



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
Alaska Fisheries Science Center
7600 Sand Point Way N.E.
Seattle, Washington 98115-6349

January 31, 2024

MEMORANDUM FOR: Jonathan M. Kurland
Regional Administrator, Alaska Regional Office

FROM: Robert Foy, Ph.D.
Science and Research Director, Alaska Fisheries Science Center

SUBJECT: Exempted Fishing Permit (EFP) Application from Real Time Data North America, LLC to examine the use of electronic logbook requirements without requiring duplicate hard copies

The Alaska Fisheries Science Center (AFSC) has reviewed the EFP application from Real Time Data North America, LLC (RTDNA) which would waive regulatory requirements for the printing of electronic logbook (ELB) and electronic discard reports aboard vessels using RTDNA's software.

While the requested regulations to be waived are an administrative change, logbook data is an important component of fishery-dependent information on which at-sea and shoreside observers rely on to complete their data collections. AFSC staff identified the following specifications that could improve the EFP and ensure continual high-quality, rapid, fishery-dependent data collections.

We recommend that the EFP include the stated objective for RTDNA's ELB to transmit logbook data to the Alaska Regional Office and that the ELB data will be accessible to the AFSC's FMA Division. ELB data provides an important quality control check for haul and trip information collected by fishery observers and electronic access to these records will replace the necessary printed copies usually returned by observers. Real time access to ELB data is also important to verify inseason information. The AFSC supports technological solutions that improve and streamline data collections, which necessitates data transmission and access. The EFP states, "*(a)t a minimum, under this EFP, observers and IPHC port samplers will be able to access required logbook data for transposition directly from the screen of the Deckhand electronic logbook device.*" This level of data access is not an improvement, and may even lead to a degradation of data quality unless accompanied by an accessible copy which is currently provided through the print out.

We look forward to working with RTDNA and the Alaska Regional Office on the successful implementation of this EFP with the suggested improvements.

