

**Mark Brown**

This is a Comment on the **Coast Guard (USCG) Notice: Agency Information Collection Activities: Proposals, Submissions, and Approvals (Federal Register Publication)**

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Comment Period Closed

Sep 29 2015, at 11:59 PM ET

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## Comment

Since the States are the largest end-users of BAR forms and therefore responsible for submitting more than 95% of the data that is utilized for statistical purposes it would stand to reason that, as the largest stakeholder of information, the States and their representative association, the National Association of State Boating Law Administrators, would have significant influence in the design and implementation of any necessary forms and publications related to the BAR.

I understand the critical importance of collecting recreational boating accident report data in order to define and direct our national- and state-level programs toward the common goals of reducing accidents, injuries and fatalities. However, at this time, two factors limit my ability to respond to this Notice in a more comprehensive and meaningful way.

First, it is my understanding that in seeking this approval for extension of the collection, the Coast Guard is not proposing modifications to the current Coast Guard Boating Accident Report (BAR) collection forms. However, the BAR forms CG-3865 and CG-3865SP will need to be updated, at minimum, to ensure conformity with terminology and other changes to the casualty report content as authorized in the final rule referenced above. Presumably, the Coast Guard will need to prepare and publish a follow-up Federal Register Notice focusing specifically on changes to the forms in order to meet the Jan. 1, 2017 effective date.

Second, while the comment period on this 1625-0003, Boating Accident Report collection closes Sept. 29, there is a related and far more comprehensive

## Document Information

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Federal Register Notice that is open for comment until Nov. 19, 2015. Myself along with the members of National Association of State Boating Law Administrators are currently examining the larger implications of that Notice 2015-20738: Recreational Boating Accident Reporting Manual, COMDTINST M16782.1 (Docket No. USCG-2015-0753).

To the point, the boating accident data collection, its related forms, and the provisions proposed in the manual are all intrinsically linked. In the future, the Coast Guard may wish to consider how it can reset the renewal process such that there can be an alignment of the review of the collection, forms, and associated policies and procedures.

As such, although I appreciate the opportunity to comment on such proposals, I believe that any suggestions that might be put forward at this time, in response to this current docket regarding either the BAR collection itself or the Coast Guard's BAR forms 3865 and 3865SP would not be particularly useful and might even be rendered obsolete by the time a Federal Register Notice regarding BAR form changes is issued.

As Oklahoma's Boating Law Administrator, I respectfully request that the USCG collaborate with representatives from the States, NASBLA and NBSAC before any additional edits are finalized on such an important data collection document.