

**SUPPORTING STATEMENT
SOUTHEAST REGION DEALER AND INTERVIEW FAMILY OF FORMS
OMB CONTROL NO. 0648-0013**

Introduction

This request for Office of Management and Budget (OMB) review is for revision and extension of the existing reporting requirements that are currently approved under OMB Control No. 0648-0013, Southeast Region Dealer Family of Forms.

This family of forms includes the various reporting instruments and procedures that the Southeast Fisheries Science Center (SEFSC) uses to collect landings statistics and quota monitoring data from commercial seafood dealers and interviews with fishermen for effort and fishing locations data.

Fishery statistics are collected by the National Marine Fisheries Service (NMFS) for a variety of reasons under several Federal statutes. The overall purposes for the data collection activities under this family have not changed significantly since the approval of this family of forms in 1995. It includes the same three methodologies that were included in the previous submissions. These methods include: (1) landings statistics, which include the general canvass statistics and the shrimp landings statistics; (2) mandatory dealer reporting for monitoring Federal fishery annual catch limits (ACLs); and (3) bio-profile data from the Trip Interview Program (TIP). The SEFSC employs several methods to collect the variety of data included in the information collection. The following is a brief description of these procedures.

For the general canvass statistics, the SEFSC does not collect these data directly from the seafood dealers. The state fishery agencies in each of the states in the southeast region collect landings statistics under their individual state authority. The state agencies share these data with the SEFSC as part of formal cooperative agreements between the SEFSC and the states. These cooperative arrangements serve to both reduce the overall cost of data collection and avoid the possibility of duplicate effort.

Because more detailed information is required for the shrimp landings statistics than some states provide in the general canvass data, SEFSC employees collect these data directly from seafood dealers. The data that the SEFSC personnel collect are available from the sales receipts that are maintained by the dealers as part of the routine accounting practices that are part of their normal business operations. The dealers are not asked nor required to keep any extra records, other than the sales receipts, which are used by the SEFSC personnel to record the shrimp landings statistics. Consequently, this data collection activity does not impose any reporting burden on the dealers.

To collect the data required to monitor the federal fisheries ACLs for the coastal fisheries, the SEFSC has entered formal cooperative agreements with the states which has reduced the public burden. Starting in 2012, 7 of the 8 states changed state regulations to allow dealers to use an electronic trip ticket system. Minimum burden will be required of dealers in these 7 states to transmit this data to the SEFSC every two weeks. In South Carolina dealers still use a paper trip

ticket system for state reporting obligations. Burden will be required of SC dealers to use the electronic system and transmit ACL data to the SEFSC every two weeks.

For the shrimp fishing effort and the bio-profile data from the Trip Interview Program, the information is collected directly from fishermen by personal interviews. SEFSC employees ask them for the information and record the data on work sheets for data entry.

Two fisheries are still using simple, easy to use forms developed by the SEFSC: mackerel gillnet dealers on the Florida gulf coast and south Atlantic wreckfish dealers report summarized landing statistics to the SEFSC for ACL monitoring on these forms. There are 3 other types of data included in OMB Control No.0648-0013 (rock shrimp dealer data, golden crab dealer data, and coral dealer data), but the SEFSC does not actively collect these data. As with the general canvass data, the state fishery agencies provide these data; however, a minimal number of hours is identified in the unlikely event the states cannot provide those data.

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

The data collected under the various programs included in OMB Control No.0648-0013 support a wide variety of analytical and management functions performed by the NMFS. These data are collected to support the stewardship role delegated to the NMFS under various Federal regulations.

The collection of this information is authorized by the [Fish and Wildlife Act](#) (FWA), modified by the [Reorganization Plan No. 4 of 1970](#), and enhanced by the [Magnuson-Stevens Act](#), originally passed as the Magnuson Fishery Conservation and Management Act of 1976. The U.S. Congress later passed two major sets of amendments to the law, first with the [Sustainable Fisheries Act of 1996](#) and then 10 years later with the [Magnuson-Stevens Fishery Conservation and Management Reauthorization Act of 2006](#). The Secretary of Commerce (Secretary) has undertaken a set of objectives for the conservation and management of marine fishery resources. The Magnuson-Stevens Act requires that conservation and management measures in fishery management plans (FMP) must prevent overfishing while achieving, on a continuing basis, the optimum yield from each fishery. Such management measures must be based on the best available scientific information. The use of dealer reporting of landings purchased throughout the various regiments of the fishery is an essential ingredient in the management of fishery resources. Section 303 (a)(5) of the Magnuson-Stevens Act specifically identifies the kinds of data to be collected in support of FMPs.

Specific regulations that authorize the collection of data in this family of forms: [50 CFR Part 622](#), Fisheries of the Caribbean, 622.2, Definitions and 622.5, Recordkeeping and Reporting.

The mandatory dealer reporting is necessary to provide the NMFS with timely information to monitor the fishery annual catch limits (ACLs) established in the respective fishery management

plans. The science and research director at the SEFSC selects every federally permitted dealer for mandatory ACL reporting. Without the direct reporting by the dealers, NMFS managers would not be able to determine when the ACLs are reached and the fisheries need to be closed.

The bio-profile data (also referred to as the trip interview data) are necessary to collect length composition information and age and reproductive samples which are essential to understanding the age composition and reproductive status (mature, immature etc) of the fish caught to develop length to age conversion tables (age-length keys). These size, age and reproductive data are used to estimate the reproductive potential of each species. The relationships between the amount of fish removed from a population and the recruitment potential (possible amount of offspring produced for each size class) are essential parts of the scientific stock assessments prepared by NMFS scientists.

2. Explain how, by whom, how frequently, and for what purpose the information will be used.

The information provided by the data collection activities in OMB Control No. 0648-0013 is used by several offices of NMFS, Fishery Management Council staffs, the U.S. Coast Guard (USCG) the Corps of Engineers, and state fishery agencies to develop, implement, and monitor fishery management regimes. NMFS, Fishery Management Councils, the Departments of State and Commerce, OMB, the fishing industry, congressional staff, and the public use summarizations and analyses of dealer data to answer questions about the nature of fisheries resources.

The primary use of these data, however, is to support the management of the fisheries resources under Federal jurisdiction. The landings data are used to determine the overall magnitude and trends in the fisheries. The trip interview programs provide the most important data for stock assessments that directly support NMFS' stewardship responsibilities. There are two parts to bio profile data collection activities. Port agents select fishing trips and interview the captain or crew to collect information on the fishing trip, (i.e., specific locations where the fishing occurred, the type and quantities of gear, and the amount of time that the various types of gear were fished). The second part of the bio profile data collection activity does not involve any interaction with the fishermen. For this part, port agents are granted permission from the fisherman to measure and weigh individual fish and collect hard-part and tissue samples either directly from the boats when the catch is being unloaded or from storage vats after the unloading has been completed. This size frequency and age data are used directly by stock assessment biologists to perform virtual population analyses for stock assessments. To assure that fishermen cooperate, Federal regulation require that fishermen make their fish available to authorized Federal port agents and provide the gear, area and effort information needed in conjunction with the size and weight data.

The SEFSC routinely performs four to six stock assessments per year (note, an assessment is not necessarily needed for each species every year; consequently, some assessments are performed every 3 to 5 years).

The SEFSC also conducts an annual vessel inventory that is used to provide a count of the vessels (greater than 5 net tons) that are actively fishing in the southeast region. The data for this inventory is extracted from trip ticket data for some of the states; however, for other states the inventory is prepared by observation and data recorded from dealer records. There are only a small number of situations where it is necessary for the agents to actually contact the vessel owner/operator for specific information on the type or amount of gear used by the vessel.

Another major data collection activity in OMB Control No. 0648-0013 is mandatory dealer reporting that is used to monitor the quotas that are promulgated under various Federal fishery management plans and amendments to those plans. The frequency of reporting is established in accordance with the nature of the respective fishery. For several of the fisheries, fishing effort and/or the biology of the fish require weekly submissions, but for other quotas, the frequency with which the fish are landed only requires reporting every two weeks or monthly. The following is a summary of the reporting frequencies and data collecting methods for the quota monitoring programs in OMB Control No. 0648-0013.

Coastal Fisheries Dealers Reporting:

The coastal fisheries quota monitoring system includes fisheries managed under the Gulf of Mexico Reef Fish Fishery Management plan and the fisheries managed under the South Atlantic Fishery Management plan. Data sufficient to monitor all the coastal fishery quotas are collected electronically by the states using the state run electronic trip ticket systems. Dealers with federal permits are required to transmit data to their state every two weeks. The following information is required in the electronic reporting system form:

1. Dealer information (including dealer name, dealer contact information, and dealer permit numbers);
2. Report information (including date and time information is submitted);
3. Trip specific Info (including state landed, and date landed);
4. Species specific Info (species purchased, quantity purchased, gear types used, and areas fished);
5. Negative reports (including the date and time submitted).

Mackerel Dealers Reporting (gear types other than gillnet):

Because king and Spanish mackerel are migratory and school in large numbers at specific times and areas, monitoring the landings for these species is only necessary for a limited time, (i.e., during the open season). Thus, reporting by dealers may only be required for two months or for as many as six months, depending on availability of fish and fishing effort. There are 3 forms used for these quotas. One form is used for dealers that handle the quotas for all gear types other than gillnet. Dealers are only required to submit this form monthly.

Mackerel Dealers Reporting (gillnet):

Because of the efficiency of gillnets to catch fish, the quota for this fishery can be reached very quickly. Thus, those dealers and vessels that are selected to submit these two forms must do so

weekly. Normally, the quota for this fishery is reached in a month or two and only 7 or 8 reports are required during a year.

Wreckfish Dealer Reporting:

Dealers that purchase wreckfish are required to report the total weight of these species purchased monthly.

Miscellaneous Reporting:

Reporting requirements have been implemented for rock shrimp and golden crab dealers along the Atlantic coast and coral dealers in Puerto Rico. These regulations were promulgated as a safeguard in the event that the states failed to collect the necessary landings statistics. To date, NMFS has not had to use this authority.

Summaries of the ACL monitoring data will be made available to the general public to inform them of the ongoing status of the ACL so fishermen can make the appropriate business decisions regarding future fishing activities.

NMFS/SEFSC 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 the response to Question 10 for more information on confidentiality and privacy. The 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](#).

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

Currently dealers in all states except South Carolina in the southeast region are reporting electronically using state-approved electronic trip ticket reporting systems and the data are provided to the SEFSC by the states through formal cooperative agreements. The weights from the electronically submitted trip tickets are summarized for the dealers for each of the ACL monitored species by the state run systems so dealers no longer need to tally weights from monitored species; hence, the dealers are no longer required to submit separate paper ACL monitoring reports to the science center as they were in the past. Effectively by transmitting electronic trip ticket data to the states they are submitting ACL data to the science center. The Trip Interview Program (TIP) form is available as a Web application at <http://www.sefsc.noaa.gov/interview/>.

4. Describe efforts to identify duplication.

A requirement of the Magnuson Act Operational Guidelines is for each Fishery Management

Council to evaluate existing state and federal laws governing the fisheries in question, and such findings are included in each Fishery Management Plan (FMP). Membership on each Fishery Management Council is composed of state and federal officials responsible for resource management in their respective states. These two circumstances identify other data collection activities that may be gathering the same or similar information. In addition, each FMP undergoes an extensive public comment period where potential applicants review the proposed rulemaking.

The NMFS has established cooperative statistics programs with the 8 coastal states in the southeast region of the United States (U.S). The State/Federal Cooperative Statistics Program is comprehensive both geographically within the southeast region and with respect to the data that are collected. The federal and state reporting requirements are coordinated through the Cooperative Agreement. In addition, the location and responsibilities of the port agents are coordinated to avoid any duplication of effort, and contact with fishermen at the docks. As a result of both the Fishery Management Council process and the Cooperative Statistics Agreements, the NMFS/SEFSC is confident that it is aware of all similar data collection activities and that all duplications that can be avoided are avoided.

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

Because almost all dealers and fishermen are considered small businesses, separate requirements based on the size of the business have not been developed. Only the minimum data to meet reporting objectives are required from the respondents. The dealers are not required, nor asked, to maintain any records other than the sales receipts that records the transactions between the dealer (purchaser) and the fishermen (seller) which is accomplished through the state run electronic trip ticket systems. Most of the data provided under OMB Control No. 0648-0013 are summaries compiled from existing accounting information maintained by seafood dealers and processors in the normal course of their business operations. Thus, there is no additional recordkeeping burden on dealers due to the reporting requirements covered in this PRA request.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

It is essential that these collection activities are continued. They provide the data necessary for future stock assessments and the means of monitoring the fishery ACLs that are currently promulgated to control fishing effort. Thus, if these collection activities were not available, the NMFS could not perform the stock assessments for the conservation and management of our fishery resources. Furthermore, without the mandatory dealer reporting, the SEFSC could not effectively monitor the ACLs implemented by existing fishery management plans and therefore, reduce fishing mortality. With respect to frequency, the collection of fish size frequency data must be an ongoing process. The dynamics of fishery biology, such as semi-annual spawning, seasonal migratory changes, growth and mortality rates, require a collection frequency that can detect these changes over time. In addition, weekly or daily reporting frequencies, rather than monthly or bi-monthly

submissions, must be used to monitor in-season ACL management.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

Not Applicable.

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons 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 (if any), and on the data elements to be recorded, disclosed, or reported.

A Federal Register Notice published on February 15, 2013 (78 FR 11156) solicited Public comment. No comments were received.

NMFS is part of a cooperative program to collect fishery statistics. SEFSC personnel meet with state, territorial and regional coordinators of fisheries statistics collection programs at least once each year to discuss, coordinate and improve data collections. Statistical data collection and biological sampling targets along the Atlantic Coast (Florida through North Carolina) are coordinated through the Atlantic Coastal Cooperative Statistics Program (ACCSP). Statistical data collection and biological sampling targets along the Gulf of Mexico coast is coordinated through the Gulf States Marine Fisheries Commission (GSMFC). Additionally the SEFSC is working closely with the U.S. Virgin Islands Department of Fish and Wildlife and the Puerto Rico Department of Natural and Environmental Resources to develop a long term plan to improve the quantity of samples collected and the representativeness of collection activities in the Caribbean.

NMFS directly asked and received comments from our partners summarized below on (a) whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility; (b) the accuracy of the agency's estimate of the burden (including hours and cost) of the proposed collection of information; (c) ways to enhance the quality, utility, and clarity of the information to be collected; and (d) ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology.

- (A) Collection of commercial statistics on both landings (eg dealer reports) and catch characteristics (TIP) is critical to the Council fishery management program. The Council is obligated to manage by landings-based limits and to implement accountability measures that ensure these limits are not exceeded. Further, it is expected that such limits are derived through quantitative stock assessments and best available science. Since modern assessment methods rely upon catch statistics and the size and age composition of those catches as a primary input, it is impossible to conduct such analyses without accurate statistics. These data are of clear utility, as every assessment conducted through

SEDAR has incorporated TIP and Dealer reporting data. Such data have also been used by the Council Scientific and Statistical Committee (SSC) in setting catch limits for unassessed stocks. Without this information the Council cannot comply with its mandates under the Magnuson Act.

- (b) Estimate of burden hours appears to be high, given the simple, easy to answer questions on the forms, however, since NMFS must account for the rare case when a dealer must gather and tally data from multiple sales receipts the estimate is accurate.
- (C) Timeliness is a major impediment to improving use of data now collected. Any efforts to decrease the time necessary to enter and validate catch statistics will be worthwhile. The agency is also urged to continue efforts to reduce landings reported as an unidentified species or through unidentified gear types. Within fisheries such as Snapper Grouper, where there is considerable variation in how and where operations are conducted, it would be helpful to obtain set-level information on effort, species composition and catch characteristics. In addition, TIP sampling could be improved by increased funding to support increased sampling effort to ensure representative samples can be collected across the full spatial and temporal range of the snapper grouper fishery.
- (D) Electronic reporting programs are widely considered to hold promise of reducing data lags and errors as well as the reporting burden to fishermen. Efforts should be made to develop electronic reporting methods that will eliminate the need for multiple reports and make data available more quickly to both fishermen and managers. Efforts should also continue to develop onboard monitoring devices which allow determination of set-level catch and gear characteristics, and, importantly, provide data on discard levels and discard size composition that is otherwise unobtainable.

To address these views on timeliness and accuracy NMFS will be monitoring the submission of the electronic reports and working with industry to encourage accurate and timely reporting. Procedures include working on data coding consistencies with our state partners, public outreach about electronic reporting, notifying dealers when reports were expected but not received, and quality control checks on the data received. Additionally NMFS is working with the developer of the electronic trip ticket program to ensure better data entry constraints on future software versions thus reducing problems with unidentified species, gears, and areas. NMFS feels these steps will increase reporting accuracy and timeliness and hopes that success demonstrated with dealer reporting will pave the way for electronic reporting of other data collection programs.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

No payments or gifts are provided.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.

As stated on the forms, all data collected under this family of forms are handled in accordance with [NOAA Administrative Order 216-100](#), Confidential Fisheries Statistics. Dealer reports are also considered confidential under the Trade Secrets Act.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

No questions of a sensitive nature are asked.

12. Provide an estimate in hours of the burden of the collection of information.

The total burden on the public for this information collection is estimated to be 1,542 hours, for a total of 6,229 responses. The following is a description of the estimated burden hours and labor costs of reporting for the individual reporting activities. The number of respondents and the estimated time per response for the individual data collection activities (forms) are summarized in Table 1.

General Canvass:

The reporting burden on seafood dealers for the landings (general canvass) statistics is zero. As described in the Introduction, these data are reported to the fishery agency for each state and the NMFS/SEFSC does not conduct this data collection activity. The respective state fishery agencies perform the data processing and quality control on these data and provide them to the SEFSC.

Shrimp Dealers:

The reporting burden for the dealers that handle shrimp in the Gulf of Mexico is also zero. For the dealers located in some states in the southeast region, the landings statistics are collected by NMFS/SEFSC port agents who visit the dealers and record the data. The dealers are not required to record any additional information or maintain any additional information other than the information that is available on the sales receipts that are maintained as part of the company's accounting. The port agents record the information from the sales receipts maintained by the dealers. The dealers are only required to make the sales receipts available to the port agents.

Shrimp Interviews:

The burden to the public for shrimp interviews conducted in the Gulf of Mexico is estimated to be 433 hours. Annually, approximately 2,600 interviews are conducted to collect fishing effort and area of catch information. It takes approximately 10 minutes to ask these questions (applicable questions from the Trip Interview question list). Thus, the total burden is $2,600 \times 10 \text{ minutes} / 60 \text{ minutes/schedule} = 433 \text{ hrs}$.

Trip Interview Program:

The industry reporting burden from interviews conducted within the Trip Interview Program (TIP) to collect fishing effort is similar to the burden involved with shrimp interviews. It is estimated that approximately 4,500 interviews are (will be) conducted annually to collect the gear, area and effort information for the TIP. The average time required to collect this effort information is 10 minutes. **The total industry burden of this program is estimated to be 750 hours**, i.e., $4,500 \times 10 \text{ minutes} / 60 \text{ minutes /interview} = 750$. The direct burden to the fishing industry is the time it takes to respond to the interview questions and no separate reporting or recordkeeping is required.

The TIP is a dockside interview and length-frequency sampling program primarily (roughly 99%) for commercial fisheries; however, recreationally caught fish are occasionally sampled to provide length/weight information for aging analysis. The interview takes a relatively small amount of time; however, sampling the catch takes considerably longer, generally in the range of 1 to 3 hours depending on catch size. The sampling of the catch generally occurs at the purchasing dealer's location and does not require the presence of the captain or crew or fish house personnel except that the port agent obtains a copy of the landings invoice or "trip ticket" from the dealer.

The approximate number of interview responses increases by 400 more interviews than the previous estimate of 4,100. The burden on industry has remained relatively constant although future recommendations from stock assessment reviews may cause this to change

Coastal Fisheries Dealer Reporting:

The total burden on coastal fisheries dealers is estimated to be 178 hours; a total of 5,682 responses from 308 dealers is estimated annually. In South Carolina an estimated 552 reports will be collected from the 23 dealers that have federal permits. It takes less than 10 minutes to log on the system and enter sales receipts. Thus, the total burden is $552 \times 10 \text{ minutes} / 60 \text{ minutes/schedule} = 92 \text{ hrs}$. In states other than South Carolina an estimated 5,130 reports will be collected from the 285 dealers that have federal permits. It takes less than 1 minute to conduct data transmissions. Thus, the total estimated burden is $5,130 \times 1 \text{ minutes} / 60 \text{ minutes/schedule} = 86 \text{ hrs}$.

Mackerel Reporting:

The total burden hours to monitor the king and Spanish mackerel quotas is estimated to be 118 hours. During the past several years, about 95 dealers have been selected to report each year in the Gulf of Mexico. Because the quotas are usually reached before the entire 12 month season is over, only about 7 monthly reports are actually submitted. The average time per report is less than 10 minutes because many dealers do not always purchase mackerel and when no purchases are made, only a no-purchase report is required. **The total Gulf of Mexico burden hours are estimated to be 111 hours annually** (i.e., $95 \text{ dealers} \times 7 \text{ reports/dealer} (665 \text{ reports}) \times 10 \text{ minutes} / 60 \text{ minutes per report}$).

In addition to the monthly mackerel reports for the western Gulf of Mexico and the south Atlantic, weekly reporting had to be implemented for the southwest Florida area. A quota has been established for the runaround gillnet fishery in this area. Because this type of gear can catch

large quantities of fish with a single set, more frequent monitoring had to be implemented. Two forms are used, one for vessels to report and one for dealer reporting. Only 7 dealers reported in 2011 and they submitted 30 reports in total. There are between 12 to 15 vessels that use gillnets, but not all of the vessels fish each year. Because of the nature of the fishery they only submit 2 or 3 reports per year each, and during 2011 only 12 reports were received from six vessels. The reporting burden is estimated at 10 minutes per form. **The total burden is estimated at 7 hours** (i.e., 42 reports x 10 minutes/60 minutes/report = 7 hrs.).

Wreckfish Dealer Reporting:

On average 40 dealers held wreckfish permits during the 5 year from 2007 to 2011. There were 2 dealers that handled wreckfish during that time period, and each of them submitted monthly reports. The estimated time required for a dealer to complete a monthly report when fish were purchased is 10 minutes, an average of 10 reports are received each year. **The burden from these reports is 2 hours** (10 reports x 10 minutes/60 minutes/report = 2). On average dealers submit 134 forms where no purchases were reported. **It is estimated to take about 3 minutes for non-purchasing reports and the burden is estimated at 7 hours.** The total burden is 7 hours (134 reports x 3 minutes/60 minutes/report = 7 hours).

The increase in the number of responses from the previous estimates is 6. The decrease in the burden hours from previous estimates is 2.

Miscellaneous Reporting:

There are 4 miscellaneous reporting requirements that are included in this family of forms. **The rock shrimp and golden crab dealer reporting requirements are not utilized, but an estimated burden of 15 hours per fishery is included** in the event the state fishery agencies cannot provide the data (an estimate of 60 dealers is used at 15 minutes per form which equals 15 hours per fishery). Likewise, Federal regulations include reporting requirements for coral harvested in Puerto Rico. **The burden for this reporting is estimated to be 16 hours** (64 submissions at 15 minutes per report).

Vessel Inventory:

Lastly, hours are included for the annual vessel inventory that is conducted by the SEFSC. Only a small percent of the commercial vessels need to be interviewed and this number, on average, is about 100 vessels. **It takes only about 5 minutes to collect the 3 pieces of information on each vessel, for a total burden of 8 hours per year** (100 x 5 minutes/60 minutes = 8 hours).

Regulations in 50 CFR 622.5(c)(3)(i) and (iii) require dealers, which include cars and trucks, to maintain a record of the landings for at least one year. Since the submission in 1998, the State of Alabama has implemented a state law that meets this requirement. All other states in the Gulf of Mexico region already had such regulations. Consequently, there is no burden associated with this Federal regulation because dealers comply with it under applicable state regulations.

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection.

There is no cost to respondents for this collection. Dealer reports are submitted electronically, and other information is collected in person.

14. Provide estimates of annualized cost to the Federal government.

The cost to the Federal government is largely salaries and benefits of the port agents that are employed to transcribe the data onto the appropriate forms. Twenty port agents are employed in the southeast; 5 of them are employed full-time in the collection of general canvass and shrimp statistics. The total salary cost of these employees is about \$440,000. The remaining 15 port agents are employed full-time in TIP data collection at a total cost of \$1,324,750. Printing and reproduction costs are about \$3,000 per year, which includes the cost of the postage-paid envelopes. The cost of data entry for the shrimp statistics and TIP data are included in the salaries of the port agents because they enter the data they collect. The data entry for the quota monitoring data is very small and is done by staff as part of their other duties. These cost are probably not more than \$1 to \$2 thousand per year.

Total government costs: \$1,769,750.

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

The total annual burden hours estimate of 1,542 represents a net decrease of 114 hours in the reporting burden for this PRA request from the previous burden of 1,656 hours. The total annual responses estimate of 13,917 represents a net increase of 3,305 responses from the previous 10,612 estimated responses.

Program change: The burden hours have decreased slightly because transmitting electronic data to the states take less time than completing a separate ACL form and faxing it to the science center every two weeks. Dealer reporting hours have decreased by 216 due to this program change, although reports have increased (see below).

Due to electronic submission of all dealer reports, the cost has decreased from \$384 to \$0.

Adjustments: The number of federally permitted dealers has increased, raising the dealer reporting responses by 2,693. In addition to the -216 hours above, there is an adjustment increase of 44.

The interview programs have adjusted the estimated number of both fish (+400) and shrimp (+212) interviews conducted annually. This is to account for seasonal variations in the fisheries due to factors outside the control of fishermen, such as weather, migration patterns of target

species, and market conditions. This translates to an increase of 67 and 35 burden hours respectively.

16. For collections whose results will be published, outline the plans for tabulation and publication.

Results from the data collection using the forms in this information collection are not planned for publication.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

Not Applicable.

18. Explain each exception to the certification statement.

Not Applicable.

Table 1. Estimated number of respondents and total burden hours for dealer/interview family of forms.

Activity	# Respondents	# Responses	Time / Response	Total Burden
General Canvass	0	0	0	0
Shrimp Dealers*	700 (est.)	0	0	0
Shrimp Interviews*	2,198 (est.)	2,600	10 min	433
Trip Interview Program*	2,895 (est.)	4,500	10 min	750
Coastal Fisheries Dealer ** Reporting non South Carolina	285	5130	1 min	86
Coastal Fisheries Dealer ** Reporting South Carolina	23	552	10 min	92
Mackerel Dealer Reporting* (non-gillnet)- Gulf	95	665	10 min	111
Mackerel Dealer Reporting* (gillnet)	7	30	10 min	5
Mackerel Vessel Reporting ** (gillnet)	6	12	10 min	2
Wreckfish Dealer Reporting*	20	10	10 min	2
Wreckfish Dealer No-purchase Reporting		134	3 min	7
Rock Shrimp***		60	15 min	15
Golden Crab Dealers***		60	15 min	15
Coral Dealers***		64	15 min	16
Vessel Operational Units***		100	5 min	8
Totals	5,499 unduplicated (not including the 700 with zero burden)	13,917		1,542

*Based on estimates from number of respondents and responses from five year average 2007-2011

**Based on estimates from the number of active federally permitted dealers

*** Minimal number of estimate hours reserved as a safeguard in the event that the states failed to collect the necessary landings statistics