Department of Transportation
Maritime Administration
Information Collection Request (ICR)
2133-0027
Capital Construction Fund (CCF) and Exhibits

SUPPORTING STATEMENT

INTRODUCTION:

This submission is to request a three-year approval from the Office of Management and Budget (OMB) for the information collection entitled OMB 2133-0027 (Capital Construction Fund (CCF) and Exhibits), which expires on June 30, 2026. Since the last approval of this collection, there was a reduction in the total respondents, responses, and burden hours for this collection. There are no other program changes or adjustments reported so this renewal is being submitted as an *extension of a currently approved collection*.

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

The Capital Construction Fund (CCF) is a tax deferred ship construction fund authorized by 46 United States Code (USC) 53501, et seq. (the Act). The program was created to assist owners and operators of U.S.-flag vessels in accumulating the large amount of capital necessary for the modernization and expansion of the U.S. merchant marine. The program encourages construction, reconstruction, or acquisition of vessels through the deferment of Federal income taxes on certain deposits of money, or other property placed into a CCF.

CCF vessels must be built in the United States (U.S.) and documented under Federal laws for operation in foreign or domestic commerce. Participants must meet U.S. citizenship requirements. Each CCF applicant must provide to the Maritime Administration (MARAD) such facts, documents, and materials as required by the instructions in 46 Code of Federal Regulation (CFR) Part 390, Capital Construction Fund. No specific form is required, only a format specified in the regulations. These applications will be examined by MARAD officials to determine the applicant's eligibility for participation in the CCF and retained as part of the official file.

Operators of U.S.-flag vessels experience a competitive disadvantage in the construction and replacement of their vessels, relative to foreign-flag operators whose vessels are registered in countries that do not tax shipping income.

This information collection supports the Secretary of Transportation's goal to increase the number of U.S. build vessels to aid in the modernization and expansion of the U.S. merchant marine. The CCF program offers participants an opportunity to make tax-deferred investments in waterborne elements of our transportation system. The CCF program provides participants with a mean to replace existing vessels with modernized maritime infrastructure that invests in our transportation system.

2. Purpose and Use of the Information Collection

U.S. citizens desiring to participate in the CCF program must file an application in accordance with the guidelines prescribed in 46 CFR Part 390 Appendix I. MARAD personnel will use the collected information to determine an applicant's qualification to enter a CCF agreement. The specific information necessary to determine a citizen's eligibility is not generally available to MARAD from other sources.

The annual requirement for each citizen who has entered a CCF to submit Exhibits A-D, provides MARAD with relevant financial information about how fundholders are complying with the terms of their agreement, and their activities within the CCF program. The citizenship affidavit is required annually from each fundholder. The citizenship affidavit is initially required prior to the approval of a CCF application and must be submitted annually thereafter by the fundholder's CCF Agreement. This affidavit verifies that the fundholder continues to meet the citizenship requirement. Samples of Exhibits A-D and citizenship affidavits are contained in the regulations for this collection.

3. Automation or Use of information technology

MARAD provides a total electronic option for all companies submitting applications or documents required on an annual basis for this collection.

4. Efforts to identify duplication

No other MARAD program offers the same type of benefits, ta x deferrals, or requires precisely the same type of information as the CCF program. There is no similar data available from other sources that can be used or modified for use by MARAD in the CCF program.

5. Impacts Small Businesses or Other Small Entities

The information requested herein has no impact on small businesses, as the applicants generally exceed the criteria for Small Business Administration. Timely information is requested when an applicant desires to obtain the benefits of the CCF program. There is no requirement for any applicant to submit any information if they do not desire the CCF benefits. An applicant for a CCF must demonstrate to MARAD that it has the financial capabilities to accomplish its proposed program, by submitting audited balance sheets and income statements for each of its past three fiscal years. Unaudited statements are accepted from smaller companies that do not have audited statements.

6. Impact of Not Conducting or Less frequent Collection of Information

The CCF application is submitted only when initially seeking a CCF Agreement. The application is essential for determining qualifications for program benefits. MARAD personnel would be unable to properly evaluate the application and administer the CCF program without this information collection.

7. Special Circumstances Relating to the Guidelines 5 CFR 1320.5

There are no special circumstances that require the collection of information to be conducted in any other manner as 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 15688, Vol 91, No. 60) on March 30, 2026, indicating comments should be submitted on or before May 29, 2026. No comments were received. A 30-day notice will now be published in the Federal Register to solicit public comments.

MARAD employees communicate routinely with respondents regarding the basis and reporting consistency of the information submitted for the CCF program. Since CCF data is not available from any other source, no consultations outside the agency other than with the companies with CCF agreements are required. Respondents are encouraged to comment fully on the scope and accuracy of the reports.

9. Explanation of Any Payment or Gift to Respondents

No payments or gifts are provided to respondents.

10. Assurance of Confidentiality and Protection of Privacy

Article XI of the CCF application instructions states that if a party desires certain information in the application be withheld from public disclosure, they must submit a written request concurrently with the application. Any application and supporting information obtained during the administration of the CCF program is subject to disclosure under the Freedom of Information Act (FOIA), unless the respondent has requested exemption from public disclosure and MARAD has determined that an exemption is applicable. The respondent is notified of MARAD's determination.

11. Justification for Sensitive Questions

There are no questions of a sensitive nature.

12. Estimate of Annualized Burden Hours and Cost

a. Estimated Annualized Burden Hours

CCF respondents are stated as fundholders and large corporations/consolidated groups. CFF respondents with funds greater than $2 million dollars are identified as a large corporation for this analysis. CCF respondents that are large companies owning smaller companies to make one big company are stated as consolidated groups. All other CCF respondents are stated as a fundholder. For respondent analysis, large corporations and consolidated groups are stated as a separate respondent group when determining the estimated annualized burden hours.

During three-year period after the last information collection renewal, the total number of CCF respondents has reduced the total number of CCF fundholders. MARAD attributes this reduction to CCF participant mergers or acquisition by existing fundholders. Some fundholders exit the CCF due to adverse economic conditions. The reduction in respondents and responses to this collection has lowered the annualized public burden hours for this collection.

MARAD estimates 10 new applicants will qualify for CCF participation annually. Therefore, the total number of respondents for this collection will be estimated at 160. Of these respondents, 79% or a 127 are fundholders, while the remaining 21% or 33 represent large corporations or consolidated groups. MARAD estimates a respondent will spend 12.5 hours preparing Exhibits A-D. This estimate is based on feedback provided from CCF program applicants. Additionally, these 160 respondents (i.e., 127 fundholders and 33 large corporations or consolidated groups) will spend one hour preparing the citizenship affidavits. The citizenship affidavit and exhibits A-D are a requirement for both a new CCF applicant and annually for CCF participants (i.e., fundholders, large corporations, and consolidated groups).

Therefore, the total 160 respondents who respond once to this collection annually for a total 160 responses, will take a combined total 13.5 hours each to complete their responses for the required CCF reporting, for a total 2,160 burden hours. These calculations are illustrated in the table below:

Type of Respondent	Form Name/ Type of Action	Total Respondents		Total Responses per Respondent		Total Responses		Average Time Taken to Respond (Hour)		Total Burden Hours
Fundholders	Exhibits A-D	127	*	1	=	127	*	12.5	=	1587.5
Large Corporations/ Consolidated Groups		33				33				412.5
TOTAL		**160**		**1**		**160**		**12.5**		**2000**
Fundholders	Citizenship Affidavit	127	*	1	=	127	*	1	=	127
Large Corporations/ Consolidated Groups		33				33				33
TOTAL		**160**		**1**		**160**		**1**		**160**
COMBINED TOTAL		**160**	*	**1**	=	**160**	*	**13.5**	=	**2,160**

b. Estimated Annualized Burden Costs

The Bureau of Labor and Statistics (BLS)[1] estimates the average hourly wage rate for six (6) professionals associated with completing all aspects of the CCF annual reporting process including collecting, organizing, and preparing records (i.e., all required application data, exhibits A-D, and affidavits for citizenship) for submission and approval by MARAD are as follows: Accountant/Auditor (13-2011) is $ 45.56, Business Operations Specialist (13-1199) is $ 45.18, Financial Clerk (43-3000) is $ 24.87, Financial Manager (11-3031) is $ 89.86 , Lawyer (23-1000) is $ 86.78, and Other Office and Administrative Support Worker 43-9000) is $ 22.53. When combined with the total compensation rate of 29%[2], the annualized hourly wage rate for each profession is: Accountant/Auditor (13-2011) is $ 58.77, Business Operations Specialist (13-1199) is $ 58.28, Financial Clerk (43-3000) is $ 32.08, Financial Manager (11-3031) is $ 115.92, Lawyer (23-1000) is $ 111.95, and Other Office and Administrative Support Worker 43-9000) is $ 29.06.

The annualized cost burden associated with this collection based on a total 2,160 burden hours is $ 146,181.60, which can be calculated as illustrated in the tables below:

[1] The hourly wage estimate is taken from current BLS tables: https://data.bls.gov/oes/#/area/0000000/2025.

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

Title and Code of Respondents	Hourly Median Wage	Compensation Rate of 29%	Number of Employees	Total Annualized Burden Hours	Total Annualized Cost Burden
Accountant/Auditor 13-2011	$ 45.56	$ 58.77	1	360	$ 21,157.20
Business Operations Specialists 13-1199	$ 45.18	$ 58.28	1	360	$ 20,980.80
Financial Clerk 43-3000	$ 24.87	$ 32.08	1	360	$ 11,548.80
Financial Manager 11-3031	$ 89.86	$ 115.92	1	360	$ 41,731.20
Lawyer 23-1000	$ 86.78	$ 111.95	1	360	$ 40,302.00
Other Office/Administrative Support Worker 43-9000	$ 22.53	$ 29.06	1	360	$ 10,461.60
COMBINED TOTAL				2160	$ 146,181.60

13. Estimate of Total Annual Cost Burden to Respondents and/or Recordkeepers

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

14. Estimates of Federal Government Costs

The total annual cost to the Federal Government for processing application for the CCF program is $ 16,116.12.

According to the Office of Personnel Management (OPM) wage tables it is estimated that four MARAD employees involved in the CCF program with a Washington-Baltimore-Arlington locality pay is as follows: a Senior Executive Staff (SES)[3] is $ 100.43 , a GS 15 (step 5) [4] $ 91.93, a GS-14 (Step 5) is $ 78.15, and a GS-12 (Step 5) staff is $ 55.62). When combined with the total compensation rate of 31%[5], the total hourly wage rate for each professional is as follows: Senior Executive Staff (SES)[6] is $ 131.56 , a GS 15 (step 5) [7] $ 120.43, a GS-14 (Step 5) is $ 102.38, and a GS-12 (Step 5) staff is $ 72.86. These employees will spend between 20 to 75 percent of their time (i.e. between 9 and 30 minutes) collecting and assimilating information submitted for a total 160 CCF applications, including the annual Exhibits A-D and citizenship affidavits. Therefore, the total combined Federal costs associated with this program are $ 16,116.12, which can be calculated as shown in the tables below:

---

[3] The average annual wage of an SES level III employee is taken from the OPM wage table: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2026/EX.pdf

[4] The hourly Federal Government wage is taken from OPM 2026 wage tables: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/26Tables/html/DCB_h.aspx

[5] Per BLS Employee Compensation Memo, the total compensation rate for the private sector is 29%: https://www.bls.gov/news.release/pdf/ecec.pdf

[6] The average annual wage of an SES level III employee is taken from the OPM wage table: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2026/EX.pdf

[7] The hourly Federal Government wage is taken from OPM 2026 wage tables: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/26Tables/html/DCB_h.aspx

FTE Grade and Step & Program Related Task	Hourly Wage	Average Hourly Wage Rate with 31% Compensation	Total Employees	Total Time for Per application (Avg. Hours)	Total Applications	Total Federal Government Wages
SES (Level III): Task Office AA	$ 100.43	$ 131.56	1	0.15	160	$ 3,157.44
GS 15 (Step 5): Task Program Director	$ 91.93	$ 120.43	1	0.2		$ 3,853.76
GS 14 (Step 5): Task Lead Program Specialist	$ 78.15	$ 102.38	1	0.2		$ 3,276.16
GS 12 (Step 5): Task Program Specialist	$ 55.62	$ 72.86	1	0.5		$ 5,828.80
Total Combined Federal Wages						**$ 16,116.16**

15. Explain of Program Changes or Adjustments

Since the last renewal the total respondents and burden hours were reduced from 243 and 3,281 hours respectively, to 160 and 2,160 hours currently due to less respondents to this collection.

16. Publication of Data Collection Results

There are no plans to publish the results of the information collection for statistical purposes or any other use. A summary of Exhibits A-D of each fundholder’s annual financial report is provided to the Internal Revenue Service on an annual basis, as required by 46 USC 53517.

17. Display of OMB Expiration Date

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

18. Exception to the certification statement

There are no exceptions to the certificate statement.