



Ohio Department of Natural Resources

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June 14, 2010

RE: USCG – 2010-0231

Information Collection Request to Office of Management and Budget

OMB control Number: 1625-0089

To Whom It May Concern:

Thank you for the opportunity to comment on the National Recreational Boating Survey. I have been personally involved with this effort as a member of the Collaboration of Partners which initially identified needed survey content. I have continued involvement as a member of the Recreational Boating Safety (RBS) Strategic Planning Panel and as a member of the National Boating Safety Advisory Council to the USCG.

This survey represents an opportunity to gain critical data to advance the national boating safety program. As designed, the survey should effectively capture exposure hours and types of boats being used. The survey should continue to focus on these components in order to address gaps in national data. Unfortunately, the survey predates current (and ongoing) RBS strategic planning efforts and is outdated in several other areas. With escalated costs estimated to complete this national effort, I believe the survey should be streamlined to capture exposure and boat type data only. This reduction in scope would decrease overall costs to the national RBS program while providing usable program statistics.

The stated survey goal is "to draw a general statistical profile of the U.S. recreational boating population," with importance of "boat operators' knowledge of safety measures." I do not believe the various survey instruments will capture usable statistics to determine boat operator's knowledge of safety measures. Here are several reasons why:

- 1) The survey asks only one question on boating safety course completion with a "yes/no" response. There is no follow up to determine what, when, type of course (e.g. classroom or on-water, skills based), length of instruction, type of certificate awarded, and/or course provider. As written, a senior-aged person who completed a camp canoe orientation in their youth could respond with a "yes" answer without knowledge of key boating regulations and realities of the 21st century.
- 2) The survey asks several questions on "types" of life jackets carried aboard and expects the typical boater to specifically distinguish between five types. In my thirty-plus years of work with the general boating public, I believe this series of questions will result in misleading, and therefore unusable, responses. Has the survey been field-tested and validated to ensure the public can appropriately distinguish and respond to what is being asked?



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3) A series of questions follows life jacket "types" regarding the age of people onboard and asking if life jackets were worn during the outing. I believe this statistical information is already collected and available through the current USCG funded JSI observational studies. If already available, I question the need to collect this information again using this format.

4) Lacking are questions concerning the boater's awareness of USCG approved inflatable-style lifejackets which are a key component to addressing wearability and are receiving emphasis in current RBS National Strategic Plan initiatives. It would be a missed opportunity to not gather statistics on awareness and use of this style of approved device.

As stated, it is my understanding that estimated survey costs have escalated over the past several years from the time the survey was initially drafted. In this time of decreasing budgets, I believe the survey should be scaled back to ensure it provides essential information to advance the RBS program at a budget level that does not create an undue hardship to the RBS program.

In conclusion, I support the collection of needed boater exposure and boat-type data gathering, but believe the current survey instruments should be re-evaluated with an eye to reduce costs and enhance alignment with the current RBS national strategic planning efforts.

Sincerely,

A handwritten signature in black ink, appearing to read "Pamela S. Dillon". The signature is fluid and cursive, with the first name "Pamela" being more prominent.

Pamela S. Dillon
Chief