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Adrienne Thomas  
NOAA PRA Officer

Submitted via email to [NOAA.PRA@noaa.gov](mailto:NOAA.PRA@noaa.gov).

RE: Docket No. OMB Control Number 0648–0223

Dear Ms. Thomas:

The American Albacore Fishing Association (“AAFA”), which represents commercial North Pacific albacore (NPA) pole and line and troll fishermen who collectively harvest almost half of the total US albacore catch, appreciates this opportunity to offer the following comments on the recently published request is for extension of a currently approved collection of information – namely logbooks required in the Pacific Hook and Line fishery (also known as the albacore troll and pole-and-line fishery).

The Federal Register Notice<sup>1</sup> seeks public comments on the following: (1) whether the proposed information collection is necessary for the proper functions of the Department, including whether the information will have practical utility; (2) Evaluate the accuracy of our estimate of the time and cost burden for this proposed collection, including the validity of the methodology and assumptions used; (3) Evaluate ways to enhance the quality, utility, and clarity of the information to be collected; and (4) Minimize the reporting burden on those who are to respond, including the use of automated collection techniques or other forms of information technology.

**Necessity of the information collected:**

Timely and accurate information on catch and effort is critically important in both assessing the status of the NPA stock and complying with our obligations under international Treaties and Agreements. This information also better prepares the Department of Commerce, through the National Marine Fisheries Service, to advance positions on international management of the NPA stock that do not disadvantage U.S. based harvesters and dependent fishing communities. Negotiations on the future management of the NPA fishery continue to occur at the international level – particularly at the Western and Central Pacific Fisheries Commission’s Northern

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<sup>1</sup> 91 Fed.Reg.1753

Committee and the Inter-American Tropical Tuna Commission.

**Accuracy of time and cost estimates:**

We find the estimates to be reasonable. We note the increased availability of electronic logbook applications, may reduce the estimated total annual costs to the public as fishermen transition from paper logbooks, with postage prepaid, to electronic submission of any required information.

**Opportunities to enhance the quality, utility, and clarity of the information to be collected:**

Transitioning to electronic logbooks, depending on how those are designed, should result in better data being submitted. Including data validation methodologies should reduce, if not eliminate, entries that are illegible or outside the bounds of what is possible. For example, an electronic logbook that is linked with a vessel's GPS system could guard against entries of fishing effort and/or catch coordinates that are not in the North Pacific. More accurate and timely reporting will better enable the U.S. to meet its reporting requirements.

**Minimization of the reporting burden**

We very much appreciate consideration of the burden on our harvesters. There is a learning curve associated with the introduction of new technologies. In 2024, AAFA worked with a private company to develop an application for our members to help with the operation of their small businesses. One of the application's functionalities is an electronic logbook that was developed in partnership with NMFS and the Pacific States Marine Fisheries Commission. Our members very much appreciated the ability to enter a day's catch and effort information on the application and then submit it electronically at the trip's conclusion. It also better prepared AAFA for management discussions as it allowed us to better understand where fishing activity was occurring on a given day, week, month, or season.

In conclusion, AAFA supports the extension of the currently approved collection of information for the Pacific Hook and Line fishery which operates of the west coast of the U.S.

Sincerely

Natalie Webster  
Director of Operations