

**Supporting Statement
for
Plan Approval and Records for Subdivision and
Stability Regulations -- Title 46 Subchapter S**

OMB No.: 1625-0064
COLLECTION INSTRUMENTS: Instruction.

A. Justification

1) Circumstances that make the collection of information necessary.

Under the authority of the Secretary in the department in which the U. S. Coast Guard is operating, the Coast Guard administers and enforces the laws and regulations promoting the safety of life and property in marine transportation. Title 46 U.S Code 3301 and 3305 require that every freight, seagoing motor, and steam vessel, and every seagoing barge, including a mobile offshore drilling unit be inspected to determine that it is in full compliance with applicable marine safety regulations. Title 46 U.S Code 3306 directs the Secretary to make appropriate regulations, including standards for vessel stability. Title 46 U.S Code 3703 directs the Secretary to prescribe additional regulations for vessels which carry liquid bulk dangerous cargoes. In addition, certain vessels must meet the standards of the Safety of Life at Sea Convention (SOLAS). Plan and vessel characteristics submissions by builders/designers and logging requirements by owners/operators are needed to assure the regulations are met.

The statutory authority is 46 U.S. Code 3101, 3305, 3306 and 3703.

2) Purposes of the information collection.

Requirements for the submission of plans, technical information, or operating instructions: This information is required by the Coast Guard to assure that a vessel meets the applicable stability standards. Plans and other information submitted are normally developed by the shipyard, designer, or manufacturer to assure the construction and safe operation of a vessel. The material and information required is not solely for Coast Guard use, although the material does contain the information necessary to meet Coast Guard regulations. Part of the submissions are nonrecurring; they are made only once at or prior to vessel construction or alteration. Resubmission of plans is not required when more than one vessel is constructed to the same plans, nor is a stability generally test required. In this case, only a certification of sister ship status by an authorized officer of the shipbuilding company is needed. Operators may elect to have a classification society, the American Bureau of Shipping (ABS), review their plans on the Coast Guard's behalf.

Requirements for the stability information to be available to vessel operating personnel and for the logging of stability verification: These requirements are necessary to help ensure the safe operation of each vessel. There are specific requirements for the content of the stability booklet and operating manuals; however, the format will vary with vessel type. Many vessel operators provide manuals to their vessels which meet or exceed any requirements of the Coast Guard. Most, though not all of the information, is reviewed by the Coast Guard. The required operating information is required to be on board the vessel as long as the vessel remains subject to inspection. Recordkeeping requirements will vary for each vessel type and operation and are required by the Coast Guard to determine if a vessel meets the appropriate stability and subdivision requirements.

3) Consideration of the use of improved information technology.

Information may be submitted in writing or electronically via e-mail, to the CG Officer in Charge, Marine Inspection (OCMI) at the local Sector Office, or the CG Marine Safety Center (MSC). Contact info for CG OCMI's can be found at—<https://www.uscg.mil/Units/Organization/>. For information on submitting information to the CG MSC, go to— <https://www.dco.uscg.mil/msc> > E-Submittals. We estimate that

100% of the reporting requirements can be done electronically. At this time, we estimate that 88% of responses are collected electronically.

Regarding Usability Testing, this ICR—

- Public-facing instructions were tested by the staff of the CG Office of Standards Evaluation and Development (CG-REG) to ensure the use of plain language. Usability testing participants reported that they had no difficulty understanding the instructions. As a result, the USCG did not make any changes to the collection.
- Is not related to a public benefit program as detailed in OMB M-22-10 (titled “Improving Access to Public Benefits Programs Through the Paperwork Reduction Act” dated April 13, 2022).
- Does not require the use of a form or specify a reporting format/method.
- Is required by international treaty, statute, and/or regulation as noted in section 1 of the Supporting Statement.

4) Efforts to identify duplication.

The Coast Guard monitors State and local regulatory activity in this field. To date no equivalent State and local programs have been identified that require equivalent information, and no other federal agencies have similar or equivalent regulatory requirements.

5) Methods to minimize the burden to small business if involved.

It is likely that some of the companies in question would be considered small entities; however, the overall impact of the requirement is minimal. Small businesses, such as independent naval architects, vessel owners and small shipyards, are favorably affected by these regulations. Subchapter S consolidates standards for all types of vessels into one set of regulations. In addition, these regulations provide clarifications to and interpretations of the previous regulations, as well as policy statements made by the Coast Guard relating to stability standards for specific vessel types, and new stability standards set by SOLAS¹. This enables smaller firms, such as independent naval architects, vessel owners, and smaller shipyards, to better prepare stability plans because they will have a better knowledge and understanding of the requirements. Smaller firms will also be better informed of Coast Guard policy and regulation interpretations, in the absence of the large staff available to major organizations.

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

If information was submitted or recorded less frequently, no assurance could be given that vessels are operating within the applicable stability requirements that ensure marine safety.

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 was published in the Federal Register to obtain public comment on this collection (See [USCG-2024-0289]; June 21, 2024, 89 FR 68915) and 30-Day Notice (November 18, 2024, 89 FR 90713) 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 payments or gifts to respondents.

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

10) Describe any assurance of confidentiality provided to respondents.

¹ SOLAS -- International Convention for Safety of Life at Sea, 1974.

There are no assurances of confidentiality provided to the respondents for this information collection. This information collection request is covered by the Marine Information for Safety and Law Enforcement (MISLE) Privacy Impact Assessment (PIA). The link to the MISLE PIA is provided below:

- https://www.dhs.gov/sites/default/files/publications/privacy_pia_uscg_misle.pdf

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

There are no questions of sensitive language.

12) Estimate of annual hour and cost burdens to respondents.

- The estimated number of annual respondents is 163.
- The estimated number of annual responses is 2,302.
- The estimated hour burden is 8,288 hours.
- The estimated cost burden is \$646,464.

The burden to respondents is provided in Appendix A. We estimate that it will take a Technical Specialist (shore side) about 3.6 hours to prepare a vessel's plan submission (3.5 hrs) and for recordkeeping (0.1 hrs).² For the wage rate, we used the Bureau of Labor Statistics (BLS) wage rate for Marine Engineers and Naval Architects (17-2121) [May 2023, mean hourly wage, loaded 50%, and rounded]³

The frequency of response is not on a set schedule but happens whenever an existing vessel's subdivision/stability is modified, or a new vessel is constructed. The Coast Guard MSC maintains two databases⁴ to track plan review information. The average annual number of plans submitted (responses) to either the MSC or Authorized Classification Societies (ACS) was derived from these databases by taking a multi-year average of plans received.

13) Estimated annualized capital and start-up costs.

There are no capital, start-up or maintenance costs associated with this information collection.

14) Estimates of annualized Federal Government costs.

The estimated annual Federal Government cost is \$177,377 (see Appendix B). We estimate that it will take a Coast Guard plan reviewer about 1 hour to conduct a review, and that the review is typically done by a Lieutenant (LT, O-3). The wage rate used is in accordance with the current edition of COMDTINST 7310.1(series) for "In-Government" personnel.

15) Reasons for the change in burden.

The change in burden is an ADJUSTMENT due to a change (i.e., increase) in the estimated annual number of responses. There is no proposed change to the reporting or recordkeeping requirements of this collection. The reporting and recordkeeping requirements, and methodology for calculating burden, remain unchanged.

16) Plans for tabulation, statistical analysis, and publication.

This information collection will not be published for statistical purposes.

² To determine the time required to submit plans and technical documents, a percentage of the time to develop such plans is used. This is because most of the documents required by the Coast Guard for stability review are prepared by the vessel designer or builder as part of the shipbuilding process. However, some changes and additions are necessary to comply with the Coast Guard requirements.

³ <https://www.bls.gov/oes/2023/may/oes172121.htm>

⁴ MASCOT (for internal work done at the MSC) and PRAS (for work done by classification societies on behalf of the Coast Guard).

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.

B. Collection of Information Employing Statistical Methods

The information collection does not employ statistical methods.