SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
Alaska Region Amendment 80 Program
OMB Control No. 0648-0565

Abstract

The National Marine Fisheries Service (NMFS), Alaska Region, requests an extension of this currently approved information collection. Non-substantive editorial changes have been incorporated into the forms in this collection to improve clarity and maintain alignment with standard NMFS Alaska Region Restricted Access Management Division (RAM) documentation.

This information collection contains applications for permits and transfers used by NMFS Alaska Region to manage the Amendment 80 Program. It also contains the appeals process for an application that is denied. NMFS uses this information to establish eligibility to receive Amendment 80 quota share, community quota, and permits; transfer and assign harvest quota; replace vessels used in the Amendment 80 Program; determine Amendment 80 species initial total allowable catch assignments; determine which vessels must be tracked for catch accounting; and review ownership and control information to ensure that quota share and community quota use caps are not exceeded.

Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

Under the Magnuson-Stevens Fishery Conservation and Management Act[1] 16 U.S.C. 1801 *et seq*. (Magnuson-Stevens Act), the Secretary of Commerce is responsible for the conservation and management of marine fishery resources within the Exclusive Economic Zone (EEZ) of the United States through the National Oceanic and Atmospheric Administration (NOAA)/National Marine Fisheries Service (NMFS). NMFS Alaska Region manages the EEZ off Alaska under the Fishery Management Plan for Groundfish of the Bering Sea and Aleutian Islands Management Area (BSAI FMP) and the Fishery Management Plan for Groundfish of the Gulf of Alaska. The North Pacific Fishery Management Council (Council) prepared these fishery management plans under the authority of the Magnuson-Stevens Act. Regulations implementing the groundfish fishery management plans appear at 50 CFR parts 600[2] and 679[3].

[1] https://www.fisheries.noaa.gov/s3/dam-migration/msa-amended-2007.pdf
[2] https://www.ecfr.gov/current/title-50/chapter-VI/part-600
[3] https://www.ecfr.gov/current/title-50/chapter-VI/part-679

The Council adopted Amendment 80 (A80) to the BSAI FMP in June 2006 (72 FR 52668[4], September 14, 2007). A80 allocates several Bering Sea and Aleutian Islands (BSAI) non-pollock trawl groundfish species among trawl fishery sectors, establishes a limited access privilege program (LAPP), and facilitates the formation of harvesting cooperatives in the non-American Fisheries Act (non-AFA) trawl catcher/processor sector. The BSAI groundfish species directly affected by A80 include Atka mackerel, Aleutian Islands Pacific Ocean perch, flathead sole, Pacific cod, rock sole, and yellowfin sole. In addition, A80 modified the management of halibut and crab prohibited species catch limits.

The Amendment 80 Program (A80 Program) encourages the formation of cooperatives and cooperative fishing practices among all persons holding A80 quota share (QS) permits. Cooperatives, which receive allocations of cooperative quota (CQ), allow vessel operators to make operational choices to improve fishery returns, reduce prohibited species catch usage, and reduce fish discards. Two cooperatives have been established under this program; however, since 2018, all A80 vessels have been operating under one cooperative, the Alaska Seafood Cooperative.

The A80 Program is intended to meet the following broad goals:

- improve retention and utilization of fishery resources by the non-AFA trawl catcher/processor fleet by extending the groundfish retention standard (GRS) to non-AFA trawl catcher/processor vessels of all lengths;
- allocate fishery resources among BSAI trawl harvesters in consideration of historic and present harvest patterns and future harvest needs;
- authorize the allocation of groundfish species to harvesting cooperatives and establish a LAPP for the non-AFA trawl catcher/processors to reduce potential GRS compliance costs, encourage fishing practices with lower discard rates, and improve the opportunity for increasing the value of harvested species; and
- limit the ability of non-AFA trawl catcher/processors to expand their harvesting capacity into other fisheries not managed under a LAPP.

On January 5, 2016, NMFS published a final rule to implement cost recovery payments for the A80 Program (81 FR 150[5]). A80 cooperatives are responsible for paying the annual fee for groundfish landed under the A80 Program. The cost recovery fee is approved under OMB Control Number 0648-0711.

This information collection is necessary for NMFS to manage the A80 Program. NMFS uses this information to establish eligibility to receive A80 QS, CQ, and permits; transfer and assign harvest quota; replace vessels used in the A80 Program; determine A80 species initial total allowable catch assignments; determine which vessels must be tracked for catch accounting; and review ownership and control information to ensure that QS and CQ use caps are not exceeded.

Other information to manage the A80 Program is collected under the following Office of Management and Budget (OMB) control numbers:

[4] https://www.govinfo.gov/content/pkg/FR-2007-09-14/pdf/07-4358.pdf
[5] https://www.federalregister.gov/documents/2016/01/05/2015-33096/fisheries-of-the-exclusive-economic-zone-off-alaska-bering-sea-and-aleutian-islands-management-area

- 0648-0678: Alaska Council Cooperative Annual Reports
- 0648-0564: Groundfish Trawl Catcher/Processor Economic Data Report
- 0648-0711: Alaska Quota Cost Recovery Programs

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.

This information collection contains the following applications and appeals for the A80 Program.

	Regulation	Form?[1]	Submission Method[2]	Frequency
Application for A80 Quota Share	50 CFR 679.4(o)(1), 679.90(b)	Y	mail, delivery, or fax	One time only
Application for A80 Limited Access Permit	50 CFR 679.4(o)(3), 679.91(b)	Y	mail, delivery, or fax	Annually
Application for A80 CQ Permit	50 CFR 679.4(o)(2), 679.91(b)	Y	mail, delivery, or fax	Annually
Application to Transfer A80 QS	50 CFR 679.90(f)	Y	mail, delivery, or fax	As needed
Application for Inter-Cooperative Transfer of A80 CQ	50 CFR 679.91(g)	Y	eFISH, mail, delivery, or fax	As needed
Flatfish Exchange Application	50 CFR 679.4(p)	N	eFISH	As needed (limited to three exchanges per calendar year)
Application for A80 Vessel Replacement	50 CFR 679.4(o)(4)	Y	mail, delivery, or fax	As needed
Appeals	50 CFR 679.4(o)(5); 15 CFR 906	N	mail, delivery, or fax	As needed

[1] Forms are available as fillable pdfs on the NMFS Alaska Region website.
[2] **eFISH**: https://alaskafisheries.noaa.gov/webapps/efish/login
Mail: NMFS Alaska Region, Restricted Access Management, P.O. Box 21668, Juneau, AK 99802-1668
Delivery: 709 West 9th Street, Room 713, Juneau, AK, 99801
Fax: (907) 586-7354
Email: RAM.Alaska@noaa.gov
Appeals — Mail or delivery: National Appeals Office, 1315 East-West Highway, Silver Spring, MD 20910; **Fax**: (307) 713-2384

a. Application for Amendment 80 Quota Share (QS)

An individual or business entity uses the Application for Amendment 80 Quota Share (QS) to request an initial allocation of A80 QS alongside an A80 QS permit. Holding an A80 QS permit grants authorization to participate in an A80 fishery.

NMFS evaluates completed applications to establish applicant eligibility under § 679.90(a)(2) for receiving A80 QS. To qualify for A80 QS, the applicant must own an A80 vessel or hold an A80 License Limitation Program (LLP) license originally designated for an A80 vessel that can no longer operate in the A80 Program because of actual total loss, total constructive loss, or permanent ineligibility for a fishery endorsement pursuant to 46 U.S.C. 12108. Should the A80 vessel not satisfy these conditions, its owner must directly apply for the A80 QS derived from that vessel's catch.

NMFS must receive fully completed A80 QS applications by 1700 hours, Alaska local time (A.l.t.), on October 15 preceding the target fishing year, or have them postmarked by that date if submitted via U.S. mail. Applications that fail to meet this submission or postmark deadline will be ineligible for an A80 QS permit for the upcoming fishing year.

A80 QS permits remain valid indefinitely, meaning applicants approved by NMFS do not need to reapply in subsequent years.

Required information on this application comprises:

- Applicant identification, contact details, and taxpayer identification number or date of birth; (Collecting the date of birth is necessary to verify the applicant's U.S. citizenship, in accordance with the regulatory requirements set forth in 50 CFR 679.90(a)(2)(i)(C).)
- A80 vessel names and identification details;
- Indication of whether the applicant agrees with, disagrees with, or did not receive the NMFS A80 Official Record Summary; and
- The signature of the applicant or an authorized representative (with written authorization attached if signed by a representative).

Additional Documentation Requirements:

- **Vessel Owners:** Applicants claiming Amendment 80 QS as vessel owners may need to submit supporting documentation establishing ownership, such as a U.S. Coast Guard (USCG) Certificate of Documentation or an abstract of title for each vessel.
- **LLP License Holders:** An Amendment 80 LLP license holder can receive an initial Amendment 80 QS allocation only if the vessel originally assigned to that license is rendered unable to participate in the A80 Program due to actual total loss, constructive loss, or permanent ineligibility. Proof of this loss or ineligibility to hold a fishery endorsement must be attached.

If the LLP license holder is not the vessel owner, the applicant must also attach a copy of a written contract demonstrating that the vessel owner transferred all rights and privileges to use A80 legal landings, resulting A80 QS, or exclusive harvest privileges to the holder of the originally assigned A80 LLP license.

b. Application for A80 Limited Access Fishery Permit

An A80 Quota Share (QS) holder must complete and submit the Application for A80 Limited Access Fishery Permit each year to request authorization to participate in the A80 limited access

fishery. Once issued, this permit allows the QS holder to catch, process, and receive allocated A80 species, as well as utilize assigned halibut and crab prohibited species catch during the specified fishing year. Whenever an assigned vessel is fishing in the BSAI or State of Alaska waters open for a parallel Federal fishing season, a legible copy of the permit must be kept on board.

NMFS reviews each fully completed application to determine the QS holder's eligibility and to issue the corresponding permit. Approval of the permit requires both an eligible, approved application and the timely submission of a complete Annual Trawl Catcher/Processor Economic Data Report (EDR) (approved under OMB Control Number 0648-0564).

The EDR must cover all A80 QS permits held throughout the preceding calendar year and must be submitted by June 1 of the following year.

For participation in an upcoming fishing year, NMFS must receive the annual application by 1700 hours A.l.t. on November 1 of the preceding year (or it must be postmarked by that date if submitted via U.S. mail).

The application requires the following information:

- applicant identification, contact details, and taxpayer identification number;
- identification data for A80 vessels and A80 LLP licenses;
- permit details and ownership documentation;
- verification of timely EDR submission for each held Amendment 80 QS permit; and
- the signature of the applicant or their authorized representative (including formal authorization if submitted by a representative).

c. Application for Cooperative Quota Permit

An A80 cooperative is required to appoint an authorized representative who will annually submit the Application for CQ Permit on behalf of its members. Applications must be received by NMFS, or postmarked if sent by U.S. mail, by 5:00 p.m., A.l.t., on November 1 of the year preceding the intended fishing season.

An A80 cooperative CQ permit authorizes the cooperative to participate in the A80 Program for the specified fishing year. A legible copy of this permit must be kept on board every A80 vessel assigned to the cooperative while fishing in the BSAI or state-managed adjacent waters adhering to a Federal season.

NMFS uses the submitted application details to:

- Confirm eligibility for an A80 CQ permit.
- Assign CQ to A80 cooperatives prior to the start of the fishing year.
- Establish initial total allowable catch allocations for the A80 species limited access fishery.
- Identify vessels required to be tracked for catch accounting.

- Evaluate ownership and control data across QS holders to ensure compliance with QS and CQ usage limits.

Approval and issuance of a CQ permit by NMFS require a complete application and verification that every cooperative member has submitted a timely Economic Data Report (EDR) under OMB Control Number 0648-0564. Every member must file an EDR for each A80 QS permit held during the prior calendar year no later than June 1.

The permit application collects the following information:

- Identification and contact information for the cooperative.
- Identification and ownership documentation for each A80 QS permit holder in the cooperative.
- Identification details for member vessels and A80 LLP licenses.
- Identification of vessels that will utilize the issued CQ.
- Confirmation of complete Annual Trawl Catcher/Processor EDR submissions for all member QS permits.
- Signature and attached authorization for the cooperative's designated representative.

A copy of the cooperative membership contract or agreement must be provided with this application.

d. 1Application to Transfer A80 QS

An Amendment 80 (A80) Quota Share (QS) permit holder can transfer their permit to a new owner, assign it to a replacement vessel, or attach it to the License Limitation Program (LLP) license initially allocated to the original A80 vessel. Because A80 QS units are strictly bound to their assigned permit and cannot be severed, any transfer requires moving the entire permit.

Transferors must submit the Application to Transfer A80 QS, which accommodates three transfer mechanisms:

- **Vessel and Permit Sale:** Transferring the A80 vessel alongside its assigned QS permit to an individual or entity qualified to document and own a U.S. fishing vessel under U.S. Department of Transportation, Maritime Administration rules.
- **Transfer to Original LLP License:** Reassigning the A80 QS permit directly to the vessel's original LLP license following the actual loss, constructive total loss, or permanent operational ineligibility of the A80 vessel. This option requires clear, verifiable documentation demonstrating that the original vessel can no longer participate in the A80 Program.
- **Transfer of LLP License with QS:** Moving an A80 LLP license that holds QS endorsement to another party using established LLP transfer procedures (50 CFR 679.4(k)(7)). When an A80 QS permit functions as an endorsement on an LLP license, it cannot be transferred independently, and all A80 species QS units must be transferred together in full.

National Marine Fisheries Service (NMFS) reviews submitted applications to confirm transfer eligibility, issue updated permits and QS records, and monitor ownership and use cap compliance.

Required application components include:

- Contact details and identification for both the transferor and transferee.
- Identification of the specific A80 QS permit, target A80 LLP license, and any replacement vessel.
- Signatures of both parties or their authorized representatives (accompanied by proof of legal representation).
- The original A80 QS permit being transferred.
- Supporting documentation according to the transfer type: verifiable evidence of vessel loss/ineligibility when transferring to an LLP license, or an Abstract of Title/U.S. Coast Guard documentation demonstrating the transferee's vessel ownership when transferring to a person.

e. Application for Inter-Cooperative Transfer of A80 CQ

The Application for Inter-Cooperative Transfer of A80 CQ allows cooperatives to reallocate A80 CQ among themselves. For a calendar year, an A80 cooperative may complete transfers with another A80 cooperative, subject to specific conditions:

- CQ transfers (both outgoing and incoming) can only occur with another recognized A80 cooperative;
- Transferred A80 species CQ must be assigned to member(s) of the receiving cooperative for calculating use caps pursuant to § 679.92(a).

A single transfer application covers all planned transfers between the participating A80 cooperatives.

Applications must reach NMFS or be postmarked by 1700 hours, Alaska local time (A.l.t.), on November 1 of the year preceding the effective year of the transfer. While mail is acceptable, recent submissions have been made electronically via eFISH.

For eFISH submissions, both the transferor and transferee must sign in using their NMFS Person ID, password, and transfer key to certify the accuracy and completeness of the provided details. NMFS issues these login credentials upon approving an applicant for the A80 Program. NMFS sends confirmation to both entities once the transfer is received and approved.

The application gathers:

- Contact and identifying details for both cooperatives;
- Specification of the A80 CQ being transferred;
- Identification of receiving cooperative members attributed with the transferred CQ pounds; and

- Signatures of both parties or their authorized representatives (including attached written authorization if signed by a representative).

NMFS evaluates completed applications to confirm transfer eligibility and process the CQ transfer. Approval requires that both entities are established and recognized by NMFS as A80 cooperatives, and all participants (transferor, transferee, and designated member) comply with all A80 Program requirements.

Crucially, each member holding an A80 QS permit during the preceding calendar year must have submitted a complete and timely EDR (approved under OMB Control Number 0648-0564) by the June 1 deadline following that permit year.

f. Flatfish Exchange Application

The Flatfish Exchange Application allows an Amendment 80 (A80) cooperative or Western Alaska Community Development Quota (CDQ) group to trade a portion of its allocated harvest quota for an equivalent amount of another flatfish species among yellowfin sole, rock sole, and flathead sole. These quota exchanges help entities maximize the harvest of their allocated fisheries resources. Approval from NMFS is mandatory before any exchanged quota can be fished.

To qualify for an exchange, the applicant must possess adequate harvest quota and acceptable biological catch (ABC) reserve. NMFS processes complete applications to confirm eligibility and administer the quota adjustments.

Exchanges take effect only upon publication of a notification by NMFS in the *Federal Register*, which sets forth the rationale for the adjustment. This notice serves to inform both the public and the affected entity while detailing the revised allocations and ABC reserves—either CDQ allocation and CDQ ABC reserve, or A80 CQ and A80 ABC reserve. The exchange becomes legally effective on the publication date.

Participation guidelines and requirements include:

- **Frequency Limit:** Each A80 cooperative or CDQ group is restricted to a maximum of three exchanges per calendar year.
- **Effective Period:** Applications must be submitted within the relevant calendar year and remain valid solely for the balance of that year.

The form gathers contact details and identification for the submitting CDQ group or A80 cooperative, along with the specific quantities of flatfish species to be exchanged

g. Application for A80 Vessel Replacement

Owners of Amendment 80 (A80) vessels may submit the Application for A80 Vessel Replacement for any purpose. Replacement vessels gain the same eligibility to participate in A80 fisheries as the original vessels, along with all associated responsibilities for monitoring,

enforcement, permits, recordkeeping, reporting, prohibitions, and general sideboard measures in the Gulf of Alaska and BSAI.

NMFS evaluates complete applications to confirm the eligibility of both the original and replacement vessels. Approval is granted provided that a replacement vessel is used for only one replaced vessel at a time and meets the following criteria:

- Does not exceed 295 feet in overall length.
- Was constructed (and any rebuilding was performed) in the United States.
- Holds appropriate class and load-line certifications or satisfies the U.S. Coast Guard Alternative Compliance and Safety Agreement.
- Is not prohibited under specific AFA sections (208(e)(1)–(20)), designated as an AFA replacement vessel on a listed catcher/processor permit, or permitted as an AFA catcher vessel.

Applicants must submit a separate application for each vessel being replaced, including contact details, identifying information for the vessel being replaced, and an authorized signature (with authorization documentation attached if applicable). If applying to replace a vessel deemed ineligible under 46 U.S.C. 12108, applicants must provide U.S. Coast Guard or MARAD documentation proving ineligibility to ensure the replaced vessel cannot re-enter the fishery and that a replacement vessel should be permitted to replace the ineligible vessel.

h. Appeals

If an application is denied, NMFS issues an Initial Administrative Determination (IAD) to the applicant. Applicants may appeal an adverse IAD in accordance with the administrative procedures detailed in 15 CFR 906.

For decisions originating from the NMFS Alaska Region, administrative appeals are handled by the NMFS National Appeals Office (NAO), located in Silver Spring, Maryland.

Filing instructions and additional details are accessible via the NAO web page at https://www.fisheries.noaa.gov/national/rules-and-regulations/appeals. Appeals may be transmitted using one of the following methods:

- **By Fax:** (307) 713-2384
- **By Mail or Commercial Carrier:** NMFS National Appeals Office, 1315 East-West Highway, Silver Spring, MD 20910

Appeals must be submitted within 45 days of the issuance date of the IAD, unless governing regulations explicitly define a different timeline for the specific initial administrative determination.

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.

The eFISH platform provides secure access to NMFS participants via a User ID and password. Guidance for accessing and navigating the system can be found directly on the NMFS Alaska Region website at https://alaskafisheries.noaa.gov/node/30749.

Program application forms are downloadable as fillable PDFs from the NMFS Alaska Region website at https://www.fisheries.noaa.gov/permit/alaska-amendment-80-applications-and-forms. Except for the Flatfish Exchange Application—which mandates electronic data entry and submission through eFISH—all forms can be printed and submitted via fax or regular mail.

To expand online capabilities, NMFS Alaska Region is developing a modern database infrastructure to replace its legacy data retrieval and entry system.

Please note that administrative appeals are exempt from electronic submission. To maintain an official record for legal proceedings, the National Appeals Office requires physical delivery, mail, or fax transmission for all appeal documentation.

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 Question 2

No duplication exists with other information collections. To avoid duplicate information collection requirements, staff in the Alaska Region who are familiar with regional reporting protocols conduct thorough reviews and collaborate when designing requirements for new initiatives. Furthermore, NMFS personnel work closely with representatives from the International Pacific Halibut Commission and the Alaska Department of Fish and Game to minimize redundancies across shared management duties and intricate fisheries. Proposed and updated collection standards tied to rulemaking undergo further evaluation by senior leadership at the Alaska Region, NMFS headquarters, and Commerce Department legal counsel, ensuring minimal overlap for participants in Alaska's Federal fisheries.

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

NMFS limits this information collection strictly to the data required for managing the A80 Program in order to reduce respondent burden. Under the Regulatory Flexibility Act, the submitting A80 cooperative does not qualify as a small entity or small business; however, CDQ groups are classified as small entities due to their status as non-profit corporations.

To ease the administrative requirement on participants, applications are accessible online as fillable PDFs, and electronic submission options are offered whenever feasible. Additionally,

participants seeking guidance or information regarding any aspect of this collection can reach the NMFS Restricted Access Management Program through a toll-free phone number.

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.

Without this information collection, the National Marine Fisheries Service (NMFS) would lack the critical, verified data necessary to effectively manage the Amendment 80 (A80) Program, ensure regulatory compliance, and fulfill statutory mandates under the Magnuson-Stevens Fishery Conservation and Management Act and other applicable federal laws.

This collection formally establishes and maintains the regulatory and administrative framework that permits non-AFA trawl catcher/processors to form harvesting cooperatives, thereby directly facilitating substantial bycatch reduction, improved target species utilization, and operational stability across the fleet. Without the comprehensive permitting scheme, transfer application tracking, quota allocation monitoring, and annual reporting structures detailed throughout this supporting statement, the integrity and functionality of the A80 Program would be severely jeopardized. A lack of timely and adequate information would diminish the objectivity of the fishery management decision-making process, exposing it to political influence and inequitable resource distribution. Ultimately, failing to collect this information would undermine the credibility of the federal fishery management process, increase administrative and legal burdens, and result in an unnecessarily costly, inefficient, and ineffective management system.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with OMB guidelines.

This collection will be conducted in a manner consistent with OMB guidelines.

8. If applicable, provide a copy and identify the date and page number of publications 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 describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

A Federal Register Notice published on April 10, 2026 (91 FR 18436), that solicited public comments. In addition to the Federal Register notice, NMFS contacted stakeholders 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, and on the data elements to be recorded, disclosed, or reported. One letter with multiple comments was received from the A80 cooperative that submits information under this collection. The comments and NMFS’s response are provided below.

Comment 1: The Alaska Seafood Cooperative (ASC) is comprised of five member companies that operate 14 trawl catcher-processor vessels. Since 2018, all vessels eligible to participate in the Amendment 80 Program have been members of the ASC. ASC believes the proposed information collection has practical utility and is necessary for the effective administration of the Amendment 80 Program. We find the agency's estimates of the associated time and cost burdens to be reasonable and accurate. However, as noted above, because all eligible Amendment 80 vessels currently participate within a single cooperative, there would be no anticipated need for applications related to the Amendment 80 Limited Access Fishery or inter-cooperative transfers of Amendment 80 cooperative quota.

Response: Based on this comment, the table in Question #12 continues to show that no applications for the A80 limited access fishery or inter-cooperative transfer of A80 cooperative quota are expected during the 3-year renewal period of this collection.

Comment 2: Allowing applicants to submit forms electronically through eFish or another secure document-sharing platform, such as Kiteworks, could further reduce administrative burden and improve efficiency for both participants and agency staff.

Response: Currently, the Application for Inter-cooperative Transfer of A80 Cooperative Quota and the Flatfish Exchange Application may be submitted electronically through eFISH. NMFS Alaska Region is working towards submission of the other applications electronically. The region is currently developing an integrated system that will include permitting, in-season management, and cost recovery tracking. Currently, there are no public-facing pieces of the new system. We will be developing public-facing portions of the new integrated fisheries application; however, those are not yet available. To the degree that any of our internal Amendment 80 functions have been transitioned to the new system, those are working in tandem with the existing public-facing eFISH system. Once completed, permit and transfer applications will be able to be submitted and processed electronically.

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

No payment or gift will be made for responses.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a system of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

All information collections by NMFS, Alaska Region, are protected under confidentiality provisions of section 402(b) of the Magnuson-Stevens Act as amended in 2006 (16 U.S.C. 1801, *et seq*.) and under NOAA Administrative Order 216-100[6], which sets forth procedures to protect confidentiality of fishery statistics.

The System of Records Notice that covers this information collection is COMMERCE/NOAA-19, Permits and Registrations for United States Federally Regulated Fisheries[7]. The Privacy Impact Assessment that covers this information collection is NOAA NMFS Alaska Region Local Area Network (NOAA4700)[8].

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

This collection of information does not include questions of a sensitive nature.

[6] https://www.noaa.gov/organization/administration/nao-216-100-protection-of-confidential-fisheries-statistics
[7] https://www.commerce.gov/node/4991
[8] https://www.commerce.gov/sites/default/files/2025-03/NOAA4700%20PIA%20FY25%20SAOP_Approved.pdf

12. Provide estimates of the hour burden of the collection of information.

The hourly wage rates are based on U. S. Bureau of Labor Statistics (BLS) wage rates and rates reported by industry. The rates have been updated to use the most current BLS rates available (May 2025) and to improve consistency in the rates used for the same respondent types in NMFS Alaska Region information collections. The rate $25.67 is the BLS mean hourly wage for Occupation Code 45-0000 (Farming, Fishing, and Forestry Occupations; https://www.bls.gov/oes/current/oes_ak.htm#:~:text=1.5%25-,45%2D0000,5.7%25,-45%2D1011) for Alaska. The rate $45 is industry reported. Burden hour and wage rate estimates are updated when new rates are available and when public comment supports doing so.

Information Collection	Type of Respondent (e.g., Occupational Title)	# of Respondents /year (a)	Annual # of Responses / Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Burden Hrs / Response (d)	Total Annual Burden Hrs (e) = (c) x (d)	Hourly Wage Rate (for Type of Respondent) (f)	Total Annual Wage Burden Costs (g) = (e) x (f)
Application for Amendment 80 Cooperative Quota (CQ) Permit	Cooperative representative	1	1	1	2 hrs.	2	45	90
Application for Amendment 80 Limited Access Fishery Permit	QS holder	0	0	0[2]	2 hrs.	0	25.67	0
Application to Transfer Amendment 80 Quota Share (QS)	QS holder	2	1	1[3]	2 hrs.	2	25.67	51
Application for Inter-Cooperative Transfer of Amendment 80 Cooperative Quota (CQ)	A80 cooperative representative	0	0	0[4]	2 hrs.	0	45	0
Appeals	Vessel owner, QS holder, cooperative representative, or CDQ group representative	1	1	1[7]	4 hrs.	4	44.68[8]	177
Application for Amendment 80 Quota Share (QS)	Vessel owner	1	1	1[1]	2 hrs.	2	25.67	51
Application for Amendment 80 Vessel Replacement	Vessel owner	1	1	1	2 hrs.	2	25.67	51
Flatfish Exchange Application	CDQ group representative; A80 cooperative	7[5]	3	21	5 min	2	54.18[6]	108

	representative							
Totals				**26**		**14 hours**		**$528**

[1] No applications for A80 quota share have been submitted in the last three years. For purposes of this analysis, one response is used.

[2] No A80 limited access fishery permits have been issued since 2010 and none are expected during the 3-year period of this renewal.

[3] This application is completed by two respondents, the transferor and the transferee. NMFS estimates one application will be submitted annually, resulting in a total of two respondents.

[4] All A80 vessels operate under one A80 cooperative. As no new cooperatives are expected during the 3-year renewal period, no inter-cooperative transfer applications are expected.

[5] The respondents for the Flatfish Exchange Application are the one A80 cooperative and the six CDQ groups.

[6] The rate $54.18 is the average of $45 (industry reported A80 cooperative) and $63.36—the rate used for CDQ groups in other NMFS Alaska Region information collections (mean hourly wage for Occupation Sciences Code 11-9121 Alaska, Natural Managers; https://www.bls.gov/oes/current/oes_ak.htm#11-0000:~:text=11%2D9121,1.9%25). $45 + $63.36 = $108.36 / 2 = $54.18

[7] No appeals have been filed. For purposes of this analysis, 1 response is used.

[8] The hourly wage rate of $40.19 is the average of $25.67, $45, and $63.36. $25.67+ $45 + $63.36 = $134.03/ 3 = $44.68

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

Operating costs account for the typical inclusive general office services packages that include expenses for email, fax, copying, mailing, printing, and internet.

The number of unique respondents is based on the number of separate participants who are expected to submit information during the 3-year renewal period for this information collection review (ICR). Unique respondents rather than a sum is used because the program participants may submit more than one type of information collection in this ICR.

Information Collection	# of Respondents/year (a)	Annual # of Responses / Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Cost Burden / Respondent (h)	Total Annual Cost Burden (i) = (c) x (h)
Application for Amendment 80 Cooperative Quota (CQ) Permit	1	1	1	Operating costs - $5	5
Application for Amendment 80 Limited Access Fishery Permit	0	0	0	Operating costs - $5	0
Application to Transfer Amendment 80 Quota Share (QS)	2	1	1	Operating costs - $5	5
Application for Inter-Cooperative Transfer of Amendment 80 Cooperative Quota (CQ)	0	0	0	Operating costs - $5	0
Appeals	1	1	1	Operating costs - $5 Attorney* - $500	505
Application for Amendment 80 Quota Share (QS)	1	1	1	Operating costs - $5	5
Application for Amendment 80 Vessel Replacement	1	1	1	Operating costs - $5	5
Flatfish Exchange Application	7	3	21	Operating costs - $5	105
TOTALS	**11 unique respondents**		**26**		**$630**

* Attorney cost is included to reflect the assumption that most people would hire an attorney to prepare an appeal ($125/hour x 4 hours).

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.

A cost recovery program is in effect for the A80 Program (81 FR 150; January 5, 2016). Under this cost recovery program, NMFS is authorized to collect direct program costs from the permit holders. Therefore, the information collection requirements of the A80 Program do not impose a cost on the Federal Government. Direct program costs are the costs NMFS incurs to manage, collect data from, and enforce the A80 Program.

The direct program costs for the A80 Program in fiscal year 2025 were $ 1,620,439.

The following are examples of the types of tasks that were included under the 2022 A80 direct program costs:

- Patrols, investigations, outreach, education, and compliance assistance
- In season operations, observer sampling station inspections, and data quality control
- Economic Data Reports
- In season management of sideboards and non-sideboards
- Reallocation of incidental catch allowance to directed fisheries
- At-sea scale and video equipment inspections
- Operation of the cost recovery program
- Application development and maintenance
- Maintenance of eLandings and the catch accounting system

15. Explain the reasons for any program changes or adjustments reported in ROCIS.

There have been no changes to the information collection since the last OMB approval.

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.

This information collection is designed to yield data that meet all applicable information quality guidelines. Prior to dissemination, the information will be subjected to quality control measures, and a pre-dissemination review pursuant to Section 515 of Public Law 106-554 (the Information Quality Act), which requires NMFS to ensure the quality, objectivity, utility, and integrity of information it publicly disseminates. Public dissemination of data collected by this information collection is governed by NOAA's information quality guidelines[9], which was updated on July 17, 2024.

[9] https://www.noaa.gov/organization/information-technology/policy-oversight/information-quality/information-quality-guidelines

It is anticipated that some of the information collected will be disseminated to the public or used to support publicly disseminated information. NMFS and the National Appeals Office will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. See response to Question 10 of this supporting statement for more information on confidentiality and privacy.

NMFS posts lists of the A80 cooperatives, A80 QS holders, and A80 limited access permit holders for the current and previous years on the NMFS Alaska Region website at https://www.fisheries.noaa.gov/alaska/commercial-fishing/permits-and-licenses-issued-alaska. The list of A80 cooperatives provides the name and address of the cooperative and the A80 permit number, holder, LLP license number, and vessel name of the cooperative members.

The list of A80 QS holders provides the following information for each permit holder: permit number, permit type, name of owner, NMFS ID, address, and QS units of each species held. The list of A80 limited access permit holders provides each permit holder's name, LLP number, and vessel name.

Final administrative appeal decisions with redactions are posted on the NMFS National Appeals Office website at https://www.fisheries.noaa.gov/national/rules-and-regulations/appeals. Personally identifiable information and confidential business information submitted in an administrative appeal are not released to the public.

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.

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

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

The agency certifies compliance with 5 CFR 1320.9 and the related provisions of 5 CFR 1320.8(b)(3).