

# PUBLIC SUBMISSION

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Comments Due: November 07, 2011

Late comments are accepted

**Docket:** [USCG-2011-0710](#)

Cancelled

**Comment On:** [USCG-2011-0710-0004](#)

Agency Information Collection Activities; Proposals, Submissions, and Approvals (Federal Register Publication)

**Document:** [USCG-2011-0710-0006](#)

Tom Hudson

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## Submitter Information

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**Government Agency:** uscg

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## General Comment

This submission is flawed and should be rejected until correct numbers are submitted. A USCG employee has chosen to submit erroneous information. Considering the penalties associated with such action, this review should be suspended and an investigation done to find out the truth.

The remaining information should be closely examined to determine who submitted the one hour estimates for the government and industry. That number is so out of touch that the source of the number MUST be reviewed. Such false information results in fault calculations and decisions based on such fundamentally flawed information cannot be depended on. Any information submitted should be at least be correct in some manner. This submission is not.

My information is based on research and personal experience. If one does any research

it can be found that the each investigation is estimated to takes 5.5 to 7.5 hours to complete the preliminary report stage. That was from 1994 and the greater complexity of equipment will make that greater which means the actual time used is at least 6 times the estimate used, and probably much more.

For industry the burden is at least an hour each activity to gather information. That is, gather information; take statements; review information; and write it (4 hours there). After my exposure to the ignorance of field personal, I will never allow a document to be submitted until the P&I attorney checks it. That is at least an hour of \$200 time. (or 5 hours at the rate proposed).

If the USCG continues to use this form, industry must be budgeted at least 10 hours per form. Any incident with injuries or damages would take much longer. Our last incident involved NO HARM TO ANYTHING OR ANYONE, but the IO insisted on a 2692 which meant drug and alcohol screens. That was about 8 man hours.

What other errors (besides the expansion of the rule without hearings) are hidden in tis submission?