will deviate from normal activities. An EFP may be issued for any justified length of time, but are usually issued for one year, with the option to renew with the foundation of the existing application. It is necessary to review and renew EFP applications for the time length specified in the original permit in order to monitor the effects of new fishing activities on a fishery and to meet the requirements of the Magnuson-Stevens Act.

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

This collection is conducted in a manner that is consistent with OMB guidelines.

- This collection does not require respondents to report information to the agency more often than quarterly.
- This collection does not require respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.
- This collection does not require respondents to submit more than an original and two copies of any document.
- This collection does not require respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.
- This collection is not 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.
- This collection does not require the use of a statistical data classification that has not been reviewed and approved by OMB.

- This collection does not include a pledge of confidentiality that is not supported by authority established in statute 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.
- This collection does not require 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.

**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 *Federal Register* Notice published on October 3, 2023 ([88 FR 68110](#)), that solicited public comments. The comment period ended December 4, 2023. No comments were received.

In addition to the *Federal Register* notice, NMFS contacted stakeholders outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format, and on the data elements to be recorded, disclosed, or reported. Comments were received from two FFP holders and one EFP holder. The comments and NMFS's responses to those comments are provided below:

*Comment 1:* One FFP holder stated they had no comments on this information collection.

*Response:* NMFS acknowledges the comment.

*Comment 2:* The second FFP holder stated the FFP is a "very basic renewal if no changes" and takes 5 minutes, and that the hourly wage rate for the FFP application is "probably closer to \$35." This commenter renews online and only prints the actual permit. They stated it costs 50 cents to comply with the permit application process. This commenter also suggested "one streamlined application that handled IFQ, skipper, Vessel, and a page if you needed to renew this would be great as would being able to go to one website and do all of the above. But some things are annual, some are paper only, etc."

*Response:* At this time, no changes are being made to the time burden or the hourly wage rate for the FFP application. The commenter's time to renew the FFP is below the current burden estimate of 21 minutes for the FFP application. The current estimate includes time for any use of this application—request a new FFP, amend an FFP, renew an FFP, or surrender an FFP. NMFS attempts to minimize the burden of the FFP application by providing the option to renew an FFP online and by collecting only information necessary for permit issuance necessary to manage the Federal fisheries. The U. S. Bureau of Labor Statistics mean hourly wage for Alaska for Occupation Code 45-0000 (Farming, Fishing, and Forestry Occupations) will continue to be used for the FFP application because this rate is used for this respondent type in other NMFS Alaska Region information collections. However, if comments are received for other NMFS Alaska Region information collections that indicate the rate for this respondent type should be revised, this rate will be updated in a future supporting statement.

NMFS Alaska Region is working toward fully electronic submission of all of its application forms. We are currently developing an online system that will allow electronic submission of applications. This system will streamline the application process as well as provide better customer support. One of the

goals of this new system is to provide more electronic processes to facilitate faster service and secure data transmission.

*Comment 3:* I think they are reasonable for a “fairly general” EFP. At times in the North Pacific the expectation set by the SSC<sup>2</sup> for EFPs applications can be that the applicant include a statistical power analysis (thought is that it is needed to demonstrate that the proposed amount of test fishing will generate statistically valid estimates of, for example, differences in catch rates with and without the bycatch reduction device). This has been the case with several EFPs I have been involved with. When this occurs, we have engaged the expertise of statisticians who have experience with experimental design and power analyses. There aren’t a ton of these applied statisticians who have experience developing experimental designs and hypothesis tests for real world fishery performance situations so this can be expensive. Typically it’s like \$300 to \$500 per hour and 10–20 hours of their time to work through and write up a power analysis, and it can be more. Just wanted you to know that in these situations, your estimates of costs are considerably under the actual costs. Thanks for your interest in EFP costs and process from people who have used EFPs for fishing gear experiments.

*Response:* Based on this comment, the response to question #13 has been updated to include the cost of hiring a statistician if a statistical power analysis is needed for the EFP application.

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

No payment or gift is provided to respondents.

**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 data collected by the EFP holder on the vessel named on the Vessel Designation Sheet submitted to NMFS for fishing under the EFP are disclosable to the public, except for haul-specific catch data and vessel-specific fishing locations and other proprietary business information not relevant to the studies, which are otherwise treated consistent with confidentiality provisions under the Magnuson-Stevens Act. Data collected by NMFS observers relevant to the EFP are disclosable to the public; otherwise, observer data will be treated consistent with data confidentiality provisions under the Magnuson-Stevens Act.

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 Notice (SORN) that cover this information collection is [COMMERCE/NOAA-19, Permits and Registrations for United States Federally Regulated Fisheries](#). An amended Privacy Act SORN for COMMERCE/NOAA-19 was published in the *Federal Register* on August 7, 2015 (80 FR 47457), and became effective September 15, 2015 (80 FR 55327).

The Privacy Impact Assessment that covers this information collection is [NOAA NMFS Alaska Region Local Area Network \(NOAA4700\)](#).

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<sup>2</sup> The SSC is the Scientific and Statistical Committee for the North Pacific Fishery Management Council.

**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 respondents, responses, burden, and labor costs for the Application for Federal Fisheries Permit are annualized because this application is renewed on a 3-year cycle. The hourly wage rate used for the FFP and FPP applications is the U. S. Bureau of Labor Statistics (BLS) mean hourly wage for Alaska for Occupation Code 45-0000 (Farming, Fishing, and Forestry Occupations; [https://www.bls.gov/oes/current/oes\\_ak.htm](https://www.bls.gov/oes/current/oes_ak.htm)). The rate has been updated to use the most current BLS rate available (May 2022). The hourly wage rate for the EFP Industry Representative is based on comments that were previously received.

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)
Application for Federal Fisheries Permit (FFP)	vessel owner or representative	350	1	350	21 min	123	\$22.52	\$2,770
Application for Federal Processor Permit (FPP)	processor owner or representative	79	1	79	25 min	33	\$22.52	\$743
Exempted Fishing Permit (EFP) Application	industry representative	1	1	1	100 hr	100	\$100.00	\$10,000
<b>Totals</b>				<b>430</b>		<b>256 hrs</b>		<b>\$13,513</b>

**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).**

Operating costs account for the typical inclusive general office services packages that include expenses for email, fax, copying, mailing, printing, and internet.

Additional costs may be incurred for the EFP application but are not included in the table below because it depends on the design of the EFP. If a statistical power analysis is needed for the EFP application, the applicant may hire a statistician with experience with experimental design and power analyses. Based on a comment received during this renewal, the cost for a statistician to work through and write up a power analysis is \$300 to \$500 per hour and takes 10 to 20 hours or more.

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)
Application for Federal Fisheries Permit (FFP)	350	1	350	Operating costs - \$5	\$1,750

Application for Federal Processor Permit (FPP)	79	1	79	Operating costs - \$5	\$395
Exempted Fishing Permit (EFP) Application	1	1	1	Operating costs - \$5	\$5
<b>TOTALS</b>	<b>430</b>		<b>430</b>		<b>\$2,150</b>

**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.**

Salaries are based on capped out salaries of full time employees in Juneau, Alaska. The fully loaded salary costs include 52 percent of the salary to account for benefits and other overhead costs (e.g., \$82,117 × 1.52 = \$124,818 loaded salary). The grade and step are from the Department of Commerce Alternative Personnel System (CAPS) 2024 pay tables (<https://www.commerce.gov/hr/practitioners/caps/pay-administration>). The general schedule grade equivalent for CAPS is included in parentheses.

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
<b>Federal Oversight</b>					
Other Federal Positions					
EFP Application Processing	(x2) ZP-3 step 3 (GS 11/12)	\$194,101	4%		\$15,528
EFP Application Processing	(x2) ZP-4 step 3 (GS 13/14)	\$272,761	4%		\$21,821
FPP and FPP Application Processing	(x3) ZS-4 step 4 (GS 7/8)	\$124,818	10%		\$37,445
<b>Contractor Cost</b>					—
<b>Travel</b>					—
<b>Other Costs:</b>					—
<b>TOTAL</b>					<b>\$74,794</b>

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

The respondents and responses have been adjusted to reflect the most current data. This adjustment affected the total burden hours and costs. Additional reasons for adjustments are noted in the tables.

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	
Application for Federal Fisheries Permit	350	402	350	402	123	141	Respondents and responses have been adjusted to reflect the most current data, which decreased the total burden hours.
Application for Federal Processor Permit	79	79	79	79	33	33	—
Exempted Fishing Permit Application	1	3	1	3	100	300	Respondents and responses have been adjusted to reflect the most current data, which decreased the total burden hours.

Total for Collection	430	484	430	484	256	474	
Difference	- 54 (adjustment)		- 54 (adjustment)		- 218 (adjustment)		

Information Collection	Labor Costs		Miscellaneous Costs		Reason for change or adjustment
	Current	Previous	Current	Previous	
Application for Federal Fisheries Permit	\$2,770	\$3,308	\$1,750	\$2,010	Adjustment: The annual number of respondents decreased, which decreased the total annual labor and miscellaneous costs. Labor costs updated to use the most recent BLS hourly wage rate.
Application for Federal Processor Permit	\$743	\$774	\$395	\$395	Adjustment: Labor costs updated to use the most recent BLS hourly wage rate.
Exempted Fishing Permit Application	\$10,000	\$30,000	\$5	\$15	Adjustment: The annual number of respondents decreased, which decreased the total annual labor and miscellaneous costs.
<b>Total for Collection</b>	<b>\$13,513</b>	<b>\$34,082</b>	<b>\$2,150</b>	<b>\$2,420</b>	
<b>Difference</b>	<b>- \$20,569 (adjustment)</b>		<b>- \$270 (adjustment)</b>		

**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 list of FFPs and FPPs and the information obtained from the permit applications are posted on the NMFS Alaska Region website at <https://www.fisheries.noaa.gov/alaska/commercial-fishing/permits-and-licenses-issued-alaska>. EFP applications, comments on the applications, and final reports resulting from issuance of EFPs are posted on the NMFS Alaska Region website at <https://www.fisheries.noaa.gov/alaska/resources-fishing/exempted-fishing-permits-alaska>. FFP and FPP permits are available from 2005 and on, and EFP applications from 2003 and on.

**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\(b\)\(3\)](#).