MEMORANDUM

TO: Council, SSC and AP Members

FROM: Clarence G. Pautzke
Executive Director

DATE: September 11, 1996

ESTIMATED TIME

3 HOURS

SUBJECT: Amendments - Final Action

ACTION REQUIRED

(a) Final review of a regulatory amendment to require groundfish processors to utilize electronic recordkeeping and reporting.

(b) Clarification of a regulatory amendment that would require transponders on Federally permitted vessels that fished seaward of the EEZ.

(c) Final review of a regulatory amendment that would adjust the directed fishing standards for groundfish.

BACKGROUND

(a) Electronic Reporting for Processors

The proposed regulatory amendment prepared by NMFS staff would require groundfish processors in the Bering Sea, Aleutian Islands, and Gulf of Alaska to utilize an electronic recordkeeping and reporting system for NMFS-required documents. The analysis was mailed to you on July 30.

In June 1996, the Council recommended that the initial review draft of the EA/RIR be revised to address a number of technical concerns raised by the SSC and AP (these are listed in the June 1996 SSC and AP minutes included under Agenda Item A). The Council further recommended that NMFS meet with industry to address software and implementation issues. That meeting occurred in mid-August at NMFS AFSC in Seattle. The EA has been revised to address industry concerns and implementation has been delayed until January 1, 1998. Industry, however, has continued to express reservations concerning the recommended hardware and software requirements for processor reporting (Item D-2(a)).

The analysis includes the following two alternatives:

Alternative 1: No Action: This would continue the current system of recordkeeping and reporting in which processors maintain paper logbooks and submit NMFS reports via conventional methods (i.e., fax and telex transmissions).

Alternative 2: Require groundfish processors that are subject to observer coverage to use NMFS-supplied software to electronically record harvest and processing activities on computer equipment. Conventional logbooks and associated NMFS reports would be replaced by electronic versions. At-sea processors would be required to transmit in-season NMFS reports using Inmarsat satellite equipment and shore-based processors would be required to use modems and phone systems. All processors using the electronic reporting system would be required to have a computer-operated printer to make paper copies of electronic logbook pages and transmitted reports at the processing site.

The NMFS electronic reporting system would be implemented in two stages. Phase 1 would consist of electronic versions of the daily production, weekly production, and check-in/check-out reports and would be distributed to the groundfish processing industry for voluntary use in early 1997. Legal implementation of Phase 1 would take place on January 1, 1998. Phase 2 would consist of electronic logbooks, vessel activity reports, and product transfer reports. These will be developed in 1997 and 1998 with full legal implementation in 1999.

The amendment before the Council for final action is the second for electronic reporting requirements for North Pacific groundfish data. The Council approved a separate electronic reporting program for observer data in June 1995. The final rule for hardware requirements for the observer program is currently undergoing NMFS Regional review. If approved by the Secretary of Commerce, requirements for observer data could be implemented by January 1, 1997.

(b) Clarification of seamount fishing proposed rule

In January 1995, the Council approved a regulatory amendment to require transponders on Federally permitted vessels that fished seaward of the EEZ. Item D-2(b) is a letter from the NMFS Regional Director informing the Council that NMFS will not be able to provide the transponders to vessel owners who wish to fish seaward of the EEZ, as was originally included in the Council's motion to forward the amendment to the Secretary.

(c) Directed Fishing Standards

At its December 1995 meeting, industry representatives and individual members of the Council requested NMFS to explore several changes to existing maximum retainable bycatch (MRB) percentages. This request responded to specific concerns about "topping off" activity and industry assertions that a limited fishery for arrowtooth flounder exists and that this species should be allowed as a basis species for the retention of pollock and Pacific cod. Current regulations prohibit the use of arrowtooth flounder as a basis species for retention of bycatch of other groundfish species. Industry representatives and NMFS in-season managers also have recommended that a reduction of the GOA sablefish MRB percentage be considered to respond to apparent "topping off" activities in the 1996 trawl fisheries. The EA/RIR, which will be distributed at the meeting, contains the following four adjustments.

Reduce the MRB established for BSAI Greenland Turbot. The current MRB percentages for BSAI Greenland turbot are set at 35% relative to sablefish, flathead sole, and rockfish; and 1% relative to all other species. The 35% MRB was implemented in 1995 to allow for a "topping off" fishery for Greenland turbot by trawl vessels instead of a-fast paced directed fishery that experiences unacceptably high halibut bycatch rates. Flathead sole was established as a separate TAC category to make better use of this species as a basis for retaining Greenland turbot up to the 35% MRB allowance. Prior to 1995, the MRB percentage for Greenland turbot was 15% relative to sablefish and rockfish and 1% relative to all other species.

In December 1995, the Council heard requests from industry representatives to reduce the MRB for Greenland turbot to 10% relative to sablefish and rockfish and 1% relative to all other species. This request stemmed from concern that halibut bycatch associated with "topping off" activity for Greenland turbot would be credited against the halibut bycatch allowances specified for other trawl fisheries, specifically the flathead sole/rock sole/other flatfish fishery category, and result in an attainment of these bycatch allowances before the available TACs for other groundfish species could be harvested.

Allow the use of GOA arrowtooth flounder as a basis species. In 1994, the Council recommended that arrowtooth flounder be prohibited as a basis species for the retention of other groundfish species on bycatch status. Target operations for arrowtooth flounder simply for the purpose of topping off with other, higher-valued species resulted in unacceptably high halibut bycatch rates. Little or no market existed for arrowtooth, which subsequently was discarded, but the halibut bycatch amounts associated with the arrowtooth flounder fishery were credited against the overall halibut bycatch limits available to other fisheries. This situation increased the rate at which respective halibut bycatch limits or allowances were reached and limited the opportunity of other groundfish fisheries to harvest available TAC amounts before halibut bycatch restrictions closed the fisheries.

In December 1995, testimony was presented to the Council that legitimate GOA target operations and markets do exist for arrowtooth flounder and that this species should be allowed as a basis species for purposes of retaining pollock and Pacific cod when these two species are on bycatch status. An MRB percentage of up to 5% was proposed for pollock and Pacific cod relative to arrowtooth flounder.

Prohibit the use of GOA northern rockfish as a basis for retention of shortraker/rougheye rockfish. In December 1995, the Council requested NMFS to prohibit any opportunity to top off retained catch of northern rockfish with rougheye/shortraker rockfish in the GOA. Current MRB percentages for shortraker/rougheye allow up to 15% retention relative to other rockfish species that are open to directed fishing, including northern rockfish. This initiative was proposed to address concerns that a "topping off" fishery for shortraker/rougheye by trawl vessels could result in premature attainment of TAC and jeopardize the ability of vessels using hook-and-line gear to retain high valued bycatch of shortraker/rougheye.

Reduce the MRB percentage for GOA sablefish. The current MRB percentage for GOA sablefish is 15% relative to deep water flatfish, flathead sole, rex sole, and rockfish and 1% relative to all other species. Sablefish typically is a bycatch species for the GOA trawl fisheries and trawl vessels maximize allowable retention of sablefish through "topping off" activity. In 1996, in-season monitoring and management of trawl fisheries was frustrated by unanticipated high harvest rates of Pacific ocean perch (POP) for purposes of topping off with sablefish, as well as unprecedented high harvest rates of sablefish through topping off activity. These higher than anticipated harvest rates resulted in several TACs for sablefish and POP being exceeded, these species being put on prohibited species status, and mandatory discard of these species for the remainder of the year. NMFS proposes, therefore, that the MRB percentage for GOA sablefish be reduced from 15% to 7% to reduce the harvest rates of this species as well as that for POP.

Alternative 1: Status quo.

Alternative 2: Revise certain MRB percentages to respond to fishery operation or management concerns. Any or all of the following proposed changes could be adopted:

Gulf of Alaska - Proposed changes to MRB percentages - current MRB percentages are shown in brackets.

	BYCATCH SPECIES			
	Pacific cod	pollock	sablefish	shortraker/rougheye
BASIS SPECIES				
Deep flatfish			7 [15]	
Rex sole			7 [15]	
Flathead sole			7 [15]	
Arrowtooth flounder	5 [0]	5 [0]		
Pacific Ocean Perch			7 [15]	
Shortraker/rougheye			7 [15]	
Other rockfish			7 [15]	
Northern rockfish			7 [15]	0 [15]
Pelagic rockfish			7 [15]	
DSR - Southeast\outside			7 [15]	
Thornyhead			7 [15]	

BSAI - Proposed changes to MRB percentages -- current MRB percentages are shown in brackets.

	BYCATCH SPECIES
	Greenland turbot
BASIS SPECIES	
Flathead sole	1 [35]
Sablefish	10 [35]
Other rockfish	10 [35]
Other red rock fish -BS	10 [35]
Pacific ocean perch	10 [35]
Sharpchin/Northern - AI	10 [35]
Shortraker/Rougheye - AI	10 [35]

AMERICAN FACTORY TRAWLER ASSOCIATION

Mr. Richard Lauber
Chairman
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252

August 13, 1996

Dear Mr. Lauber:

We note that the NPFMC is scheduled to take final action on electronic reporting at the September meeting in Sitka. AFTA and many other industry participants strongly endorse electronic reporting because it will eventually resolve many in-season management problems and should result in better scientific data for management and research purposes. Although we support electronic reporting, a number of important questions were raised at the April Council meeting regarding the implementation of an electronic reporting system. I have included a copy of an industry letter to NMFS which provides a detailed statement of some of the concerns raised before the Council in April as well as some additional matters that have come to light more recently. The letter was written in the spirit of working constructively to improve the proposed electronic reporting system with the goal of implementing a well-designed system as expeditiously as possible.

Since our letter was drafted, NMFS has held a meeting with industry wherein many of our concerns were discussed (and some new ones were raised). Because the final rule is currently being drafted for the Observer Program portion of the electronic reporting system (Phase I), and final Council action is scheduled in September for the Regional Office portion (Phase II), many in the industry are skeptical that our concerns can be incorporated into the mix given the time schedule. For this reason, we would like our industry letter included in the materials Council considers before final action is taken. We believe that NMFS' proposals that are presented in September to address our concerns can be more thoroughly reviewed by the Council if the letter outlining our concerns is available to Council members prior to the meeting.

Thanks in advance for considering our letter. We appreciate the opportunity to share our thoughts with NMFS and the Council during the development of an electronic reporting system.

Sincerely,

John Gauvin

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29 July 1996

Mr. Steve Pennoyer, Director
Alaska Region, National Marine Fisheries Service
709 West 9th Street
Juneau, AK 99802

Re: Industry comments on NMFS electronic reporting systems.

Dear Steve:

The industry offers the following comments to facilitate the creation of an electronic reporting system that is accurate, reliable, and cost-effective. We enthusiastically support NMFS' efforts to improve inseason fisheries management because we know that a well-conceived reporting system will be beneficial to both managers and industry. The trawl sector especially appreciates the scope of the task at hand because it encountered many difficult obstacles in the development of the much smaller electronic reporting system used by Seastate.

Over the past three years, electronic communication systems from a variety of providers and communication routes have been installed on many of the larger groundfish vessels. Our goal has been to reduce costs while ensuring accurate and reliable transmission. We have reduced our communication costs by as much as 80% and our dependence on telephone facsimile transmissions to near zero. The industry continues to investigate new ways to further reduce these costs, such as selecting from various satellite communications vendors and transmitting all electronic mail in a single daily burst to our main offices. We are now experimenting with cellular telephones as an alternative to satellites. The future promises even greater advances in technology, providing improvements in reliability and further reductions in cost.

These rapid advances in technology signal the need for flexible and adaptable electronic reporting systems. Further, industry should be involved in the development process. Therefore, the industry highlights the following concerns regarding the NMFS vessel and observer data electronic reporting systems that are being developed. We view this letter as the start of an industry/NMFS dialogue during the development of an electronic reporting system.

1. Electronic Reporting Software in Development.

A recent test of the reporting software application (hereafter, application) for vessel data revealed problems in the current system. We believe this may indicate flaws in the in-house system of application development relied on by NMFS. Working in a closed environment creates barriers to communication with the industry and this may explain some of the problems that arose when the current system was tested. Working in isolation also creates the need for NMFS programmers to develop new applications and programs that may be similar to widely available commercial software. Therefore, we recommend that NMFS evaluate its current reporting application and increase industry

involvement in the development process. Rather than relying solely on in-house development, we also would like NMFS to consider providing open architecture standards which any software/hardware developer could use to meet NMFS reporting standards. This pertains particularly to the vessel data reporting where the data will be entered by the vessel crew.

Another potential problem that the recent system test revealed is that it is somewhat difficult to "maneuver around" in the current application. Making the system as "user-friendly" as possible will be critical to the reliability of the data transmitted. For instance, the inclusion of default fields in the data entry form would reduce the prospect of fallacious entries. An open architecture system (e.g., HP Open Mail) would allow vessels currently using electronic mail systems (e.g., ccMail, Internet, SMPT, MIME, POP3, X.500) to continue using the system best suited to their individual needs and would provide the flexibility to choose the most cost-effective system as technology improves.

2. Transmission Options

The proposed requirement to use the IMMARSAT system of satellites would prevent the use of acceptable technologies that are more affordable. The new family of wide-coverage cell satellites (low orbit) are currently available at approximately one-fifth the cost of the IMMARSAT system providers such as COMSAT ($2/minute versus $10/minute). Examples of wide-coverage cell systems providers are V-SAT satellite, Gates-McGraw LEO satellite, Motorola Iridium, Orbcomm, and Teleglobe. Some of the smaller vessels are already using wide-coverage cell systems. Transmission quality and speed meet the standard set by IMMARSAT systems. For this reason, the industry feels NMFS should not require the more expensive IMMARSAT system links. We feel the industry should be free to select the technology and service that best meets industry needs while meeting specifications set by NMFS.

Additionally, cellular phone service will be a viable alternative communication system in the near future. For instance, cell phone service was used for roughly 80% of the vessel-to-shore communications in the Pacific whiting fishery this spring. Cell phone coverage is currently limited in the Bering Sea to areas within 40 to 50 miles of Dutch Harbor, but this could change as it has on the Pacific coast. When service becomes available in the Pribilofs and other locations in the Aleutian chain, cell phones will probably represent the most cost-effective alternative.

3. Data Quality

The implementation of electronic reporting is in the best interest of NMFS managers, scientists, observers, and the fishing industry. However, any system that prevents or decreases the opportunity for industry review of the raw data could degrade data quality. Data quality could decrease for two obvious reasons. As discussed previously, if the data entry program is not user-friendly, mistakes are inevitable when data are entered into the computer by the observer or crew members. The other potential cause for a loss of quality is that the system impedes or prevents access to the raw data by the vessel-owner company's main office. Presently, most companies have staff designated to receive observer and catch reports concurrent with NMFS reception of these reports. This provides an opportunity to check the data for obvious mistakes. Currently, errors such as incorrect statistical area

for the catch report or improper statistical expansion of bycatch rates (e.g., an expansion of a whole-haul sample) are frequently detected by the main office.

The industry is concerned that the design of the electronic reporting system in its present form could result in a greater probability for key-punch or other reporting errors to remain undetected. Fishing companies must receive the data at the same time NMFS receives it because industry review of the raw data is beneficial to the goal of improving accuracy. We have been assured that our concerns about access to data have been addressed. However, based on the limited experience of industry representatives who have had a chance to work with the electronic reporting system during its development, we continue to believe that data access for purposes of verification may be a problem for some companies. We raise this issue to highlight the concern that compromising the quality of fishery data impacts all users and all participants in the fishery, as well as the attainment of the conservation and management objectives of the groundfish FMP.

4. Hardware

To maximize the flexibility and adaptability of the reporting system, NMFS should specify performance standards, not hardware requirements. As technology advances, the requirements in the current proposed rule will become antiquated. To prevent locking the industry into a specific hardware standard, NMFS should specify the minimum system requirements for running the electronic reporting applications, allowing the industry to choose the most cost-effective hardware for their vessels. The requirement for the 100 MHz or better Pentium chip and 16 mb RAM is apparently based not on the current requirement to run the reporting application, but to run future applications as they come on line.

We appreciate the fact that NMFS does not want to set up one hardware standard and then have to modify it when other phases and applications of the electronic reporting system come on line. From the industry's perspective, however, the hardware standard that is imposed is an upgrade from what most companies have in their offices, never mind what they have on their vessels. If a lower-power 486 can run the current application, then some companies may opt to delay upgrading until the application changes such that more power is required. This would delay purchase of the upgrade until a time when that hardware may be considerably less expensive.

Recommendations

The trawl industry appreciates NMFS' consideration of the points made in this letter. We understand that a NMFS/industry meeting is supposed to occur sometime in August. In the meantime, many in the industry are concerned that NMFS will continue formalizing the program and progress to a point where modifications of the sort suggested in this letter would be costly or perhaps impossible. That would be unfortunate.

Considering the technical and practical aspects of developing an electronic reporting system, perhaps a somewhat different approach to the usual industry/NMFS interaction and cooperation is merited. Speaking for the factory trawler sector, we have arrived at the list of concerns contained herein

through a general meeting. Any further refinement or practical implementation of the suggestions we list should probably come from the computer/communications systems people from within individual companies.

For this reason, we suggest that NMFS and the industry form an informal working group made up of the computer and communications systems people. Such a group would be available to work out technical and practical problems during the implementation and testing phase. It would serve as a resource base and, from our perspective, would be responsible for evaluating and explaining what would be involved in implementing solutions to the concerns raised in this letter, as well as any other matters that the other industry sectors may voice.

Thanks in advance for considering our comments. If NMFS should decide that a implementation work group would be valuable, we would be happy to attempt to contact other industry sectors as well as to suggest some qualified people from our sector to serve on the work group. Please feel free to call John Gauvin or Christian Asay from Tyson Seafood if you would like us to start working on the formation of a work group.

Sincerely,

American Factory Trawler Assn.

Alaska Ocean Seafood

Michael Lotin
International Maritime Management, Inc.

Alaska Trawl Fisheries

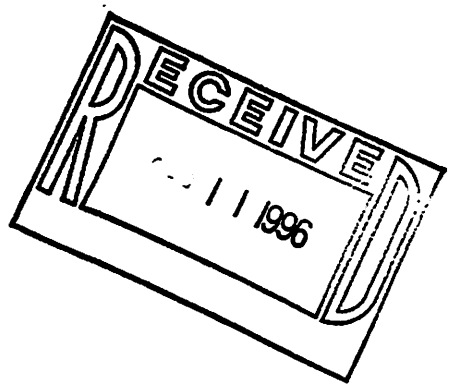
North Pacific Fishing, Inc.

Michael L. Zubko
Area Fishing Company
Cape Horn Fisheries

Michael A. Guo
Operations Manager
Sea Sea Limited

cc: J. Balsiger, W.Karp

Dave Benson
Dir. Govt. Affairs -
Tyson Seafood Group



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Mr. Steve Pennoyer, Director
Alaska Region, National Marine Fisheries Service
709 West 9th Street
Juneau, Ak 99802

September 11, 1996

Re: Overview of the electronic data reporting issues

Dear Steve,

The attached document has been developed to try to give a simplified overview of the general issues relating to electronic reporting of data from ship to shore for processing vessels operating in the BSA/GOA. Frankly, there has been a great deal of confusion and misunderstanding about the two electronic reporting regulations currently in process of being promulgated: the mandatory electronic reporting of Observer data that has recently been amended and is awaiting final signature by the Secretary (Observer) and the newly proposed electronic Log Book reporting program (Log Book) that has only just been presented.

I trust this spread sheet comparing the attributes of the current voluntary system and the proposed Observer program will help with your discussions with industry to develop an electronic production log book reporting program. The document was developed at the request of a segment of the industry and in response to your request made in the NPLA meeting last week.

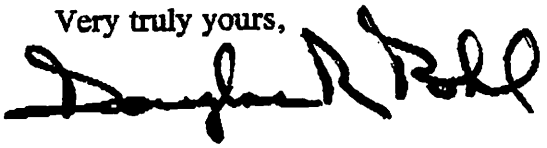
The personnel in the NMFS Observer office have been very helpful and available this week to respond to our questions despite their overloaded schedules. We appreciate it very much because the NMFS/industry meeting in early August had left people confused.

In the course of getting a handle on this issue after the meeting, I've been able to talk both with the chap who developed the current software program pursuant to a contract with NMFS and to the people at Comspec Digital Products, Inc., the company that created the communications program (JFT) that NMFS proposes to use in lieu of cc:MAIL for transmission. As I serve several clients as their cc:MAIL administrator, I feel comfortable that I've got a handle on that technology. The only pieces I have not been able to review are the new software that NMFS has/is developing which is apparently both proprietary and still under development and the Log Book program as

there is no one in Seattle conversant with it. Nonetheless, I believe I have a respectable understanding of the technical situation; I hope that this explanation will prove useful for both you and the industry.

I will be unable to attend the meeting next week in Sitka. Should you or your staff have any questions please feel free to call me; I am available through my cell phone and pager which connect to my office phone 'round the clock. I wish you success with both programs.

Very truly yours,



Douglas R. Pohl

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Douglas Pohl

Data Communications Consulting
2442 N.W. Market St. MS-30, Seattle, WA 98107
Tel: (206) 283-6127 Internet: dpohl@datamarine.com

September 11, 1996

Qualifications: **Fishing:** Involved in the North Pacific Fisheries for over 23 years- Participated in the salmon, groundfish and crab fisheries- Vessel owner and operator- Licensed Master. **Computing:** Director of Quality Control for Atari, Inc.- PC Systems Engineer: Microsoft, Lotus, Novell- Communications consultant: shipboard/office systems setup and operation for ship to shore communications solutions- Network Administrator to fishing companies with local area networks and multiple vessels.

Electronic Reporting Key Points:

HARDWARE:	Existing:	NMFS Proposed:	Comments:
PC Computer	386 & 486, some Pentiums	Pentium 100 MHz. minimum	Existing industry PCs sufficient for an expanded Observer Program by Datamax using cc:MAIL.
RAM Memory	Most with 4 to 8MB, some 16MB	16MB minimum	
Free Hard Drive Storage Space	Most less than 70MB free	70MB minimum free	
Modem	V.32/V.32bis (9600) widely used	V.34 (28,800) required	V.34 (28,800) fails over regular Inmarsat. 28.8k modem can "step down" to slower 9600 modulation but at extra time/cost suggest a setup to default at V.32 9600

SOFTWARE:	Existing:	NMFS Proposed:	Comments:
Proven Performance	Observer Program = 3 years cc:MAIL = 9 years	New Program=expanded/untested JFT = 9 years	NMFS developed but not yet BETA tested JFT works well on NOAA ships with expert Radio Officer
Creator/Owner (R&D)	Datamax and LOTUS (IBM)	NMFS & Comspec Digital (JFT)	
Service & Support	Local support & 10,000 business partners worldwide	2 NMFS staff & Texas Co. No local JFT rep./support	cc:MAIL BBS - no cost tech info.
User Base	cc:MAIL = 10,000,000 users, including 50% of Fortune 1000 de facto communications standard	JFT = Less than 1000 users	
Control for deployment & upgrade	Outside programmer controls with NMFS scheduling	NMFS controls in house	NMFS could purchase Datamax
Data Compression	Automatic, avoids user errors. Average data transfer less than 2,000 bytes compressed	10-15 times more data (20-30,000 bytes compressed)	Large data files are very hard for smaller vessels, expect very large cost

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COMMUNICATIONS: (cont.)	Existing: (cont.)	NMFS Proposed: (cont.)	Comments: (cont.)
Transmissions	cc:MAIL protocol over Inmarsat Standard A, B, C, & M, Cellular, HF Sitor and dialup modem, too many to list...	JFT protocol over "point to point modem connection to NMFS host computer" as specified by NMFS	NOTE: Inmarsat C does not allow "point to point" modem connection to NMFS host computer. Requires 3rd party relay (i.e. MCI, NewEast)
User's skill	Industry has personnel on shore/ship trained and familiar with hardware, software, and transmission systems	Observers as yet untrained Vessel crews in their support role unfamiliar with new JFT system NOAA ships use highly skilled Radio Officer to handle JFT mail	Budget, staff and support issues will greatly influence success of this proposed program

SECURITY:	Existing:	NMFS Proposed:	Comments:
Description of basic security features	cc:MAIL is considered to be a highly secure e-mail package. Does not have NSA security certification. cc:MAIL restricts access by requiring a login name and password. Restrictions may be tightened further by cc:MAIL Administrator. All cc:MAIL transactions are encrypted before leaving the PC. No situation ever occurs in which message contents are available outside of the PC's RAM in an unencrypted format. The cc:MAIL post office database itself is always encrypted for maximum security.	JFT has a relatively low level of security, relying on user restricted DOS program commands and mail directories. No use of industry recognized higher security systems. Used by oil companies to transmit highly proprietary data and by NOAA Only two 3 digit password tokens JFT requires skilled users familiar with DOS directories and file naming syntax, can be overcome thru programming a better mail interface in Observer program to automate send/receive	cc:MAIL is an advanced product which is able to migrate to LOTUS Notes Mail that uses state of the art **RSA public key** and X.509 certificate-based authentication. Notes uses **digital signatures** that verify the authenticity of the sender and that the information received from another Notes user was not modified during transmission **Access control** allows for specifying who can use a resource and what they can do with it. Access control is applicable to databases, documents and fields within documents. **Encryption** is used for secure communications of information between all user/clients and master/servers.

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SECURITY: (cont.)	Existing: (cont.)	NMFS Proposed: (cont.)	Comments: (cont.)
How could existing and proposed NMFS messages be compromised?	Any security system can be breached. Multiple levels of security that are religiously enforced offer best protection NMFS needs to install a complete cc:MAIL post office with a gateway router to have the correct tools to insure security. Estimated cost <$1,500 thru GSA pricing. Additional comments inappropriate to insure confidentiality.	Access at the ship or at a modem level is the most likely security breach. Improved data throughput is JFT's primary objective.	NSA standards based systems protect with recognized security, JFT e-mail does not offer a expert security system thru either upgrade or third party add-on.
How do some of the other major e-mail vendors address security?	MICROSOFT: (Exchange Mail) limited message encryption and digital signatures support, requires add-on security device from Northern Telecom	NOVELL: (G Groupwise) No message encryption or digital signatures. No document or field level security. No support for certification based authentication	NETSCAPE: (Mail Server) No message encryption, digital signature support or certification based authentication. No access control.
FINANCIAL COSTS:	**Existing:**	**NMFS Proposed:**	**Comments:**
Hardware	No additional costs even with expansion to 3US using Datamax	Estimate $1,500-2,000	Better hardware will repay investment with improved communications
Software	Already invested in NMFS approved Observer software for existing program Expanded program would require investment by NMFS	NMFS says their new Observer Program will not be sold or any charge to a user. Industry states there was no cost 3 years ago when originally provided by NMFS, then last two years worth of users had to pay for software.	No assurance that NMFS will be successful in operating new Observer program - not Beta tested. NMFS responsibility for minimizing burden on industry during "raw" data trial.

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FINANCIAL COSTS: (cont.)	Existing: (cont.)	NMFS Proposed: (cont.)	Comments: (cont.)
Communications	Well understood and economical because of small data file. But with expanded "raw" summary of the data cost will increase accordingly	"Raw" observer data will increase transmitted data file by a factor of 10 to 15 times over existing data amount.	NMFS "Raw" data reporting cost estimate: Via Standard A on ccMAIL = 30kb@0.9kb/sec = <1 minute = <$8/message (use off peak = <$4/message.) If via JFT, faster transmission rate with minimal savings to Standard A user Via Standard C = $.005/character (1byte/ch.) = 30,000 x $.005 = $150/message File transfers over Standard C requires special user training because of disparate software and hardware types. During 1997, two transmissions would be required; one with cc:MAIL for existing Observer data and another with JFT for the New Observer "raw" data beta test. Costs will be significant.

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RECOMMENDATIONS:	Critical Elements:	Benefits:	Cost Estimate:
1. NMFS JFT setup, training and support.	Setup and installation appear simple - they are not - JFT's modem files are out dated for newer V.34/28.8k required modems	Alpha and Beta test before mandating hardware purchase. (Last NMFS test resulted in disappointment with regard to hardware)	Unknown
	Industry inquiries have uncovered various problems.	Provide most popular V.34 updated modem files. A JFT sponsored training class for installing and configuring JFT software would help all users.	Less than three man days One man day plus expenses.
2. Expand Present Electronic Reporting Program(s)	Start parallel development: Datamax expanded software NMFS new software	Insures a workable system. Invites competition, produces better products, measurable benefits by easy results comparisons	Datamax = less than $10K, ready in 60-90 days NMFS = substantial $$$, costs and budget unknown by industry
	If keeping existing system(s): Datamax Observer Program 1US & 2 US forms data	4 years of success - minimal risks Small data - acceptable cost - all ships can do a small data file	
	cc:MAIL communications	Installed, proven, trained and supported	
	Expand Datamax Program for 3US form and "raw" data	NMFS gets "raw" data in timely fashion -better tools = better management	
	Expanded Datamax Program will store and copy to a floppy disk all encrypted "raw" data so it can be mailed to NMFS at the end of	NMFS will continue to receive management data, additional data by onboard "primary" processing of "raw" data for summary transmittal with the original	

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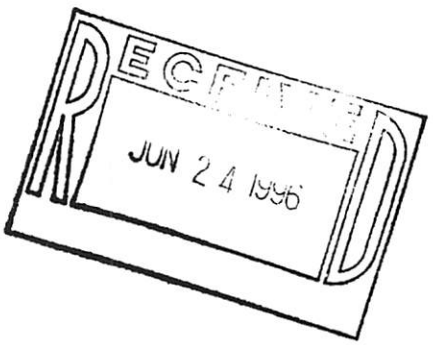
RECOMMENDATIONS:	Critical Elements: (cont.)	Benefits: (cont.)	Costs: (cont.)
Expand Program(s) (cont.)		"raw" data sent by floppy disk rather than waiting for an observer to complete a multi month contract and transport the "paper" records	
3. Finish NMFS cc:MAIL Post Office and Gateway Router	Install proper hardware and cc:MAIL software, configure software to properly construct a secure cc:MAIL Post Office environment	Security and full cc:MAIL feature functionality requires complete cc:MAIL system. Secure two way messaging between observer and NMFS	All cc:MAIL software less than $1,500 GSA, NOTES Mail costs more but offers very best security. Budget migration to Notes Mail ASAP.
4. Improve cc:MAIL user and post office security	Change all passwords, require min. length, use a validity period, use password tests. Enable cc:MAIL automatic directory exchange to control cc:MAIL update and program issues from NMFS	Security is maintainable, any updates can be automated from NMFS cc:MAIL Administrator	Less than one man day
	Use unique user names, i.e. SHIPNAME/1234, with federal fishing permit number ID	Prevents same name access/miss-communications caused by ship's business using cc:MAIL with common passwords and names	
5. Interim Expanded "Raw" Data Program	"Raw" data could be stored on the PC for transfer to a floppy disk that is sent to NMFS every time it offloads the catch.	Conserves communications cost, Provides reasonable alternative to real time data cost	Nominal

09/11/1996 15:34 FROM Broadside International TO 19072712817 P.09

UNITED STATES DEPARTMENT
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
P.O. Box 21668
Juneau, Alaska 99802-1668

AGENDA D-2(b)
SEPTEMBER 1996

June 18, 1996



Mr. Richard B. Lauber
Chairman
North Pacific Fishery Management Council
605 W 4th Ave., Suite 306
Anchorage, AK 99501-2252

Rich

Dear Mr. Lauber:

At its January 1995 meeting the North Pacific Fishery Management Council(Council) made a motion to adopt a regulatory amendment that would require transponders on Federally permitted vessels that fished seaward of the Alaska Exclusive Economic Zone (EEZ). The intent of this proposed regulation is to provide the NMFS Office of Enforcement with improved tools to monitor the origin of groundfish and halibut harvest, thus ensuring that groundfish or halibut that are claimed to have been harvested seaward of the Alaska EEZ are in fact harvested seaward of the EEZ and not inside the EEZ.

The motion made by the Council included a provision for NMFS to provide the transponders for vessels that are used to fish on the seamounts seaward of the Alaska EEZ. NMFS has since determined that the vessel owners must be responsible for obtaining their own transponders.

This change to the requirements should not impose a great burden on the industry because very few vessels can or do go seaward of the Alaska EEZ to fish on the seamounts. This regulation, therefore, would impact few vessels, while improving NMFS's ability to monitor the fishing activity of a vessel that chooses to fish seaward of the Alaska EEZ. NMFS intends to proceed with the proposed rule to implement the regulatory amendment as adopted by the Council, except that NMFS would not provide the transponders required by this rule. We would appreciate your concurrence that the proposed action is consistent with the intent of the Council so that we may proceed to initiate rulemaking.

Sincerely,

Steven Pennoyer
Director, Alaska Region

D-2(c)
DFS

ERRATA SHEET
for
Draft EA/RIR ro Revise Maxumum Retainable Bycatch Percentages
Corrections noted in **BOLD** type

Table 4. Summary of 1995-1996 catch data on bycatch of shortraker/rougheye in the GOA northern rockfish trawl fishery. Proportion of shortraker/rougheye relative to total catch in the northern rockfish fishery is in parenthesis.

	YEAR	
	1995	1996 (thru 8/31/96)
Total groundfish catch	10,151	5,697
Total catch of northern rockfish	4,806	2,776
Total bycatch of shortraker/rougheye	481(5)	**460** (8)

Table 6. Catch, retained, and discard amounts (in metric tons) of arrowtooth flounder in the 1994 - 1996 (through August) groundfish fisheries (trawl and nontrawl).

Year		catch	discard	retained
1994				
	GOA Trawl	22,088	21,653	436
	GOA Nontrawl	872	857	15
	BSAI Trawl	12,524	12,103	421
	BSAI nontrawl	1,790	1,580	210
1995				
	GOA Trawl	16,849	14,600	2,249
	GOA Nontrawl	1,578	1,552	26
	BSAI Trawl	7,052	6,753	299
	BSAI nontrawl	2,230	2,020	210
1996				
	GOA Trawl	17,317	14,165	3,152
	GOA Nontrawl	501	492	9
	BSAI Trawl	**8,635**	**8,040**	**595**
	BSAI nontrawl	**1,418**	**1,323**	**95**

Appendix 1 - 1996 catch composition by gear and fishery (through Aug 1996).

Corrections to total catch by gear and fishery are as follows:

		GOA	BSAI
HAL	C		78,305
	K	504	44
	S		2,292
	T		4,049
POT	C		30,014
TRW	A		118,751
	B		58,197
	C	43,021	107,640
	D	2,661	
	H	10,717	
	F		5,302
	K	19,224	16,446
	L	2,709	20,325
	P		531,169
	R		45,053
	S	313	106
	T		766
	W	6,535	45
	X	14,701	
	Y		128,687
	Z		891

Chris Blackburn D-20

CENTRAL GULF OF ALASKA - ROCKFISH AND TRAWL SABLEFISH
THRU SEPTEMBER 7, 1996
SOURCE: NMFS BULLETIN BOARD

TABLE 1

CATCH AND QUOTA STATUS THRU SEPTEMBER 7
CENTRAL GULF - 1996

SPECIES	MT CAT	QUOTA	REMDR
POP	5,139	3,333	-1,806
SR/RE	942	1,210	268
PSR	1,782	3,200	1,418
NRTHRN	3,193	4,610	1,417
O.ROCK	605	1,170	565
SBLF-TR	1,634	1,380	-254

TABLE 2

CATCH AND DISCARD BY MODE THRU SEPTEMBER 7
CENTRAL GULF - 1996

	SHOREBASED OPERATIONS				
SPECIES	MT CAT	VSL DISC	%DISC	MT MEAL FISH	% OF RTNED
POP	2529	155	6.13	195	8.21
SR/RE	170	48	28.24	1	0.82
PSR	612	52	8.50	12	2.14
NRTHRN	1012	40	3.95	71	7.30
O.ROCK	82	19	23.17	10	15.87
SBLF-TR	751	123	16.38	3	0.48

	MOTHERSHIP		
SPECIES	MT CAT	VSL DISC	%DISC
POP	6	5	83.33
SR/RE	1	0	0.00
PSR	1	0	0.00
NRTHRN	0	0	#DIV/0!
O.ROCK	0	0	#DIV/0!
SBLF-TR	0	0	#DIV/0!

CATCHER/PROCESSOR		
MT CAT	VSL DISC	%DISC
2604	825	31.68
771	119	15.43
1168	137	11.73
2181	335	15.36
523	492	94.07
884	289	32.69

TABLE 3

CENTRAL GULF - TRAWL SABLEFISH - 1991 THRU 1995
QUOTA, CATCH AND REMAINDER
SOURCE: NMFS YEAR END DATA

YEAR	QUOTA	CATCH	REMNDR	%RMNDR
1991	2115	1858	257	12.15
1992	1914	2006	-92	-4.81
1993	1922	1967	-45	-2.34
1994	2244	2002	242	10.78
1995	1720	1724	-4	-0.23
TOTAL	9915	9557	358	3.61
1996	1,634	1,380	-254	-15.54

TABLE 4

TRAWL SABLEFISH AS PERCENT OF TOTAL TARGET - GULFWIDE
SEPT. 12, 1996, EA/RIR FOR DFS REGULATORY AMENDMENT

TARGET	MT TGT	MT SBLFSH	%TGT
ROCKFISH	18972	1338	7.05
FLATHEAD	2696	12	0.45
DEEP FLAT	2544	191	7.51
REX SOLE	14592	142	0.97

15% Sablefish allowed against the target species shown above

C. Blackburn
D-7(c)

OCEANBEAUTY SEAFOODS, INC.

August 13, 1996

Mr. Rick Lauber, Chairman
North Pacific Fisheries Management Council
PO Box 103136
Anchorage, Alaska 99510

Dear Mr. Lauber:

I am writing in reference to industry concerns about this summer's Rockfish Trawl Fishery in the Central Gulf of Alaska.

This was our facility's first year participating in this fishery. Consequently, we started out very low on the learning curve for effectively processing and marketing these species. In spite of this, we view the season as a success in which we processed and sold virtually 100% of the usable flesh from the target and bycatch species.

Our focus was to fillet as much of our fleet's target species (POP and Northern Rockfish) as possible with the finished product aimed at the domestic U.S. market. As volumes dictated, we also produced headed and gutted and round frozen fish for export sales.

In light of the current, very difficult salmon situation, we view our continued participation and improvement in the Rockfish Fishery important to our economic survival. It is also very important for the financial stability of the shorebased trawl fleet we work with. As a resident Alaskan, I have an appreciation for the work and income this fishery provided to the 225 person, predominately resident workforce we employed during this fishery.

In consideration of the above, we hope the North Pacific Fisheries Management Council will do its best to balance the sablefish bycatch retention rate against the available target species in the Rockfish Trawl Fishery. Thank you for your time and consideration in this matter.

Sincerely,

OCEAN BEAUTY SEAFOODS, INC.

Mike Simpson
Kodiak Plant Manager

KING CRAB / KODIAK FACILITY
P.O. BOX 1457 • KODIAK, ALASKA 99615 • (907) 486-5791 • FAX (907) 486-8244
P.O. BOX 70739 • SEATTLE, WASHINGTON 98107 • (206) 285-6800 • FAX (206) 286-2581

Tyson Seafood Group 111 Marine Way • Post Office Box 646 • Kodiak, AK 99615 • Phone (907) 486-3266

September 11, 1996

To: Rick Lauber, Chairman
North Pacific Fishery Management Council
605 West 4th Ave., Suite 306
Anchorage, Alaska 99501-2252

Fr: Mike Robinson, Plant Manager
Tyson Seafoods
Kodiak, Alaska 99615

Re: On Shore Participation in the Gulf of Alaska Pacific Ocean Perch Fishery

Dear Mr. Lauber;

There seems to be some confusion as to how Pacific Ocean Perch was utilized during the 1996 fishery by on shore plants in the Kodiak area, with rumors having all of the fish ground up into meal. I wanted to assure you that this was not the case and that the P.O.P fishery is very important to our operation and to the catcher boats that sell their catch to us. Tyson was the first plant in Kodiak to process any volumes of P.O.P, starting in 1995 when we purchased several hundred tons of fish. All of this fish was processed into a fillet form, as was 99% of our 1996 production.

It is obvious to industry participants that the rebuilding plan for P.O.P. in the Gulf of Alaska is successful, and as the quota increases, so will the opportunities for market expansion to occur. This fishery is important to the economic base in Kodiak and will be even more so in the future. I would hope that the Council recognize the on shore component as viable participants in all Gulf wide fisheries, including Pacific Ocean Perch.

I would like to thank you and the Council in advance for your consideration of this matter of great importance.

Sincerely;

Mike Robinson
Tyson Seafoods

International Seafoods of Alaska, Inc.

Kodiak • Egegik • Seattle

August 12, 1996

TO: Rick Lauber

FROM: Jean Franquelin
Plant Manager

RE: Third Quarter Rockfish Fishery

ISA participated in the third quarter rockfish fishery and, therefore, I would like to comment on the rumors that this fishery was only intended to be a "sablefish grab".

ISA processed all the Pacific Ocean perch and northern rockfish it purchased, either as fillets, H&G or round frozen product, or fish powder. None of the rockfish we purchased was ground for discard.

The fishery caught us a little bit by surprise this year, but economically speaking it was a good surprise. The plant was able to process 24 hours a day for an extra 12 days.

In conclusion, the rockfish fishery is important to ISA and we definitely want to continue to develop a shorebased position in this fishery.

Jean

☐ 517 Shelikof Street
P.O. Box 2997
Kodiak, AK 99615-2997, USA
TEL: 907 / 486-4768
FAX: 907 / 486-4885

KODIAK™ SEAFOOD

☐ 2360 West Commodore Way
Seattle, WA 98199-1285, USA
TEL: 206 / 284-4830
FAX: 206 / 286-5920

ALASKA PACIFIC SEAFOODS
DIVISION OF NORTH PACIFIC PROCESSORS, INC.
HOME OFFICE 2300 EASTLAKE AVE. EAST • SEATTLE, WASHINGTON 98102 • (206) 726-9900
P.O. BOX 31179 • SEATTLE, WASHINGTON 98103-1179
PROCESSING PLANT: 627 SHELIKOF AVE. • KODIAK, ALASKA 99615 • (907) 486-3234

September 13,1996

North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Alaska Pacific Seafoods purchased 458342 pounds of rockfish, which includes Northern, Pacific Ocean Perch and Duskys during the July 1996 opening. Seven percent of this product went to discard due to low quality. All of the fish bought was processed and shipped to the Far East.

Sincerely,

John Sevier
Plant Manager

JS/sn

Alaska Seafoods

cook inlet processing
Box 9
Kodiak, Alaska 99615
(907) 486-6385
Fax (907) 486-6592

9/13/96

Mr. Rick Lauber, Chairman
North Pacific Fisher Management Council
605 W. 4th Ave. Suite 306
Anchorage, AK 99501-2252

Dear Rick,

During this past summer our company had the opportunity to participate in the Northern Rockfish/POP fishery. While a relatively new fishery for the processors here on shore in Kodiak, the economic potential of this slowly rebounding fishery is readily apparent.

It was troubling to see news reports that these fish were caught and discarded just to be able to catch Black Cod. From what I can find out there were minimal discards in town and I know every rockfish that we bought during this summer season was retained and filleted here on shore in Kodiak.

We are excited about this fishery and can only hope that the current stock rebuilding effort is successful and continuing.

Regards,

Timothy J. Blott
Manager

KODIAK FISHMEAL COMPANY

915 GIBSON COVE ROAD KODIAK, AK 99615
PH. (907) 486-3171 FAX (907) 486-2670

September 11, 1996

Richard B. Lauber, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, Ak. 99501-2252

Dear Mr. Lauber:

I understand that there are a lot of rumors flying around regarding the processing of Pacific Ocean Perch at Kodiak Fishmeal Co. I just want you and the rest of the Council to know that less than 1% of the Pacific Ocean Perch delivered to Kodiak Fishmeal Co. this summer was delivered as whole fish. Of that less than 1%, almost all of them were undersized fish. The other more than 99% were delivered as by-products of filleting operations, i.e. frames, heads and entrails. When processing is slow around town, as it was this summer, we instruct the processors to not grind their fish by-products. This being the case, you can understand why it would be very easy for us to identify deliveries containing whole P.O.P. Feel free to contact me if you have any questions.

Very Truly Yours,

Dan James
Operations Manager

To Chris Blackburn
Company ALASKA Groundfish Databank
Location Shee Atika Hotel
Fax # 907 747 5486 Telephone # 907 747 6241
C Per your Request

From KEN ALLCREAD 9/19/96
Company WESTERN ALASKA Fisheries
Location Dept. Charge
Fax # Telephone #
Original Disposition: ☐ Destroy ☐ Return ☐ Call for pickup

Sept 19, 1996

Shee Atika Hotel
Sitka, Ak

Phone 907-747-6241
Fax 907-747-5486

Attn.: Chris Blackburn
Alaska Groundfish Databank

John Sevier called me last night asking me to write a letter to him or you explaining what we did with our POP and Northern Rockfish in July. He mentioned that Clem Tillion was accusing us of wasting the resource by sending it to the meal plant. If he would only check with NMFS he could find out exactly what we did with it. Every day we process we fill out a log book and production reports. These are sent in to NMFS, plus we have an observer.

In July we processed POP and Northern Rockfish. we manufactured 4 containers of round, approx. 160, 00 pounds, we also manufactured 5 containers of surimi, approximately 200,000 lbs.

At the time the boats were having a hard time finding volume of flat fish. We started paying .06 per pound. We quickly found out the markets, and our manufacturing costs, and realized this was not going to work. It was either let the boats quit fishing and let our workers go with out work. We chose to lower the POP price to .01, this allowed our vessels to remain profitable and our workers to continue to draw pay checks. If we hadn't done this the factory trawler fleet would have still caught the fish and the sable fish. On the plus side, we now have a customer interested in more surimi. If the market improves so will the fish price.

Next lets compare salmon to rockfish. I do not think it's any secret that we paid .05 per pound for pink salmon. The fishermen were targeting red salmon, but they have a by catch of pinks. They have a law called wanton waste. This law says they cannot throw pinks away. So if we wanted reds we had to purchase pinks. I do not believe that there is much difference.

Hope this helps.

Ken