

## SUPPORTING STATEMENT

### A. JUSTIFICATION

1. Data collected on SF 17 is used for determining and assessing for ship construction; ship repair and services rendered to Maritime and Navy ships. The responsibilities for data collection relative to shipbuilding capabilities was initially assigned by the Merchant Marine Act of 1936 (amended 1970). Letter of Agreement dated 9 November 1955, between the Department of Defense and Department of Commerce established the Office of the Coordinator of Ship Repair and Conversion for the Department of Defense and the Department of Commerce. The responsibilities of the Office of the Coordinator were vested in the Naval Sea Systems Command (Formerly the Bureau of Ships). One of the functions of the Office of the Coordinator is to maintain adequate records covering available facilities and capacities of the shipbuilding and ship repair yards.
2. The Naval Sea Systems Command (NAVSEA 04Z) and the Maritime Administration will be the organizations using the data provided on Standard Form 17. NAVSEA 04Z is responsible for conducting Master Ship Repair Agreement (MSRA)/Agreement for Boat Repair (ABR) and Pre-award surveys. The data is used to determine the eligibility of a private ship repair company to do Navy repair work or its capability to perform a specific ship repair contract. The Merchant Marine Act of 1936, as amended, gives Maritime Administration the responsibility for surveying and keeping records on private shipyards.
3. The applicant can only provide the information required. Our efforts have not discovered a method that would reduce the burden. The form is available online, fillable, and can be submitted electronically, although most choose not to submit in that mode.
4. A survey of other existing forms was conducted. The study concluded that no single form in use would duplicate this information. The data required is not available from any source other than the respondents.
5. There is not a significant economic effect on a substantial number of small entities.
6. The Merchant Marine Act of 1936, as amended, requires an annual survey be conducted. No other information source provides a comprehensive listing of private sector ship repair firms' physical capabilities and limitations including launching ways, drydocks, piers, shops, cranes, work-force, etc., among other items.

7. There are no special circumstances for this collection. Collection is Consistent with the guidelines in 5 CFR 1320.5(d)(2).
8. A copy of the Notice published in the Federal Register (Vol. 72, No. 32 page 7624, dated February 16, 2007) is attached. No public comments were received. Supervisors of Shipbuilding, Conversion and Repair have direct contact with the respondents and hold periodic discussions to assess the type of information requested. They have received no complaints or recommendations for changing the collection instrument.
9. No payment or gift will be provided to respondents.
10. The data is considered "Business Sensitive" and is stored in locked file cabinets. Information no longer used is disposed of in accordance with agency policy regarding the disposition of sensitive material.
11. None of the questions are of a personal or private nature.
12. For the purpose of this review, costs calculations include only private sector civilians.
  - a. The hour burden information collection on the civilian Portion is as follows:
 

Respondents:	130
Response time:	4 hours*
Response frequency:	Annual
Burden hours:	520
  - \*The individual burden was based on an estimate industry average. Depending on the optional comments provided, the hour burden for individual respondents could vary by plus or minus ½ hour.
  - b. The estimated annual cost to each respondent is approximately \$116.00, allowing for 2 ½ hours of mid-level managerial time to compile the information (avg. wage rate/hr \$34.33), and 1 ½ hours of clerical time to prepare and forward the information requested (avg. wage rate/hr \$19.47). An estimated cost for mailing (\$.81) is also included in the total.
13. There will be no additional cost burden to respondents.

14. Estimated annualized cost to the Federal Government are as follows:

Operating Expense:	
Support Staff	\$13,774*
Overhead	\$ 2,755**
Production/Distribution	<u>\$ 3,145***</u>
Total	\$19,674

\* Includes approximately 330 professional hours x average professional rate/hr of \$41.74

\*\* Overhead is calculated using 20% of the support staff cost

\*\*\* Production/Distribution includes the estimated material cost associated with printing and mailing the product.

15. This is an extension of a previously approved collection for which approval will expire.

16. The results of this information collection will not be published.

17. Approval is not sought for avoiding display of the expiration date for OMB approval.

18. There will be no exceptions to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions", of OMB Form 83-I.

#### B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

The collecting of this information does not employ statistical methods.