



**The
Ornithological
Council**

26 May 2026

U.S. Geological Survey
Information Collections Clearance Officer
12201 Sunrise Valley Drive, MS 159
Reston, VA 20192

Submitted via regulations.gov

Re: Docket No. USGS–2025–0006

The Ornithological Council appreciates the opportunity to offer comments on the bird banding permit application form used by the U.S. Geological Survey's Bird Banding Laboratory (BBL).

The Ornithological Council is a consortium of scientific societies of ornithologists. The research conducted by their members spans the globe and their cumulative expertise comprises the knowledge that is fundamental and essential to science-based bird conservation and management. The members of these scientific societies may be researchers working for academic institutions, museums, agencies or non-profit organizations. Their work runs the gamut from field research, to teaching, to curating museum collections. Collectively, the ornithological research they conduct and facilitate enables ornithological conservation around the globe.

Federal permit applications, policies, and regulations are a priority of the Ornithological Council, as such permits are often a prerequisite for the scientific research undertaken by ornithologists. Therefore, we appreciate the USGS's attention to improving efficiency and reducing regulatory burden through this Information Collection.

We have organized our comments according to the questions posed by the U.S. Geological Survey in the Federal Register Notice.

(1) Whether or not the collection of information is necessary for the proper performance of the functions of the agency, including whether or not the information will have practical utility.

Association of Field Ornithologists

Birds Caribbean

CIPAMEX: Sociedad para el Estudio y
Conservación de las Aves en México

Neotropical Ornithological Society

North American Crane Working Group

Pacific Seabird Group

Raptor Research Foundation

Waterbird Society

Wilson Ornithological Society

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BIRDNET.org

As noted above, banding permits are essential for much of the work that ornithologists do. We support the BBL and the banding program, and we value the work that it does. We agree that the information collected by banding permit application is necessary for the BBL's functions and we provide minor suggestions below to improve those forms, reduce the burden on applicants and banders, and improve clarity of the application requirements.

(2) The accuracy of our estimate of the burden for this collection of information, including the validity of the methodology and assumptions used.

The agency estimates the time to complete a banding application at "up to 30 minutes." That estimate is low if it is meant to include time to prepare the required additional documents that must be provided along with the application form (the banding resume and the project description). We suggest that 60 to 120 minutes is a more realistic estimate of the time required to prepare the entire application package.

(3) Ways to enhance the quality, utility, and clarity of the information to be collected.

We encourage the BBL to add mention of cloacal swabs to Box 12.

(4) How the agency might minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of response.

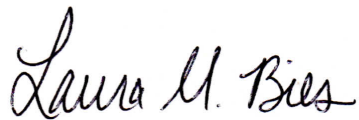
We encourage USGS to develop a comprehensive system to allow online submission of the banding application form and all supplementary materials. Such a system should also allow online tracking of application status and easy renewal of permits.

Additional comments on proposed changes outlines in the Federal Register Notice

Overall, the changes proposed on the bird banding application will make applying for a federal banding permit more straightforward for applicants, which we appreciate. We support the change that allows applicants to list the capture methods that they plan to use, rather than select from a short list. We also appreciate the mention of mouth swabs and tracheal swabs in Box 12.

Thank you for considering the views of ornithologists.

Sincerely,

A handwritten signature in black ink that reads "Laura M. Bies". The signature is written in a cursive, flowing style.

Laura M. Bies
Executive Director