



October 15, 2019

VIA WEBSITE SUBMISSION

Information Collection Clearance Officer,
U.S. Fish and Wildlife Service, MS: JAO/1N PRB/PERMA,
5275 Leesburg Pike,
Falls Church, VA 22041-3803

RE: OMB Control Number 1018-Falconry

Dear Sir or Madame:

The North American Falconers Association (NAFA) is the largest membership-based falconry organization in the world and has represented falconers, raptor breeders and raptor enthusiasts across the United States since 1961. On behalf of the members and the Board of Directors I would offer the following thoughts on the Service's request for comment on the Falconry Application Database published in FR Doc. 2019-17240.

In general, NAFA supports the collection of relevant information related to the capture, release and transfer for raptors collected for the wild. This information is necessary to ensure and demonstrate that the use of wild raptors continues to be environmentally sustainable. Overall, the information collected on the 3-186A form meets this requirement.

However, we have a number of issues with the web application itself. We find the process of completing the form online unnecessarily cumbersome, tedious and therefore error prone. In particular, we suggest form-based, rather than field-based data entry validation. This would greatly simplify the data-entry process.

In addition, we are confused by some statements in the posting: For example, it indicated that the service anticipated about 40 annual respondents. Since the 3-186A form is required for every raptor taken, release or transferred, and nearly 700 birds are taken annually, we would expect closer to 1000 3-186A forms to be submitted every year.

Finally, the posting anticipates that it will take 2.5 hours to complete the form. This would be outrageous if it were true. In our experience it takes approximately 30 minutes to complete a 3-186A online. However, this time could be and should be reduced to approximately 10 minutes with proper website design including the use of form-based rather than field-based data entry validation.

Sheldon Nicolle, President, NAFA * P.O. Box 404 * Tom Bean, TX 75489 * (214)288-0670

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Thank you for this opportunity to comment. The 3-186A database is an important component of falconry management and we sincerely hope the Service will consider our input regarding the need for improvements to the 3-186A data entry process.

Yours in conservation,

A handwritten signature in dark ink, appearing to read 'Sheldon' followed by a stylized flourish.

Sheldon Nicolle, President, NAFA
NAFAPresident@n-a-f-a.com

Cc: NAFA Board of Directors