

**Supporting Statement
for
Plan Approval and Records for Vital System Automation**

A. JUSTIFICATION

1. CIRCUMSTANCES WHICH MAKE COLLECTION NECESSARY

(a) The collection of information pertaining to the vital automation systems of commercial vessels is necessary to protect personnel and property on board U.S. flag commercial vessels. The vital systems in machinery and engineering spaces of Coast Guard inspected commercial vessels are automated for a variety of reasons. These reasons include convenience of operation, improvements of efficiency, reduction of personnel, and the detection and control of unsafe conditions. Most automation is implemented at the discretion of the vessel owner to reduce necessary manning and increase operating efficiency, thereby significantly reducing operating costs.

(b) The Code of Federal Regulations (CFR) currently addresses the technical criteria for the safe and reliable automation of these vessels in the following sections: 46 CFR Parts 61 and 62. These regulations also ensure that U.S. flag vessels conform to the automation regulations of the International Convention for the Safety of Life at Sea. The U.S. is signatory to this convention.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention

Coast Guard

- Maritime Safety

Marine Safety, Security and Stewardship Directorate (CG-5)

- Reduce crewmember deaths and injuries on U.S. commercial vessels
- Reduce the number of collisions, allisions, and groundings

2. BY WHOM, HOW, AND FOR WHAT PURPOSE THE INFORMATION IS TO BE USED

This information, which is collected by the Coast Guard, is used to determine compliance with safety regulations. Through the review of the plans prior to construction, the vessel owner or builder may be assured that the vessel, if built in accordance with the plans, will meet the regulatory standards.

3. INFORMATION TECHNOLOGY USED TO REDUCE THE BURDEN

The Coast Guard Marine Safety Center (MSC) accepts information/plans via electronic submittal. For information on submitting information go to— <https://homeport.uscg.mil/msc> > Contact Us > Mail Address, Telephone Contacts, and E-Commerce Info. Information may also be submitted to the CG Officer in Charge, Marine Inspection (OCMI) at the local Sector Office. Contact info for CG OCMI's can be found at—<http://www.uscg.mil/top/units/>. Electronic submission is voluntary, and we estimate that 77% of respondents submit their plans electronically.¹

4. EFFORTS TO IDENTIFY DUPLICATION

There are no other Federal agencies with similar programs, thus there is no duplication of other Federal

¹ Since the last ICR submission (ICR Reference No. 200907-1625-001), voluntary e-submissions of vital system automation plans has risen from 18% to 77% (see OMB Notice of Action Terms of Clearance for 200907-1625-001). It is unclear what caused the increase, however the MSC did update its e-submission guidance in June 2009.

information collections.

5. IMPACT ON SMALL BUSINESSES

This information collection does not have an impact on small businesses or other small entities..

6. CONSEQUENCES IF INFORMATION IS NOT COLLECTED

If this information were not collected, the Coast Guard would not be able to carry out its responsibility for the promotion of safety on commercial vessels. The information cannot be collected any less frequently, as the information is submitted when the owner seeks Coast Guard approval of automation installations or changes in vessel manning.

7. SPECIAL COLLECTION CIRCUMSTANCES

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320(d)(2).

8. PUBLIC CONSULTATION

A 60-day Notice and 30-day Notice were published in the *Federal Register* to obtain public comment on this collection. (See USCG-2012-0274: April 23, 2012; 77 FR 24211; July 2, 2012, 77 FR 39248). The USCG has not received any comments on this information collection.

9. PAYMENT OF GIFT TO RESPONDENTS

The Coast Guard does not provide payment of gifts to respondents in exchange for a benefit sought.

10. CONFIDENTIALITY FOR RESPONDENTS

There are no assurances of confidentiality provided to the respondents for this information collection.

11. JUSTIFICATION FOR QUESTIONS OF A SENSITIVE NATURE

There are no questions of sensitive language.

12. HOURLY BURDEN OF THE COLLECTION OF INFORMATION

- The estimated number of annual respondents is 85.
- The estimated number of annual responses is 532.
- The estimated annual hour burden is 39,900 hours.
- The estimated annual cost burden is \$3,311,700.

The MSC estimates that the average annual number of responses is 532 per year.² According to the MSC, the estimated time for a respondent to prepare the necessary information is approximately 75 hours. This number reflects a conservative average as some respondents simply resubmit previous year's documents and therefore would have a much lower burden hour requirement while others must spend more time preparing new plans and the requisite COI documents. Plan development is not performed to meet information collection requirements, but rather in order to develop the plans necessary to build or modify the vessel. There are no recordkeeping requirements for this information collection.

² Average number of yearly submissions for the years 2009 through 2011.

Thus the annual burden may be calculated by multiplying the hours per submission by the number of submissions:

$$532 \text{ submissions} * 75 \text{ hours/submission} = 39,900 \text{ hours}$$

The cost of this collection information is the wage rate paid for the number of hours involved in developing the plan. We assume these plans are developed by someone equivalent to level GS-13, and the wage rate used is \$83/hour.³ The annual cost is calculated as follows:

$$532 \text{ submissions} * 75 \text{ hours/submission} * \$83/\text{hour} = \$3,311,700$$

The average annual number of unique respondents is 85.⁴

13. TOTAL ANNUALIZED CAPITAL AND START UP COSTS

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

14. ANNUALIZED COST TO THE FEDERAL GOVERNMENT

With some minor exceptions, the federal burden of items covered by this supporting statement will be borne by the Coast Guard's field technical office, the Marine Safety Center. This office is responsible for the review and processing of vessel plans and information. We estimate that 900 hours of labor per year are required to implement the regulation. This includes time for the review of submissions and other indirectly related tasks such as field support, industry outreach and training related specifically to the regulation. The personnel working the 900 hours have pay equal to GS-level 13. The applicable hourly rate is \$77/hour.⁵ Thus the full cost to the Federal Government is \$69,300 (900 hours * \$77/hour = \$69,300).

15. REASONS FOR CHANGES IN BURDEN

The change in burden is an ADJUSTMENT due to a change in the estimated number of plans annually submitted to the Coast Guard. There is no proposed change to the reporting requirements of this collection. The reporting requirements, and the methodology for calculating burden, remain unchanged.

The following items listed below are changes to the collection:

- Revised ICR title from "Plan Review and Records ..." to "Plan Approval and Records ..." to align with other Coast Guard plan approval-related ICRs.
- Decrease in burden (i.e., responses/burden hours) is due to a decrease in the estimated number of vital system automation plans annually submitted to the Coast Guard.
- Updates are provided for cost burden associated with this collection of information.
- The Coast Guard has updated printable instructions for this collection of information.

16. PLANS TO PUBLISH INFORMATION

The Coast Guard does not intend to employ the use of statistics or the publication thereof for this information collection.

17. REASONS FOR NOT DISPLAYING THE EXPIRATION DATE FOR OMB APPROVAL

³ Equivalent to a GS-13 "out of gov't" rate, per COMDTINST 7310.1M.

⁴ Average number of unique respondents for the years 2009 through 2011.

⁵ Equivalent to a GS-13 "in gov't" rate, per COMDTINST 7310.1M.

The Coast Guard will display the expiration date for OMB approval of this information collection.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

The Coast Guard does not request an exception of this information collection.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection does not employ statistical methods.