

**December 2, 2021**

**Submitted to:**

The Office of Management & Budget (OMB), Office of Information and Regulatory Affairs (OIRA) via <https://www.reginfo.gov/public/do/PRAMain>

**Regarding:**

State Registration Data (DHS-USCG; Docket USCG-2014-0713)

OMB Control Number: None; new collection; request for OMB control number

ICR Reference Number: [201905-1625-001](#)

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/OIRA for approval of the information collection **State Registration Data (Docket USCG-2014-0714)**. NASBLA had submitted comments to previous Notices regarding this collection on [December 8, 2014](#), [January 30, 2017](#), and [November 13, 2018](#), and commented on the latest 60-day Notice on [September 26, 2021](#). We welcome the opportunity to comment again in response to the current Notice.

It is our understanding that the primary purpose of this 30-day Notice of the Coast Guard’s forwarding of the Information Collection Request to OMB/OIRA is to solicit final 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, affect the content of this collection and, inevitably, the form (CGHQ-3923) that the states use to summarize and submit the data.

In comments previously submitted, NASBLA did not take issue with the content of that final 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, previous comments to the docket 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.

Since then, Coast Guard representatives have had multiple discussions with NASBLA via the association's Vessel Identification, Registration & Titling Committee (VIRT) regarding the aforementioned issues and the contents of the CGHQ-3923 annual collection form. These discussions were part of an effort to surface any further issues about the collection, seek resolution on differences, and identify mutually acceptable revisions to CGHQ-3923 for use by the states.

In light of those efforts and based on the recommendations of the VIRT committee, NASBLA supports the information collection request and the [Form CGHQ-3923](#) submitted to OIRA on Nov. 24, 2021, and 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 aforementioned [final rule](#) on the changes to SNS, VIS, and BARD; and,
- NASBLA strongly encourages the expeditious, formal approval of this information collection request, authorization of the accompanying form, and issuance of any associated guidance that will alleviate uncertainties among the states as to how and to what level of detail these data should be reported to the Coast Guard.

We appreciate your consideration of these comments.

Sincerely,

Kenton K. Turner  
Chair