

**SUPPORTING STATEMENT  
ATLANTIC MACKEREL, SQUID AND BUTTERFISH AMENDMENT 14 FAMILY OF  
FORMS  
OMB CONTROL NO. 0648-0679**

**A. JUSTIFICATION**

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

This is a request for a revision of a currently approved information collection, per Proposed Rule 0648-BF53. FMPs for Federal Fisheries managed under the National Ocean and Atmospheric Administration's (NOAA) National Marine Fisheries Service (NMFS) are developed under the authority of the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act).

The 2016-2018 Atlantic mackerel, squid, and butterfish specifications will indefinitely suspend the pre-trip notification system (PTNS) requirement for longfin squid vessels. The PTNS requirement is suspended in these fisheries because new observer selection protocols have made this system unnecessary and potentially counterproductive. Therefore this change will remove the cost and time burden associated with the PTNS requirement for vessels with a longfin squid permit, which had been added to OMB Control Number 0648-0679 under a change request approved by OMB on June 30, 2015, merging OMB Control No. 0648-0601 into this collection.

**2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.**

The 2016-2018 Atlantic mackerel, squid, and butterfish specifications will indefinitely suspend the PTNS requirement for longfin squid vessels, and therefore PTNS information for these vessels will no longer be collected. There are no changes to the following requirements.

The information collections under OMB Control No. 0648-0679, including permit application forms, are used by several offices of NMFS, the United States Coast Guard (USCG), the Mid-Atlantic Fishery Management Council (MAFMC), the New England Fishery Management Council (NEFMC), state fishery management agencies, academic institutions, and other fishery research and management organizations to evaluate current management programs and future management proposals. In most cases, aggregated summaries are made available, but for law enforcement, mailings, or resource allocation problems, individual permit information is often required. Mailing lists derived from the applications provide NMFS with the assurance of reaching all concerned constituents with notices of fishery closures, regulatory changes, and other important information. All information collections are necessary for improved monitoring of the MSB fisheries.

There are no changes to the following information collections:

### **VTR submission**

Amendment 14 revises the reporting frequency of VTRs from monthly to weekly submissions for all MSB permit holders. Compared to the current monthly VTR submission requirement, weekly VTR submissions are expected to supply more accurate and timely landings data, which can be used to cross check dealer data to ensure that directed fishery and mortality cap closures occur appropriately. Vessels that also possess a Northeast multispecies, Atlantic herring limited access, or Tier 3 mackerel permit are already required to submit weekly VTRs. Because many other vessels already have this requirement related to other permits they possess, there are a limited number of vessels that will be affected by this changed provision. Monthly VTR submissions are currently covered under OMB Control No. 0648-0212, and this new information collection would eventually be added to that form family.

### **VMS for limited access mackerel and longfin squid/butterfish moratorium permit holders**

Amendment 14 requires all limited access mackerel and longfin squid/butterfish moratorium permit holders to install and maintain a VMS unit on their vessels and to declare intent to target Atlantic mackerel or longfin squid via VMS. Many of these permit holders already have an operational VMS unit related to other Greater Atlantic region permits (Northeast multispecies, Atlantic herring, monkfish, surfclam/ocean quahog, scallops). The amendment also requires that limited access mackerel and longfin squid/butterfish moratorium permit holders submit daily catch reports via VMS. VMS reporting is expected to facilitate quota monitoring.

### **Pre-landing notifications**

Amendment 14 would require that, when on a declared mackerel trip, vessels that land over 20,000 lbs. mackerel must notify NMFS Office of Law Enforcement (OLE) via VMS of the time and place of offloading at least 6 hours prior to crossing the VMS demarcation line on their return trip to port, or if a vessel does not fish seaward of the VMS demarcation line, at least 6 hours prior to landing.

### **Observer notification requirements**

Amendment 14 would require any vessel with a limited access mackerel permit intending to land over 20,000 lbs. mackerel to contact NMFS at least 48 hrs. in advance of a fishing trip to request an observer. This measure would assist NMFS's scheduling and deployment of observers across the mackerel fleet, with minimal additional burden on the industry, helping ensure that observer coverage targets for the mackerel fishery are met.

The list of information that must be provided to NMFS as part of this pre-trip observer notification is described in the proposed regulations. Vessels with limited access mackerel permits would be required to contact NMFS via telephone. If a vessel is required to notify NMFS to request an observer before its fishing trip, but it does not notify NMFS before beginning the fishing trip, that vessel would be prohibited from possessing, harvesting, or landing Atlantic mackerel on that trip. If a fishing trip is cancelled, a vessel representative must notify NMFS of the cancelled trip, even if the vessel is not selected to carry an observer. All

waivers or selection notices for observer coverage will be issued by NMFS to the vessel via VMS so the vessel would have an on-board verification of either the observer selection or waiver.

If an observer is not available through the observer program, vessels required to carry an observer must arrange for carrying a Northeast Fisheries Observer Program (NEFOP) certified observer from an approved observer service provider. The owner, operator, or vessel manager of a vessel selected to carry an observer must contact the observer service provider by phone and must provide at least 48 hours for the provider to arrange for observer deployment for a specified trip.

An owner, operator, or vessel manager of a vessel who cannot procure a certified observer within 48 hours of the notification to the provider, due to the unavailability of an observer, may request a waiver from the requirement for observer coverage for that trip, but only if the owner, operator, or vessel manager has contacted all of the available observer service providers to secure observer coverage. To request a waiver based on the unavailability of observers, an owner, operator, or vessel manager of the vessel must call the NEFOP. If the NEFOP confirms that no observers are available, it will issue a waiver within 24 hours.

### **Released Catch Affidavits**

Amendment 14 would require limited access mackerel and longfin squid/butterfish moratorium permit holders to bring all catch aboard the vessel and make it available for sampling by an observer. The Council recommended this measure to improve the quality of at-sea monitoring data by reducing the discarding of unsampled catch. If catch is discarded before it has been made available to the observer, that catch is defined as slippage. If a slippage event occurs, Amendment 14 would require the vessel operator to complete a released catch affidavit within 48 hours of the end of the fishing trip. The released catch affidavit would detail: (1) Why catch was slipped; (2) an estimate of the quantity and species composition of the slipped catch; and (3) the time and location of the slipped catch.

### **Permit applications**

Vessels applying for a limited access mackerel permit under the limited access program are required to complete an application for the limited access permit category for which they are applying and submit proof of landings that meet the criteria for that permit category. In addition to the standard baseline requirements (horsepower, length overall, gross and net registered tonnage), Tier 1 and Tier 2 vessels will also be required to submit documentation of hold volume at initial application and at the time of vessel replacement. This information will be used by NMFS to qualify the vessel for the applicable limited access permit category. The initial application for a limited access permit was a one-time occurrence.

Once a vessel is determined to qualify for a limited access permit, the vessel owner is required to renew that permit annually. The permit category itself will be used by NFMS to identify these limited access vessels, on a case-by-case basis, to ensure compliance with the restrictions associated with each limited access permit category.

### **Replacement/upgrades and confirmation of permit history (CPH)**

Each replacement, upgrade, permit history (RUPH) action would require an RUPH application. This information is necessary to execute the RUPH transaction as requested by the applicant. NMFS retains control over all information and safeguards it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. The information collection is designed to yield data that meet all applicable information quality guidelines. Prior to dissemination, the information would be subjected to quality control measures and 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.**

After the initial permit issuance, permit renewal has been made as simple as possible and currently feasible for both the public and the issuing office. The information obtained from current permits is used to prepare a computer-generated, pre-printed renewal permit, which is sent to the permit holder for updating. If there are no changes in the information required on the permit, renewal requires only the applicant's signature. This feature minimizes the reporting burden on the public as well as the administrative burden on the agency. Permit information and all initial permit applications are posted as fillable Adobe Acrobat documents (PDF file format) on the NE Regional Office's (NERO) web site: <http://www.nero.noaa.gov>. Posting this information on the internet makes it widely available to the public, thereby reducing both public and administrative burden. At this time, permit applications, with signature and accompanying documents, must be mailed.

Federally permitted dealers are required to submit detailed, electronic reports of all purchases from fishing vessels. Dealers submit transaction information through an online data entry form available at <http://www.accsp.org/safis.htm>.

Due to the required confidentiality of fish purchase reports, information sent from dealers to NMFS is subject to strict encryption standards and is available only to authorized agency personnel and the submitter. Dealers receive a username and personal identification number (PIN) that enables them to log onto a secure site and submit their reports. Dealers are also allowed to access, review, and edit the information they have submitted using a secure procedure similar to those in common usage throughout the banking industry. These submissions constitute the official reports as required by the various FMPs in the Greater Atlantic region.

All data submitted through the vessel's VMS unit is electronic. VMS vessel polling is automated and other than for the initial cost and transmission costs, does not impose any burden on commercial fishing vessels.

**4. Describe efforts to identify duplication.**

The information to be collected through the issuance of permits is not duplicated elsewhere.

The information collected on daily VMS catch reports is often duplicated on vessel trip reports (VTRs) which are approved under the 0648-0212 family of forms. However, VMS daily catch reports are necessary to monitor fisheries catch in real-time. VTRs are submitted to NMFS on a weekly (for this collection) or monthly basis, and are therefore used to cross-check the accuracy of the daily VMS catch reports.

The application processes and information submissions for the observer program and vessels are unique to the Atlantic mackerel observer program, and direct duplication with other collections does not exist.

None of the other information collected through this family of forms is duplicated elsewhere.

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

Only the minimum data needed to meet the objectives of Amendment 14 are requested from all respondents. Since most of the respondents are small businesses, separate requirements based on the size of business have not been developed.

For initial and renewal vessel and dealer permits, as well as applications for observer service providers, detailed instructions are included with the application to help facilitate proper completion of the form. NMFS also sends bulletins detailing reporting requirements to all permitted entities.

NMFS has currently certified three vendors to provide VMS service to vessels participating in the fisheries that require VMS as a condition of their permits. Each vendor offers comparable equipment and services over a range of prices. This reduces the burden on the public by increasing competition among vendors, thereby decreasing costs to the fishing industry to obtain and operate a VMS unit. Further, the increased variety of VMS units may allow vessel owners/operators to select the most economical and efficient unit to purchase, therefore minimizing costs associated with VMS.

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

To the extent practicable, frequency of information collection under this family of forms has been minimized. To reduce the frequency any further would compromise the intent of each collection of information requirement.

Information on permit applications and renewal forms for vessels, dealers, and operators, is necessary for accurately tracking information about who is issued permits annually, gathering data on permit holders, and ensuring compliance with fishing regulations. Furthermore, this information (in a consolidated form) is used by a variety of researchers, students, and managers when making important fisheries policy decisions.

All information is required for the efficient operation of the Atlantic herring observer program

must be submitted in the time frames requested. Collecting this information less frequently would jeopardize the goals and objectives of the observer program and the effective management of the Atlantic mackerel fishery.

VMS units are crucial for enforcing area based fishing regulations; without VMS tracking of fishing vessel activity, it would be near impossible to monitor whether fishing vessels are complying with such regulations. VMS catch reporting is vital to gaining real-time data on fish catch. Without such information, or if the information was collected less frequently, it would be very difficult to monitor fisheries quotas and ensure sustainable harvests that prevent overfishing.

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

The data collection is consistent with 5 CFR 1320.6 guidelines except that it requires information to be reported more frequently than quarterly. The need for this is described in Question 6.

**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 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 proposed rule, 0648-BF53, will be published coincident with this revision request.

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

No payment or gift will be made to respondents.

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

All data will be handled in accordance with NOAA Administrative Order 216-100, Confidentiality of Fisheries Statistics, and will not be released for public use except in aggregate statistical form (and without identifying the source of data, e.g., vessel name, owner, etc.). In addition, any information collected under the Permit Family of Forms would be considered confidential and would not be disclosed except as provided in Section 402(b) of the Magnuson-Stevens 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.**

There are no questions of a sensitive nature involved in this collection of information.

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

The reduced time burden of this information collection change for the 2016-2018 Specifications is presented in Table 2. Table 2 shows the total burden from when OMB Control Number 0648-0601 and OMB Control Number 0648-0679 were combined and the revised totals including the reduction in this change request. **The total annual reduction in responses is 10,224 and annual time burden reduction is 255 hours (170 hours for observer notification + 85 hours for trip cancellation).**

The time burden of this information collection is presented in Table 1. **The total annual responses are 42,047 and annual time burden is 3,751 hours, reflecting the reductions of 10,224 responses and 255 hours, which had been added as part of the 2015 change request.**

**VTR submission**

Vessels with Atlantic mackerel, butterfish, longfin squid, and *Illex* squid permits would be required to submit VTRs (Form 88-30) on a weekly basis.

This action does not change the total number of respondents previously covered under this action, but rather adjusts the frequency of the reporting requirement for several of the current respondents. There are an estimated 2,551 MSB permit holders that are already covered in the existing submission for this action. An estimated 135 of these MSB permit holders do not already submit VTRs on a weekly basis due to permit requirements related to Northeast multispecies permits, Atlantic herring limited access permits, or Tier 3 mackerel permits, so only these 135 vessels will be affected by the revision of the VTR reporting requirement.

The estimated response time for the reporting burden for VTRs is 5 minutes. Some of the information being provided by the respondents, such as fishing location and catch, are already collected and recorded in the normal course of fishing activity; therefore that time is excluded from the calculation. While the fishing vessel logbook information is collected on a trip-by-trip basis, the burden calculation is based on the required weekly or monthly submission. **There will be an additional 5,400 annual responses (additional 40 responses per vessel (135 \* 40)) and 450 hours (5 minutes \* 135 vessels \* 40 submissions).**

**VMS for limited access mackerel and longfin squid/butterfish moratorium permit holders**

Limited access mackerel and longfin squid/butterfish moratorium permit holders would be required to purchase and maintain a VMS. Because other Greater Atlantic Federal permits require vessels to maintain a VMS, it is estimated that only 63 of the 312 longfin squid/butterfish moratorium permit holders, and only 17 of the 132 limited access mackerel permit holders (80 vessels total) do not already have a VMS. **VMS installation takes 1 hour to complete. The VMS certification form takes an estimated 5 minutes to complete, and the call to confirm a**

**VMS unit takes an estimated 5 minutes to complete. The total burden to confirm VMS installation is 94 hours ([80 vessels \* 60 minutes per installation] + [80 vessels \* 5 minutes per certification form] + [80 vessels \* 5 minutes per installation call]).**

Greater Atlantic Region regulations require VMS trip declarations, which take an estimated 5 minutes to complete. **If a longfin squid/butterfish moratorium permit holder takes an average of 22 trips per year, the total burden estimate would be 572 hours (312 vessels \* 5 minutes \* 22 declarations). If a limited access mackerel permit holder takes an average of 8 trips per year, the total burden estimate would be 88 hours (132 vessels \* 5 minutes \* 8 declarations).**

Permit holders would also be required to submit a daily VMS catch report that would take an estimated 5 minutes to complete. **The total annual time burden for daily VMS catch reports for longfin squid/butterfish moratorium permit holders is 1,144 hours (5 minutes per catch report \* 22 trips \* 2 days per trip \* 312 vessels). The total annual time burden for daily VMS catch reports for limited access mackerel permit holders is 264 hours (5 minutes per catch report \* 8 trips \* 3 days per trip \* 132 vessels).**

Vessels carrying permits that require VMS units must transmit a signal indicating the vessel's position either once or twice per hour, 24 hours a day, depending on the permit type. The vessel power down exemption allows both voluntary VMS users as well as vessels required to use VMS to stop position transmission under certain provisions, provided the vessel would be out of the water for a minimum of 72 hours, or at dock/mooring and not engaging in any fisheries for a minimum of one month. Vessel operators are allowed to discontinue the use of VMS as long as a valid letter of exemption is obtained and the vessel complies with the conditions and requirements of the exemption letter. The vessel is required to retain this exemption letter on board the vessel. The vessel owner may also request to extend the time period for which the exemption was granted. There is no limit to either the length of time a VMS unit may be turned off or the number of times a vessel may participate in this program.

Every vessel with a VMS unit may request a power-down exemption letter at some point during a year, and vessels in the past have requested up to 2 per year to cover boat repairs or seasonal docking. **The request to turn off the VMS unit (power-down exemption) takes approximately 5 minutes per request for a total burden of 13 hours (5 min \* 2 requests \* 80 vessels).** The power down exemption burden for vessels that already have VMS is covered under the Permit Family of Forms (OMB Control No. 0648-0202).

### **Pre-landing notifications**

Amendment 14 would require limited access mackerel permit holders that land over 20,000 lbs. mackerel to submit a VMS pre-landing notification 6 hours prior to landing. Limited access mackerel permit holders take an average of 8 trips per year, so the total annual burden estimate is **88 hours (8 trips \* 132 vessels \* 5 minutes).**

### **Observer notification requirements**

The 2016-2018 Atlantic mackerel, squid, and butterfish specifications will indefinitely suspend the observer notification requirement for longfin squid vessels. Vessels issued a longfin squid and butterfish moratorium permit are no longer required to call NMFS to request an observer at least 48 hours prior to beginning a longfin squid trip where the vessel intends to land over 2,500 lb of longfin squid. There are estimated 426 vessels with longfin squid and butterfish moratorium permits and it is estimated that each vessel takes 12 trips each year. The phone call is estimated to take 2 minutes to complete, for a total annual burden reduction of **169 hours (426 vessels \* 12 trips \* 2 minutes)**.

Removing the PTNS requirement for longfin squid vessels would also remove the requirement and burden for cancelling trips. The call to notify NMFS of a cancelled trip is estimated to take 1 minute to complete. Since each vessel has the potential to cancel every trip for which it submitted notification, the total annual burden reduction of the cancellation call is **87 hours (426 vessels \* 12 trips \* 1 minute)**.

Amendment 14 would increase the reporting burden for measures designed to improve at-sea sampling by NMFS-approved observers. Vessels issued a limited access mackerel permit would be required to call NMFS to request an observer at least 48 hours prior to beginning a mackerel trip (any trip where the vessel intends to land over 20,000 lbs. mackerel). The phone call is estimated to take 5 minutes to complete, for a total annual burden of **88 hours (132 vessels \* 8 trips \* 5 minutes)**.

If a vessel has already contacted NMFS to request an observer and then decides to cancel that fishing trip, Amendment 14 would require that vessel to notify NMFS of the trip cancellation. The call to notify NMFS of a cancelled trip is estimated to take 1 min to complete. Since each vessel has the potential to cancel every trip for which it submitted notification, the total annual burden of the cancellation call is **18 hours (132 vessels \* 8 trips \* 1 minute)**.

### **Released Catch Affidavits**

Amendment 14 would require a released catch affidavit for limited access mackerel and longfin squid/butterfish moratorium permit holders that discard catch before it had been made available to an observer for sampling (slipped catch). The reporting burden for completion of the released catch affidavit is estimated to average 5 minutes. The affidavit requirement would affect an estimated 444 vessels (132 mackerel; 312 longfin squid/butterfish). If a limited access mackerel vessel slipped catch once per trip with an observer onboard, and took an estimated 8 trips per year, **the total annual reporting burden for the released catch affidavit would be 88 hours (132 vessels \* 8 trips per year \* 5 minutes)**. If a longfin squid/butterfish moratorium vessel slipped catch once per trip with an observer onboard, and took an estimated 22 trips per year, **the total annual reporting burden for the released catch affidavit would be 572 hours (312 vessels \* 22 trips per year \* 5 minutes)**.

### **Permit application**

Renewal of permits by the 273 qualifying vessels each year is estimated to take 30 minutes on average to process, for a total burden of **137 hours annually**.

### **Replacement/upgrade and CPH**

Limited access mackerel vessels are subjected to the same RUPH restrictions as other limited access vessels. Completion of RUPH application requires an estimated 3 hours per response. It is estimated that no more than **40** of 410 vessels possessing these permits will request a vessel replacement or upgrade annually (other FMPs estimated roughly 10 percent of vessels). The resultant burden would up to **120 hours**. Completion of a CPH application requires an estimated 30 minutes per response. It is estimated that no more than **30** of the 410 vessels possessing these limited access permits will request a CPH annually. The resulting burden would be up to **15 hours**.

### **Tier 1 and Tier 2 hold volume certification**

Vessels that qualify for a Tier 1 or Tier 2 mackerel permit are required to submit documentation of hold volume size after permit issuance, and at the time of replacement if a Tier 1 or 2 mackerel permit is moved to a new vessel, or if a vessel is upgraded and fish hold volume changes. The Council estimated that 74 vessels would qualify for either a Tier 1 or Tier 2 limited access mackerel permit, and would be required to submit a fish hold volume certification at the time of permit issuance. Roughly 40 vessels are expected to upgrade or replace vessels each year and thus need replacement certifications. Tier 1 and 2 vessels will experience a time burden due to this requirement in the form of travel time to/from a certified marine surveyor. It is impossible to estimate a time burden associated with obtaining a hold volume measurement, as vessels would have to travel varying distances to visit certified marine surveyors; **however, this is not an information collection burden and thus these are not counted as responses.**

### **13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in Question 12 above).**

There is no reduced cost burden of this information collection change for the 2016-2018 Specifications. Because the PTNS and trip cancellation notifications are calls to NMFS and the cost of these calls is negligible, there were never any additional costs added for these requirements when they were put in place. Table 2 shows that there is no change in cost.

The cost burden of this information collection is presented in Table 1. **The total annual cost for all requirements in this information collection is \$383,384.**

### **VTR submission**

As VTRs are submitted though the mail, this provision will cost the public an additional \$0.45 per item for postage; accordingly, **the public cost per burden item will increase by \$2,430 (additional \$.45 per stamp (5,400 \* \$.45)).**

### **VMS for limited access mackerel and longfin squid/butterfish moratorium permit holders**

Because other Greater Atlantic Federal permits require vessels to maintain a VMS, it is estimated that only 80 vessels issued limited access mackerel or longfin squid/butterfish moratorium permits do not already have a VMS.

The average cost of purchasing and installing a VMS is \$3,400, the VMS certification form costs

\$0.45 to mail, and the call to confirm a VMS unit costs \$1. The average cost of maintaining a VMS is \$600 per year. The total cost to install and maintain a VMS unit is **\$320,116 (80 vessels \* \$3,400 = 272,000 + 80 vessels \* \$0.45 + 80 vessels \* \$1 = \$116 + 80 vessels \* \$600 = 48,000).**

Greater Atlantic regulations require VMS trip declarations and automated polling of VMS units to collect position data: **1) Each trip declaration costs \$0.50 to transmit, for a total cost of \$3,960 (\$0.50 \* 22 trips \* 312 longfin squid vessels + \$0.50 \* 8 trips \* 132 mackerel); 2) Each automated polling transmission costs \$0.06. Since automated polling occurs once every hour for each day of the year, the total annual cost is \$42,048 (\$0.06 \* 365 days per year \* 24 hours \* 80 vessels).**

Vessels are also required to submit a daily VMS catch report, at a cost of \$0.60 per transmission. **The total annual cost for daily VMS catch reports for mackerel vessels is \$1,901 (\$0.60 per catch report \* 8 trips \* 3 days per trip \* 132 vessels). The total annual cost for daily VMS catch reports for longfin squid/butterfish vessels is \$8,237 (\$0.60 per catch report \* 22 trips \* 2 days per trip \* 312 vessels).**

The cost of obtaining a power down exemption letter is the cost of postage (\$0.45), **therefore the total annual cost to the public is \$72 (\$0.45 \* 2 letters \* 80 vessels).**

#### **Pre-landing notifications**

Each VMS pre-landing notification cost \$1. Limited access mackerel vessels take an average of 8 trips per year, so **the total cost for this requirement is \$1,056 (8 trips \* 132 vessels \* \$1).**

#### **Observer notification requirements**

The pre-trip observer notifications, as well as the trip cancellation notification, are calls to NMFS. The cost of these calls is negligible, so there is no additional cost for these requirements.

#### **Released Catch Affidavits**

The released catch affidavits must be submitted by mail, for \$0.45 per submission. If each of the 132 limited access mackerel permit holders required to submit the affidavits slipped catch once per trip with an observer onboard, and took an estimated 8 trips per year, the total annual cost for the released catch affidavit would be **\$475 (132 vessels \* 8 trips per year \* \$0.45)**. If each of the 312 longfin squid/butterfish moratorium permit holders required to submit the affidavits slipped catch once per trip with an observer onboard, and took an estimated 22 trips per year, the total annual cost for the released catch affidavit would be **\$3,809 (312 vessels \* 22 trips per year \* \$0.45)**.

#### **Replacement/upgrade and CPH**

It is estimated that it would cost approximately \$1 in mail fees and \$1 in copy fees to submit an RUPH application. **Therefore, it is estimated that 70 RUPH applications submitted annually would cost \$140 to print and mail (\$2 x 70).**

#### **Tier 1 and Tier 2 hold volume certification**

Informal contacts by Council staff with several marine surveyors revealed that a fish hold

measurement could run approximately \$13.30-\$40 per foot of vessel length, which could range from as low as \$1,000 for a 75 foot vessel to as high as \$6,000 for a 150 foot vessel. If we assume that the average vessel that qualifies for a Tier 1 or Tier 2 permit is 100 ft in length, and use the highest hold measurement price, then each hold volume measurement done by a certified marine surveyor is estimated to cost **\$4,000** ( $\$40 \times 100 \text{ ft}$ ). The Council estimated that **74** vessels would qualify for either a Tier 1 or Tier 2 limited access mackerel permit, therefore it is estimated that the annualized cost for the initial hold volume certification cost for these vessels would be \$98,667, not including travel expenses ( $74 \text{ initial hold volume certification} \times \$4,000 = \$296,000 / 3 \text{ years} = \mathbf{\$98,667}$ ). A total of **40** vessel replacements are expected each year, and the total annual hold volume certifications cost for these vessels is estimated at **\$160,000**. **Therefore, it would cost on average over a three year period an estimated \$258,667 per year (\$98,667 for annualized initial hold volume certification, plus \$160,000 for replacement hold volume certifications).**

#### **14. Provide estimates of annualized cost to the Federal Government.**

The reduced cost to the government of this information collection change for the 2016-2018 Specifications is **\$25,943** (**\$21,726 for observer notification response + \$4,217 for trip cancellation response**).

The 2016-2018 Atlantic mackerel, squid, and butterfish specifications will indefinitely suspend the observer notification requirement for longfin squid vessels. Vessels issued a longfin squid and butterfish moratorium permit are no longer required to call NMFS to request an observer at least 48 hours prior to beginning a longfin squid trip where the vessel intends to land over 2,500 lbs of longfin squid. There are approximately 5,112 trips per year, based on an average of 12 directed trips per permitted vessel. Each response by the Observer Program or NMFS takes approximately 10 minutes (0.17 hours). A wage rate of \$25/hour was used to calculate the annualized cost reduction to government of **\$21,726** ( **$5,112 \text{ trips} \times 0.17 \text{ hours/response} \times \$25/\text{hour}$** ).

Removing the PTNS requirement for longfin squid vessels would also remove the requirement and cost for responding to trip cancellations. Assuming that each of the estimated 5,112 trips has to the potential to be cancelled, and assuming that the Observer Program or NMFS response to the cancellation requires approximately 2 minutes (0.033 hours), the annualized cost reduction to the government for this change is **\$4,217** ( **$5,112 \text{ trips} \times 0.033 \text{ hours/response} \times \$25/\text{hour}$** ).

The total annualized cost to the Federal government from the herring observer program is **\$262,457**. This is the cost to the Federal government based on 10,498 hours at a rate of \$25 per hour.

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

As described above, this information collection change includes reduction in information collection associated with removing the PTNS requirement for longfin squid vessels which is included in the 2016-2018 Atlantic mackerel, squid, and butterfish specifications. This change would result in a total burden reduction of 255 hours and no cost reduction to respondents.

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

Results from this collection may be used in scientific, management, technical, or general informational publications such as Fisheries of the United States, which follows prescribed statistical tabulations and summary table formats. Data are available to the general public on request in summary form only. Data are available to NMFS employees in detailed form on a need-to-know basis only.

**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.

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

No statistical methods are employed in the information collection procedures. The requirements are mandatory for all participants in the indicated fisheries.

Table 1.

	Number of entities	Items per entity	Total # of items	Response time (minutes)	Total time burden (hours)	Cost per item	Total Public cost	Total Government Response Time	Total Government Cost
<b>Reporting requirements for MSB Permit holders</b>									
Weekly VTR	135	40	5400	5	450	\$0.45	\$2,430	1350	\$33,750
VMS installation	80	1	80	60	80	\$3,400.00	\$272,000	0	\$0
VMS Certification Form	80	1	80	5	7	\$0.45	\$36	13.3	\$333
Call-in for Unit Confirmation	80	1	80	5	7	\$1.00	\$80	13.3	\$333
Trip Declaration: Mackerel	132	8	1056	5	88	\$0.50	\$528	176.0	\$4,400
Trip Declaration: Longfin Squid	312	22	6864	5	572	\$0.50	\$3,432	1258.4	\$31,460
VMS Operation	80	1	0	0	0	\$600.00	\$48,000	0	\$0
Automated VMS polling	80	8760	0	0	0	\$0.06	\$42,048	0	\$0
Daily VMS Catch Reports: Mackerel	132	24	3168	5	264	\$0.60	\$1,901	528	\$13,200
Daily VMS Catch Reports: Longfin Squid	312	44	13728	5	1144	\$0.60	\$8,237	2517	\$62,920
Mackerel pre-landing notification	132	8	1056	5	88	\$1.00	\$1,056	264	\$6,600
Power down exemption	80	2	160	5	13	\$0.45	\$72	40	\$1,000
Limited access permit renewal	273	1	273	30	137	\$0.45	\$123		\$13,530
Confirmation of permit history plus cost of initial and replacement Tiers 1 and 2 hold volume certification	30	1	30	30	15	\$8,623	\$258,727		\$1,000
Replacement/upgrade application	40	1	40	180	120	\$2	\$80		\$750
<b>Observer reporting changes for vessels</b>									
Pre-trip notification to observer program	132	8	1056	5	88	\$0.00	\$0	176	\$4,400
Trip Cancellation notification to observer program	132	8	1056	1	18	\$0.00	\$0	88	\$2,200
Released catch affidavit: Mackerel	132	8	1056	5	88	\$0.45	\$475	528	\$13,200
Released catch affidavit: Longfin Squid	312	22	6864	5	572	\$0.45	\$3,089	3546.4	\$88,660
<b>TOTALS</b>			42,047		3,751		\$642,314	10,498	\$277,737

Table 2.

<b>Burden</b>	<b>Responses</b>	<b>Hours</b>	<b>Costs</b>
Previous	52,271	4,006	642,311
New	42,047	3,751	642,311*
Difference			
Change due to New Statute	0	0	0
Change due to Agency Discretion	10,224	255	0
Change due to Agency Adjustment	0	0	0
Change due to PRA Violation	0	0	0

\*New total cost is 642, 314, not due to program change but to rounding.