



June 14, 2010

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Docket Management Facility (DMF)(M-30)  
U.S. Department of Transportation (DOT)  
West Building Ground Floor, Room W12-140  
1200 New Jersey Avenue, SE  
Washington, DC 20590-001

RE: USCG-2010-0231 – Information Collection Request to Office of Management  
and Budget; OMB Control Number: 1625-0089

To Whom it May Concern:

I would like to offer comments related to the notice published in the Federal Register as denoted above. I was personally involved in the survey development process as a member of the Collaboration of Partners (COP), representing both my state boating agency and the National Association of State Boating Law Administrators. I also serve on the National Boating Safety Advisory Council and that Council's Strategic Planning Subcommittee, both of which perform substantial work which relates directly to the Coast Guard's recreational boating safety mission.

As to whether this Information Collection Request (ICR) should be granted based on the collection being necessary for the proper performance of Departmental functions, I support an appropriate effort to conduct a National Recreational Boating Survey in order to obtain important statistical information to help evaluate current programs and form targets for the future. On the other hand, I feel this survey is more complex, burdensome and expensive than necessary to accomplish those tasks.

As additional background on the topic of expense, the estimate repeatedly offered during the development of this survey instrument was a cost per iteration of between \$2 million and \$2.5 million dollars. The actual contract to implement the survey is in excess of \$5 million per iteration. Given the current economic conditions faced within every level of government across our nation, spending at this level is, in my opinion, inappropriate. With regard to the practical utility of the collection, I believe the need to "provide the Coast Guard with the required information in a format suitable to effectively manage the Program" can and must be met through a survey conducted in a more economical manner.

The burden estimate for this biennial survey is reported to be approximately 10,880 hours per iteration. While I may lack professional expertise in estimating time required to complete such a survey, I believe the time estimates are lower than the actual time it will take to complete the surveys. In fact, the survey instrument titled "Telephone Survey, Boat Enumeration" directs the survey taker to explain to the respondent that the survey will take approximately 15 minutes (after already answering some questions. The "Supporting Statement for RBS Survey" document, Table 1, estimates the survey duration to be only 9 minutes. I suggest that the time estimates be revisited and confirmed through trial runs, if that hasn't already been done.

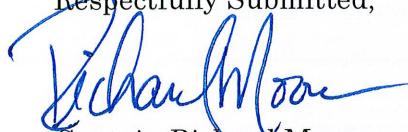
I also believe that the information to be collected is more expansive than necessary. I recall extended conversations during the development of the survey instruments revolving around the wide variety of data desired by the various interests represented. Given the very high cost of this project, I suggest the collection instruments be given an in-depth review to ensure that it is collecting the data absolutely necessary to accomplish the intended mission. As it currently stands, I am confident that the instruments could be whittled down considerably to reduce cost and burden on the public while still providing enough detailed information for the Coast Guard and states to effectively manage their portions of the recreational boating safety program.

Based on my experience and recent discussions with Coast Guard staff on this subject, I share concern expressed by several others about the intent to attempt data collection for 2010 by requiring participants to recall an entire year's worth of information. It has been widely acknowledged that such an effort results in poor data accuracy, and I suggest that data collection begin in 2011 using a single-month recall methodology.

In closing, I support the gathering of sufficient data necessary for the Coast Guard, and the individual states, to effectively evaluate and manage the components of the recreational boating safety program under their responsibility. I do, on the other hand, believe that this ICR, as proposed, is more costly than necessary to accomplish the intended goal, is likely to be more burdensome on the public than estimated, and has a reach that is deeper than that which is necessary. I would support appropriate revision to the data collection instruments to satisfy these concerns.

If additional information is desired related to these comments, I may be reached by email addressed to [richard.moore@myfwc.com](mailto:richard.moore@myfwc.com).

Respectfully Submitted,



Captain Richard Moore  
Boating Law Administrator

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