

**1SUPPORTING STATEMENT A FOR
PAPERWORK REDUCTION ACT SUBMISSION**

**Incidental Take of Marine Mammals During Specified Activities
(50 CFR 18.27 and 50 CFR Part 18, Subpart L)
OMB Control Number **1018-0203****

Terms of Clearance: This is a revision to and renewal of OMB Control No. 1018-0070 in conjunction with our **final rule** under RIN 1018-BI09, “Marine Mammals; Incidental Take During Specified Activities; North Slope, Alaska.” With this submission, in order to manage simultaneous applications more effectively for incidental take regulations (ITRs) as explained in question 2. **Changes to the Supporting Statement since the submission at the proposed rule stage are highlighted in yellow.**

We are requesting a new control number for the information collections (ICs) and burden estimates currently approved under OMB Control No. 1018-0070 associated with regulations at **50 CFR 18, subpart L – U.S. Coast Guard**. This ITR, effective May 19, 2023, authorizes the nonlethal, incidental, unintentional take by harassment of small numbers of northern sea otters (otters; *Enhydra lutris kenyoni*) while engaged in activities associated with or in support of marine construction activities in the Gulf of Alaska. Unless a new ITR is issued for subpart J, we will discontinue the newly assigned control number when the ITR expires on May 19, 2028.

Transferring the ICs associated with subpart L, currently approved in OMB Control No. 1018-0070, into a new, stand-alone collection will allow the Service to more effectively manage simultaneous applications for incidental take regulations (ITRs).

See also the simultaneous submission of the ICR to revise OMB Control No. 1018-0070 (**final rule ICR Ref No.: 202503-1018-002**).

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The Marine Mammal Protection Act of 1972, as amended (MMPA; 16 U.S.C. 1361 *et seq.*) imposed, with certain exceptions, a moratorium on the taking of marine mammals. Section 101(a)(5)(A) of the MMPA directs the Secretary of the Interior (Secretary) to allow, upon request by citizens of the United States, the taking of small numbers of marine mammals incidental to specified activities (other than commercial fishing) if the Secretary makes certain findings and prescribes specific regulations that, among other things, establish permissible methods of taking. Once the U.S. Fish and Wildlife Service (Service or we) issue specific regulations, applicants seeking to conduct activities must request a Letter of Authorization (LOA) for the specific activity and submit onsite monitoring reports and a final report of the activity to the Secretary.

Procedural regulations outlining the requirements for the submission of a request are contained in 50 CFR 18.27. We request OMB approval of the specific regulations governing authorized incidental take of marine mammals activities as separate control numbers for each subpart to facilitate simultaneous rulemaking actions when we receive applications for ITR.

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. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.

We will use the information we collect to verify the finding required to issue incidental take regulations, to decide if we should issue an LOA, and, if issued, what conditions should be contained in the LOA. In addition, we will analyze the information to determine impacts to the marine mammals and the availability of those marine mammals for subsistence purposes of Alaska Natives. This is a nonform collection.

APPLICATION FOR REGULATIONS (50 CFR §18.27(d))

Regulations at 50 CFR 18 require the applicant provide information on the activity as a whole, which includes, but is not limited to, an assessment of total impacts by all persons conducting the activity. Applicants can find specific requirements in 50 CFR 18, subparts J and K. These regulations provide the applicant with a detailed description of information that we need to evaluate the proposed activity and determine whether to issue specific regulations and, subsequently, LOAs. The required information includes:

- A description of the specific activity or class of activities that can be expected to result in incidental taking of marine mammals;
- The dates and duration of such activity and the specific geographical region where it will occur;
- Based on the best available scientific information, each applicant must also provide:
 - An estimate of the species and numbers of marine mammals likely to be taken by age, sex, and reproductive conditions,
 - and the type of taking (e.g., disturbance by sound, injury or death resulting from collision, etc.) and the number of times such taking is likely to occur;
 - A description of the status, distribution, and seasonal distribution (when applicable) of the affected species or stocks likely to be affected by such activities;
 - The anticipated impact of the activity upon the species or stocks;
 - The anticipated impact of the activity on the availability of the species or stocks for subsistence uses;
- The anticipated impact of the activity upon the habitat of the marine mammal populations and the likelihood of restoration of the affected habitat;
- The availability and feasibility (economic and technological) of equipment, methods, and manner of conducting such activity or other means of effecting the least practicable adverse impact upon the affected species or stocks, their habitat, and, where relevant, on their availability for subsistence uses, paying particular attention to rookeries, mating grounds, and areas of similar significance. (The applicant and those conducting the specified activity and the affected subsistence users are encouraged to develop mutually agreeable mitigating measures that will meet the needs of subsistence users.);
- Suggested means of accomplishing the necessary monitoring and reporting which will result in increased knowledge of the species through an analysis of the level of taking or impacts and suggested means of minimizing burdens by coordinating such reporting requirements with other schemes already applicable to persons conducting such activity;
- Suggested means of learning of, encouraging, and coordinating research opportunities, plans and activities relating to reducing such incidental taking from such specified activities, and evaluating its effects;
- Applicants must develop and implement a site-specific (or umbrella plan addressing site-specific considerations), Service-approved marine mammal monitoring and mitigation plan to monitor and evaluate the effectiveness of mitigation measures and the effects of activities on marine mammals and the subsistence use of these species.
- Applicants must also provide trained, qualified, and Service-approved onsite observers to carry out monitoring and mitigation activities identified in the marine mammal monitoring and mitigation plan.

This information is necessary so that we can anticipate the impact of the activity on the species or stocks and on the availability of the species or stocks for subsistence uses. Under requirements of the MMPA, we cannot authorize a take unless the total of all takes will have a negligible impact on the species or stocks and, where appropriate, will not have an unmitigable adverse impact on the availability of the species or stocks for Alaska Native subsistence uses. These requirements ensure that applicants are aware of related monitoring and research efforts they can apply to their situation, and that the monitoring and reporting that we impose are the least burdensome to the applicant.

FINAL MONITORING REPORT (50 CFR §18.151)

The results of monitoring and mitigation efforts identified in the otter monitoring and mitigation plan must be submitted to the Service for review within 90 days of the expiration of an LOA. Upon request, final report data must be provided in a common electronic format (to be specified by the Service). Information in the final (or annual) report must include, but is not limited to:

- (1) A summary of monitoring efforts (hours of monitoring, activities monitored, number of PSOs, and, if requested by the Service, the daily monitoring logs).
- (2) A description of all project activities, along with any additional work yet to be done. Factors influencing visibility and detectability of otters (e.g., sea state, number of observers, and fog and glare) will be discussed.
- (3) A description of the factors affecting the presence and distribution of sea otters (e.g., weather, sea state, and project activities). An estimate will be included of the number of sea otters exposed to noise at received levels greater than or equal to 160 dBRMS re: 1 μ Pa (decibels root-mean squared referenced to 1 microPascal) (based on visual observation).
- (4) A description of changes in sea otter behavior resulting from project activities and any specific behaviors of interest.
- (5) A discussion of the mitigation measures implemented during project activities and their observed effectiveness for minimizing impacts to sea otters. Sea otter observation records will be provided to the Service in the form of electronic database or spreadsheet files.

REQUESTS FOR LETTERS OF AUTHORIZATION (50 CFR §18.27(f) and §18.145)

LOAs, which may be issued only to U.S. citizens, are required to conduct activities pursuant to any specific regulations established. Once specific regulations are effective, the Service will to the maximum extent possible, process subsequent applications for LOAs within 30 days after receipt of the application by the Service. All LOAs will specify the period of validity and any additional terms and conditions appropriate for the specific request. Issuance of LOAs will be based on a determination that the level of taking will be consistent with the findings made for the total taking allowable under the specific regulations.

ONSITE MONITORING AND OBSERVATION REPORTS

The regulations also require that each holder of an LOA submit a monitoring report indicating the nature and extent of all takes of marine mammals that occurred incidentally to the specific activity. Since the inception of incidental take authorizations for polar bears (*Ursus maritimus*), Pacific walrus (walrus) (*Odobenus rosmarus divergens*), and northern sea otters (otters; *Enhydra lutris kenyoni*), we have required monitoring and reporting during industrial activities. The purpose of monitoring and reporting requirements is to assess the effects of industrial activities on otters to ensure that take is minimal to their populations, and to detect any unanticipated effects of take. The monitoring focus has been site-specific, area-specific, or population-specific. Site-specific monitoring measures animal-human encounter rates,

outcomes of encounters, and trends of animal activity in the industrial areas, such as otter numbers, behavior, and seasonal use. Area-specific monitoring includes analyzing animal spatial and temporal use trends, sex/age composition, and risk assessment to unpredictable events, such as oil spills. Population-specific monitoring includes investigating species life history parameters, such as population size, recruitment, survival, physical condition, status, and mortality.

In-Season Monitoring (Activity Progress Reports) (50 CFR §18.151)

Activity progress reports. Holders of an LOA must:

- (i) Notify the Service at least 48 hours prior to the onset of activities;
- (ii) Provide the Service weekly progress reports of any significant changes in activities and/or locations;
- (iii) Injured, dead, or distressed sea otters that are not associated with project activities (e.g., animals known to be from outside the project area, previously wounded animals, or carcasses with moderate to advanced decomposition or scavenger damage) must be reported to the Service within 24 hours of the discovery to either the Service MMM (1-800-362-5148, business hours); or the Alaska SeaLife Center in Seward (1-888-774-7325, 24 hours a day); or both. Photographs, video, location information, or any other available documentation must be provided to the Service. and
- (iv) Notify the Service within 48 hours after ending of activities.

In-Season Monitoring (Observation Reports) (50 CFR §18.150)

Holders of an LOA must report, within 48 hours, all observations of otters, during any industry activity. Upon request, monitoring report data must be provided in a common electronic format (to be specified by the Service). Information in the observation report must include, but is not limited to:

- (i) date; time; the observer's locations, heading, and speed (if moving); weather; visibility; number of animals; group size and composition (adults/juveniles); and the location of the animals (or distance and direction from the observer);
- (ii) initial behaviors of the sea otters, descriptions of project activities and underwater sound levels being generated, the position of sea otters relative to applicable monitoring and mitigation zones, any mitigation measures applied, and any apparent reactions to the project activities before and after mitigation;
- (iv) distance from the vessel to the sea otter upon initial observation, the duration of the encounter, and the distance at last observation in order to monitor cumulative sound exposures.; and
- (xii) any instances of animals lingering close to or traveling with vessels for prolonged periods of time.

NOTIFICATION OF LOA INCIDENT REPORT (50 CFR §18.148)

Holders of an LOA must report, as soon as possible, but within 48 hours, all LOA incidents during any industry activity. An LOA incident is any situation when specified activities exceed the authority of an LOA, when a mitigation measure was required but not enacted, or when injury or death of a marine mammal occurs. Reports must include:

- (1) All information specified for an observation report;
- (2) A complete detailed description of the incident; and
- (3) Any other actions taken.

MITIGATION – INTERACTION PLAN (50 CFR §18.149)

All holders of an LOA must have an approved otter safety, awareness, and interaction plan on file with the Service's Marine Mammals Management Office and onsite and provide awareness training to certain personnel. Interaction plans must include:

- (A) The type of activity and where and when the activity will occur (i.e., a summary of the plan of operation);
- (B) Personnel training policies, procedures, and materials;
- (C) Site-specific sea otter interaction risk evaluation and mitigation measures;
- (D) Sea otter avoidance and encounter procedures; and
- (E) Sea otter observation and reporting procedures.

MITIGATION – 3rd PARTY NOTIFICATIONS (50 CFR §18.149)

All applicants for an LOA must contact affected Alaska Native subsistence communities and hunter organizations to discuss potential conflicts caused by the activities and provide the Service documentation of communications as described in § 18.122.

MITIGATION – REQUESTS FOR EXEMPTION WAIVERS (50 CFR §18.149)

Exemption waivers to the operating conditions in 50 CFR §18.126(c) may be issued by the Service on a case-by-case basis, based upon a review of seasonal ice conditions and available information on marine mammal distributions in the area of interest.

MITIGATION – PLAN OF COOPERATION (50 CFR §18.149)

When appropriate, a holder of an LOA will be required to develop and implement a Service-approved Plan of Cooperation (POC).

- The POC must include a description of the procedures by which the holder of the LOA will work and consult with potentially affected subsistence hunters and a description of specific measures that have been or will be taken to avoid or minimize interference with subsistence hunting of marine mammals and to ensure continued availability of the species for subsistence use.
- The Service will review the POC to ensure that any potential adverse effects on the availability of the animals are minimized. The Service will reject POCs if they do not provide adequate safeguards to ensure the least practicable adverse impact on the availability of marine mammals for subsistence use.

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 and specifically how this collection meets GPEA requirements.

The majority of applicants and respondents indicate a preference for electronic submission of information, and we have worked to accommodate that preference. Applicants may submit information via email or in an electronic format, thus, reducing the burden on the applicant of having to provide hard copies of reports or other documents. Though not required, applicants may also submit information via hard-copy documents, if they so choose. A minority of applicants and respondents continue to submit at least some information via hard-copy documents as their preference.

Information requested by the Service, such as petitions and applications, are available to the

public on the Service's website: <https://www.fws.gov/ITA-applicant-instructions>.

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 Item 2 above.

Under the MMPA, we share responsibilities with the National Marine Fisheries Service, National Oceanic and Atmospheric Administration, U.S. Department of Commerce (NOAA-Fisheries), with each agency being responsible for different species. While both agencies may have similar regulations, they apply to different species of marine mammals. Therefore, there is no duplication of information collected.

When available, we provide information from other sources to prospective applicants and encourage them to use it to supplement, or even supplant, their own information collection efforts, thereby reducing their information collection burden.

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

The collection of information will not impact small businesses or other small entities. The regulations are specific to the U.S. Coast Guard infrastructure repair and installation, and port improvements. As such, this information collection affects a Federal agency marine and coastal construction, or other heavy industry, depending on the area. The U.S. Coast Guard does not qualify as a small business or small entity.

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 MMPA requires that we determine what impacts proposed activities would have on marine mammals. The MMPA requires we make a determination of negligible impact to the species or stock prior to issuance of regulations. In addition, we must determine the activity will not have an unmitigable adverse impact on the availability of these species for subsistence uses by Alaska Natives.

If we do not collect the information described in this supporting statement, we would not have critical information needed to make the required determinations. As a result, we could not authorize incidental taking under provisions of the MMPA. In addition, conducting information collection less frequently would limit the Service's ability to monitor potential adverse impacts to federal trust species.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- * requiring respondents to report information to the agency more often than quarterly;
- * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- * requiring respondents to submit more than an original and two copies 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;
- * 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;
- * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- * that includes 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; or
- * requiring respondents to submit proprietary trade secrets, 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.

Visual sightings and interactions with marine mammals are not always predictable. If the encounter is persistent or unusual, the respondent must contact us to report the encounter and to request our expertise in assistance. At times, we also request that the respondent verbally report an encounter with a marine mammal at the time of occurrence and follow up with a written report. We are not aware of any other circumstances that would cause us to collect information in a manner that is inconsistent with OMB guidelines.

8. If applicable, provide a copy and identify the date and page number of publication 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 in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons 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 (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On November 7, 2024, we proposed regulations (RIN 1018-BI09; 89 FR 88216) to clarify, revise, and implement the types of incidental take in 50 CFR subpart J that may occur and authorize the nonlethal, incidental, unintentional take by harassment of small numbers of polar bears from the Southern Beaufort Sea stock during year-round oil and gas industry activities in the Beaufort Sea (Alaska and the Outer Continental Shelf) and adjacent northern coast of Alaska. The proposed rule solicited public comment for a period of 60 days on the new and revised information collection requirements, as well as our intention to renew this information collection, described in this supporting statement. The comment period ended January 6, 2024. We received no comments in response to the proposed rule.

As part of this rulemaking, we are also revising OMB Control Number 1018-0070 (final rule ICR Ref. No.: 202503-1018-002) as described in the Terms of Clearance above to request OMB approval to move all information collections in subpart L to a new collection, 1018-0203.

This final rule solicits public comment for a period of 30 days on the revised ICs and burden

associated with proposed revisions described in question 2 of this supporting statement. We provided a copy of the published **final** rule as a supplemental document in ROCIS.

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

We do not make any payments or gifts to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

We do not provide any assurance of confidentiality. Information may be disclosed in accordance with applicable law including the Freedom of Information Act (FOIA). The information collected is a matter of public record; however, companies may submit confidential geological and geophysical maps with requests to conduct geophysical seismic programs. Section 522(b)(9) of the Freedom of Information Act (5 U.S.C. 552, as amended) allows us to withhold “geological and geophysical information and data, including maps, concerning wells.” Therefore, we will not release this information in response to a Freedom of Information Act request.

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

We do not ask questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- * **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- * **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- * **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here.**

We estimate the burden associated with the ITR in 50 CFR subpart L to be **22 annual responses** totaling **325 annual burden hours**. We estimate the total dollar value of the annual burden hours will be **\$18,618** (rounded). We included a burden calculations spreadsheet in ROCIS titled “RIN 1018-BI09 Attachment A – Burden Calculations” to provide more detail regarding these burden estimates. This spreadsheet contains separate tabs for the burden in

subpart J (which will remain in OMB Control Number 1018-0070 – **final rule ICR 202503-1018-002**), as well as a tab for the expired subpart K which is discontinued, and for subpart L which is reported in this new ICR.

To calculate the cost of the total annual burden hours, we used Table 1 from the Bureau of Labor Statistics (BLS) [News Release](#) USDL-24-2561, December 17, 2024, Employer Costs for Employee Compensation—September 2024, which lists the hourly rate for government workers as \$62.92, including benefits.

NOTE: We used a placeholder of 1 response for ICs where we have regulatory requirements but we do not expect to have respondents on an annual basis.

13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- * The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- * If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- * Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

There is no nonhour cost burden associated with the information collections contained in 50 CFR subpart L beyond what is required for normal business operations.

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.

We estimate the total annual cost to the Federal Government to administer this information collection is **\$117,406** (\$87,406 rounded for salary/benefits and \$30,000 for printing costs).

To determine average annual salary costs, we used the Office of Personnel Management

Salary Table [2025-AK-H](#) to determine the hourly rates for staff involved in reviewing and processing the information collected as shown below. In accordance with BLS [News Release USDL-24-2561](#), we multiplied the annual salaries by 1.61 to account for benefits.

Position/Grade	Hourly Rate	Hourly Rate (Incl. Benefits)	Hours Spent On Collection	Total Estimated Salary Costs
Clerical, GS-07/05	\$ 30.68	\$ 49.39	157	\$ 7,754.23
Biologist, GS-12/05	54.42	87.62	418	36,625.16
Biologist, GS-12/05	54.42	87.62	418	36,625.16
Management, GS-14/05	76.46	123.10	52	6,401.20
			Total:	\$ 87,405.75

*All figures rounded

Printing - \$30,000

- \$27,000 Average annual printing and publication costs for proposed and final rules (two each over 3-year period)
- 3,000 Printing costs for issuance of LOAs (one per year)

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

This is a request for a new control number for the transfer of the burden (22 annual responses, 325 annual burden hours, and \$0 annual cost burden) for the ICs in 50 CFR subpart L previously approved under OMB Control No. 1018-0070.

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.

We do not publish the information in the form in which it is received. We do analyze the information annually to determine impacts resulting from incidental take authorizations.

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.

These are regulatory requirements; however, we will display the OMB control number and expiration date on appropriate materials.

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

There are no exceptions to the certification statement.