

**ENFORCEMENT CONSULTANTS REPORT ON  
FUTURE COUNCIL MEETING AGENDA AND WORKLOAD PLANNING**

The Enforcement Consultants (EC) appreciates the Council’s interest in addressing Vessel Monitoring System (VMS) ping rate requirements following an adverse ruling by Chief Administrative Law Judge, Susan L. Biro, in the case of the F/V Risa Lynn. In that ruling, Judge Biro ruled that the one-hour VMS ping rate was not adequate for enforcing the Rockfish Conservation Area continuous transit rule. When briefed at the September Council meeting, Office of Law Enforcement (OLE) requested the Council consider increasing the ping rate from (one hour to fifteen minutes as a short-term fix to this situation while a long-term strategy could be developed. The EC recognizes that increasing the ping rate will increase the transmission cost for vessels required to carry VMS. Those cost increases are summarized in Table 1: VMS Cost Summary.

**Table 1: VMS Cost Summary (1 hour rates are minimums package rates, 15 minute rates assume 30 fishing days a month).**

Ping Rate Cost	Skymate	CLS America (Argos)	GIMPCS Thran & Thran	Boatrac	Faria
1 hour	\$21.99	\$45	\$43	\$34.95	\$44.95
15 minutes	\$85.19	\$90	\$172	\$59.95	\$69.95

Considering this issue in the long-term offers a number of potentially viable alternatives to increasing the ping rate. These alternatives could be evaluated and developed in concert with the Council’s ongoing alternative to human observers / Electronic Monitoring Program development process.

**Table 2: Electronic Monitoring Matrix**

EM Type	TRat with Camera	TRat with Observer	Open Access	Limited Entry Tier
VMS	Yes/ 1 hr <sup>2</sup>	Yes / 15m <sup>1</sup> /1hr <sup>2</sup>	Yes / 15m <sup>1</sup> /1hr <sup>2</sup>	Yes / 15m <sup>1</sup> / 1hr <sup>2</sup>
Data Logger	No <sup>3</sup>	No <sup>1</sup> / Yes <sup>2</sup>	No <sup>1</sup> / Yes <sup>2</sup>	No <sup>1</sup> / Yes <sup>2</sup>
Camera	Yes	No	No	No
E logbook	Yes <sup>4</sup>	No <sup>1</sup> /Yes <sup>4</sup>	No <sup>1</sup> / Yes <sup>2</sup>	No <sup>1</sup> / Yes <sup>2</sup>

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<sup>1</sup> 15 minute ping rate / No E Logbook / No Data Logger / No Camera

<sup>2</sup>EM data logger capabilities / 1 hr ping rate

<sup>3</sup> Camera has data logger capabilities

<sup>4</sup> Preferred: E Logbook has data logger capabilities / quicker discard turnaround / better science / better enforcement

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