

**SUPPORTING STATEMENT
ATLANTIC MACKEREL, SQUID AND BUTTERFISH AMENDMENT 20 DATA
COLLECTION
OMB CONTROL NO. 0648-0679**

A. JUSTIFICATION

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

This is a resubmission, with the final rule, of a request for a revision of a currently approved information collection to support new information collections associated with Amendment 20 to the Atlantic Mackerel, Squid and Butterfish (MSB) Fishery Management Plan (FMP). 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 Mid-Atlantic Fishery Management Council adopted Amendment 20 to reduce latent effort in the longfin squid fishery and adjust the management of the longfin squid fishery during Trimester 2 (May through August). The objectives of this action are to remove unused or minimally used squid permits to maximize economic opportunities for active participants in the fishery and to reduce the potential negative impacts of excessive fishing effort on inshore spawning aggregations and squid egg mops during Trimester 2.

Amendment 20 adds to the information collections previously included under Amendment 14 to the FMP and approved under OMB Control No. 0648-0679. Specifically, Amendment 20 would implement the following new measures that involve information collections:

1. Separate butterfish from the current longfin/butterfish moratorium permit to create a new butterfish moratorium permit;
2. Reissue a longfin squid moratorium permit to recently active vessels previously issued a longfin/butterfish moratorium permit. This permit category will be split into two: Tier 1 and Tier 2;
3. Create two new longfin squid moratorium permits (Tier 2, Tier 3) with reduced trip limits for less active vessels. The Tier 3 permit group will be required to apply for a new permit;
4. Appeals procedure similar to that established for previous limited access programs; and
5. Allow permit holders to swap requalified longfin squid moratorium permits among their vessels.

This action would affect vessels issued a Federal longfin squid/butterfish moratorium or a squid/butterfish incidental permit. NMFS is already collecting information from these entities through the existing permit process. This action would not change the burdens associated with the yearly permit renewals, as approved under OMB Control No. 0648-0202, but would create a one-time burden to apply for one of the new longfin squid moratorium permits, appeal a denial of one of these new permits, and swap requalified longfin squid moratorium permits among vessels owned by an entity. New information collections would provide the information necessary for NMFS to review and process permit appeals and permit swaps among vessels

owned by a single entity, as proposed under Amendment 20.

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 information collections that result from Amendment 20 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. All information collections are necessary for improved monitoring and administration of the MSB fisheries. Amendment 20 will require a one-time collection of information for the permit swap and a one-time opportunity to apply for and appeal the issuance of a new longfin squid moratorium permit. There are no changes to the following submissions: Vessel trip report (VTR) submission, vessel monitoring system (VMS) for limited access mackerel and longfin squid/butterfish moratorium permit holders, pre-landing notifications, observer notification requirements, and released catch affidavits. All Amendment 20 measures comply with the utility, integrity, and objectivity standards set out in the Information Quality Act, as documented in the supporting documents associated with the Amendment 20 rulemaking.

VTR submission

Weekly submissions of VTRs for all MSB permit holders are currently required. Weekly submissions supply more accurate and timely landings data than monthly reports, and can be used to cross check dealer data to ensure that directed fishery and mortality cap closures occur appropriately. Monthly and weekly VTR submissions for MSB permits are currently covered under OMB Control No. 0648-0212, and this new information collection will eventually be added to that form family. Amendment 20 does not create any changes to this collection or associated reporting burdens

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

Limited access mackerel, and longfin squid, *Illex* squid, and butterfish moratorium permit holders are currently required to maintain a VMS unit on their vessel and declare their intent to target Atlantic mackerel, longfin squid, or *Illex* squid via VMS. Limited access mackerel permit holders submit daily catch reports via VMS are also required. Under Amendment 20, longfin squid moratorium permit holders would continue to submit daily catch reports via VMS, but the new separated butterfish moratorium permit would not be required to submit such reports, because reporting is required for monitoring longfin squid targeted trips. Amendment 20 does not create any changes to this collection or associated reporting burdens

Pre-landing notifications

The current requirement is for vessels on a declared mackerel trip that will land over 20,000 lb 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. Amendment 20 does not create any changes to this collection or associated reporting burdens

Observer notification requirements

Any vessel with a limited access mackerel permit intending to land over 20,000 lb mackerel to contact NMFS at least 48 hr in advance of a fishing trip to request an observer is currently required. This measure assists NMFS in 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 regulations. Vessels with limited access mackerel permits are 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 is 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. Amendment 20 does not create any changes to this collection or associated reporting burdens.

Released Catch Affidavits

Limited access mackerel, and longfin squid, *Illex* squid, and butterfish moratorium permit holders are currently required 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, the vessel operator is required to complete a “Released Catch Affidavit” form within 48 hours of the end of the fishing trip. This affidavit details: (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. Amendment 20 does not create any changes to this collection or associated reporting burdens. However, revised longfin/butterfish permit forms will now reference the separate longfin squid moratorium and butterfish moratorium permits.

New longfin limited access permit structure change

The Greater Atlantic Permit Family of Forms collection under OMB Control No. 0648-0202 will be updated to recognize the new permit structure created by the separation of the longfin/butterfish moratorium permits and the creation of new incidental longfin squid moratorium permits under Amendment 20. Amendment 20 does not add or change the collection burden. In the future, anyone who will renew and replace longfin squid and butterfish moratorium permits will use these revised forms.

Application process for new longfin squid permits

Amendment 20 will require longfin squid permit holders that have not been issued a longfin squid Tier 3 moratorium permit to complete an application for a Tier 3 longfin squid moratorium permit. Fishing history, including for a permit held in confirmation of permit history, can be used by a vessel to qualify for and be issued a Tier 3 longfin squid moratorium permit.

Appeal process for longfin squid permits

Amendment 20 would allow permit holders that have been issued a Tier 2 permit, and denied a longfin squid Tier 1 moratorium permit or permit holders that have applied for a Tier 3 longfin squid moratorium permit that have been denied, to appeal that denial by submitting additional information to the Regional Administrator that demonstrates why the determination by NMFS was incorrect. The appeal may also request a hearing by including a concise statement raising genuine and substantial issues of a material fact or law that cannot be resolved based on the documented evidence alone. An appellant may also request a letter of authorization (LOA) that would enable the vessel to continue to fish under the measures applicable to Tier 1 moratorium permits during an appeal. Once a vessel is determined to qualify for a Tier 1 or Tier 3 moratorium permit, the vessel owner is required to renew that permit annually. The permit category itself will be used by NMFS to identify these moratorium permit vessel qualifications, on a case-by-case basis, to ensure compliance with the restrictions associated with each moratorium permit category.

One time longfin squid moratorium permit swap

An entity that owns multiple vessels issued longfin squid/butterfish moratorium permits as of May 26, 2017, has a one-time opportunity to swap one Tier 1 longfin squid moratorium permit issued to one of its vessels with a longfin squid Tier 2 moratorium permit issued to another of its vessels. The one-time permit swap gives vessel owners the opportunity to maximize their vessel utility. A permit holder could submit an “Application for a Longfin Squid Permit Swap” form that permit holders can submit to apply for the permit swap. This form provides information for NMFS about the vessels involved in the swap to ensure the permits are placed on a vessel that meets the vessel baseline size and horsepower restrictions for this provision

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.

The Amendment 20 measures would require permit holders to submit a permit application, and the option of submitting a permit swap form will be mailed as a hardcopy in addition to the forms and related instructions being made available to the public on the Internet. The appeals process will not require a form, but will require the appellant to submit a letter with supporting evidence

from the appellant. The forms will be uploaded for public access here:
<https://www.greateratlantic.fisheries.noaa.gov/aps/permits/index.html>

The current requirement is for all data submitted through the vessel's VMS unit, including trip declarations, daily catch reports, pre-landing reports, and catch affidavits, 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. Other trip reports are mailed, and observer notifications are made by telephone calls. Amendment 20 does not create any changes to this collection or associated reporting burdens.

4. Describe efforts to identify duplication.

Amendment 20 will require a one-time collection of information for the permit swap, application for a new longfin squid moratorium permit, and request to appeal the denial of a longfin squid moratorium permit if there is a discrepancy of qualification. Amendment 20 also modifies the forms associated with this permit family due to the new or revised permits associated with this action. The burden for these forms is accounted for in OMB Control Number 0648-0202. The information collected through the issuance of permits is not duplicated elsewhere. The information collected through the issuance of permits, permit swap, or appeals form is not duplicated elsewhere.

The current requirement for 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. This amendment does not change this.

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 20 are requested from all respondents. Since the information collections in this action apply to all permit holders regardless of size, separate requirements based on the size of business have not been developed. We are reaching out to permit holders at the time of qualification to provide them with new permits and permit swap form.

The current vessel permit renewal form indicates that NMFS has currently certified four 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. Amendment 20 does not create any changes to this collection or associated reporting burdens.

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

The revision to this family of forms for Amendment 20 will be a one-time collection for the permit swap form, permit application, and materials submitted in association with an appeal. To the extent practicable, frequency of information collection under this family of forms has been minimized. If the Amendment 20 collection requirements were not conducted, the intentions of Amendment 20, which are to reduce latent (unused or minimally used) longfin squid permits, and reduce incentives to target longfin squid under high incidental catch limits would not be met. Specifically, without changes to longfin squid incidental catch permits, an unlimited number of vessels could target longfin squid under relatively high incidental catch limits which could negatively impact both target and non-target species. Further, without this collection, a vessel owner would not have the opportunity to appeal a decision to deny the issuance of a longfin squid moratorium permit or swap longfin squid permits among vessels owned by that entity. This would reduce fishing opportunities and associated revenue for such owners due to more restrictive access to the longfin squid fishery.

Amendment 20 does not change any of the following information collections described below. 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.

VMS units are crucial for enforcing area based fishing regulations; without VMS tracking of fishing vessel activity, it would be difficult to monitor whether fishing vessels are complying with applicable 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; this is only a one time collection. 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, RIN 0648-BH16, published in the Federal Register (FRN 2018-18934) on August 31, 2018, solicited public comment. In addition, in effort to encourage comments, NMFS sent all fishery stakeholders an email message notifying them of the public comment period, and also announced the comment solicitation at a Mid-Atlantic Fisheries Management Council meeting. This message was also prominently posted on the GARFO website to further encourage public comment. There were no comments received for this collection revision.

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

No payment or gift has been or 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 is 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 this collection or the Permit Family of Forms (OMB Control No. 0648-0202) is considered confidential and would not be disclosed except as provided in Section 402(b) of the Magnuson-Stevens Act.

The permit and permit-related information is covered by the Privacy Act System of Records Notice (SORN), COMMERCE/NOAA-19, Permits and Registrations for United States Federally Regulated Fisheries. An amended SORN was published on August 7, 2015 and became effective on September 16, 2017. An updated SORN is under review at the Department of Commerce.

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 time burden of this information collection is presented in Table 1. **The total annual new responses are 986 and new annual time burden is 1446.26 (1446) hours. The new totals are 42,450 responses (increased from 41,464) and 4831 hours (increased from 3385).**

Respondents have increased to 1986 , from 426 (current respondents being limited access permit holders only) to include all potential open access permit holders.

Vessel Permit Swap Form

Under this data collection, we expect that there will be a maximum of 10 responses from vessels that will be eligible to swap based on the criteria established in Amendment 20 that an entity which owns multiple vessels issued longfin squid/butterfish moratorium permits as of May 26, 2017, would have a one-time opportunity to swap one Tier 1 longfin squid moratorium permit issued to one of its vessels with a longfin squid Tier 2 moratorium permit issued to another of its vessels. **Under these criteria, we expect 10 vessels will be eligible to swap permits. We expect 3 annual responses (1 response per vessel * 10 vessels/3 because this is a one-time occurrence) and a time burden of .26 hours (1 response per vessel * 10 vessels * .08 hours per form/3 because this is a one-time occurrence).**

New Permit Application

Amendment 20 will require longfin squid permit holders that have not been issued a longfin squid Tier 3 moratorium permit to complete an application for a Tier 3 longfin squid moratorium permit. As of 2017, which is the year used for qualifications, there are 1560 open access vessels that may apply for a Tier 3 longfin squid moratorium permit. It will take 1 hour to apply for a new permit. Under this collection, the new burden requirement would be **520 annual responses (1 response per vessel*1560 total permit holders/3 because this is a one-time occurrence and the time burden is expected to be 520 hours (1 response per vessel*1560 total permit holders* 1 hour per form/3).**

Permit Appeals

Amendment 20 would allow permit holders that have been issued a Tier 2 permit, and denied a longfin squid Tier 1 moratorium permit and permit holders that have applied for a Tier 3 longfin squid moratorium permit that have been denied, to appeal that denial by submitting additional information to the Regional Administrator that demonstrates why the determination by NMFS was incorrect. There will be 169 vessels that do not qualify for a Tier 1 permit that will be issued a Tier 2 permit who may file an appeal, in addition to about 1220 vessels that may not qualify for a Tier 3 permit and could file an appeal, for a total of 1389 vessels. Under this data collection there will potentially be **463 annual responses (1 response per vessel * 1389 vessels/3 because this is a one-time occurrence) If the maximum number of permit holders proceed with the appeals process the time burden is expected to be 926 hours (1 response per vessel * 1389 vessels * 2 hours)/3.**

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).

The cost burden of this information collection is presented in Table 1. The total annual cost for all new requirements in this information collection is \$483. Current costs are \$111,807. **New total costs will be \$112,290.**

Vessel Permit Swap Form

Under this data collection, we expect that there will be a maximum of 10 responses from vessels that will be eligible to swap based on the criteria established in Amendment 20 that an entity that owns multiple vessels issued longfin squid/butterfish moratorium permits as of May 26, 2017, will have a one-time opportunity to swap one Tier 1 longfin squid moratorium permit issued to one of its vessels with a longfin squid Tier 2 moratorium permit issued to another one of its vessels. The permit swap form can be submitted by mail or electronically. Under this criteria, 10 vessels will be eligible to swap permits. **We expect 3 annual responses (1 response per vessel * 10 vessels/3 because this is a one-time occurrence). Under this data collection, there will be an estimated cost burden of \$1.63 (1 response per vessel * 10 vessels*\$.49/3)**

New Permit Application

Amendment 20 would require longfin squid permit holders that have not been issued a longfin squid Tier 3 moratorium permit to complete an application for a Tier 3 longfin squid moratorium permit. As of 2017, the year used to qualify Tier 3 permit holders, there were a total of 1560 open access permits holders that may apply for the Tier 3 permit. It will take 1 hour to apply for a new permit. Under this collection, the new burden requirement would be **520 annual**

responses (1 response per vessel*1560 total permit holders/3 because this is a one-time occurrence) and the cost burden is expected to be \$254.80 (1 response per vessel*1560 total permit holders* \$.49 per response/3).

Permit Appeals

Amendment 20 would allow permit holders that have been issued a Tier 2 permit, and denied a longfin squid Tier 1 moratorium permit and permit holders that have applied for a Tier 3 longfin squid moratorium permit that have been denied, to appeal that denial by submitting additional information to the Regional Administrator that demonstrates why the determination by NMFS was incorrect. The permit category itself would be used by NMFS to identify these Tier 1, 2, and 3 moratorium longfin squid permits, on a case-by-case basis, to ensure compliance with the restrictions associated with each moratorium permit category. There will be 169 vessels that do not qualify for a Tier 1 permit that will be issued a Tier 2 permit who may file an appeal, in addition to about 1220 vessels that may not qualify for a Tier 3 permit and could file an appeal, for a total of 1389 vessels. Under this data collection there will potentially be **463 annual responses (1 response per vessel * 1389 vessels/3 because this is a one-time occurrence) and the cost burden is expected to be \$226.87 (1 response per vessel * 1389 vessels*\$.49 per response/3).**

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

The total annualized burden to the Federal government from the forms associated with Amendment 20 is 54,980.17 hours. The total cost incurred by the federal government by these actions is \$28,748.

New Permit Application

Costs likely to be incurred by the government include the costs of processing permit applications. Estimated annualized cost to the Federal Government assumes that the average cost for issuance of a permit is \$33/permit, including labor, printing, distribution, computer time, and handling, as calculated in the 0202 family of forms. The cost for processing the new permits is expected to be **\$17,160.00 because 520 annual responses (1 response per vessel*1560 total permit holders/3 because this is a one-time occurrence)* \$33.00/permit. The time to process new permits is 31,200 minutes because 520 annual responses (1 response per vessel*1560 total permit holders/3).**

Vessel Permit Swap Form

Government costs associated with the permit swap form collection and appeals form collections reflect a cost of \$25/hour to the government. The time needed for government staff to process a vessel permit swap request form is estimated at 10 minutes (0.17 hours) per request. This results in an estimated annualized cost to the government over three years of **\$12.75 (3 responses * 0.17 hours/response *\$25/hour) to review permit swap requests. This is rounded to \$13.00 on the burden table below. The total time burden is expected to be 10 minutes (3 responses*10 minutes/3).**

Permit Appeals

The annual estimated cost to the Federal Government is estimated to be \$25/hour for processing appeals and it is expected that processing an appeals form would take 1 hour. **The cost of**

processing appeals is expected to be \$11,575 (1 response per vessel * 1,389 vessels * \$25/hour/3 because this is a one-time occurrence). The anticipated time burden on the government is expected to be 27,780 minutes (1 response per vessel * 1,389 vessels*60 minutes/3).

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

Program Changes: An increase in the number of responses from the public (41,464 to 42,450), burden hours (3,385 to 4,831.26), and costs to the public (\$111,806 to \$112,012) is due to:

- 1) Amendment 20 creates the opportunity for permit holders to swap permits in order to best maximize their business;
- 2) Amendment 20 will require longfin squid permit holders that have not been issued a longfin squid Tier 3 moratorium permit to complete an application for a Tier 3 longfin squid moratorium permit and;
- 3) Those vessels who do not qualify for a Tier 1 or Tier 3 permit can appeal that initial decision and request to be issued a SMB 1A permit through an appeals process. This requires an appellant to submit a letter with documented support of their appeal.

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 and Mid-Atlantic Fishery Management Council staff 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	Public				Government		
				Response time (minutes)	Total time burden (hours)	Cost per item	Total Public cost	Response time per item (minutes)	Total Government Response Time	Total Government Cost
Reporting requirements for MSB Permit holders										
Weekly VTR	135	40	5,400	5	450	\$0.49	\$2,646	15	1350	\$33,750
Trip Declaration: Mackerel	132	8	1,056	5	88	\$0.50	\$528	10	176.0	\$4,400
Trip Declaration: Longfin Squid	312	22	6,864	5	572	\$0.50	\$3,432	11	1,258.4	\$31,460
VMS Operation	80	1	0	0	0	\$600.00	\$48,000	0	0	\$0
Automated VMS polling	80	8,760	0	0	0	\$0.06	\$42,048	0	0	\$0
Daily VMS Catch Reports: Mackerel	132	24	3,168	5	264	\$0.60	\$1,901	10	528	\$13,200
Daily VMS Catch Reports: Longfin Squid	312	44	13,728	5	1,144	\$0.60	\$8,237	11	2,517	\$62,920
Mackerel pre-landing notification	132	8	1,056	5	88	\$1.00	\$1,056	15	264	\$6,600
Power down exemption	80	2	160	5	13	\$0.49	\$78	15	40	\$1,000
Observer reporting changes for vessels										
Pre-trip notification to observer program	132	8	1,056	5	88	\$0.00	\$0	10	176	\$4,400
Trip Cancellation notification to observer program	132	8	1,056	1	18	\$0.00	\$0	5	88	\$2,200
Released catch affidavit: Mackerel	132	8	1,056	5	88	\$0.49	\$517	30	528	\$13,200
Released catch affidavit: Longfin Squid	312	22	6,864	5	572	\$0.49	\$3,363	31	3,546.4	\$88,660
Vessel Permit Swap Form (divided by 3 because this is a one time collection)	10	1	3	5	.26	\$0.49	\$1.63	10	.17	\$13

				Public				Government		
	Number of entities	Items per entity	Total # of items	Response time (minutes)	Total time burden (hours)	Cost per item	Total Public cost	Response time per item (minutes)	Total Government Response Time	Total Government Cost
New Permit Application (divided by 3 because this is a one time collection)	1,560	1	520	60	520	\$0.49	\$254.80	60	31,200	\$17,160
Permit Appeals (divided by 3 because this is a one time collection)	1,389	1	463	120	926	\$0.49	\$226.87	60	23,780	\$11,575
Amendment 20 Totals			986		1,446		\$483	130.00	54980.17	\$28,748
Pre Amendment 20 Totals			41,464		3,385		\$111,806		10,471.8	\$261,790
New Totals			42,450		4831		\$112,289		65,451.97	\$290,538