

**Department of Transportation  
Maritime Administration  
Information Collection Request (ICR)  
OMB 2133-0540  
Procedures for Determining Vessel Services Categories  
For Purposes of the Cargo Preference Act**

**SUPPORTING STATEMENT**

**INTRODUCTION:** This submission is to request a three-year extension from the Office of Management and Budget (OMB) for the information collection entitled OMB 2133-0540 (Procedures for Determining Vessel Services Categories for Purposes of the Cargo Preference Act), which expires on August 31, 2024. There are no changes since the last renewal, so this collection will be submitted as an *extension* request.

**A. JUSTIFICATION**

**1. Circumstances Making the Collection of Information Necessary**

This information collection is required to administer the interagency Memorandum of Understanding (MOU) Regarding Procedures for Determining Service Categories for the Purpose of the Cargo Preference Act (CPA). The text and an explanation of the MOU are set forth in the Federal Register notice (74 FR 47308). There is no form associated with this information collection. This collection supports the DOT strategic goal of Economic Strength and Global Competitiveness by creating resilient supply chains stakeholders and ensuring that vessels used in both domestic and international shipment of goods are properly credentialed in compliance with CPA requirements.

**2. Purpose and Use of the Information Collection**

Maritime Administration (MARAD) personnel will use the data submitted by vessel operators to create a list of Vessel Self-Designations and determine whether the Agency agrees or disagrees with a vessel owner's designation of a vessel. Collected data will also be used to determine whether or not a vessel should be re-designated into a different service category.

**3. Automation or Use of Information Technology**

MARAD's public notice encourages electronic submission of application and supporting data for this collection.

**4. Efforts to Identify Duplication**

There is no duplication of this data collection.

**5. Impacts on Small Businesses or Other Small Entities**

Per Small Business Administration size standards found in 13 CFR Part 121), most respondents to this collection are small business owners (e.g., having fewer than 500 employees). However, the voluntary nature of the application and the small scale of the hourly and financial burdens indicate that this collection has a minimal impact on small businesses.

## **6. Impact of Not Conducting or Less Frequent Collection of Information.**

Without this collection MARAD would be unable to make legally essential determinations of vessel service types for purposes of implementing the CPA under the terms of the MOU.

## **7. Special Circumstances Relating to the Guidelines 5 CFR 1320.5.**

There are no special circumstances that require this collection of information to be conducted in a manner described below:

- Requiring respondents to report information to MARAD more often than quarterly;
- Requiring respondents to prepare a written response in fewer than 30 days after receipt of a collection instrument;
- Requiring respondents to submit more than one original copy 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;
- Requiring the use of statistical data that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- Requiring the use of statistical data classification that has not been reviewed and approved by OMB;
- Requiring a pledge of confidentiality; or
- Requiring respondents to submit any proprietary or trade secrets

## **8. Public Comments in Response to the Federal Register Notice and Outside Consultation**

MARAD published a 60-day notice and request for comments on this information collection in the Federal Register (FR 23082, Vol. 89, No. 65) on April 3, 2024, indicating comments should be submitted on or before June 3, 2024. No comments were received. A 30-day notice will be published in the Federal Register to solicit public comments.

All public comments regarding any aspect of this collection will receive an official response. MARAD personnel does not consult with respondents to this collection, unless the information submitted is different from the information we have obtained during our independent research of public records.

## **9. Explanation of Any Payments or Gifts to Respondents**

There are no payments or gifts are provided to respondents.

**10. Assurance of Confidentiality and Protection of Privacy**

The information requested is not of a confidential nature, so there is no need for any assurance of confidentiality.

**11. Justification for Sensitive Questions**

There are no questions of a sensitive nature.

**12. Estimate of Annualized Burden Hours and Cost**

**a. Estimate Annualized Burden Hours**

Current vessel owners are required submit a self-designation once for this information collection. Under the MOU, if a new vessel comes on-line or a vessel owner subsequently seeks to change their designation, they are required to submit a new application. Optional vessel re-designation requests can be submitted quarterly. Vessel owners who are satisfied with MARAD’s existing designation do not need to submit a new application, so the total actual respondents to this collection may be less may in a given year.

An estimated 120 owners or operators of U.S.-registered vessels, and some 80 foreign-registered vessels owners, for a total combined 200 respondents can complete a request for self-designation and/or re-designation once annually under the MOU for this collection. It will take each respondent approximately 15 minutes (.25 hours) to complete the designation/ re-designation process. Therefore, the total burden hours associated with this collection is 50 hours, which can be calculated as shown in the table below:

Total Respondents		Total Responses per Respondent		Total Responses		Average Time Taken to Respond (Hour)		Total Burden Hours
200	*	1	=	200	*	0.25 (15 mins)	=	50

**b. Estimated Annualized Cost Burden**

The Bureau of Labor and Statistics (BLS)<sup>1</sup> estimates that the average hourly wage for Captains, Mates, and Pilots of Water Vessels (53-5021) is \$47.03. When combined with

<sup>1</sup> The hourly wage estimate is taken from current BLS tables: <https://www.bls.gov/oes/current/oes535021.htm>.

the total compensation rate <sup>2</sup>of 29%, the total annualized hourly rate is: \$60.67. Therefore, the estimated annualized cost burden to respondents to compile, prepare, and submit the required materials to process either an initial vessel designation or a redesignation is \$3,033.50, which is calculated as show in the table below:

Type of Respondents	Rate		Total Annualized Burden Hours		Total Annualized Cost Burden
Ship and Boat Captain and Vessel Operators (53-5020)	\$ 60.67	*	50	=	\$ 3,033.50

### 13. Estimate of Total Annual Cost Burden to Respondents and /or Record Keepers

There are no capital, start-up, operations, or maintenance costs to respondents and/or record keepers associated with this collection.

### 14. Estimate of Federal Government Costs

The total Federal Government costs associated with this collection is \$4,566.00. According to the Office of Personnel Management wage tables<sup>3</sup>, it is estimated that one GS 13 (Step 8) employee with a Washington-Baltimore-Arlington locality hourly pay of \$69.71. When combined with the Federal Employee compensation of 31%, the hourly wage rate is: \$91.32. It will take 15 minutes (.25 hours) to review and process each of a total combined estimated total 200 designation or re-designation requests annually. Therefore, the total wages associated with this collection is \$4,566.00, as calculated in the tables below:

FTE Grade and Step	Average Hourly Wage Rate with 31% Compensation		Total Hours (per application)		Cost to process each application		Total Applications		Total Wages
GS 13 (Step 8)	\$ 91.32	*	0.25 (15 mins)	=	\$22.83	*	200	=	\$ 4,566.00

### 15. Explanation of Program Changes or Adjustments

There were no reported program changes since the last renewal.

<sup>2</sup> Per BLS Employee Compensation Memo, the total compensation rate for the private sector is 29%, :<https://www.bls.gov/news.release/pdf/ecec.pdf>

<sup>3</sup> The hourly federal government wage is taken from OPM 2024 wage tables: [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/html/DCB\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/html/DCB_h.aspx)

## **16. Publication of Data Collection Results**

Per the MOU, MARAD publishes a list of the self-designations submitted by vessel owners on their website: <https://www.maritime.dot.gov/data-reports>

## **17. Display of the OMB Expiration Date**

MARAD is not seeking approval to omit displaying the expiration date for this collection.

## **18. Exceptions to the Certification Statement**

There are no exceptions to this certificate statement.