

Fishing Vessel Enterprises, Inc.
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October 8, 2015

Ms. Jennifer Jessup
Department Paperwork Clearance Officer
Department of Commerce, Room 6616
14th & Constitution Ave NW
Washington DC 20230

Re; Comments on Proposed Information Collection; Surf Clam/Ocean Quahog ITQ Administration

Dear Ms. Jessup,

Please accept Fishing Vessel Enterprises Inc. public comments based on the August 10, 2015 Federal Register, Vol 80, No. 153, Notices 47911 invitation to comment on proposed and/or continuing collections, as required by the Paperwork Reduction Act of 1995.

We are a vertically integrated harvest, management and marketing company for Surf Clams and Ocean Quahogs.

We express our displeasure in the Final rule of July 20, 2105 Federal Register Vol. 80 No. 138 where NMFS implemented an information collection program for the SC/OQ ITQ fisheries regardless of the overwhelming objection from the ITQ allocation shareholders. We feel that the new information being required is financially intrusive, unsubstantiated and unnecessary. The NMFS purpose was to define excessive shares as well as implement a renewal process for ITQ permits.

The Mid-Atlantic Fishery Management Council passed a motion by an overwhelming majority requesting NMFS to reduce the amount of financial information pertaining to ITQ transfers such as price paid for transfers, fees, terms on contract and any conditions. NMFS rejected the request from the council based on the fact that it was not unanimous and certain members would like to see the information.

The requirement would include confidential business records that are unnecessary and have no bearing in tracking ITQ shares and subsequent transfers throughout the fishing year. The system is currently set up for exacting traceability throughout the processes of the ITQ system.

Since NMFS service already has a mechanism in place to account for and track ITQ tags and landings, the financial information that NMFS would be collecting would not be prudent or necessary to collect based on the Paperwork Reduction Act of 1995.