



June 14, 2010

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 20590-0001

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

On behalf of the National Association of State Boating Law Administrators (NASBLA), which represents the 50 states and six U.S. territories, I am writing to comment on the U.S. Coast Guard's intent to submit an Information Collection Request to the Office of Management and Budget for the National Recreational Boating Survey; OMB Control Number: 1625-0089. [USCG-2010-0231]

NASBLA actively participated in the diverse Collaboratory of Partners that was assembled to assist in the initial development of the content of the survey instruments for this collection. A broad range of data points--associated with the varied interests of the partners--was identified, with questions subsequently formulated for the purpose of gathering those data.

In the years since that development process was undertaken, two things have become clearer. One is that there remains a critical need for the generation of reliable data on exposure. A second is that the ongoing evaluation of the existing strategic plan of the National Recreational Boating Safety Program, which has resulted in proposed revisions for the next five-year period, has crystallized the need to revisit the data priorities for this survey.

NASBLA, through its Engineering, Reporting and Analysis Committee, as well as other organizational projects requiring the analysis of recreational boating accident statistics, has encountered numerous problems in evaluating specific research questions. A critical factor is the lack of available and reliable exposure figures to normalize the accident-related data, notably to account for differences in time spent aboard certain types of recreational vessels or involved in certain types of activities. NASBLA strongly supports the implementation of those elements within the survey which hold the most promise for providing such exposure data. In saying that, NASBLA also supports a survey administration process most likely to achieve high quality exposure data. However, with the proposal to require survey respondents to recall a year's worth of boating experiences in the first survey cycle, it is unlikely that such data quality will be achieved. NASBLA encourages a reevaluation of this proposal.

Further, in support of the data priorities for the national strategic plan, NASBLA also encourages the reevaluation of other survey elements to determine their relevance to effectively evaluating the revised plan objectives and strategies.

Thank you for the opportunity to comment.

A handwritten signature in black ink that reads "Terry West". The signature is fluid and cursive, with the first name "Terry" and last name "West" clearly distinguishable.

Terry West
President