

- **Equipment maintenance and upkeep**, including, but not limited to, regular software and system upgrades, ensuring that cameras are clean and free of debris, replacing cameras as needed, and periodically checking the system to ensure operation.
- **Training for captain and crew** (as appropriate) to use, troubleshoot, and maintain EM equipment and systems while at sea.
- **Development of vessel monitoring plans (VMPs)**, including identification of camera placement, catch handling protocols, and other requirements to facilitate third party video review.
- **Data transmittal**, *i.e.*, transmitting data collected through the EM system, including raw footage and metadata, to the appropriate review entity (or entities), whether by physical transfer of hard drives or sending data electronically.
- **Video processing and storage**,⁹ including initial review and summary of EM video¹⁰ and storage of raw video footage or photos and associated metadata.
- **Service provider fees and overhead**, including any fees or overhead the service provider charges as part of its EM system service contract with industry.

Administrative costs may include, among others:

- **Program administration support** to address science, enforcement, and management needs, including staff time and equipment to review VMPs, troubleshoot system issues that arise; facilitate communication between industry participants and EM service providers, as needed; and manage vessel selection processes, as needed.
- **Certification of EM service providers**, including staff time to review EM provider contracts and output reports to ensure data quality standards are met.
- **EM program performance monitoring**, including auditing service provider reviewers, reviewing video to determine optimal sampling rates, and analyzing data to ensure quality and effective program performance.
- **Data analysis and storage of Federal records**, including analysis of data that are submitted to NOAA Fisheries and storage of that data consistent with Federal record retention requirements.

Cost Category	Cost Responsibility Options
Sampling costs	• Industry;

⁹ Review of EM video footage by a third party is considered a sampling cost; reviewing the video and summarizing the data is similar to the function of an at-sea monitor collecting commercial fisheries data on the vessel at-sea.

¹⁰ In addition to this procedural directive on cost allocation, NOAA Fisheries will be developing a procedural directive on EM data storage for EM video held by a third party, contracted by the fishing industry. The policy will consider the costs and benefits of storing video for various lengths of time, as well as the management, scientific, and enforcement needs of any EM program. NOAA Fisheries will also consider different types of data storage to reduce costs to industry.

