

**Supporting Statement
for
Application for Tonnage Measurement of Vessels**

OMB No.: 1625-0022
COLLECTION INSTRUMENTS: CG-5397 & Instruction

A. Justification

1) Circumstances that make the collection of information necessary.

Title 46 U.S. Code section 14104 requires a vessel to be measured for tonnage if the application of a law of the United States to that vessel is determined by its tonnage. Tonnages are used as a basis for vessel taxes, licensing, inspections, safety requirements and operating fees. The law prescribes four systems of tonnage measurement: the "Convention Measurement System," the "Standard Regulatory Measurement System," the "Dual Regulatory Measurement System," which are designated as "Formal Measurement Systems", and the "Simplified Regulatory Measurement System." Tonnage measurement under the Simplified system is an option available to owners of certain qualifying vessels and requires the least amount of information to be collected. The authorization for submitting or retaining tonnage measurement applications is found in 46 CFR 69.17, which refers to 46 CFR 69.205 which specifically applies to Simplified measurement.

The statutory authority is 46 U.S. Code 14104.

Additional information is required if an owner requests certain tonnage treatment. These information requirements are at:

- (a) 46 CFR 69.117(f) (Request to exempt water-ballast space that is in excess of 30 per cent of the vessel gross tonnage);
- (b) 46 CFR 69.121(d) (Request to treat certain framed-in engine room spaces as part of a propelling machinery space); and
- (c) 46 CFR 69.19 (Request for remeasurement and adjustment of tonnage).

2) Purposes of the information collection.

The information required for the optional Simplified system is collected on forms which may be obtained from the Coast Guard Marine Safety Center (MSC) and are available through MSC and National Vessel Documentation Center (NVDC) web sites. Information required for measurement under other Formal Measurement Systems is more complex in nature and is submitted by the vessel owner to a third party organization delegated the authority by the Coast Guard to perform the service. The information being collected is used to establish a vessel's registered dimensions and gross and net tonnages. Without the information, a vessel could not be assigned tonnages or documented as a vessel of the United States.

3) Consideration of the use of improved information technology.

The simplified measurement application form is available through the Internet at this [LINK](#). The applicant has the choice of printing out the form, and then manually filling it in, or filling in the electronic version of the form. In either case, for documented vessels, the completed forms are transmitted to the NVDC by fax, mail, or as email attachments, and for undocumented vessels, the completed form may be retained, at the vessel owner's option, as evidence of the tonnage measurement. For Formal measurement, 100% of the reporting requirements can be accomplished electronically. We estimate that approximately 30% of the formal measurement responses (about 1% of the total tonnage measurement responses) are collected electronically. The NVDC e-mail is NVDC.pdf.filing@uscg.mil.

This Coast Guard form was developed and is maintained as a service to the public. It provides a preferred alternative to the regulatory requirement of obtaining a formal measurement through an

Authorized Measurement Organization, or a free-formatted submission of a vessel owner's tonnage calculation based on their interpretation of the Federal regulations. The Simplified Tonnage Application identifies the information required by regulations for virtually every vessel in the U.S., explains in plain language what is required, and completes the mathematical tonnage calculations for the owner using a background script (code). Without this form, not only would the burden on the public be substantially greater, the burden on the government would also be significantly higher as the NVDC would have to interpret individual calculation formats and narratives of vessel owner's tonnage assessments, return documentation requests based on the tonnage assessment requiring more information, and have to allocate substantial staff-hours toward responding to public inquiries regarding tonnage requirements. This form provides the public with a quick and easy way of submitting the information which is already required by Federal regulations. There is no material cost to obtaining or submitting the form, and the obligated time it takes to fill out is significantly less than any other alternative. There have been no complaints to the Coast Guard regarding the need for the form. Aside from an occasional (monthly) question about filling the form out on novel/unusual vessels, all the public feedback regarding the form has been positive.

Regarding Usability Testing, this ICR—

- Public-facing instructions were tested by the staff of the CG Office of Standards Evaluation and Development (CG-REG) to ensure the use of plain language. No changes were needed.
- Is not related to a public benefit program as detailed in OMB M-22-10 (titled "Improving Access to Public Benefits Programs Through the Paperwork Reduction Act" dated April 13, 2022).
- Undergoes pre-publication and post-publication testing of new or revised public use forms to validate data field functionality.
- Is required by international treaty, statute, and/or regulation as noted in section 1 of the Supporting Statement.

Usability Testing participants reported that they had no difficulty navigating the form or understanding the instructions. As a result, Coast Guard did not make any changes to the collection.

4) Efforts to identify duplication.

There is no duplication of information collected; only one submittal is required per vessel and each vessel is an individual case. The information collected is not adaptable for any other U.S. Coast Guard purpose. Tonnage measurement is frequently the first step required to document a vessel. There is no other source for this information at that time. The information necessary to process the submittal is available only from the applicant or vessel manufacturer.

5) Methods to minimize the burden to small business if involved.

There is potential impact on small businesses or entities, since designers, builders, owners, or operators of U.S.-flag vessels who submit tonnage related information are often small businesses or entities. To minimize this impact, considerable flexibility is allowed in the way data can be submitted. The Application for Simplified Measurement is available on a USCG web site to facilitate access to this form.

6) Consequences to the Federal program if collection were conducted less frequently.

The collection of information necessary to measure a vessel for tonnage is a one-time requirement for any vessel to which the application of a law of the United States to the vessel depends on the vessel's tonnage. Once a vessel is measured, there is no further measurement requirement unless the vessel is altered, or undergoes a change in service, number of passengers, or other factors that could affect the assigned gross or net tonnage.

7) Special collection circumstances.

This information collection is conducted in manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

8) Consultation.

A 60-Day Notice will be published in the Federal Register to obtain public comment on this collection.

9) Provide any payments or gifts to respondents.

There is no offer of monetary or material value for this information collection.

10) Describe any assurance of confidentiality provided to respondents.

There are no assurances of confidentiality provided to the respondents for this information collection. This information collection request is covered by the Marine Information for Safety and Law Enforcement (MISLE) Privacy Impact Assessment (PIA) and System of Records Notice (SORN). Links to the MISLE PIA and SORN are provided below:

- https://www.dhs.gov/sites/default/files/publications/privacy_pia_uscg_misle.pdf
- <http://edocket.access.gpo.gov/2009/E9-14906.htm>

11) Additional justification for any questions of a sensitive nature.

There are no questions of sensitive language.

12) Estimate of annual hour and cost burdens to respondents.

- The estimated annual number of respondents is 18,651.
- The estimated annual number of responses is 18,651.
- The estimated annual hour burden is 38,157 hours.
- The estimated annual cost burden is \$2,060,478.

The burden to respondents is provided in Appendix A. This collection accounts for two different methods of tonnage measurement—

- (a) Simplified Measurement
- (b) Formal Measurement

(a) For a vessel owner that elects tonnage assigned under the Simplified system, a form is provided by the Coast Guard. We estimate it takes 2 hours to complete the form.

(b) For a vessel owner that elects tonnage assigned under the Formal system, we estimate it takes 5 hours¹ to complete the submission.

We expect that a vessel owner would complete the Simplified or Formal system application. We estimate that a vessel owner's wage rate is equivalent to the average of—(1) Bureau of Labor Statistics (BLS) wage rate for Captains, Mates, and Pilots of Water Vessels (53-5021) [May 2023, mean hourly wage, loaded 50%, and rounded]² and (2) BLS wage rates for Motorboat Operators (53-5022) [May 2023, mean hourly wage, loaded 50%, and rounded].³

13) Estimated annualized capital and start-up costs.

¹ There is considerable variance in the amount of information required since it is not always directly related to vessel size or service. The burden could be as little as that required under the Simplified system, or much greater if the owner requests certain options that may require preparation of special plans and/or water ballast justification calculations. Accordingly, an average response time is estimated by considering the time required to prepare, assemble, and submit all special plans and other information required for a "typical" vessel.

² <https://www.bls.gov/oes/2023/may/oes535021.htm>

³ <https://www.bls.gov/oes/2023/may/oes535022.htm>

There are no capital, start-up or maintenance costs associated with this information collection.

14) Estimates of annual Federal Government costs.

The estimated annual Federal Government cost is \$256,603 (See Appendix B).

(a) Processing a Simplified measurement system application takes about 0.25 hours for a Tonnage Application Reviewer (junior). For the wage rate, we used Office of Personnel Management (OPM) data [2024-RUS Salary Table, GS-5-Step 5, hourly basic rate, loaded 65%, and rounded].⁴

(b) Processing a Formal measurement system application is delegated to third party organizations. The oversight task is done by a Tonnage Application Reviewer (senior). For the wage rate, we used OPM data [2024-RUS Salary Table, GS-13-Step 5, hourly basic rate, loaded 65%, and rounded].⁵

15) Reasons for the change in burden.

The change in burden is an ADJUSTMENT due to a change (i.e., increase) in the estimated annual number of responses. There is no proposed change to the reporting or recordkeeping requirements of this collection. The reporting and recordkeeping requirements, and the methodology for calculating burden, remain unchanged.

16) Plans for tabulation, statistical analysis, and publication.

This information collection will not be published for statistical purposes.

17) Approval for not explaining the expiration date for OMB approval.

The Coast Guard requests an exemption from the requirement to display the OMB expiration date on form CG-5397 "Application for Simplified Measurement" for several reasons. First, the addition of an OMB expiration date will impose an unnecessary burden on U.S.-flag vessel owners/operators. Tonnage measurement is a one-time action. For undocumented vessels, form CG-5397 serves as permanent evidence of tonnage measurement. If form CG-5397 had an OMB expiration date, then a U.S.-flag vessel owner/operator would have to periodically interact with the Coast Guard to reissue the form so that it stays current. Reissuance of a form where the tonnage measurements remain unchanged is considered an unnecessary administrative burden. Second, as a vessel transits from port-to-port in the U.S. or to foreign ports, the U.S. vessel owner/operator may be required to show evidence of tonnage. Having a "past due" expiration date on the form may cause confusion with boarding officers, resulting in U.S.-flag vessel being delayed or detained in port. Eliminating the OMB expiration date would eliminate this potential problem. For these reasons, we request that the OMB expiration date be omitted from form CG-5397. However, the OMB expiration date will be displayed on the Instruction sheet.

18) Explain each exception to the certification statement.

The Coast Guard does not request an exception to the certification of this information collection.

B. Collections of Information Employing Statistical Methods.

This information collection does not employ statistical methods.

⁴ https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/RUS_h.pdf

⁵ https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/RUS_h.pdf

Appendix A: Total Estimated Annual Burden on Industry*Reporting and recordkeeping*

| Category | Respondents and Responses | Burden Hours / Response | Annual Hour Burden | Wage Rate | Annual Cost Burden |
|---|---------------------------|-------------------------|--------------------|-----------|--------------------|
| Simplified Measurement System submissions | 18,366 | 2 | 36,732 | \$54 | \$1,983,528 |
| Formal Measurement System submissions | 285 | 5 | 1,425 | \$54 | \$76,950 |
| Totals | 18,651 | | 38,157 | | \$2,060,478 |

*Estimates may not sum due to rounding

Total

| | |
|--------------------------|--------------------|
| Total Respondents | 18,651 |
| Total Responses | 18,651 |
| Total Hour Burden | 38,157 |
| Total Cost Burden | \$2,060,478 |

Appendix B: Estimated Annual Federal Government Cost

| Category | Responses | Hours / Response | Annual Hours | Wage Rate | Annual Cost |
|---------------------------------------|-----------|------------------|--------------|-----------|------------------|
| Simplified Measurement System reviews | 18,366 | 0.25 | 4,592 | \$35 | \$160,720 |
| Formal Measurement System reviews | 285 | 3.62 | 1,031 | \$93 | \$95,883 |
| Totals | | | | | \$256,603 |

*Estimates may not sum due to rounding

Total

| | |
|-------------------|------------------|
| Total Cost | \$256,603 |
|-------------------|------------------|