















I appreciate the effort that went into Table 10 on page 21 of the discussion paper which clearly lays out four elements of DMR methodology and five steps for progressive change for each. However, I have reservations about the “Gold standard” program under “unit of estimation” that would use individual vessel DMRs inseason. I frequently encounter situations where there are large differences between sequential observers’ assessments on a boat, with no other change to vessel operations or personnel. For this reason, in 2002 I discontinued a weekly DMR “report card” (vessel names listed) format which I had used starting in 1992. A weekly report card format has been an important element in promoting individual accountability in *FIS* monitoring programs for halibut encounter rates and seabird incidental catch numbers, but I consider those data, resulting from observer counts and strict sampling protocol, to be substantially reliable and accurate. On board halibut injury assessments can be more problematic. In 2000-2001 I examined halibut injury data to see if there was an “observer effect”. There were too few cases where observers made trips on more than one boat to make my analysis statistically conclusive, but I recommend that NOAA similarly examine this phenomenon before implementing a system that would use individual vessel DMRs inseason. After 2002 I continued to provide weekly updates to boat managers describing fleet averages and ranges (for each of four categories: CDQ and non-CDQ Bering Sea cod, Gulf cod, and turbot). In 2014, when the Council asked for further reductions in overall halibut bycatch mortality, I was still reluctant to release boat names, but added boat DMR “ranking” to the detailed DMR information provided. Boat managers can better track their boat(s) success compared to the rest of the fleet, and we have continued this approach in 2016.

However frequently the Council decides to review/revise DMRs, I hope there is sufficient opportunity for industry analysts to have input. I informally reviewed IPHC’s estimates for hook-and-line DMRs annually until 2009 and communicated any concerns to Gregg Williams. In the two subsequent 3-year cycles his summary paper became available too late to provide an opportunity for thorough review. In almost every instance *FIS* estimates have agreed with Williams’ but I have identified two cases that are still unresolved: I estimate the 2010 CDQ cod target at 9% not 18% and the 2009 Greenland turbot target at 16% not 35%. Though these are obvious outliers in the Hook-and-line DMR time series, neither the SSC nor Plan teams or the Review Team have recommended correcting them. I realize these numbers and others may be revised with a changed methodology (and they may “fall off” the time series being considered, if it’s shortened); but I hope they are revisited, particularly if the new system is not implemented in 2017.

I appreciate the opportunity to comment on this issue.

Sincerely

*Janet Smoker*

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Copy to Chad See, FLC