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Comment Submitted by Bruce Grimm

This is a Comment on the **Coast Guard (USCG) Notice: Information Collection Request to Office of Management and Budget; OMB Control Number: 1625-0037**

For related information, [Open Docket Folder](#)

Comment

RE: USCG-2019-0348 FRN 2019-11020 OMB 1625-0037

The United States Coast Guard policies and standards for inspection activities provide for a system of reporting that is essential to safe operation of vessels. The information collection for certificates of compliance, boiler and pressure vessel repairs, cargo gear repairs, shipping papers and NFPA 10 certification harmonizes how the CG conducts an examination and allows for consistency in evaluating vessels both foreign and domestic.

The information collection request verifies data needed to verify safety of operations under 46 CFR Part 97 et al. The forms contain action codes, instructions and notices that are easily delineated and understood by users.

The certificate of compliance substantiates that a vessel is fit for duty and along with the other criteria helps to detect deficiencies in the safety management system of the vessel that hinder compliance.

The boiler and pressure vessel repair reporting where the regulations have a preemptive effect over state and local regulation in the same field make it essential to verify the nature of repairs to important maritime operational equipment. It is a simplified format that is easily discerned by inspectors or repair persons.

Reporting on cargo gear repairs is important to determine condition and suitability of shipboard cargo gear such as

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Submitter Information

Submitter Name:
Bruce Grimm

masts, stays, winches, booms, cranes, elevators, running gear and other equipment. The form is a certification that various tests including those required at least once in a year have been conducted.

Shipping papers are important to verify quantity, proper shipping name, hazard class or suitability and other data for loading on vessels. These forms are harmonized worldwide, and the information well understood by any experienced commercial mariner.

NFPA 10 certificates ensure that fire protection systems are under an inspection, repair and maintenance program so that this important equipment is operational if needed.

Synonymous data elements on federal forms and reporting mechanisms have sometimes been used interchangeably. Common data elements standardize the information collection to promote increased efficiency and interoperability of the reporting process.

The paperwork burden on responders is minimal and the information captured is essential to protect the public. The Coast Guard request for extension should be approved.