

SUPPORTING STATEMENT FOR
Great Lakes Pilotage
OMB Control No.: 1625--0086
COLLECTION INSTRUMENT(S): Form CG-4509, GLPMS, and Instruction

A. Justification

1) Circumstances which make the collection of information necessary.

This collection of information relating to the Rate-making requirements is required pursuant to 46 CFR parts 401 and 404 and discussed in the following paragraphs.

Pursuant to 46 CFR part 404, the Director of the Great Lakes Pilotage is required to set pilotage rates on the Great Lakes. In meeting this requirement, the Director requires that pilot associations provide data relating to bridge hours; vessel delay, detention, cancellation, and movage; pilot travel; revenues; and pilot availability. In the past, this data was being recorded and provided to the Office of Great Lakes Pilotage via hard copy source forms that each pilot prepared immediately following each completed pilot assignment. Upon request, copies of the source forms were mailed to the Office of Great Lakes Pilotage on a monthly basis. Each month, pilot availability is reported monthly on a separate form. In an effort to improve the timeliness and accuracy of the data collection and to utilize enhanced data collection technology, the Director mandated the use of electronic data collection.

In March 2006, the Office of Great Lakes Pilotage commenced its use of electronic data collection with the implementation of the Great Lakes Electronic Pilot Management System software. A web based system, it provides the three U.S. pilot associations electronic capabilities in entering and storing pilotage data relating to bridge hours; vessel delay, detention, cancellation, and movage; pilot travel; revenues; and pilot availability. This software also makes this data readily available and retrievable by the Office of Great Lakes Pilotage for use in the course of daily operational oversight and rate-making.

In March 2017, the Office of Great Lakes Pilotage along with the Canadian Great Lakes Pilotage Authority (GLPA) updated the GLEPMS to a web based electronic data collection, now called Great Lakes Pilot Management System (GLPMS). This system is used by both the US registered pilots and the Canadian pilots.

At the September 2019 Great Lakes Pilotage Advisory Committee meeting, the members unanimously recommended that all three pilotage districts move to new billing and dispatch system, starting the 2020 shipping season. The new system is managed by the pilot associations and provides the same data as the previous system. The pilotage districts are required to provide the Great Lakes Pilotage Office bridge hours, vessel delays, cancellations, pilot travel and administration time, revenues, and pilot availability. The system makes the data readily available and retrievable, for use in the course of daily

operational oversight and rate-making.

2) Purpose of the information collection.

The Director of Great Lakes Pilotage uses the data stored in the Great Lakes Pilot Management System and on Form CG-4509 to carry out operational and rate making oversight of pilotage activities on the Great Lakes.

3) Considerations of the use of improved technology.

Form CG-4509 will be posted to the internet for easy access at: Office of Waterways and Ocean Policy – Great Lakes Pilotage Division. It is a fillable pdf that can be printed, signed and scanned to the Office of Great Lakes Pilotage via a dedicated email address (GreatLakesPilotage@uscg.mil). Form CG-4509 can also be mailed to: Commandant (CG-WWM-2), Great Lakes Pilotage Division, 2703 Martin Luther King Jr Ave SE, Stop 7509, Washington, DC 20593-7509

The Office of Great Lakes Pilotage has electronic tracking of vessels and pilot assignments on the Great Lakes using real time data via the Great Lakes Pilot Management System (GLPMS). This system enables the program to accurately and quickly answer queries from pilots, industry, or the general public regarding operations and/or retrieve information that previously was not always readily available. Additionally, the use of the pilotage software program enables the Office of Great Lakes Pilotage to access and view all foreign vessel traffic in the Great Lakes and to determine pilot availability at any given time. The three U.S. pilot associations have unlimited access to the Great Lakes Pilot Management System through the use of a username and secured passwords. The GLPMS is a Web based application, accessed with Internet access - regardless of location or access device. The GLPMS uses <https://pilotsystem.seapropilot.com> specifically tailored to meet the needs and business practices of each of the three Great Lakes Pilot Associations and provides real-time pilotage data and information to users. The application does not have a standalone web address but rather consists of an online database accessed through a specific program. Furthermore, the system has added firewall security measures that allow the host server to recognize only those remote users with pre-registered IP addresses.

4) Efforts to identify duplication.

The specific information captured on the Form CG-4509 is not captured on any form currently used by the National Maritime Center.

The GLPMS information is not collected in any other type of collection instrument/form, and therefore is not duplicated elsewhere.

5) Methods used to minimize the burdens to small business if involved.

The Coast Guard provides a dedicated shared public mailbox (<https://pilotsystem.seapropilot.com>) for the submission of the Form CG-4509 and will continue to respond to any inquiries regarding the form or its instructions.

6) Consequences to the Federal program or policy if collection were conducted less frequently.

The Form CG-4509 must be collected in a timely manner to ensure that Great Lakes Registered Pilots and mariners interested in becoming certified as such meet the registration requirements specified in 46 CFR part 401.

The Coast Guard pilotage regulations require annual reviews of pilotage rates and the creation of a new rate at least once every five years, or sooner, if the annual review shows a need. To facilitate this process, the Office of Great Lakes Pilotage must rely on the pilot associations to submit timely and accurate data that includes financial reports; bridge hours; vessel delay, cancellations; pilot travel and administration time; revenues; and pilot availability. From an operational standpoint, quick access of the pilotage data on a daily basis allows the Director to make accurate assessments and informed decisions on pilotage activities on the Great Lakes immediately. Similarly, from a rate making standpoint, immediate entry, access, and retrieval of the pilotage data allows the Office to calculate and make proper adjustments to pilotage rates as required.

7) Special collection circumstances.

This information collection is conducted in manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

8) Consultation.

A 60-Day Notice (See [USCG-2022-0042], January 25, 2022, 87 FR 3835) and 30-Day Notice (April 20, 2022, 87 FR 23529) were published in the Federal Register to obtain public comment on this collection. The Coast Guard has not received any comments on this information collection.

9) Provide any payment or gift to respondents.

There is no offer of monetary or material value to respondents for this information collection.

10) Assurances of confidentiality provided to respondents.

There are no assurances of confidentiality provided to the respondents for this information collection. This information collection request is covered by the Merchant Mariner Licensing and Documentation System 2011 (MMLDS) Privacy Impact Assessment (PIA) and Great Lakes Registered Pilot and Applicant Pilot Eligibility

System of Records Notice (SORN). Links to the MMLDS PIA and Great Lakes Registered Pilot and Applicant Pilot Eligibility SORN are provided below:

- <https://www.dhs.gov/sites/default/files/publications/privacy-pia-uscg-015-MMLDS-2011.pdf>
- <https://www.gpo.gov/fdsys/pkg/FR-2014-12-16/html/2014-29380.htm>

11) Additional justification for any questions of a sensitive nature.

There are no questions of sensitive nature.

12) Burden Hour and Annualized Cost Estimates.

Mariners - Form

It takes an estimated 18 minutes for a mariner to fill out the Form CG-4509. The average new applications received from 2018-2020 is rounded up to 13. The average application renewed from 2017 – 2020 was 9.

This puts an estimated total burden hour to mariners for Form CG-4509 at 7 (rounded up) hours each year. Multiply time (18 minutes) .3 X (applications) 22 = 6.6 (rounded up to 7) hours.

Burden hours for Mariners - Form collection (1625-0086) is: 7 (rounded up) each year.

Pilots - GLPMS

It is estimated that an average 60 pilots entered data into the Great Lakes Pilot Management System. It is estimated that each entry takes 5 minutes to enter the data. For 2017 - 2020, it is estimated there were an average of 4,827 entries put into GLPMS. The total burden hours to pilots for GLPMS is figured by; multiplying time (5 minutes) X (entries) 4827 = (24,135) minutes divided by (60) minutes = (402.25) hours.

Burden hours for Pilots – GLPMS collection (1625-0086) is: 402 (rounded down) each year.

We use BLS wage rates for industry, and then multiply it by a wage factor to account for benefits. The most current mean hourly wage rate for captains, mates, and pilots of water vessels is \$42.39 (June 2021), [Captains, Mates, and Pilots of Water Vessels \(bls.gov\)](#). We find the load factor using BLS Employer Costs for Employee Compensation, found in Table 4 at [ecec.pdf \(menlosecurity.com\)](#). The loaded wage factor is equal to the total compensation of \$32.25 divided by the wages and salary of \$21.86. Values for the total compensation, wages, and salary are for industry and occupational group in the Production, transportation, and material moving occupations.

So multiplying the \$42.39 wage rate by 1.48 gives us a loaded wage rate of \$62.74.

The burden cost for this collection is figured by; multiplying number of burden hours (402) x loaded wage rate (62.74) dollars = \$25,221.48.

Administrators - GLPMS

Also, there are estimated 20 administrative individuals that view the 4,827 entries put in GLPMS. It is estimated each entry view takes 13 minutes. The total burden hour for GLPMS is figured by; multiplying time (13 minutes) X entries (4,827) = (62,751) minutes divided by (60) minutes = (1,045.85) hours.

Burden hours for Administrators - GLPMS collection (1625-0086) is: 1,046 (rounded up) each year.

We use BLS wage rates for industry, and then multiply it by a wage factor to account for benefits. The most current mean hourly wage rate for captains, mates, and pilots of water vessels is \$20.38 (June 2021), [Office and Administrative Support Occupations \(bls.gov\)](https://www.bls.gov). We find the load factor using BLS Employer Costs for Employee Compensation, found in Table 4 at [ecec.pdf \(menlosecurity.com\)](https://www.bls.gov/ecec.pdf). The loaded wage factor is equal to the total compensation of \$28.23 divided by the wages and salary of \$19.59. Values for the total compensation, wages, and salary are for industry and occupational group in the Production, transportation, and material moving occupations.

So multiplying the \$20.38 wage rate by 1.44 gives us a loaded wage rate of \$29.35.

The burden cost for this collection is figured by; multiplying number of burden hours (1046) x loaded wage rate (29.35) dollars = \$30,700.10.

Total burden hours/costs for this collection (1625-0086) is: 2,420/\$98,106.29.

Total number of responses for this collection (1625-0086) is: 9,661(average).

Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
Pilots	CG-4509	22	1	.3	7	\$62.74	\$439.18
Pilots	GLPMS	60	80	.1	402	\$62.74	\$25,221.48
Administrators	GLPMS	20	241	.3	1046	\$29.35	\$30,700.10
Total		102	322	.2	1455	\$51.61	\$75,092.55

13) Estimate of capital and start-up costs.

The recommended and currently approved Great Lakes Pilot Management System was

developed and is maintained by the three U.S. Great Lakes Pilot associations. The estimated start-up costs for the pilot associations was \$35,000.00. The total monthly service fees are \$87,750.00. Monthly service fee of \$3,250.00 per month X (3) three pilot associations = \$9,750.00 X (9) nine months (length of the shipping season) = \$87,750.00.

14) Estimates of annualized cost to the Federal Government.

Government Burden:

The average number of new applications (CG-4509) the government reviews is thirteen (13), based on the number of public respondents. It takes approximately 30 minutes to review each application, to verify the requirements are met. Total Hour Burden is 3.5 hours. The Hourly Rate of \$74 is from [SALARY TABLE 2021-DCB \(opm.gov\)](#). The Total Cost Burden to review new applications is \$259.

The average number of renewal applications (CG-4509) the government reviews is nine (9), based on the number of public respondents. It takes approximately 15 minutes to review each application, to verify the requirements are met. Total Hour Burden is .5 hours. The Wage Rate of \$74 is from [SALARY TABLE 2021-DCB \(opm.gov\)](#) The Total Cost Burden to review renewal applications is \$37.

The total government burden for the Form CG-4509 is Total Hour Burden - 4 hours and Total Cost Burden - \$296.

15) Reasons for change in the burden.

The average estimated number of responses increased to 9,661 a year. This is an update due to increased marine traffic on the Great Lakes, higher number of pilots providing pilotage services, and better record keeping in the past four years. The information requested from the respondents has not changed.

The total annual burden hours decreased to 1,455 hours because the pilot districts engaged in using the new electronic dispatching/invoicing/billing system. The new system required the pilots to accept and enter data for the pilotage jobs.

The capital and startup costs changed because the Great Lakes Pilotage Advisory Committee recommended the pilot associations adopt new software to provide data to the GLPMS. This new software was developed and is maintained by the three pilot associations. Also, this software is providing better real time data adding to better record keeping. The information gathered on this new software has not changed from the previous software.

16) Plans for tabulation, statistical analysis and publication.

This information collection will not be published for statistical purposes.

17) Approval for not explaining the expiration date for OMB approval.

The Coast Guard will display the expiration date for OMB approval of this information collection.

18) Explain each exception to the certification statement.

The Coast Guard does not request an exception to the certification of this information collection.