

**Supporting Statement
for
Licensing and Manning Requirements
for Officers of Towing Vessels**

OMB No.: 1625-0078
COLLECTION INSTRUMENTS: Instruction.

A. Justification

1. Circumstances that make the collection of information necessary.

The U.S. Coast Guard has requirements in 46 CFR Part 10 for licensed individuals that operate towing vessels. The Coast Guard defines a “towing vessel” as any commercial vessel engaged in towing another vessel astern, alongside, or by pushing ahead. These regulations help to ensure that towing vessels operating on the navigable waters of the United States are under the control of mariners who comply with standards for training and licensing qualifications. The information collection requirements described in this supporting statement are necessary to comply with 46 CFR part 10. The Coast Guard requires that vessel employees maintain documentation of ongoing participation in training and drills if they are seeking a license as master or mate of towing vessels or for renewal of licenses. Recording this information is necessary so those mariners are able to demonstrate proficiency in: vessel management, seamanship, navigation, watchkeeping, radar operation, fire prevention/fighting, emergency procedures, lifesaving training, and environmental regulations. Information collection activities are logged in a towing officers’ assessment record to confirm mariner qualifications for towing vessel licensing or endorsements. The Coast Guard requires a final evaluation by a designated examiner to verify a mariner’s qualification for license upgrade to mate (pilot) of towing vessels.

The need for the collection of information is to ensure that the mariner's training information is available to assist in determining an individual's overall qualification to hold a Coast Guard issued merchant mariner's towing vessel license.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

Coast Guard

- Marine Safety
- Protection of Natural Resources

Prevention Policy & Response Policy Directorates (CG-5P & CG-5R)

- Safety: Eliminate deaths, injuries, and property damage associated with commercial maritime operations.
- Economic Growth and Trade/Mobility: Reduce interruptions and impediments that restrict the economical flow of goods and people, while maximizing safe, effective, and efficient waterways for all users.

2. Purposes of the information collection.

The purpose of the information collection is to document a mariner's qualifications and ensure that the mariner maintains a record of training and experience. The information collection requires crewmembers on towing vessels to maintain documentation of ongoing participation in training and drills. These recordkeeping requirements are consistent with good commercial practices and dictates good seamanship for safe navigation.

3. Consideration of the use of improved information technology.

The information collection may be in written or electronic form, and must be retained by the companies, onboard the vessel or made readily available to the Coast Guard upon request. There is no technology that can decrease the burden of this information collection. We estimate that 100% of the recordkeeping can be done electronically. At this time, we estimate that 15% are done electronically.

4. Efforts to identify duplication.

There are no State or local regulations relating to this issue. Other Federal agencies do not conduct similar information collection. Similar information does not exist.

5. Methods to minimize the burden to small businesses if involved.

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

6. Consequences to the Federal program if collection were not done or conducted less frequently.

If the Coast Guard conducted information collection less frequently, compliance with the training and licensing requirements for towing vessel operations would delay review of mariners' qualifications and processing license transactions. Although the Coast Guard finds that most prudent operators already maintain records on their own, these regulations are intended to ensure compliance by those companies not conforming to the safety practices of the majority of the industry.

Without an information collection, the owner or operator of a towing vessel would not be assured that there has been sufficient training for proper licensing of its personnel and operation of their vessels.

7. Special collection circumstances.

This information collection is conducted in manner consistent with the guidelines in 5 CFR 1320.5(d) (2).

8. Consultation.

A 60-Day Notice (See [USCG-2014-0092], March 24, 2014, 79 FR 16021) and 30-Day Notice (June 9, 2014, 79 FR 32971) were published in the Federal Register to obtain public comment on this collection. The Coast Guard has not received any comments on this information collection.

9. Provide any payments or gifts to respondents.

There is no offer of monetary or material value for this information collection.

10. Describe any assurance of confidentiality provided to respondents.

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

11. Additional justification for any questions of a sensitive nature.

There are no questions of sensitive language.

12. Estimate of annual hour and cost burdens to respondents.

- The estimated number of annual respondents is 15,376.
- The estimated number of annual responses is 15,376.
- The estimated hour burden is 15,869 hours.

- The estimated cost burden is \$435,408.

The annual reporting hour and cost burdens on Industry are summarized in Appendix A and are based on the following information:

The reporting and recordkeeping burden includes time to update and review training records and oversee and maintain final evaluations as follows:

Documentation of ongoing participation in training and drills (10.209(c)). This requires currently licensed towing vessel operators to submit documentation of ongoing participation in training and drills when renewing their licenses. Therefore, the mariners should maintain records of ongoing participation in training and drills.

Towing Officers' Assessment Record (TOAR)(10.464(g) and 10.465(e)). This requires each master or mate of self-propelled vessels of greater than 200 gross tons seeking an endorsement for towing vessels, to complete a towing officers' assessment record (TOAR).

Final Check-Ride Review 10.209(c)(6) and 10.465(f). The final check-ride is one of 3 options available to demonstrate proficiency. We estimate that 30% of entering and 5% of existing mariners will choose this option.

Companies have to maintain evidence 10.464(f) and 10.465(c) that every vessel it operates is under the direction and control of a licensed mariner with appropriate experience.

The populations (respondents) that may be affected by this collection are existing licensed mariners, prospective licensed mariners, and companies with licensed mariners. The total population was estimated by adding together these three groups of respondents.

Annual Burden (Respondents):

Industry Burden: The industry burden consists of the burden to new applicants, existing mariners, and companies.

1) New Applicants: The new entrants to the industry who will apply for licenses each year were estimated to be 2% of the population of existing license holders. The paperwork burden is due to new requirements for recordkeeping and the application process, as well as the check-ride updates. The burden for recordkeeping and the application process was estimated at 1 hour per applicant per year, and the burden for check-rides was estimated at 0.5 hours per applicant per year. The wage rate was obtained from the current edition of COMDTINST 7310.1(series) for a Cadet Out-Government.

2) Existing Mariners: The regulations require all towing vessel personnel to submit documentation of ongoing participation in training and drills as a prerequisite for renewal of licenses. The Coast Guard estimates that approximately 95% of mariners will choose this method of renewal. This recordkeeping is also required of individuals seeking endorsements as master or mate of towing vessels or for restricted local areas. We estimate that this recordkeeping will take 1 hour of a mariner's time per year. While renewal requests are submitted once every 5 years, the required recordkeeping is constant. The total cost of this burden was estimated by calculating the burden for submitting documentation and seeking endorsements and the burden for check-ride updates. The wage rate was obtained from the current edition of COMDTINST 7310.1(series) for a Cadet Out-Government.

The burden for check-ride updates was estimated by first finding the number of mariners that will renew by this method each year. We expect that 5% of existing mariners will choose the check-ride method for renewal over a 5 year period. Therefore, we expect that approximately 1% of existing mariners will renew by this method per year. 1% of the existing mariners are multiplied by the burden

of 0.5 hours per check-ride. The number of hours for check-ride burden was multiplied by the wage rate, obtained from the current edition of COMDTINST 7310.1(series) for a Cadet Out-Government. This cost was added to the cost of submitting documents and seeking endorsements to find the total cost of recordkeeping and reporting for existing mariners.

3) **Companies:** Towing companies are required to maintain evidence that every vessel they operate is under the direction and control of a licensed mate or master with appropriate experience, including 30 days of observation and training on the intended route. While this could be accomplished using copies of records that most companies already keep, it is impossible to determine exactly how many companies will have an increased burden (the data we obtained was from the National Maritime Center). We therefore considered all of the companies as having this burden. We also estimated the annual time burden to each company to be approximately 2 hours. The total cost to towing companies was found by multiplying the number of companies by the number of hours per year required to maintain records, by the hourly wage of personnel. The hourly wage of personnel was obtained from the current edition of COMDTINST 7310.1(series) for a GS-5, Out Government.

13. Total annualized capital and start-up costs.

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

14. Estimates of annualized Federal Government costs.

The estimated annual Federal Government cost is \$143,106 (see Appendix B). The Federal Government burden is the time it takes Coast Guard personnel to review the documentation of ongoing participation in training and drills for existing mariners as well as the service records, applications and check-ride results of entry mariners. These reviews are expected to take 1 hour each for documentation of ongoing participation in training and drills and entry mariners' service records and applications. Check-ride reviews will take 0.5 hours. The number of mariners choosing to submit documentation of ongoing participation in training and drills is 95% of the total number of towing vessel licenses issued. Since licenses are valid for 5 year periods, we assume that only 1/5th (20%) of this total will submit renewal requests in any given year. The total renewal requests per year are therefore the number of existing mariners multiplied by 95%, and then multiplied by 20%.

The number of mariners seeking endorsements and the number of entering mariners were added to the total renewal requests per year to find the total number of reviews per year for the Government. The total hourly burden of recordkeeping and application review was found by multiplying the total number of reviews for Government by 1 hour of burden for each review.

The total number of check-ride reviews was found by adding the check-ride reviews for new applicants to the check-ride reviews for existing mariners. The total number of reviews was multiplied by the 0.5 hours of burden to find the total hours of burden per year for the Government for check-ride reviews.

The total information collection burden to the Government was found by adding the hours of burden for recordkeeping and application review to the hours of burden for check-ride reviews. The total cost to the Government was then found by multiplying the total hours of information collection burden by the hourly wage rate for reviewers. The hourly wage rate for reviewers was obtained from the current edition of COMDTINST 7310.1(series) for a GS-8 In-Government.

15. Reasons for the change in burden.

The change in burden is an ADJUSTMENT due to a change (i.e., decrease) in the mariner and company populations.

16. Plans for tabulation, statistical analysis, and publication.

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This information collection will not be published for statistical purposes.

17. Approval for not explaining the expiration date for OMB approval.

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

18. Explain each exception to the certification statement.

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

B. Collection of Information Employing Statistical Methods.

This collection does not employ statistical methods.