

# PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: C-3e CRAB EDR

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NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person "to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.



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Date: January 24, 2012

To: Mr. Eric Olson, Chair  
Mr. Chris Oliver, Executive Director  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2252

From: Mark H. Gleason, Executive Director  
Alaska Bering Sea Crabbers

Re: Agenda Item C-3 (e)- Final Action on BSAI Crab EDR Revisions

Dear Mr. Olson & Mr. Oliver-

The Alaska Bering Sea Crabbers (ABSC) represents nearly 70% of the harvesters participating in the BSAI Rationalized Crab (CR) fisheries. As such, we welcome the opportunity to provide the Council with comments on Agenda Item C-3 (e) "*Final Action on BSAI Crab EDR Revisions*." Many of our members have participated in the evolution of this program since its inception and we as an organization look forward to the Council taking Final Action at the February 2012 meeting. It is our hope that Council action will resolve the many longstanding problems that have been identified through numerous reviews of the EDR data and that the resulting data collection program will provide analysts meaningful information upon which to assess the effects of the CR program.

We will limit our comments to only those data elements applicable to the Catcher Vessel (CV) sector. Similar to the format employed by Council staff in the Public Review Draft of the RIR/IRFA, we have also indicated under which alternative each data element would be included. For example, "(CV1, CV2, CV3)" would indicate that a particular data element would be included in Alternative #1, Alternative #2, and Alternative #3, respectively. In addition to these written comments, we have also submitted an excel spreadsheet titled "*ABSC EDR Recommendations Summary.xlsx*" that summarizes our recommendations in tabular form.

We also provide commentary as to whether or not each data element is currently audited. Data elements that are audited are expected to be of higher quality. AKT, the company contracted to perform EDR audits, recently stopped auditing data elements that are of questionable accuracy. Including this information may provide some guidance as to what data elements may be widely viewed as accurate or not.

Overall, our recommendation is that the Council adopts Alternative #3, with some minor revisions. Our comments on agenda item C-3 (e) will be organized such that we will address each data element individually and provide the Council with our recommendations accordingly.

#### **Option to Remove Blind Formatting Requirement**

We understand that removing the blind formatting requirement may slightly ease the burden on analysts and correspondingly reduce overall management costs. However, we have significant concerns related to maintaining the anonymity of data submitters. We feel removing the blind formatting requirement will, in the words of Dr. Fina, "increase the vulnerability of data to disclosure." We understand that data submitted will be subject to the same data handling protocols and Federal protections, regardless of whether the blind formatting requirement remains; however, considering that EDR data may be circulated among many individuals, including NMFS personnel and contractors as well as members of academia, we feel the risk of compromising an individuals proprietary data and possibly jeopardizing business relationships, far outweigh the benefits of reducing the burden on analysts. We feel there has not been sufficient rationale provided for removing the blind formatting requirement and therefore recommend the requirement remain in place.

#### **Fishing Data**

##### ***Fish ticket number by crab fishery- (CV1)***

We feel there is little utility in collecting fish ticket numbers in the EDR's. This data can easily be merged more accurately from other sources including ADF&G vessel numbers and permit numbers. We note this data element is only collected under Alternative #1 (*status quo*) and recommend dropping it from the revised EDR program. This exclusion of the data element is consistent with Alternative #3.

Recommendation: Drop *Fish ticket number by crab fishery*

##### ***Days fishing by crab fishery- (CV1)***

This information can be collected directly from fish ticket data as well as logbooks. All fish tickets include a start date (i.e. date of first fishing) as well as an end date (i.e. date of last fishing). The information gathered through the fish tickets is believed to be accurate. Logbooks, which are also believed to be accurate, include date of gear deployment, by string; as well as haul date, by string. To continue to include this data element in the revised EDR would be redundant with these two other data collection efforts and should therefore be dropped, as proposed in Alternative #3. This data element is currently audited.

Recommendation: Drop *Days fishing by crab fishery*

##### ***Days traveling (from port to grounds) & offloading- (CV1)***

This data element is often estimated by the EDR submitter from fish ticket information and therefore may not be accurate. A more appropriate approach would be to use known travel times for each fishery as an estimate, in conjunction with fishing time from fish ticket data. In addition, an estimate of offload times could be provided as well. This would provide a more accurate and less burdensome result and we feel this data element should be dropped from the revised EDR, as proposed in Alternative #3. This data element is currently audited.

**Recommendation:** Drop *Days traveling (from port to grounds) and offloading*

### **Deliveries & Revenues**

#### ***Landings by share type (pounds & revenue)- (CV1, CV2, CV3)***

We note that this data element is somewhat redundant with information collected through fish tickets as well as the IFQ program. We also note these sources provide an accurate accounting of the ex-vessel price. However, they do not provide any information related to post-delivery price adjustments, bonuses, etc. The Commercial Operator's Annual Reports (COAR) may be a better source for this post-delivery information. With that said, we realize information regarding pounds and revenue by share type are vital in terms of understanding the effects of the CR program on harvesters, processors, captains, crews, and communities. As such, while we do recognize this data element may not be perfect in its present form, we do recommend continuing to collect it at this time, consistent with Alternative #3. This data element is currently audited.

**Recommendation:** Continue collecting *Landings by share type (pounds and revenue)*

#### ***Dead-loss by share type (pounds)- (CV1)***

We note this information is already collected through fish tickets and by the IFQ program. We therefore recommend it be dropped from the revised EDR, as proposed under Alternative #3. This data element is not currently audited.

**Recommendation:** Drop *Dead-loss by share type*

#### ***Vessel owners IFQ used on the vessel by share type & Vessel owners IFQ used on other vessel by share type- (CV1)***

We note this data element is currently collected under the status quo, but has been omitted from alternatives #2 and #3. We feel this is appropriate and the data element should not be collected in the revised EDR. The way the data element is currently collected does not even begin to capture the range of complexities that exist when discussing the relationships that may exist between vessel owners and quota holders. According to Council staff, in order to begin to understand the complex nature of these relationships, a much more detailed and time-consuming form would need to be developed. Furthermore, terms such as "share holder" and "vessel owner" would need to be defined in much greater detail than under the status quo alternative. And finally, when this data element is actually audited (which according to one data submitter is infrequently if ever), auditors note significant misinterpretation on the part of submitters. Once again, as this data element is neither "reliable nor revealing," we recommend it be dropped from the revised EDR. This data element is not currently audited.

**Recommendation:** Drop *Vessel owners IFQ used on the vessel by share type & Vessel owners IFQ used on other vessel by share type*

#### ***Leased quota by share type (pounds & cost)- (CV1, CV2, CV3)***

While we agree it is important to understand quota lease markets, we feel the way the data is currently being collected (under the status quo as well as proposed under Alternative #2) yields unreliable and inaccurate results that are prone to misinterpretation by analysts.



Often quota transfers are made as part of complex business relationships; as a means to manage pooled quota at the cooperative level; or for other reasons, which may not adhere to strict market forces. Therefore, we feel that if this information is to continue to be collected, it should only include "arm's length" transactions, as proposed in Alternative #3. While this may not be comprehensive in terms of the range of transfers made (i.e. those that do not adhere to traditional market forces), arm's length data will provide enough information for analytical purposes and provide analysts with insight into the lease market. This data element is not currently audited.

Recommendation: Continue collecting *Leased quota by share type (pounds & cost)* but only arms length transactions

***Leased quota by share type (crew contributing shares)- (CV1, CV2)***

We find this data element problematic for a number of reasons. When quota is "pooled" in a cooperative it is very difficult to actively track which vessel may be fishing which C-share holders quota, thus removing the direct connection between C shares and crew on a particular vessel. Furthermore, we note there are regulations pending that would revise the C-share active participation requirements (presumably including reporting requirements for C-share holders). Our concern is that these revised active participation requirements may complicate the issue for the purposes of the EDR program. For these reasons we feel this data element should be dropped from the revised EDR, per Alternative #3. This data element is not currently audited.

Recommendation: Drop *Leased quota by share type (crew contributing shares)*

**Crew**

***Number of crew by fishery- (CV1)***

We feel this data element is not only redundant, but is also subject to inaccurate reporting on the part of data submitters. In terms of inaccuracy, the instructions to submitters are fairly vague and may not capture some of the nuances of the labor pool. For example, some crewmembers may participate in a fishery on a per trip basis, whereby they may fish on the first trip but not necessarily on subsequent trips. So, while this may give analysts an idea of how many unique individuals may be employed for at least one trip in a given year, it does little to provide the level of detail needed to understand changes in the labor pool. A better measure way to examine this is through e-landings. E-landings will identify the number of crew present at the time of a landing, thereby making it easier to track changes in labor over time. For this reason, we recommend dropping this data element from the revised EDR, consistent with Alternative #3. This data element is currently audited.

Recommendation: Drop *Number of crew by fishery*

***Payments to crew- (CV1, CV2, CV3)***

We note this data element has been shown to be accurate, consistently reported, and available from no other source. We recommend continuing to collect this data element, as proposed in Alternative #3. This data element is currently audited.

Recommendation: Continue collecting *Payments to crew*

***Payments to captain- (CV1, CV2, CV3)***

We also note this data element has been shown to be somewhat accurate, consistently reported, and available from no other source. We would also like to point out however, that difficulties with interpretation might arise when the captain also has an ownership stake in the vessel. Alternative #2 provides for a "check box" when this situation arises. However, there is no definition provided for "ownership" or what percentage (i.e. "threshold") of a vessel would constitute ownership for the purposes of EDR. Without resolution of this issue, there is a high likelihood of inconsistent reporting on the part of data submitters. Therefore, we recommend collecting information related to payments to captains, without the "check box," as proposed in Alternative #3. This data element is currently audited.

**Recommendation:** Continue collecting *Payments to captain* without the addition of a check box regarding vessel ownership

***Labor payment details (charges & deductions)- (CV1)***

This data element has significant issues related to its accuracy and consistency between data submitters as many vessels have dis-similar practices when it comes to charges and deductions against gross revenue. Furthermore, as currently collected, this data provides no quantitative information, but rather simply a box to check indicating if a particular variable (such as fuel and lubrication) is deducted, directly charged, not charged to crew, or not applicable. As such, given the limited accuracy, consistency issues between data submitters, and limited utility of non-quantitative information, we recommend this data element be dropped, per Alternative #3. This data element is not currently audited.

**Recommendation:** Drop *Labor payment details (charges & deductions)*

***All unique captain & crew contracts and settlement sheets- (CV2, CV3)***

While ABSC and its members may philosophically believe that crew contracts and settlement sheets are a private matter between vessel owners and captains and between captains and crew, we will take no formal position on this data element at this time. However, we wish to point out a few of the issues surrounding the collection of crew contracts and settlement sheets should the Council decide to proceed. Broadly speaking, our concerns involve issues of privacy and the potential release of proprietary data as well as the increased burden on analysts. We will discuss each issue separately.

In terms of privacy concerns, we wish to point out that many, if not all, crew contracts and settlement sheets include proprietary data such as social security numbers and obviously, wage data. Many also include a health questionnaire of some kind. We are troubled by the idea that a crewman's social security number, earnings, and pertinent health information may be passed from analyst to analyst; from analyst to contractor; or in the worst case scenario, from analyst to a third party data user such as a member of academia. If the Council chooses to remove the blind formatting requirement our concerns over the release of proprietary data are amplified even further. We also wish to "pass along" the concern we have heard from some crewmembers that feel they already submit wage information to the Internal Revenue Service and this may be an attempt to "ground truth" the information they already submit. And finally, we wish to make note of the fact that the self-appointed crewman's advocates have repeatedly and publicly called for the collection of crew contracts and settlement sheets without once voicing concerns related to the privacy of crew nor to the ultimate use of their proprietary data.

As for the issue of burden on analysts, we feel Dr. Fina captures the issue most poignantly in the Public Review Draft of the RIR/IRFA when he states (p. 22):

*"While the information should provide analysts with an ability to examine all aspects of crew contract arrangements, the amount of information and its form could present some challenges to administrators of the collection and analysts. Data processors, in conjunction with analysts, will need to incorporate data into a workable format. Analysts will likely need to read each contract to identify the various factors included in contracts."*

Dr. Fina then goes on to mention, *"the diversity of contractual arrangements will require some discretion on the part of analysts and data managers, who must read each contract and the accompanying settlement sheets, identify salient elements in those documents, accurately and consistently categorize those elements, and incorporate each entry into a workable data set. Interpretation of contracts is likely to be a significant challenge in some cases and may be misleading in some cases."*

Dr. Fina further mentions additional difficulties related to data management; the sheer volume of data that will be collected when considering that there will likely be between 750-1000 unique crew contracts and accompanying settlement sheets collected under this data element; and the high likelihood of errors being made during manual data entry.

And finally, Dr. Fina offers the observation: *"this element of the program would likely have the largest data administration and management costs of any element of the program and could equal the cost of all other elements of the program combined."*

While ABSC will decline to take a formal position on this data element, we would hope that if the Council decides to collect crew contracts and settlement sheets, it will also identify a funding source to cover the increased administrative and management costs that will be incurred as a result, as industry is not interested in being burdened with this expense. This data element is not currently audited, as it is a new data element.

**Recommendation:** If the Council chooses to move forward with collecting *All unique captain & crew contracts and settlement sheets*, that a funding source outside of industry be identified.

***Revenue shares (owner/captain/crew)- (CV1)***

This data element has been shown to be prone to misinterpretation by analysts who may not have a complete understanding of all aspects of crew compensation or an accurate description of compensation practices that may deviate from the traditional share-based system, such as in the case of quota and revenue "pooling" in a multi-boat company. As such, this data element should be dropped as recommended in Alternative #3. This data element is currently audited.

**Recommendation:** Drop *Revenue shares (owner/captain/crew)*

***Crew license number/CFEC permit number- (CV1, CV2)***

We understand that multiple efforts, conducted in the past, have failed to provide an accurate census of crew participation in the various fisheries of the North Pacific. This problem is not limited to the crab fisheries, but rather most, if not all of the major fisheries in the North Pacific. Therefore, we recommend this information be collected in the EDR, as

proposed in Alternative #2. We have a few additional comments we wish to make on this specific data element. First, we would make a recommendation to improve the accuracy of the demographic information collected as part of the crew licensing process. It is currently believed that this demographic information is of little utility in terms of understanding the effects of the Crab Rationalization program on crew as a function of demographics/geography. Second, we are supportive of the State of Alaska effort to capture this similar information from all fisheries in the North Pacific. Finally, we would hope that if the State of Alaska were successful in their efforts to capture this data that this data element would then be dropped from future Crab EDR forms. This data element is not currently audited.

**Recommendation:** Continue collecting *Crew license number/CFEC permit number*

### **Crab Costs**

#### ***Insurance premium (crab only)- (CV1)***

The diversity of insurance products available to vessel owners (including hull, PI, cargo insurance, liability, etc.) and the fact that there is nothing in the data collection that will enable analysts to determine what type of insurance costs are being recorded in the EDR, make this data element problematic. Due to this inconsistency in reporting and the possibility of misinterpretations of the data, we recommend this data element be excluded from the revised EDR, per Alternative #3. This data element is not currently audited.

**Recommendation:** Drop *Insurance premium (crab only)*

#### ***Paid deductibles (crab only)- (CV1)***

Similar to the previous data element, it is difficult if not impossible for analysts to determine what type of coverage and/or claim the deductible applies to. Understanding this data element is further complicated by the fact that payments may be spread over multiple years and/or the claim to which the deductible applies may have been filed in a year other than the one being captured by the EDR. As with the previous data element, we recommend excluding "paid deductibles" from the revised EDR, as recommended in Alternative #3. This data element is not currently audited.

**Recommendation:** Drop *Paid deductibles (crab only)*

#### ***Pot purchases (number, cost, & location)- (CV1)***

The number of pots purchased, their cost, and the location of purchase are all difficult to collect accurately and even more difficult to interpret. This is true for a number of reasons. Primary among these is the fact that the same pots may be used in multiple fisheries (including groundfish), thereby making it difficult to apportion costs between fisheries. Furthermore, many pots on the market are used. The data element, as it is currently collected, does not provide any meaningful information in terms of whether a pot is new or used; whether pots may be in need of refurbishment or repair before they are serviceable; it provides no information related to pots that may be discarded when the new owner realizes the time and costs involved with repairing damaged pots; and the data collection has no mechanism for understanding when pots are used by more than one vessel (i.e. "pooled use"). In terms of the location information, it is often the case whereby the actual physical location of a pot purchase may differ from the address provided on an invoice. This



possibility is not adequately addressed in the current data collection effort. Given the difficulties in accurately reporting and interpreting this data element, we recommend it be dropped from the revised EDR consistent with Alternative #3. Logbooks, pot registrations, and ADF&G dockside interviews provide much more meaningful information related to pot use, pot pulls, and pot-sharing arrangements. This data element is currently audited.

**Recommendation: Drop *Pot purchases (number, cost, & location)***

***Line & other gear purchases (costs & location)- (CV1)***

For the same reasons we recommend dropping the data elements related to pot purchases, we recommend dropping this data element, as proposed by Alternative #3. This data element is currently audited.

**Recommendation: Drop *Line & other gear purchases (costs & location)***

***Bait used (species/pounds by fishery, species/cost by fishery, and purchase location by fishery)- (CV1)***

This data is believed to be inaccurate in that it does not account for inventory harvesters may "hold over" from fishery to fishery, or even year to year; it does not take into consideration the fact that many vessels catch at least a portion of their own bait and may not report it; and the location information suffers from the same problem as with pot purchases by location and line/gear purchases by location (i.e. invoices may not accurately reflect physical location of purchase). In order to collect data that could be considered more accurate and provide analysts more insight into bait use trends over time, it may be beneficial to collect bait costs aggregated across all fisheries and potentially a "check box" for vessels that catch a portion of their own bait. Absent this more appropriate data collection effort, we would recommend abandoning the element all together, as recommended by Alternative #3. This data element is not currently audited.

**Recommendation: Drop *Bait used (species/pounds by fishery, species/cost by fishery, and purchase location by fishery)***

***Fuel used (gallons, cost, and location by fishery)- (CV1, CV3)***

As with other "location" information collected in the EDR's, we recommend the location component be dropped from the revised EDR. This is necessary due to the fact that many invoices do not accurately reflect the physical location of the purchase. We would also like to point out that there are many different estimation techniques being used to determine fuel "use." As some of these techniques may be more accurate than others, we are not comfortable with comparisons being made across multiple techniques. We also note that many harvesters may "carry over" fuel from one fishery to another (including groundfish), even possibly one year to another in the case of end of the year purchases. Having said this, we also understand the importance of attempting to accurately provide fuel usage by fishery, as this is a key variable cost driver. By focusing this data element simply on gallons used by fishery, and utilizing an average price per gallon from the fuel data element below under the Vessel Cost section, we believe we can provide more accurate reporting on fuel usage by fishery. This data element is currently audited.

**Recommendation: Continue collecting *Fuel used but only by gallons and fishery***

***Food & provisions (cost)- (CV1)***

As it is currently collected, this data element is believed to be inaccurate for a number of reasons. For example, vessels may "carry-over" food inventories from fishery to fishery, thus making apportionment difficult. In addition, different vessels have different practices when it comes to food and provisions. For instance, some vessels simply charge crew a "daily rate" for food whereas others may employ much more detailed accounting practices. Although it is not overly difficult to provide food and provision information on an aggregate basis, we question the utility of the data and therefore feel the data element should be dropped. This data element is currently audited.

**Recommendation: Drop *Food & provisions (cost)***

***Other crew expenses- (CV1)***

This "catch all" element is not well defined and may result in significant inconsistency among data submitters. Without much more specificity in terms of what this data element may or may not include, it is of little value. As such, we recommend discontinuing its collection, consistent with Alternative #3. This data element is not currently audited.

**Recommendation: Drop *Other crew expenses***

***Freight costs for landed crab- (CV1)***

This data element is of little relevance as most vessels relinquish chain of custody when crab is delivered to the processor. We therefore recommend this data element be dropped, as per Alternative #3. This data element is not currently audited.

**Recommendation: Drop *Freight costs for landed crab***

***Storage, wharfage, delivery costs for gear- (CV1)***

Data under this element are believed to suffer from issues of inaccuracy. For instance, vessels participating in multiple crab fisheries, as well as non-crab fisheries, may face significant difficulties when attempting to apportion costs between the various activities. In addition, companies that employ multiple vessels may also have great difficulty apportioning costs between company vessels. We therefore recommend dropping this data element, as recommended in Alternative #3. This data element is not currently audited.

**Recommendation: Drop *Storage, wharfage, delivery costs for gear***

***Observer costs (by fishery)- (CV1)***

This data element would only be applicable to St. Matthew's Blue King crab and Aleutian Islands Golden King crab and may be obtained from sources other than the EDR. We therefore recommend its exclusion, consistent with Alternative #3. This data element is not currently audited.

**Recommendation: Drop *Observer costs (by fishery)***

***Landing taxes & fees- (CV1)***

This is also something of a "catch all" category and could include a wide variety of information including state & local taxes, buyback fees, cooperative fees, etc. Additionally, an analyst can also easily estimate landing taxes. Without much greater specificity in terms of instructions to submitters, this data element is of little value and should be excluded from the revised EDR, as proposed in Alternative #3. This data element is not currently audited.

Recommendation: Drop *Landing taxes & fees*

***Cooperative fees- (CV1)***

We feel data collected under this element may be incomplete, inconsistent, and potentially misleading. Each cooperative may have different methods for charging costs to members and without sufficient explanation of these differing methods it is very difficult for analysts to make meaningful comparisons. Furthermore, confidentiality issues may arise in some cooperatives further complicating the issue. Therefore, we recommend omitting this data element from the revised EDR, consistent with Alternative #3. This data element is not currently audited.

Recommendation: Drop *Cooperative fees*

***Other expenses- (CV1)***

The use of the term "other" leaves many expenses open to interpretation. We feel this yields inconsistent data. As a "catch-all" of little consistency and reliability, we recommend excluding this element from the revised EDR, as proposed in Alternative #3. This data element is not currently audited.

Recommendation: Drop *Other expenses*

**Vessel Costs**

***Vessel & equipment investment (cost & location)- (CV1, CV2)***

This data may be misleading because there is no distinction made between investments made in order to upgrade from existing equipment and investments made to replace worn-out or antiquated equipment. Also it is difficult to determine if investments are made to support crab fishing only, or if the equipment purchased would be used in other fisheries as well. Therefore, cost apportionment is difficult at best. In addition, vessel owners do not have standard practices regarding expensing or capitalizing these costs which will result in potentially meaningless data. Directing industry to provide this data on an expensed basis is not reasonable either. For example, if a new crab vessel were built this data element would then have well over \$5M appear in one year, skewing any analyst's ability to draw meaningful conclusions from this data. Alternative #2 recommends aggregating these costs across all fisheries in order to overcome the cost apportionment issue. This may be a suitable alternative in terms of the apportionment issue, but it still does not differentiate between upgrades on existing equipment and replacement of worn-out or antiquated equipment. In terms of the location component, this data element suffers from the fact that invoices may not accurately reflect the physical purchase location. As such, given the difficulties inherent in collecting both the cost and location information, we recommend dropping this data element, as per Alternative #3. This data element is not currently audited.

Recommendation: Drop *Vessel & equipment investment (cost & location)*

***Repair & maintenance (costs & location)- (CV1)***

This data may also be misleading as there is no distinction made between repair & maintenance specific to crabbing activity and repairs & maintenance that would support

participation in other non-crab fisheries. While this may provide analysts with information that would be useful to understand repair and maintenance costs on an annual basis, the utility in understanding the crab component of a vessels' annual R&M would be limited. The issues regarding capitalization and expensing above holds true with this data element as well. Furthermore, the location component suffers from the fact that invoices may not accurately reflect the location where the repair and maintenance may have taken place. As such, we recommend dropping this data element from the revised EDR, as per Alternative #3. This data element is not currently audited.

**Recommendation: Drop *Repair & maintenance (costs & location)***

***Insurance premium- (CV1, CV2)***

If insurance information is going to continue to be collected, this data element is probably the more applicable of the two "insurance" elements as it is aggregated across all fisheries rather than attempting to apportion the costs specifically to crab. However, despite this broader applicability, the data element still suffers from issues of accuracy and consistency for the same reason as the prior insurance premium data element (i.e. broad range of insurance products and no meaningful way to determine what types of coverage a vessel owner may purchase). For this reason, we recommend this data element be discarded in the revised EDR, as proposed in Alternative #3. This data element is not currently audited.

**Recommendation: Drop *Insurance premium***

***Fuel, lubrication, fluids (annual cost & location)- (CV1, CV2)***

Alternative #2 includes purchase location information. This location information suffers from the same data quality problems as other purchase location information collected in the EDR's (i.e. invoices may not accurately reflect physical purchase location). Therefore, we recommend the location component be dropped consistent with Alternative #3. Furthermore, many vessel operators may "carry over" inventory of lubrication and fluids from year to year, making apportionment difficult and the resulting analysis of questionable utility. As such, we recommend dropping this data element altogether, consistent with Alternative #3. This data element is currently audited.

**Recommendation: Drop *Fuel, lubrication, fluids (annual cost & location)***

***Fuel (gallons & cost)- (CV3)***

We feel this is a more appropriate data element to collect in conjunction with fuel use (in gallons) by crab fishery in the fuel data element above under the Crab Costs section. This data can be collected accurately and consistently between data users. Therefore, we recommend Alternative #3, whereby fuel purchases (in both gallons and cost) would be collected, aggregated across all fisheries. An analyst could then use this data to determine the average fuel price which could then provide meaningful information by fishery simply by multiplying the average fuel price by fuel used by fishery captured in the fuel data element under the Crab Costs section. This data element is currently audited.

**Recommendation: Add *Fuel (gallons & cost)***

***Other vessel-specific costs- (CV1)***

As with other "catch all" data elements, we feel this lacks the specificity needed in order to collect meaningful information. As such, we recommend it be excluded from the revised EDR, per Alternative #3. This data element is not currently audited.

Recommendation: Drop *Other vessel-specific costs*

### **All Activities**

#### ***Days at sea (all activities)- (CV1)***

This data element, as currently collected, includes all vessel activities including crabbing, tendering, transiting, offloading, participating in other fisheries, and potentially engaging in research activities. Currently, there is no way to disaggregate the data into relevant categories. Therefore, this data element is of little use in understanding dependence on the crab fishery relative to other activities the vessel may engage in. As such, this element should be excluded from the revised EDR, as proposed in Alternative #3. This data element is currently audited.

Recommendation: Drop *Days at sea (all activities)*

#### ***Gross revenues (all activities)- (CV1)***

The original intent of this data element was to enable analysts to measure dependence on the crab fisheries by comparing revenues from crab to overall gross revenues. However, inconsistencies in reporting and difficulties that may arise when trying to disaggregate crabbing from non-crabbing activities make this data element problematic. In addition, many vessels owners make a conscious decision to focus on one fishery or another. For example, this year some vessels participated in the St. Matthews fishery, which prevented them from participating in the red king crab fishery. As a result, they received a harvest fee for the red king crab quota they owned. It is unclear if this revenue should be included in this data element or not which further complicates both the collection and interpretation of the results. We therefore recommend excluding this data element from the revised EDR, per Alternative #3. This data element is currently audited.

Recommendation: Drop *Gross revenues (all activities)*

#### ***Pounds (all fisheries)- (CV1)***

This data element was also originally intended as a measure of dependence on the crab fisheries relative to non-crabbing activities. However, this element is of little use in terms of comparisons across fisheries (i.e. a pound of crab is very different from a pound of Pacific cod from a pound of Pollock) and is of little overall value. As such, we recommend dropping this data element as proposed in Alternative #3.

Recommendation: Drop *Pounds (all fisheries)*

#### ***Tendering- (CV3)***

We recommend including a "check box" as proposed in Alternative #3. We feel this data element will help analysts to understand the level of tendering activity by the fleet during the off-season and that collecting this data will be of little burden to data submitters. This data element is currently audited.

**Recommendation: Add a check box for *Tendering***


***Labor cost (all activities)- (CV1, CV2, CV3)***

We feel this data element is important in terms of explaining the labor markets for both crabbing and non-crabbing activities. As such, we recommend continuing its collection as proposed in Alternative #3. This data element is not currently audited.

**Recommendation: Continue collecting *Labor cost (all activities)***

In conclusion, we appreciate the opportunity to comment on Agenda Item C- 3(e). We hope that our comments may inform the Council and we are prepared to answer any specific questions Council members or staff may have.

Respectfully,

  
\_\_\_\_\_  
Mark H. Gleason, Executive Director  
Alaska Bering Sea Crabbers



Harvester (Catcher Vessel) Alternatives

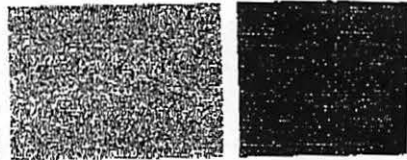
Data type	Data element	Alt 1. (status quo)	Alt 2.	Alt 3.	ABSC Recommendation
Fishing data	Fish ticket number	all crab fisheries	-	-	-
	Days fishing	by crab fishery	-	-	-
	Days traveling (from port to grounds) and offloading	by crab fishery	-	-	-
Deliveries and revenues	Landings by share type - pounds	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Deadloss by share type - pounds	by crab fishery	-	-	-
	Landings by share type - revenues	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Vessel owner's IFQ used on the vessel by share type	by crab fishery	-	-	-
	Vessel owner's IFQ used on other vessels by share type				
	Leased quota by share type - pounds	by crab fishery	by crab fishery	by crab fishery- arms length monetary payments only	by crab fishery- arms length monetary payments only
	Leased quota by share type - cost				
Leased quota by share type - crew contributing shares	by crab fishery	aggregated all crab fisheries- count of crew leasing	-	-	
Crew	Number of crew by fishery	by crab fishery	-	-	-
	Payments to crew	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Payments to captain	by crab fishery	by crab fishery, check box for skipper/owners	by crab fishery	by crab fishery
	Labor payment details - charges and deductions	in all crab fisheries	-	-	-
	All unique captain and crew contracts and settlement sheets	-	by crab fisheries	by crab fisheries	If collect, funding source other than industry must be defined
	Revenue shares - owner/crew/captain	by crab fishery	-	-	-

## Harvester (Catcher Vessel) Alternatives

Council Motion - October 2011  
Crab EDR Alternatives

Data type	Data element	Alt 1. (status quo)	Alt 2.	Alt 3.	ABSC Recommendation
	Crew license number/CFEC permit number	aggregated across all crab fisheries	aggregated across all crab fisheries	-	aggregated across all crab fisheries
Crab costs	Insurance premium - crab only	aggregated across all crab fisheries and aggregated across all fisheries	-	-	-
	Paid deductibles - crab only	aggregated across all crab fisheries	-	-	-
	Pot purchases - number	aggregated for all crab fisheries	aggregated all fisheries new pots only	-	-
	Pot purchases - cost				
	Pot purchases - location	aggregated for all crab fisheries	-	-	-
	Line and other gear purchases - costs	aggregated for all crab fisheries	-	-	-
	Line and other gear purchases - location	aggregated for all crab fisheries	-	-	-
	Bait used - species/pounds by fishery	by crab fishery	-	-	-
	Bait used - species/cost by fishery				
	Bait used - purchase location by fishery	by crab fishery	-	-	-
	Fuel used - gallons by fishery	by crab fishery	-	by crab fishery (gallons only)	by crab fishery (gallons only)
	Fuel used - cost by fishery			-	-
	Fuel used - purchase location by fishery	by crab fishery	-	-	-
	Food and provisions - costs	aggregated across all crab fisheries	-	-	-
	Other crew expenses	aggregated for all crab fisheries	-	-	-
	Freight costs for landed crab	aggregated for all crab fisheries	-	-	-
Storage, wharfage, delivery costs for gear	aggregated for all crab fisheries	-	-	-	

Data type	Data element	Alt 1. (status quo)	Alt 2.	Alt 3.	ABSC Recommendation
	Observer costs - by fishery	by crab fishery	-	-	-
	Landing taxes and fees	aggregated across all crab fisheries	-	-	-
	Cooperative fees	aggregated across all crab fisheries	-	-	-
	Other expenses	aggregated across all crab fisheries	-	-	-
Vessel costs	Vessel and equipment investment - cost	aggregated across all fisheries (excluding exclusively non-crab costs)	aggregated all fisheries, including R&M	-	-
	Vessel and equipment investment - location	aggregated across all fisheries	-	-	-
	Repair and maintenance - costs	aggregated across all fisheries	-	-	-
	Repair and maintenance - location	aggregated across all fisheries	-	-	-
	Insurance premium	aggregated across all fisheries	Aggregated All Fisheries	-	-
	Fuel - gallons and cost			aggregated all fisheries	aggregated all fisheries
	Fuel, lubrication, fluids - annual - cost	aggregated across all fisheries	Aggregated All Fisheries	-	-
	Fuel, lubrication, fluids - annual - location	aggregated across all fisheries	-	-	-
	Other vessel specific costs	aggregated across all fisheries	-	-	-
All activities	Days at sea - all activities	aggregated across all activities	-	-	-
	Gross revenues - all activities	aggregated across all activities	Aggregated across all activities	-	-
	Pounds - all fisheries	aggregated across all fisheries	-	-	-
	Tendering			check box	check box
	Labor cost - all activities	aggregated across all activities	Aggregated across all activities	Aggregated across all activities	Aggregated across all activities



RECEIVED

DEC 26 2011

December 20, 2011

[Redacted]

As the Data Collection Agent Auditor for Pacific States Marine Fisheries Commission (PSMFC) Economic Data Reports (EDRs) for the Bering Sea and Aleutian Islands (BSAI) Crab Rationalization Program, we would like to thank you again for your timely submission and cooperation with our random audit requests. Your helpfulness and patience is very much appreciated by our staff and management.

2010 Economic Data Report (EDR) Audit Results

This letter is to inform you that our audit process has been completed. Your vessel documentation was adequate, well thought-out, and provided enough information for us to complete the audit of your vessel without major discrepancies. Any errors identified in your EDR submission were limited and we were able to easily identify them, the reason for them, and correct them with the supporting documentation supplied. A summary of the audit findings is attached, including any minor corrections that were identified during the audit. These were confirmed with either yourself or the preparer of your audit documentation before finalizing our report to PSMFC.

In summary, thank you for providing us with clear and well-organized supporting documentation. If you should have any questions about the feedback contained in this letter, or would like further clarification, please contact me by phone at (503) 620-4489 or email at [eclarke@aktcpa.com](mailto:eclarke@aktcpa.com). We hope you have continued success in the crab fishing industry, and look forward to working with you in the future. As the years progress, we aim to make the audit process as smooth as possible for all involved parties. Thank you for your participation.

Sincerely,

[Redacted signature]

Enclosures

**SUPPORT SUMMARY DEFINITIONS**

***Supported:*** The documentation provided to AKT was sufficient to validate the original EDR entry for a given variable and no difference between the original submission and the provided documentation were found.

***Reasonable Estimate:*** The documentation provided to AKT was sufficient to validate that the original EDR entry was established through a valid estimation. This could result in an audit difference.

***Immaterial Difference:*** A difference was found between the documentation provided to AKT and the original EDR entry. If the error was less than 5%, it was coded as an immaterial difference.

***Material Difference:*** A difference was found between the documentation provided to AKT and the original EDR entry. If the error was more than 5%, it was coded as a material difference.

***Estimate ~ No Basis:*** The preparer provided AKT with an estimate with insufficient basis to assess the validity of the given value. Entry was ultimately deemed unsupported.

***Unsupported:*** No documentation was provided for a given EDR entry.

EDR Section Heading	Fishery	Support Summary	Percent Error
1.0 Days Crab Fishing	BSS	Reasonable Estimate	0.0%
	BBR	Supported	0.0%
1.0 Traveling & Offloading	BSS	Reasonable Estimate	0.0%
	BBR	Supported	0.0%
2.0 Crab Sales, Gross Revenue, A Shares	BSS	Supported	0.0%
	BBR	Supported	0.0%
2.0 Crab Sales, Gross Revenue, B Shares	BSS	Supported	0.0%
	BBR	Supported	0.0%
2.0 Crab Sales, Gross Revenue, C Shares	BSS	Supported	0.0%
	BBR	Supported	0.0%
2.0 Crab Sales, Live Pounds Sold - A	BSS	Supported	0.0%
	BBR	Supported	0.0%
2.0 Crab Sales, Live Pounds Sold - B	BSS	Supported	0.0%
	BBR	Supported	0.0%
2.0 Crab Sales, Live Pounds Sold - C	BSS	Supported	0.0%
	BBR	Supported	0.0%
4.1 Harvest Labor Costs - Number of Harvest Crew	BSS	Supported	0.0%
	BBR	Supported	0.0%
4.1 Harvest Labor Costs - Total Crew Labor Payment	BSS	Supported	0.0%
	BBR	Supported	0.0%
4.1 Harvest Labor Costs - Total Captain Labor Payment	BSS	Supported	0.0%
	BBR	Supported	0.0%
4.3 Vessel Revenue Share - Owner Share	BSS	Supported	0.0%
	BBR	Supported	0.0%
4.3 Vessel Revenue Share - Crew Share	BSS	Supported	0.0%
	BBR	Supported	0.0%
4.3 Vessel Revenue Share - Captain Share	BSS	Supported	0.0%
	BBR	Supported	0.0%
5.1 Costs for Crab Fishing - Food and Provisions for Crew	ALL	Supported	0.0%
5.1 Costs for Crab Fishing - Fuel Quantity and Cost by Location	BSS-AKU,DUT,STP	Supported	0.0%
	BBR-AKU,DUT,OOS	Supported	0.0%
5.1 Costs for Crab Fishing - Fuel Quantity	BSS	Supported	0.0%
	BBR	Supported	0.0%
5.1 Costs for Crab Fishing - Fuel Cost	BSS	Supported	0.0%
	BBR	Supported	0.0%
5.1 Costs for Crab Fishing - Include Lube and Fluids (Y/N)	BSS	Supported	0.0%
	BBR	Supported	0.0%
5.1 Costs for Crab Fishing - Quantity/Cost of Pots by Location	ALL	Supported	0.0%
5.1 Costs for Crab Fishing - Quantity of Pots	ALL	Supported	0.0%
5.1 Costs for Crab Fishing - Cost of Pots	ALL	Supported	0.0%
5.1 Costs for Crab Fishing - Line and Other Gear Purchases Location	DUT	Supported	0.0%
	OOS	Supported	0.0%
5.1 Costs for Crab Fishing - Line and Other Gear Purchases	DUT	Immaterial Difference	-0.2%
	OOS	Supported	0.0%



EDR Section Heading	Fishery	Support Summary	Percent Error
5.2 Annual Vessel Cost - Fuel Location	DUT	Supported	0.0%
	OAC	Supported	0.0%
	OOS	Supported	0.0%
5.2 Annual Vessel Cost - Fuel Cost	DUT	Material Difference	-87.4%
	OAC	Material Difference	-78.9%
	OOS	Material Difference	-59.8%
5.2 Annual Vessel Cost - Include Lube and Fluids (Y/N)	DUT	Supported	0.0%
	OAC	Supported	0.0%
	OOS	Supported	0.0%
5.2 Annual Vessel Cost - Crab Only Cost (Y/N)	DUT	Supported	0.0%
	OAC	Supported	0.0%
	OOS	Supported	0.0%
6.0 Annual Total - Days at Sea	ALL	Supported	0.0%
6.0 Annual Total - Pounds Retained	ALL	Immaterial Difference	-0.5%
6.0 Annual Total - Gross Land Revenue	ALL	Supported	0.0%

Review note

Date: January 30, 2012

To: Mr. Eric Olson, Chairman  
Mr. Chris Oliver, Executive Director  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2252

RECEIVED  
FEB - 8 2012

From: Crew of the F/V Pacific Mariner

Re: Agenda Item C-3 (e) "Final Action on BSAI Crab EDR Revisions"

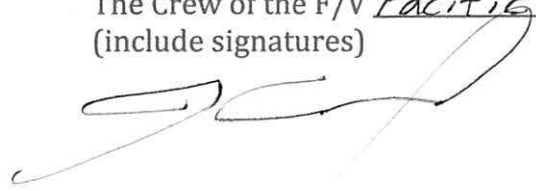
Dear Chairman Olson & Mr. Oliver,

We are writing today to provide the Council with our comments on agenda item C-3 (e), "Final Action on BSAI Crab EDR Revisions." As crewmen, the issue of EDR's has never been something we've thought much about. Up until now only vessel owners have been directly affected. However, we recently became aware there is a proposal before the Council requiring crew contracts and settlement sheets to be submitted along with the EDR forms. So now the EDR issue affects us as well.

From what we understand, this proposal is being put forward as a way to protect crew interests. As crew we would have liked to be consulted. Crew contracts and settlement sheets contain proprietary information like social security numbers, emergency contacts, health information, and of course financial information. The existing EDR already collects the crew pay information at the aggregate level. We don't understand why you need to collect this information at the individual crewmember level. And we also don't understand how having our social security numbers, our emergency contacts, and our health information is going to help the Council manage the fishery more effectively. We understand there are protections in place to deal with proprietary data. But the best protection is to not collect the information in the first place.

In conclusion, we are against the proposal to collect crew contracts and settlement sheets as part of the EDR program. We are concerned that private information such as our social security numbers, emergency contacts, and health-related information may accidentally fall into the wrong hands. We are also concerned that as the people most affected by this proposal we were not consulted. We want the Council to understand that the crew "advocates" who have been coming to the Council requesting this proposal don't represent us and haven't asked us what we think of this proposal. We appreciate you considering our comments.

Sincerely,  
The Crew of the F/V Pacific Mariner  
(include signatures)



Date: January 30, 2012

To: Mr. Eric Olson, Chairman  
Mr. Chris Oliver, Executive Director  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2252

From: Crew of the F/V Pacific Marine

Re: Agenda Item C-3 (e) "Final Action on BSAI Crab EDR Revisions"

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Sincerely,

The Crew of the F/V Pacific Marine  
(include signatures)

*M. J. O'Connell*

Date: January 30, 2012

To: Mr. Eric Olson, Chairman  
Mr. Chris Oliver, Executive Director  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2252

From: Crew of the F/V Pacific Mariners

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Sincerely,

The Crew of the F/V Pacific Mariners  
(include signatures)



Date: January 30, 2012

To: Mr. Eric Olson, Chairman  
Mr. Chris Oliver, Executive Director  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2252

From: Crew of the F/V Pacific Mariner

Re: Agenda Item C-3 (e) "Final Action on BSAI Crab EDR Revisions"

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Sincerely,  
The Crew of the F/V Pacific Mariner  
(include signatures)



Date: January 30, 2012

To: Mr. Eric Olson, Chairman  
Mr. Chris Oliver, Executive Director  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2252

From: Crew of the F/V Pacific Marines

Re: Agenda Item C-3 (e) "Final Action on BSAI Crab EDR Revisions"

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Sincerely,

The Crew of the F/V Pacific Marines  
(include signatures)

*Brett A. ?*



Date: January 30, 2012

To: Mr. Eric Olson, Chairman  
Mr. Chris Oliver, Executive Director  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2252

From: Crew of the F/V Arctic Mariner

Re: Agenda Item C-3 (e) "Final Action on BSAI Crab EDR Revisions"

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Sincerely,

The Crew of the F/V Arctic Mariner  
(include signatures) Hayden Dau

Date: January 30, 2012

To: Mr. Eric Olson, Chairman  
Mr. Chris Oliver, Executive Director  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2252

From: Crew of the F/V Arctic Mariner

Re: Agenda Item C-3 (e) "Final Action on BSAI Crab EDR Revisions"

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Sincerely,

The Crew of the F/V Arctic Mariner  
(include signatures)



Date: January 30, 2012

To: Mr. Eric Olson, Chairman  
Mr. Chris Oliver, Executive Director  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2252

From: Crew of the F/V Arctic Pioneer

Re: Agenda Item C-3 (e) "Final Action on BSAI Crab EDR Revisions"


Dear Chairman Olson & Mr. Oliver,

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Sincerely,  
The Crew of the F/V Arctic Pioneer  
(include signatures)

  
Bruce McGlashan

Date: January 30, 2012

To: Mr. Eric Olson, Chairman  
Mr. Chris Oliver, Executive Director  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2252

From: Crew of the F/V Arctic Mariner

Re: Agenda Item C-3 (e) "Final Action on BSAI Crab EDR Revisions"

---

Dear Chairman Olson & Mr. Oliver,

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Sincerely,  
The Crew of the F/V Arctic Mariner  
(include signatures)



Leo Travenshek 1-30-12

Date: January 30, 2012

To: Mr. Eric Olson, Chairman  
Mr. Chris Oliver, Executive Director  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2252

From: Crew of the F/V ARCTIC MARINER

Re: Agenda Item C-3 (e) "Final Action on BSAI Crab EDR Revisions"

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Dear Chairman Olson & Mr. Oliver,

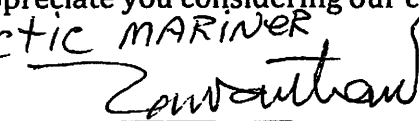
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Sincerely,

The Crew of the F/V ARCTIC MARINER  
(include signatures)

ARCTIC MARINER  


Date: January 29, 2012

To: Mr. Eric Olson, Chairman  
Mr. Chris Oliver, Executive Director  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2252

From: Crew of the F/V Keuleen K.

Re: Agenda Item C-3 (e) "Final Action on BSAI Crab EDR Revisions"

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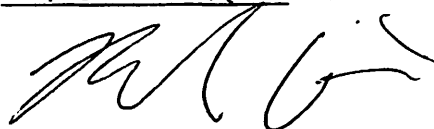
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Sincerely, Raul Garcia  
The Crew of the F/V Keuleen K.  
(include signatures)



Date: January 29 2012

To: Mr. Eric Olson, Chairman  
Mr. Chris Oliver, Executive Director  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2252

From: Crew of the F/V North American

Re: Agenda Item C-3 (e) "Final Action on BSAI Crab EDR Revisions"

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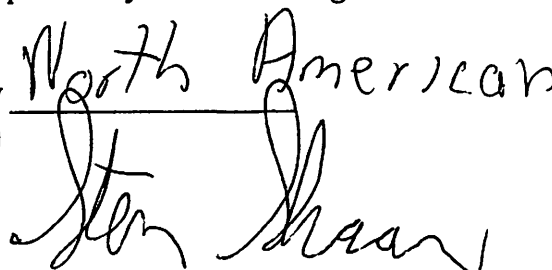
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Sincerely,  
The Crew of the F/V  
(include signatures)

North American  


Date: January \_\_\_\_\_, 2012

To: Mr. Eric Olson, Chairman  
Mr. Chris Oliver, Executive Director  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2252

From: Crew of the F/V Rollo

Re: Agenda Item C-3 (e) "Final Action on BSAI Crab EDR Revisions"

Dear Chairman Olson & Mr. Oliver,

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Sincerely,  
The Crew of the F/V Rollo  
(include signatures)





Date: January 24, 2012

To: Mr. Eric Olson, Chairman  
Mr. Chris Oliver, Executive Director  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2252

From: Crew of the F/V Rollo

Re: Agenda Item C-3 (e) "Final Action on BSAI Crab EDR Revisions"

Dear Chairman Olson & Mr. Oliver,

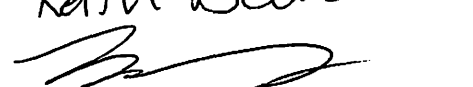
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Sincerely,

The Crew of the F/V  
(include signatures)

Rollo  
Keith Bowler  


Date: January 29, 2012

To: Mr. Eric Olson, Chairman  
Mr. Chris Oliver, Executive Director  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2252

From: Crew of the F/V ROLLO

Re: Agenda Item C-3 (e) "Final Action on BSAI Crab EDR Revisions"

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The Crew of the F/V  
(include signatures)



Date: January \_\_\_\_\_, 2012

To: Mr. Eric Olson, Chairman  
Mr. Chris Oliver, Executive Director  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2252

From: Crew of the F/V Rollio

Re: Agenda Item C-3 (e) "Final Action on BSAI Crab EDR Revisions"

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(include signatures)



Harvester (Catcher Vessel) Alternatives

ATTACHMENT - AP Minutes  
February 2012  
Crab EDR Alternatives

Data type	Data element	Alt 1. (status quo)	Alt 2.	Alt 3.	Modified Alt 3.
Fishing data	Fish ticket number	all crab fisheries	-	-	-
	Days fishing	by crab fishery	-	-	-
	Days traveling (from port to grounds) and offloading	by crab fishery			
Deliveries and revenues	Landings by share type - pounds	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Deadloss by share type - pounds	by crab fishery		-	-
	Landings by share type - revenues	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Vessel owner's IFQ used on the vessel by share type	by crab fishery	-	-	-
	Vessel owner's IFQ used on other vessels by share type				
	Leased quota by share type - pounds	by crab fishery	by crab fishery	by crab fishery- arms length monetary payments only	by crab fishery- arms length monetary payments only
	Leased quota by share type - cost				
Leased quota by share type - crew contributing shares	by crab fishery	aggregated all crab fisheries- count of crew leasing			
Crew	Number of crew by fishery	by crab fishery	-	-	-
	Payments to crew	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Payments to captain	by crab fishery	by crab fishery, check box for skipper/owners	by crab fishery	by crab fishery
	Labor payment details - charges and deductions	in all crab fisheries			
	All unique captain and crew contracts and settlement sheets		by crab fisheries	by crab fisheries	-
	Revenue shares - owner/crew/captain	by crab fishery	-	-	-
	Crew license number/CFEC permit number	aggregated across all crab fisheries	aggregated across all crab fisheries	-	aggregated across all crab fisheries
	Insurance premium - crab only	aggregated across all crab fisheries and aggregated across all fisheries	-	-	-
	Paid deductibles - crab only	aggregated across all crab fisheries	-	-	-
	Pot purchases - number	aggregated for all crab fisheries	aggregated all fisheries new pots only		
	Pot purchases - cost				
	Pot purchases - location	aggregated for all crab fisheries	-	-	-
	Line and other gear purchases - costs	aggregated for all crab fisheries			
	Line and other gear purchases - location	aggregated for all crab fisheries	-	-	-
	Bait used - species/pounds by fishery	by crab fishery	-	-	-
	Bait used - species/cost by fishery				

Data type	Data element	Alt 1. (status quo)	Alt 2.	Alt 3.	Modified Alt 3.
Crab costs	Bait used - purchase location by fishery	by crab fishery	-	-	-
	Fuel used - gallons by fishery	by crab fishery		by crab fishery (gallons only)	by crab fishery (gallons only)
	Fuel used - cost by fishery			-	-
	Fuel used - purchase location by fishery	by crab fishery	-	-	-
	Food and provisions - costs	aggregated across all crab fisheries	-		
	Other crew expenses	aggregated for all crab fisheries	-		
	Freight costs for landed crab	aggregated for all crab fisheries	-		
	Storage, wharfage, delivery costs for gear	aggregated for all crab fisheries	-		
	Observer costs - by fishery	by crab fishery	-	-	-
	Landing taxes and fees	aggregated across all crab fisheries	-	-	-
	Cooperative fees	aggregated across all crab fisheries	-	-	-
	Other expenses	aggregated across all crab fisheries	-	-	-
	Vessel costs	Vessel and equipment investment - cost	aggregated across all fisheries (excluding exclusively non-crab costs)	aggregated all fisheries, including R&M	
Vessel and equipment investment - location		aggregated across all fisheries	-	-	-
Repair and maintenance - costs		aggregated across all fisheries	-	-	-
Repair and maintenance - location		aggregated across all fisheries	-	-	-
Insurance premium		aggregated across all fisheries	Aggregated All Fisheries	-	-
Fuel - gallons and cost				aggregated all fisheries	aggregated all fisheries
Fuel, lubrication, fluids - annual - cost		aggregated across all fisheries	Aggregated All Fisheries	-	-
Fuel, lubrication, fluids - annual - location		aggregated across all fisheries	-	-	-
Other vessel specific costs		aggregated across all fisheries	-	-	-
All activities	Days at sea - all activities	aggregated across all activities	-	-	-
	Gross revenues - all activities	aggregated across all activities	aggregated across all activities	-	-
	Pounds - all fisheries	aggregated across all fisheries	-	-	-
	Tendering			checkbox	checkbox
	Labor cost - all activities	aggregated across all activities	aggregated across all activities	aggregated across all activities	aggregated across all activities

Data type	Data element	Alt 1. (status quo)	Alt 2.	Alt 3.	Modified Alt 3.
Fishing Data	Dates covered (days in the fishery)	by crab fishery			
	Days fishing	by crab fishery	-	-	-
	Days traveling (from port to grounds) and offloading	by crab fishery			
	Days processing	by crab fishery			
Deliveries and revenues - for operations as a catcher vessel	Landings by share type - pounds	-	by crab fishery	by crab fishery	by crab fishery
	Landings by share type - revenues	-	by crab fishery	by crab fishery	by crab fishery
Production	Raw crab processed by fishery	by crab fishery			
	Product and processed pounds by fishery	by crab fishery			
	Production - crab size and grade	by crab fishery			
	Production - box size	by crab fishery			
	Production - finished pounds	by crab fishery			
	Production - custom processing identifier	by crab fishery			
Revenues	Sales to affiliates/non-affiliates by species - product/process	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Sales to affiliates/non-affiliates by species - crab size and grade	by crab fishery	by crab fishery		
	Sales to affiliates/non-affiliates by species - box size and finished pounds	by crab fishery	by crab fishery	by crab fishery (use box size categories)	by crab fishery (use box size categories)
	Sales to affiliates/non-affiliates by species - revenues (fob)	by crab fishery	by crab fishery	by crab fishery - FOB Alaska	by crab fishery - FOB Alaska
	Custom processing by species/product/process	by crab fishery	by crab fishery	by crab fishery (include pounds raw and pounds of product)	by crab fishery (include pounds raw and pounds of product)
	Custom processing revenues	by crab fishery	by crab fishery	by crab fishery	by crab fishery
IFQ	Vessel owner's IFQ used on the vessel by share type	by crab fishery	-	-	-
	Vessel owner's IFQ used on other vessels by share type				
	Leased quota by share type - pounds	by crab fishery	by crab fishery	by crab fishery- arms length monetary payments only	by crab fishery- arms length monetary payments only
	Leased quota by share type - cost				
	Leased quota by share type - crew contributing shares	by crab fishery	aggregated all crab fisheries- count of crew leasing	-	-

Data type	Data element	Alt 1. (status quo)	Alt 2.	Alt 3.	Modified Alt 3.
Crew	Number of harvest crew by fishery	by crab fishery	-	-	-
	Payments to captain	by crab fishery	by crab fishery -check box for skipper/owners	by crab fishery	by crab fishery
	Payments to harvest crew	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Harvest labor payment details - charges and deductions	in all crab fisheries			
	Number of crew paid based on processing work	by crab fishery			
	Average processing positions by fishery	by crab fishery			
	Total processing labor payments	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	All unique captain and crew contracts and settlement sheets		by crab fisheries	by crab fisheries	-
	Crew license number/CFEC permit number	aggregated across all crab fisheries	aggregated across all crab fisheries	-	aggregated across all crab fisheries
	Crab processing employees by residence	aggregated across all crab fisheries	aggregated across all crab fisheries	-	-
Custom processing services purchased	Custom processing services purchased - raw pounds	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Custom processing services purchased - product and process	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Custom processing services purchased - size and grade	by crab fishery			
	Custom processing services purchased - box size	by crab fishery			
	Custom processing services purchased - finished pounds	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Custom processing services purchased - processing fee	by crab fishery	by crab fishery	by crab fishery	by crab fishery
Crab purchases	Raw crab purchases by fishery - ifq type	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Raw crab purchases by fishery - size and grade	by crab fishery			
	Raw crab purchases by fishery - pounds	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Raw crab purchases by fishery - gross payments	by crab fishery	by crab fishery	by crab fishery	by crab fishery

Data type	Data element	Alt 1. (status quo)	Alt 2.	Alt 3.	Modified Alt 3.	
Crab costs	Insurance premium - crab only	aggregated across all crab fisheries	-	-	-	
	Paid deductibles - crab only	aggregated across all crab fisheries	-	-	-	
	Pot purchases - number	aggregated for all crab fisheries	aggregated all fisheries new pots only	-	-	
	Pot purchases - cost					
	Pot purchases - location	aggregated for all crab fisheries	-	-	-	
	Line and other gear purchases - costs	aggregated for all crab fisheries	-	-	-	
	Line and other gear purchases - location	aggregated for all crab fisheries	-	-	-	
	Bait used - species/pounds by fishery	by crab fishery	-	-	-	
	Bait used - species/cost by fishery					
	Bait used - purchase location by fishery	by crab fishery	-	-	-	
	Fuel used - gallons by fishery	by crab fishery	-	-	by crab fishery (gallons only)	by crab fishery (gallons only)
	Fuel used - cost by fishery				-	-
	Fuel used - purchase location by fishery	by crab fishery	-	-	-	
	Food and provisions - costs	aggregated across all crab fisheries	-	-	-	
	Other crew expenses	aggregated for all crab fisheries	-	-	-	
	Processing and packing materials, equipment, and supplies - crab	aggregated across crab fisheries	-	-	-	
	Repackaging costs	aggregated across crab fisheries				
	Broker fees and promotions by fishery	by crab fishery				
	Lease (IPQ) costs		by crab fishery	by crab fishery - arm's length (monetary payments)	by crab fishery - arm's length (monetary payments)	
	Landing and sales taxes and fees - crab only	by crab fisheries				
	Storage, wharfage, delivery costs for gear	aggregated for all crab fisheries				
	Observer costs - by fishery	by crab fishery	-	-	-	
	Freight costs for products	aggregated across crab fisheries				
	Product storage	aggregated across crab fisheries				
Cooperative fees	aggregated across all crab fisheries	-	-	-		
Other expenses	aggregated across all crab fisheries	-	-	-		



Data type	Data element	Alt 1. (status quo)	Alt 2.	Alt 3.	Modified Alt 3.
Vessel costs	Vessel and equipment investment - cost	aggregated across all fisheries (excluding exclusively non-crab costs)	aggregated all fisheries, including R&M	-	-
	Vessel and equipment investment - location	aggregated across all fisheries	-	-	-
	Repair and maintenance - costs	aggregated across all fisheries	-	-	-
	Repair and maintenance - location	aggregated across all fisheries	-	-	-
	Foremen, managers, other employees and salaries	aggregated across all fisheries	aggregated across all fisheries	aggregated across all fisheries	aggregated across all fisheries
	Insurance premium	aggregated across all fisheries	Aggregated All Fisheries	-	-
	Fuel - gallons and cost			aggregated all fisheries	aggregated all fisheries
	Fuel, lubrication, fluids - annual - cost	aggregated across all fisheries	Aggregated All Fisheries	-	-
	Fuel, lubrication, fluids - annual - location	aggregated across all fisheries	-	-	-
	Other vessel specific costs	aggregated across all fisheries	-	-	-
All activities	Processing days - all activities	aggregated all fisheries	aggregated all fisheries		
	Days at sea - all activities	aggregated across all activities	aggregated all fisheries		
	FOB revenues - all activities	aggregated across all activities	aggregated all fisheries		
	Finished pounds - all fisheries	aggregated across all fisheries	aggregated all fisheries		
	Round/raw pounds - all fisheries	aggregated across all fisheries	aggregated all fisheries		
	Labor cost - all activities	aggregated across all activities	aggregated all fisheries		

Data type	Data element	Alt 1. (status quo)	Alt. 2	Alt. 3
	Raw crab purchases by fishery - gross payments	by crab fishery	by crab fishery	by crab fishery
Crab processing costs	Fisheries taxes and fees - crab only	by crab fisheries		
	Processing and packing materials, equipment, and supplies - crab only	aggregated across crab fisheries		
	Food and provisions - crab only	aggregated across crab fisheries		
	Other direct crab labor costs	aggregated across crab fisheries		
	Insurance deductibles - crab only	aggregated across crab fisheries		
	Repackaging costs	aggregated across crab fisheries		
	Broker fees and promotions by fishery	by crab fishery		
	Lease (IPQ) costs	by crab fishery	by crab fishery	by crab fishery - arm's length (monetary payments )
	Observer costs	by crab fishery		
	Freight cost for plant supplies	aggregated across crab fisheries		
	Freight costs for products	aggregated across crab fisheries		
	Product storage	aggregated across crab fisheries		
	Water, sewer, and waste disposal	aggregated across crab fisheries		
	Other crab-specific costs	aggregated across crab fisheries		
General plant costs	Annual fuel, electricity, lubrication, hydraulic fluids	aggregated across all fisheries		
	Plant and equipment investments	aggregated across all fisheries		
	Repair and maintenance	aggregated across all fisheries		
	Foremen, managers, other employees and salaries	aggregated across all fisheries	aggregated across all fisheries	aggregated across all fisheries
	Other plant specific costs	aggregated across all fisheries		
General processing information	Processing days - annual total - all fisheries	aggregated across all fisheries	aggregated across all fisheries	
	Gross FOB revenues - annual total - all fisheries	aggregated across all fisheries	aggregated across all fisheries	
	Finished processed pounds - annual total - all fisheries	aggregated across all fisheries	aggregated across all fisheries	
	Processing labor costs - annual total - all fisheries	aggregated across all fisheries	aggregated across all fisheries	

Data type	Data element	Alt 1. (status quo)	Alt. 2	Alt. 3
Production	Production - dates covered by fishery	by crab fishery		
	Production - processing days by fishery	by crab fishery	Providing first and last day and number of active days	
	Raw crab processed by fishery	by crab fishery		
	Product and processed pounds by fishery	by crab fishery		
	Production - crab size and grade	by crab fishery		
	Production - box size	by crab fishery		
	Production - finished pounds	by crab fishery		
	Production - custom processing identifier	by crab fishery		
Revenues	Sales to affiliates/non-affiliates by species - product/process	by crab fishery	by crab fishery	by crab fishery
	Sales to affiliates/non-affiliates by species - crab size and grade	by crab fishery	by crab fishery	
	Sales to affiliates/non-affiliates by species - box size and finished pounds	by crab fishery	by crab fishery	by crab fishery (use box size categories)
	Sales to affiliates/non-affiliates by species - revenues (fob)	by crab fishery	by crab fishery	by crab fishery - FOB Alaska only
	Custom processing by species/product/process	by crab fishery	by crab fishery	by crab fishery (include pounds raw and pounds of product)
	Custom processing revenues	by crab fishery	by crab fishery	by crab fishery
Labor	Average processing positions	by crab fishery		
	Man-hours	by crab fishery	by crab fishery	aggregated across all fisheries
	Total processing labor payments	by crab fishery	by crab fishery	aggregated across all fisheries
	Crab processing employees by residence	by crab fishery	by crab fishery	aggregated across all fisheries
Custom processing services purchased	Reporting requirement			All companies contracting custom processing must report
	Custom processing services purchased - raw pounds	by crab fishery	by crab fishery	by crab fishery
	Custom processing services purchased - product and process	by crab fishery	by crab fishery	by crab fishery
	Custom processing services purchased - size and grade	by crab fishery		
	Custom processing services purchased - box size	by crab fishery		
	Custom processing services purchased - finished pounds	by crab fishery	by crab fishery	by crab fishery
	Custom processing services purchased - processing fee	by crab fishery	by crab fishery	by crab fishery
Crab purchases	Raw crab purchases by fishery - ifq type	by crab fishery	by crab fishery	by crab fishery
	Raw crab purchases by fishery - size and grade	by crab fishery		
	Raw crab purchases by fishery - pounds	by crab fishery	by crab fishery	by crab fishery

Data type	Data element	Alt 1. (status quo)	Alt. 2	Alt. 3
Production	Production - dates covered by fishery	by crab fishery		
	Production - processing days by fishery	by crab fishery	Providing first and last day and number of active days	
	Raw crab processed by fishery	by crab fishery		
	Product and processed pounds by fishery	by crab fishery		
	Production - crab size and grade	by crab fishery		
	Production - box size	by crab fishery		
	Production - finished pounds	by crab fishery		
	Production - custom processing identifier	by crab fishery		
Revenues	Sales to affiliates/non-affiliates by species - product/process	by crab fishery	by crab fishery	by crab fishery
	Sales to affiliates/non-affiliates by species - crab size and grade	by crab fishery	by crab fishery	
	Sales to affiliates/non-affiliates by species - box size and finished pounds	by crab fishery	by crab fishery	by crab fishery (use box size categories)
	Sales to affiliates/non-affiliates by species - revenues (fob)	by crab fishery	by crab fishery	by crab fishery FOB Alaska only
	Custom processing by species/product/process	by crab fishery	by crab fishery	by crab fishery (include raw pounds and pounds of product)
	Custom processing revenues	by crab fishery	by crab fishery	by crab fishery
Labor	Average processing positions	by crab fishery		
	Man-hours	by crab fishery	by crab fishery	aggregated across all fisheries
	Total processing labor payments	by crab fishery	by crab fishery	aggregated across all fisheries
	Crab processing employees by residence	by crab fishery	by crab fishery	aggregated across all fisheries
Custom processing services purchased	Reporting requirement			All companies contracting custom processing must report
	Custom processing services purchased - raw pounds	by crab fishery	by crab fishery	by crab fishery
	Custom processing services purchased - product and process	by crab fishery	by crab fishery	by crab fishery
	Custom processing services purchased - size and grade	by crab fishery		
	Custom processing services purchased - box size	by crab fishery		
	Custom processing services purchased - finished pounds	by crab fishery	by crab fishery	by crab fishery
	Custom processing services purchased - processing fee	by crab fishery	by crab fishery	by crab fishery
Crab purchases	Raw crab purchases by fishery - ifq type	by crab fishery	by crab fishery	by crab fishery
	Raw crab purchases by fishery - size and grade	by crab fishery		

Data type	Data element	Alt 1. (status quo)	Alt. 2	Alt. 3
Crab purchases	Raw crab purchases by fishery - pounds	by crab fishery	by crab fishery	by crab fishery
	Raw crab purchases by fishery - gross payments	by crab fishery	by crab fishery	by crab fishery
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	Broker fees and promotions by fishery	by crab fishery		
	Lease (IPQ) costs	by crab fishery	by crab fishery	by crab fishery - arm's length (monetary payments)
	Observer costs	by crab fishery		
	Freight cost for plant supplies	aggregated across crab fisheries		
	Freight costs for products	aggregated across crab fisheries		
	Product storage	aggregated across crab fisheries		
	Water, sewer, and waste disposal	aggregated across crab fisheries		
	Other crab-specific costs	aggregated across crab fisheries		
General plant costs	Annual fuel, electricity, lubrication, hydraulic fluids	aggregated across all fisheries		
	Vessel and equipment investments	aggregated across all fisheries		
	Repair and maintenance	aggregated across all fisheries		
	Foremen, managers, other employees and salaries	aggregated across all fisheries	aggregated across all fisheries	aggregated across all fisheries
	Other vessel specific costs	aggregated across all fisheries		
General processing information	Processing days - annual total - all fisheries	aggregated across all fisheries	aggregated across all fisheries	
	Gross FOB revenues - annual total - all fisheries	aggregated across all fisheries	aggregated across all fisheries	
	Finished processed pounds - annual total - all fisheries	aggregated across all fisheries	aggregated across all fisheries	
	Processing labor costs - annual total - all fisheries	aggregated across all fisheries	aggregated across all fisheries	

**January 26, 2012**

**Mr. Eric Olson, Chair  
Mr. Chris Oliver, Executive Director  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2252**

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**Chairman Olson & Mr. Oliver,**

**This letter is being delivered to the Council on behalf of the crew of the *F/V Scandies Rose*. We would like to comment on the proposal before the Council that would require vessel owners to submit crew contracts and settlement sheets as part of the EDR forms. We would rather testify in person, as we did at the December Council meeting in Anchorage, but we are fishing opilio crab right now and need to concentrate on that. But we feel our input is important and we want to make sure you know how we feel.**

**At no point has anyone asked the crew how we feel about this proposal. We are all adults and we freely enter into contracts with our vessel owners. We understand what we're signing up for before we sign the dotted line. We think the details of our contracts and settlement sheets are a private matter between our boat owner and us. We don't understand why the Council feels this information needs to be out there for the public to see. Our contracts and settlement sheets contain private information like our social security numbers, home addresses, emergency contacts, and information about our health. We are worried that if the Council chooses to go with this proposal our personal information may fall into the wrong hands. We have no way to control who gets to see our information once the EDR forms are submitted. We understand there are supposed to be protections in place to guard our privacy, but the best way to guard our privacy is not to collect the information in the first place.**

**We are also bothered by the fact that the people pushing the**

hardest for this proposal say they represent crew. We don't know who the crew is that they claim to represent, but it's not us. If they really represented crew they would be out there trying to protect our privacy. Since that's not happening, we can only guess that they have other ideas in mind than what's best for crew. Thanks for listening to our concerns and we hope the Council won't move forward with the option to collect crew contracts and settlement sheets.

Sincerely,  
The Crew of the *F/V Scandies Rose*

Jerry D. Coburn Jr.

W. Tipton

Jerrine Thomas

Shawn Tipton

Peter Wilson Jr.

Mark Lee

[Signature]

David Leigh Coburn

**PACIFIC NORTHWEST CRAB INDUSTRY ADVISORY  
COMMITTEE (PNCIAC)**

4824 Harbor Lane  
Everett, WA 98203  
360 440 4737  
[steve@wafro.com](mailto:steve@wafro.com)

January 30, 2012

Mr. Eric Olson, Chair  
Mr. Chris Oliver, Executive Director  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2252

Re: Agenda Item C-3(e)-Final Action on BSAI Crab EDR Revisions  
Endorse ABSC recommendations for Alternative #3, with minor  
revisions as noted in the ABSC comments

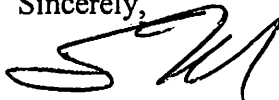
Dear Mr. Olson and Mr. Oliver:

The PNCIAC comprised of harvesters and processors involved in the Bering Sea and Aleutian Islands king and tanner crab fisheries, sanctioned under the BSAI King and Tanner Crab FMP since 1990, has been involved in analysis and review of the Crab Economic Data Reporting Program (EDRs) since the Council initiated the review a few years ago. During the course of its involvement in the review, PNCIAC has called on industry professionals directly involved in completing the reports for both harvesters and processors.

Most recently, PNCIAC has reviewed the comments of the Alaska Bering Sea Crabbers (ABSC), a number of whose members are harvester representatives on the PNCIAC. ABSC comments are noted in their submission to Eric Olson, Chair of the NPFMC, dated January 24, 2012.

At this time the PNCIAC would like to fully endorse the comments and recommendations of the Alaska Bering Sea Crabbers for Alternative #3, with minor revisions as noted in their comments.

Sincerely,



Steve Minor, Chair  
Pacific Northwest Crab Industry Advisory Committee



to Aaron Peterson

I am the wife of a crab fisherman aboard the F/V Silver Dolphin.

I am extremely concerned about the safety of my husband's personal information being given to anyone and here are the following reasons:

- a. invasion of privacy
- b. safety for my family while he's gone (i.e. our address/SS#)
- c. identity theft

I do not agree with anyone having any sort of unwanted information on my family.

Stacy Petter

2-3-12

Date: January 28, 2012

To: Mr. Eric Olson, Chairman  
Mr. Chris Oliver, Executive Director  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2252

From: Crew of the F/V Arctic Hunter

Re: Agenda Item C-3 (e) "Final Action on BSAI Crab EDR Revisions"

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Dear Chairman Olson & Mr. Oliver,

We are writing today to provide the Council with our comments on agenda item C-3 (e), "Final Action on BSAI Crab EDR Revisions." As crewmen, the issue of EDR's has never been something we've thought much about. Up until now only vessel owners have been directly affected. However, we recently became aware there is a proposal before the Council requiring crew contracts and settlement sheets to be submitted along with the EDR forms. So now the EDR issue affects us as well.

From what we understand, this proposal is being put forward as a way to protect crew interests. As crew we would have liked to be consulted. Crew contracts and settlement sheets contain proprietary information like social security numbers, emergency contacts, health information, and of course financial information. The existing EDR already collects the crew pay information at the aggregate level. We don't understand why you need to collect this information at the individual crewmember level. And we also don't understand how having our social security numbers, our emergency contacts, and our health information is going to help the Council manage the fishery more effectively. We understand there are protections in place to deal with proprietary data. But the best protection is to not collect the information in the first place.

In conclusion, we are against the proposal to collect crew contracts and settlement sheets as part of the EDR program. We are concerned that private information such as our social security numbers, emergency contacts, and health-related information may accidentally fall into the wrong hands. We are also concerned that as the people most affected by this proposal we were not consulted. We want the Council to understand that the crew "advocates" who have been coming to the Council requesting this proposal don't represent us and haven't asked us what we think of this proposal. We appreciate you considering our comments.

Sincerely,  
The Crew of the F/V Arctic Hunter

Brett Robinson  
LE H. NGUYEN  
MINH UY  
THUY NGUYEN  
GARRETT DOKTER  
DAVID FISHER

