

September 26, 2021

Submitted to:

The U.S. Coast Guard via www.regulations.gov, Office of Information and Regulatory Affairs (OIRA) via dhsdeskofficer@omb.eop.gov

Regarding:

State Registration Data

Docket No. USCG-2014-0713

OMB Control Number 1625-NEW

On behalf of the National Association of State Boating Law Administrators (NASBLA), which represents the recreational boating law officials in the 50 states, the District of Columbia, and five U.S. territories (hereafter referred to as the “states”), I am writing to comment on the U.S. Coast Guard’s request to OMB for approval of the information collection **1625-NEW, State Registration Data**. NASBLA first submitted comments to this docket on [December 8, 2014](#), [January 30, 2017](#) and [November 13, 2018](#). We welcome the opportunity to do so again.

It is our understanding that the primary purpose of this current Notice is to solicit public comment on the utility and other aspects of this recreational vessel registration data collected under 33 CFR 174.123 (Annual Report of Numbered Vessels), and annually submitted by the states to the Coast Guard for statistical purposes. We further understand that the regulatory amendments cited in the March 28, 2012 [Final Rule on Changes to Standard Numbering System \(SNS\), Vessel Identification System \(VIS\) and Boating Accident Report Database \(BARD\)](#), and which were intended to harmonize terminology across these systems, require revisions to the content of this collection and, inevitably, to the form (CGHQ-3923) that the states use to summarize and submit the data.



In the comments NASBLA submitted [November 13, 2018](#), we did not take issue with the content of that rule, the harmonization of terminology, or the importance of the information collection. Over the years, NASBLA has been supportive of efforts to create clarity and consistency in data collection across systems. In that spirit, our comments to the docket at that time raised the question of why such effort had been put forward by the Coast Guard to incorporate authorized terms and definitions and harmonize data across systems when it appeared, from the Coast Guard's own admission, that it had not used and does not anticipate internal use for a lot of the data that will continue to be collected by the states as part of the CFR-amended Certificate of Number (CON) application and issuance provisions. NASBLA sought clarification as it deemed the information collection and centralized availability of it to be of value to the states and other sectors. Moreover, as an alternative to the Coast Guard's proposed, trimmed-down version of the collection Form CGHQ-392, on the recommendation of NASBLA's Vessel Identification, Registration & Titling Committee (VIRT), NASBLA submitted a prototype form that would have fully incorporated the new terms and all information the states are required to capture under 33 CFR 174.17 and 174.19.

Since then, Coast Guard representatives have had discussions with the VIRT committee to more fully explain the reasons for a simplified CGHQ-3923 annual collection form, to surface any issues in the collection and seek resolution on differences, and to identify mutually-acceptable revisions to the form for use by the states.

In light of those efforts and based on the recommendation of the VIRT committee, NASBLA supports the information collection request and the version of Form CGHQ-3923 that was posted July 28, 2021, as a supporting document under docket USCG-2014-0713 and as intended for the states' summary and annual submission of recreational vessel registration data to the Coast Guard. In expressing this support, however, we would also like to make note of the following:



- NASBLA acknowledges and appreciates that this version of Form CGHQ-3923 is likely to result in a reduced reporting burden for the states; this, however, is in comparison to the form(s) the states have been using for the annual summary and submission of recreational vessel registration data to the Coast Guard, and not with regard to the substantial data collection and capture requirements that were imposed by the [final rule](#);
- NASBLA strongly encourages the expeditious, formal approval of this information collection request and authorization of the accompanying Form CGHQ-3923 to alleviate uncertainties among the states as to how and to what level of detail these data should be reported to the Coast Guard; and,
- NASBLA strongly encourages the Coast Guard's development and adoption of instructions for the states' use in completing both the Application for Certificate of Number (33 CFR 174.17) and the Form CGHQ-3923, for the sake of data consistency.

We appreciate your consideration of these comments.

Sincerely,

A handwritten signature in black ink, reading "Timothy C. Dunleavy". The signature is written in a cursive, flowing style.

Capt. Timothy C. Dunleavy
Chair