

## 11.0 PAPER WORK REDUCTION ACT (PRA)

The major purposes of the PRA of 1980 are to: (1) minimize the federal paperwork burden for individuals, small businesses, state and local governments; (2) minimize the cost to the federal government of collecting, maintaining, using and disseminating information and (3) ensure the collection, maintenance, use and dissemination of information by the federal government is consistent with applicable laws relating to confidentiality. If this amendment is approved, collection of the information described in this chapter would require completion of a PRA analysis and an Office of Management and Budget authorization. During implementation, it may be determined that information in addition to that described here is needed to properly implement the amendment. At that point, information requirements will be modified and appropriate analysis done under the PRA.

This amendment would require three primary information collection activities:

1. During the initial issuance process, vessel owners would be required to submit proof of their landings and evidence relevant to other considerations for establishing their qualifications. This would be a one time submission.
2. After initial issuance, whenever a permit is transferred to a different vessel or a different vessel owner, the permit owner would be required to submit notice of the transfer to NMFS.
3. Each year, permits would be renewed. Included in the renewal form would be a mail survey on the intent of holders of LE permits to harvest potentially underutilized species for domestic processors.

The following is a partial list of the information which would be collected in each of these three collection activities.

### 11.1 Initial Permit Issuance

The amount of time required to provide information on an owner's and vessel's qualifications for a permit is the most difficult to estimate. This would however be a one time collection of information (except for individuals upgrading provisional permits, in which case two separate applications would be required).

Vessel owners applying for "A" endorsements would be required to submit the following:

1. Applicants name and address;
2. Vessel name and identification numbers;
3. Evidence of current ownership of the vessel;
4. Evidence of sufficient landings by the vessel
  - (a) with the limited entry gear during the qualification period, or
  - (b) meeting the provisional "A" endorsement upgrade criteria.

Vessel owners applying for provisional "A" endorsement under the construction or conversion criteria would be required to submit the following:

1. Applicants name and address;

2. Vessel name and identification numbers;
3. Evidence of current ownership of the vessel;
4. Evidence of ownership as of August 1, 1988;
5. Evidence that construction or conversion began prior to August 1, 1988;
6. Evidence that construction or conversion was not completed prior to July 11, 1984;
7. Evidence of sufficient landings to meet the upgrade criteria since the date of completion.

Vessel owners applying for provisional "A" endorsement under the replacement vessel criteria would be required to submit the following:

1. Applicants name and address;
2. Replacement vessel name and identification numbers;
3. Evidence of current ownership of the replacement vessel;
4. Replaced vessel name and identification numbers;
5. Evidence of past ownership of the replaced vessel;
6. Name and address of the current owner of the replaced vessel;
7. Evidence that the replaced vessel would have qualified for a permit;
8. Evidence that the rights to the permit from the replaced vessel were transferred to the owner of the replacement vessel;
9. Evidence that the replaced vessel was "in place" prior to September 30, 1990;
10. Evidence of sufficient landings to meet the upgrade criteria since the date of replacement.

Vessel owners applying for provisional "A" endorsement under the prohibited gear criteria would be required to submit the following:

1. Applicants name and address;
2. Vessel name and identification numbers;
3. Evidence of current ownership of the vessel;
4. Evidence that the vessel made the landings necessary to meet the MLRs specified for the window period.

Vessel owners applying for "B" endorsements would be required to submit the following:

1. Applicants name and address;
2. Vessel name and identification numbers;
3. Evidence of current ownership of the vessel;
4. Evidence of continuous ownership during and since the last three landings of groundfish with the limited entry gear prior to August 1, 1988.

Vessel owners applying for designated species "B" endorsements would be required to submit the following:

1. Applicants name and address;
2. Vessel name and identification numbers;
3. Evidence of current ownership of the vessel;
4. Evidence of commitments to deliver the designated species to domestic processors (or, in the event of the possibility of an apportionment of TALFF, commitment to foreign processors).

The amount of time vessel owners spend collecting and submitting information would depend on how well they have maintained records. Some vessel owners may have to make requests to a state for evidence of landings, if they have not kept copies of their landing tickets.

### 11.2 Permit Transfer

Information on permit transfer might be anticipated to require the permit owner 5 to 10 minutes of work to fill out and mail notice of the change in ownership or of vessel registration. Information to be provided would be the:

1. previous owners name and address and new owner's name and address (same in the case of transfer to a vessel owned by the same individual),
2. the previous vessel identification number and identification number for the new vessel, and
3. the date of transfer (notarization of the statement might also be required).

This paper work would only be required on transfer of the permit. If vessel owners keep their vessels for the length of the minimum depreciation period (seven years) the amount of work required might be an average of about one minute a year. This information is used to track permit ownership, verify compliance and address notice of annual fees to the proper individuals.

### 11.3 Permit Renewal and Survey of Harvest Intent

Permit renewal would require the collection of little if any additional information. Forms would be supplied with the information currently contained in NMFS records and the individual renewing the permit would be asked to update any information if necessary. The survey of harvest intent would require vessel owners to fill out and return a form on their potentially underutilized species harvest intent once a year. There are currently three potentially underutilized species of concern (Pacific whiting, shortbelly rockfish and jack mackerel). The time involved in filling out and returning this form for all three species might be 20 minutes once a year. The information to be provided for each species would likely be comprised of a statement of the:

1. amount of the potentially underutilized species which they have firmly committed to delivering for domestic processors (or, in the event of the possibility of an apportionment of TALFF, commitment to foreign processors),
2. processor to whom they have made this commitment,
3. time of year during which deliveries would be made, and
4. nature of the arrangements (contingent on price, any amount up to a certain number of pounds, a certain number of pounds per week, etc.).

This information would be used to determine whether harvesting intent of the permitted fleet is sufficient to meet processor needs for potentially underutilized species, or whether additional temporary LE permits should be issued. It would also serve as a cross check on the processor statements about the amount they intend to process. Vessel owners not intending to harvest underutilized species would not need to return the form.

Permit owners would also be required to keep NMFS apprised of their current address so NMFS may notify them of annual permit fees.