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**Comments of the Boat Owners Association of the United States
Regarding Information Collection Request,
National Recreational Boating Survey
USCG Docket Number 2012-1047**

February 15, 2013

BoatU.S. is the largest organization of recreational boaters in the United States, with more than half a million members nationwide. As an active participant in the U.S. Coast Guard's boating safety efforts, we appreciate the opportunity to provide our views on the National Recreational Boating Survey.

The development of an accurate picture of the many facets of recreational boating is a commendable goal, particularly for the government agency that has the day-to-day responsibility for its regulation. Well reasoned regulations, supported by timely, precise data, will engender greater support from the regulated community. That, in turn, should result in better compliance with regulations and an increased level of safety.

The current budget constraints faced by various government agencies and non-profit groups with a direct interest in boating safety should also be considered. In reviewing the supporting documentation for this information request, it is apparent this is an ambitious undertaking that will require significant, on-going resources. As this information request is reviewed, we suggest consideration be given to the impact its funding might have on other boating safety programs, particularly those administered by the non-profit sector.

We further believe that The U.S. Coast Guard should review the scope and methodology of the survey. In our view, gathering safety related information should be the priority. The breadth of this survey is too broad given current budget conditions. We also suggest greater use of the Internet, or other less costly methods to implement the survey. Given the continuing advances in access to the Internet by large sections of the United States

populations (some 49 million U.S. households have such access¹) the Coast Guard should work to make greater use of this economical medium to gather data.

The development of timely, accurate data should be integral to the Coast Guard's recreational boating safety mission, and we support that goal. The cost of developing this data, which is funded by the recreational boating community itself through the Sport Fish Restoration and Boating Trust Fund, must, however, be carefully managed. Other crucial boating safety programs should not be sacrificed in the process of gathering this information. Thoughtful deployment of these funds to maximize their safety benefit is crucial to the continued support of the recreational boating community. Thank you for the opportunity to provide our views on the proposed survey.

¹ "Computer and Internet Use." *In the United States: 2010*. Census.gov, n.d. Web. 12 Feb. 2013