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**DEPARTMENT OF HOMELAND SECURITY
UNITED STATES COAST GUARD**

Regulatory Assessment

TEMPORARY FINAL RULEMAKING

**Notification of Arrival in U.S. Ports; Certain Dangerous
Cargoes; Electronic Submission**

USCG 2003 - 16688 - 2

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Executive Summary

The purpose of this Regulatory Assessment (RA) is to estimate the costs of this temporary rule, which will change the definition of Certain Dangerous Cargo (CDC) to include ammonium nitrate and propylene oxide. This change will promote maritime safety and security and facilitate the uninterrupted flow of commerce by increasing the Coast Guard's ability to maintain awareness of these cargoes. Moreover, this rule provides vessel owners and operators optional methods (on-line or via e-mail) to submit Notice of Arrival (NOA) reports. This rule is effective until June 2005. However, for the purposes of this analysis, we will use a period of January 2004 to June 2005 to show the cost.

There are two elements of cost associated with this rulemaking. The first cost stems from the NOA requirements and the second cost is from the Maritime Transportation Security Act of 2002 (MTSA) regulations. Currently, vessels that transport CDC materials are required to prepare and submit NOA reports to the Coast Guard. In addition, vessels and facilities that handle CDC materials are required to implement some form of security measures, to be in compliance with the MTSA regulation.

The Coast Guard is temporarily changing the NOA and the MTSA regulations by including ammonium nitrate and propylene oxide to the list of CDCs. Vessels that transport such materials will now be required to prepare and submit NOA reports, such as a list of the crew, a list of persons in addition to the crew, a paragraph with a general description of the cargo on board, and the location from where the NOA is being sent. Furthermore, vessels and facilities that handle ammonium nitrate and propylene oxide will now have to implement some form of security measures. Security measures can include preparing security plans and assessments; hiring and training security personnel; and installing security equipment.

In our review of the affected population, we have determined that there are approximately 9,213 barges that can potentially transport ammonium nitrate or propylene oxide and therefore will be impacted by this rule. However, based on our available data, we note that there are only approximately 600 movements of these materials a year, which indicates that the actual number of barges used to transport these materials is a fraction of the barge population that may potentially transport ammonium nitrate or propylene oxide. Since the industry may want to retain the flexibility to use any of these 9,213 barges to carry these materials, we have based our cost estimate on this larger population.

The total first year cost and the remaining 6-month cost discounted to its present value (PV) at 7 percent is presented below.

TOTAL RULEMAKING COST (JANUARY 2004 – JUNE 2005)

Affected Entity	Year 2004	Year 2005	PV for 2005	Total PV cost
NOA requirements				
Increase in NOA submittals	\$8,209	\$4,105	\$3,836	\$12,046
Previously not covered by NOA	<u>\$46,614</u>	<u>\$23,307</u>	<u>\$21,782</u>	<u>\$68,396</u>
Total cost	\$54,824	\$27,412	\$25,619	\$80,442
MTSA – Vessel Security				
Company-level cost	\$89,200	\$43,000	\$40,187	\$129,387
Vessel-level cost	<u>\$460,650</u>	<u>\$230,325</u>	<u>\$215,257</u>	<u>\$675,907</u>
Total cost	\$549,850	\$273,325	\$255,444	\$805,294
MTSA – Facility Security				
Group A facility	\$3,395,500	\$1,151,850	\$1,203,598	\$4,599,098
Group B facility	<u>\$2,769,000</u>	<u>\$874,200</u>	<u>\$817,009</u>	<u>\$3,586,009</u>
Total cost	\$6,164,500	\$2,026,050	\$2,020,607	\$8,185,107
Total Cost				\$9,070,843

Detail may not calculate to total due to independent rounding.

Introduction

General Background

The U.S. Coast Guard published a final rule for notification of arrival in U.S. ports on February 28, 2003 [68 FR 9537]. We continually review the potential security hazards associated with chemicals transported on U.S. waters. Since publication of the February 2003 final rule, we have developed additional concerns about potential security hazards of chemicals transported on U.S. waters. In response to these concerns, we are adding two chemicals, ammonium nitrate and propylene oxide, to the list of CDC for which a Notification of Arrival (NOA) is required. Also, since the February 2003 final rule was published, the Coast Guard has developed two new means for electronic submittal of NOAs to the Coast Guard's National Vessel Movement Center (NVMC). We are making these options available to barge owners and operators in this rule.

Any vessels and facilities that transport or handle ammonium nitrate and propylene oxide, and were not previously regulated under NOA and the MTSA regulations, will now have to perform the following:

- Prepare NOA reports such as a list of the crew, a list of persons in addition to the crew, a paragraph with the general description of the cargo on board.
- Submit NOA reports to the National Vessel Movement Center (NVMC).
- Prepare security plans and assessments, such as Vessel Security Plans (VSP), Vessel Security Assessments (VSA), Facility Security Plans (FSP), and Facility Security Assessments (FSA)
- Hire and train security personnel, such as security officers and security guards.
- Install security equipment, such as CCTVs and communication systems.

Moreover, since the NOA final rule was published in 2003, the Coast Guard developed two new means for electronic submittal of NOAs to the Coast Guard's NVMC. This rule will provide notice to vessel owners and operators of optional methods of submitting NOA reports. This rule will be effective until June 2005.

Economic Impacts of the Temporary Rule

The cost associated with changing the definition of CDC to include ammonium nitrate and propylene oxide has two components. The first element is the cost for vessels solely carrying these chemicals to comply with the NOA requirements (USCG 2001-11865). Second is the cost for these vessels, and facilities servicing them, to comply with the regulations implementing the MTSA of 2002. The MTSA requirements were promulgated in 33 CFR Subchapter H on October 22, 2003. In particular, this analysis uses similar assumptions and per unit cost estimates developed for the final rules titled "Vessel Security" (USCG-2003-14749, 68 FR 60483) and "Facility Security" (USCG-2003-14732, 68 FR 60515). This rule is effective until June 2005. However, for the purposes of this analysis, we will use a period of January 2004 to June 2005 to show the cost.

Baseline Conditions

As stated above, the data we collected for this rule were from the NOA final rule and the MTSA 2002 regulation. There are three conditions associated with the population of affected vessels. The first condition is to vessel owners and operators who currently submit NOA reports to the Coast Guard. There will be an increase in number of NOA submittals. The second condition is to vessel owners and operators who were not previously covered by the NOA requirements. These vessel owners and operators are now required to submit NOA reports thus adding new population of vessels to the affected population. Lastly, there will be additional number of vessels and facilities that now have to come into compliance with the 'Vessel Security' or 'Facility Security' section of the MTSA regulation due to this rule.

For condition number one, there are no impacts to the population of vessels. The population of affected vessels for condition number two is based on an estimate from the Coast Guard's NOA 2000 data. We estimate that there are approximately 111 new barges that are respondents to the NOA requirements. We assume that these 111 barges only transport ammonia nitrate or propylene oxide. For condition number three, we base our population of affected vessels on data collected from U.S. Army Corps of Engineers 2001. Based on this data, there are approximately 9,213 barges that can potentially transport ammonia nitrate or propylene oxide. There are 14 companies that own these 9,213 barges; however only 2 companies, who own 555 of these barges have not been required to be in compliance and now must be in full compliance with the 'Vessel Security' section of the MTSA regulation. The other 12 companies are currently complying with the 'Vessel Security' section of the MTSA regulation for other vessel types that they own and operate. This means that the 12 companies will only have an incremental cost associated with preparing VSAs and VSPs; whereas the other 2 companies will incur initial personnel and labor cost such as hiring a Company Security Officer (CSO), training a personnel, and developing initial VSAs and VSPs as well as the incremental cost of developing VSAs and VSPs.

For facilities, there are approximately 40 to 60 fleeting areas that will be impacted by this rule. We take a median of 50 as our affected population of facilities. Moreover, we assume that the transfer facilities of these materials were represented in the 'Facility Security' section of the MTSA regulation.

NOA requirements

For the NOA requirements, there are two types of costs associated with adding ammonium nitrate and propylene oxide to the list of CDC – vessels that transport CDC materials and are currently submitting NOA reports to the Coast Guard, and vessels that only transport ammonia nitrate or propylene oxide and were not previously covered by NOA requirements.

Vessels that transport CDC materials and are currently submitting NOA reports to the Coast Guard

These vessels may be required to submit additional NOAs that otherwise were not reported before this rule. For these vessels, we assume there will be an incremental cost increase of 10% in submission of NOA reports.¹ To account for this, we increase the annual U.S. port calls by 10% and calculate only for the 10% increase in port calls. For the previously regulated vessels, based on the Office of Budget and Management (OMB) – approved Collection of Information (COI) for NOA (OMB 1625-0100), formally (OMB 2115-0557), we assume 10 minutes (0.167 hours) will be spent retrieving and transmitting reports. We assume that clerical labor will complete these tasks at a cost of \$31.00 per hour (loaded labor rate), and that there will be a \$2 transmittal fee (fax, e-mail, telephone, etc.) to provide this report to the Coast Guard.

Based on the Coast Guard data on NOA submittals for 2000, there were approximately 11,439 port calls of 2,219 vessels that carry CDC materials.² The additional 10% calculates to 1,144 port calls per year, or 95 port calls each month. This results in an estimate of 1,144 (95 x 12 months) port calls for the first year (January 2004 to December 2004) and 572 port calls for the remaining 6 months (January 2005 to June 2005). Labor hours during this temporary rule are 287 (191 for the first year + 95 remaining 6 months). The remaining 6 month cost is discounted to its present value (PV) at 7 percent. The total cost is presented in Table 1.

TABLE 1. TOTAL COST FOR INCREASE IN NOA SUBMITTALS

	Port calls	Labor Hours per Port Call	Labor Hours during Temporary Rule	Cost per Labor Hour	Cost per Information Transmittal	Total cost	Total PV cost
Year 2004	1,144	0.167	191	\$31.00	\$2.00	\$8,210 ³	\$8,210
Year 2005	572	0.167	95	31.00	2.00	4,105	3,836
Total	1,716					\$12,315	\$12,046

Detail may not calculate to total due to independent rounding.

¹ The 10% increase is based on the Coast Guard's estimates. We welcome any comments that addresses the 10% estimate.

² We looked at 2001 data and found that they were not representative of port calls, especially due to the September 11th event. Between 2000 and 2001 data there were approximately 24% differences in port calls.

³ \$8,210 = [(191 x \$31.00) + (1,144 x \$2.00)]; 191 = (1,144 x 0.167)

Vessels that only transport ammonia nitrate or propylene oxide and were not previously covered by the NOA requirements

Because there are no past data on vessels that only transport ammonium nitrate or propylene oxide and were not previously covered by the NOA requirements, we use a proxy based on the above data for 2000. We estimate the proxy by multiplying the number of port calls from 2000 by 0.10 and the number of vessels population by 0.05.⁴ This will provide an estimate of number of port calls and number of vessels that solely transport ammonium nitrate and propylene oxide. Therefore, we assume that there are approximately 1,144 port calls per year by 111 barges or 95 port calls by this population of vessels each month. This means an estimated 1,716 (95 x 18 months) port calls will be made by the newly covered vessels over the time period of this rulemaking.

Based on the current, OMB-approved COI for NOA (OMB-1625-0100), we estimate that it will take 10 minutes (0.167 hours) to complete the report, plus an additional 5 minutes (0.083 hours) for the general description of the cargo. Because these populations of vessels never had to submit NOA reports, they will require more time to complete the forms. We assume that clerical labor will complete the report at a cost of \$31.00 per hour. Additionally, these vessels will need to develop and submit the crew /persons-in addition-to-the crew lists. Based on information from the Immigration and Naturalization Service (OMB-1115-0083), it will require 60 minutes (1.000 hour) to complete the lists, for a total of 75 minutes (1.250 hours) for the entire submission (NOA report, cargo description, and crew/persons-in-addition-to-the-crew lists). There will be a \$2 transmittal fee to provide the information to the Coast Guard. Labor hours during this temporary rule are 2,145 (1.250 hours x 1,716 port calls). The total rulemaking costs (for first year and remaining 6 months) and the present value cost of the rule for submitting NOA for vessels that only carry ammonium nitrate and propylene oxide is presented in Table 2.

TABLE 2. TOTAL COSTS FOR VESSELS THAT ONLY CARRY AMMONIUM NITRATE AND PROPYLENE OXIDE

	Port calls during first year	Labor Hours per Port Call	Labor Hours during Temporary Rule	Cost per Labor Hour	Cost per Information Transmittal	Total cost	Total PV cost
Year 2004	1,144	1.250	1,430	\$31.00	\$2.00	\$46,614	\$46,614
Year 2005	572	1.250	715	31.00	2.00	23,307	21,782
Total	1,716					\$69,921	\$68,396

Detail may not calculate to total due to independent rounding.

The summary of total cost from NOA requirements is presented in Table 3.

TABLE 3. TOTAL COST ASSOCIATED WITH NOA REQUIREMENTS

	Year 2004	Year 2005	Total Cost
Total cost from increase in number of NOA submittals	\$8,210	\$3,836	\$12,046
Total cost for vessels that were not previously covered by NOA	46,614	21,782	68,396
Total Rulemaking Cost			\$80,442

Detail may not calculate to total due to independent rounding.

⁴ The 0.10 and 0.05 are based on the Coast Guard's estimates. We welcome any comments addressing these numbers. The vessel population is estimated by multiplying 2,219 by 0.05.

MTSA 2002 Requirements

Vessel Security

The second element of costs associated with this rule is the MTSA 2002 requirements. Accordingly, to be in compliance with the 'Vessel Security' requirements of the new MTSA regulations, vessels that transport ammonium nitrate or propylene oxide will incur new costs. Based on the data from U.S. Army Corps of Engineer 2001, there are approximately 9,213 barges that had the potential to transport ammonium nitrate or propylene oxide in 2001. The 'Vessel Security' section of the MTSA regulation did not previously cover these 9,213 barges, which now has to be accounted for because of this rule. There are 14 companies that own these barges; however only 2 companies, who own 555 of these barges, are not currently required to be in compliance with the 'Vessel Security' section of the MTSA requirements. The other 12 companies are currently complying with the 'Vessel Security' section of the MTSA requirements for other types of vessels that they own and operate. This means that these 12 companies will only incur an incremental cost of preparing a VSAs and VSPs; whereas the remaining 2 companies will incur initial personnel and labor cost, such as hiring, training and initial development of VSAs and VSPs as well as the incremental cost associated with developing VSAs and VSPs. Based on the 'Vessel Security' analysis in the MTSA of 2002, these two companies are considered small.⁵ As in the 'Vessel Security' section of the MTSA assessment, small companies will incur personnel costs. We assume small companies will hire a part-time CSO at a cost of \$37,500 per year, which is equivalent to 0.25 of dedicated full-time CSO. Table 4 summarizes the unit cost of personnel for small companies for the first year and PV cost for the remaining 6 months.

TABLE 4. UNIT COST OF PERSONNEL (LOADED LABOR RATE)

Small Company	Year 2004	Year 2005	PV for 2005
CSO	\$37,500	\$18,750	\$17,523
CSO training	2,000	1,000	935
Training of key crew	3,500	1,750	1,636
VSA	800	50	47
VSP	800	50	47

For the purpose of this rule, the total labor cost estimate is \$55,023 per company (\$37,500 + \$17,523) over the time period of this rulemaking. Moreover, the CSO and key crew will have some form of annual training, either as refresher courses or to address potential employee turnover within a company. Consistent with the 'Vessel Security' analysis from the MTSA regulations, the training unit cost for small companies is \$5,500 (\$2,000 for CSO training + \$3,500 for training key crew) for the first year and \$2,570 is the present value cost for the remaining 6 months or a total of \$8,070 over the time period of this rulemaking. Lastly, these companies will incur costs associated with developing Vessel Security Plans (VSPs) and conducting Vessel Security Assessments (VSAs). Because this temporary final rule is in effect for 18 months and the initial cost will be incurred in year 2004, we estimated the initial cost to be \$1,600 (\$800 + \$800). The annual cost is the incremental cost associated with updating the plans

⁵ Small company is defined as a company who owns only towboats or barges, regardless of the number.

and assessments; therefore it is included in the vessel-level cost. The total company-level personnel cost is presented in Table 5.

TABLE 5. TOTAL COMPANY-LEVEL COST

Small Company	Total rulemaking cost (18 mo.)	Number of Companies Affected	Total PV Cost
CSO	\$55,023	2	\$110,047
Training	8,070	2	16,140
VSA & VSP	1,600	2	3,200
Total			\$129,387

Detail may not calculate to total due to independent rounding.

To account for the incremental cost or the vessel-level cost, which is based on the incremental cost of preparing VSAs and VSPs, we use the 9,213 barges that will be impacted by this rule.⁶ We assume there will be an incremental cost for each vessel included in the assessment or plan. The incremental cost added to each plan will be a function of the number of vessels. We assume each hour of planning costs an average of \$100/hour, a loaded labor rate that represents an average cost of the labor performing these duties. While some employees cost more than this and some cost less, we believe \$100/hour is a reasonable average cost of the employees who would conduct this work. We assume that all 9,213 barges will develop VSAs and VSPs in the initial year 2004. The remaining 6-month of this rule, we assume that half of the population of vessels (4,607) will maintain and update VSAs and VSPs. To calculate costs for VSAs and VSPs, we estimated the number of hours that would be required initially (document development and submission) and annually (document updates), then multiplied by the hourly cost. The initial year (January 2004 – December 2004) cost is presented in Table 6, and the annual cost (remaining 6 month) discounted to its present value (PV) at 7 percent is presented in Table 7.

TABLE 6. TOTAL VESSEL-LEVEL COST FOR 2004 (9,213 BARGES AFFECTED)

Item	Initial Year 2004			
	Qty	Cost/ item	Total unit cost	Total Cost
VSA (incremental cost)	0.25 hrs	\$100/hr	\$25	\$230,325
VSP (incremental cost)	0.25 hrs	100/hr	25	230,325
Total				\$460,650

Detail may not calculate to total due to independent rounding.

TABLE 7. TOTAL VESSEL-LEVEL COST FOR 2005 (4,607 VESSELS AFFECTED)

Item	Remaining 6 months of the rule (Year 2005)				
	Qty	Cost/ item	Total unit cost	Total Cost	Total PV Cost
VSA (incremental cost)	0.25 hrs	\$100/hr	\$25	\$115,163	\$107,629
VSP (incremental cost)	0.25 hrs	100/hr	25	115,163	107,629
Total					\$215,257

Detail may not calculate to total due to independent rounding.

The total vessel-level cost calculates to \$675,907 (\$460,650 + \$215,257). We assume that the company will develop an overarching assessment or plan for its entire fleet (cost estimated above in section on company costs), and then the company will add individual vessels to its

⁶ There are approximately 12 companies that are currently in compliance with the MTSA regulations for other vessel types but not for the 9,213 barges. This population of vessels can carry ammonia nitrate or propylene oxide in a given year, therefore now must comply with the MTSA 2002 regulations.

overarching assessment or plan. The cost presented in this analysis is to add characteristics unique to a particular vessel of this type to the overarching company assessment or plan. To calculate total cost of vessel security, we added the company-level costs and the vessel-level costs, which estimates to be \$805,294 (\$129,387 + \$675,907).

Facility Security

Changing the definition of CDC to include ammonium nitrate and propylene oxide will also have an impact on the fleeting facilities. There are 40 to 60 fleeting facilities that receive barges carrying ammonium nitrate and propylene oxide that were not previously affected by the MTSA regulations.⁷ This population was derived from the Coast Guard's Inland Rivers Vessel Movement Center. For the purpose of our analysis, we will use an average of 50 fleeting facilities. As in the 'Facility Security' section of the MTSA assessment, we divided the facility population in two groups. One group is composed of one third of all facilities and will implement more security measures, hire more guards, and spend more time drafting Facility Security Assessments (FSA) and Facility Security Plans (FSP) than will the other group, composed of the remaining two-thirds of the total population. Facilities in the first group are addressed in this analysis as "A" and facilities in the second group as "B". There are an estimated 17 fleeting facilities in group A and 33 fleeting facilities in group B.

Consistent with the 'Facility Security' section of the MTSA assessment, the unit cost for group A and B fleeting areas are based on equipment, personnel, training and plans. For group A fleeting areas, the total cost for equipment is \$969,271. This estimate is based on the number of equipment items (communications systems, handheld radios, CCTVs) and the estimated number of facilities that will purchase this equipment. The personnel cost is estimated to be \$3,099,650. We assume that the loaded labor rate of a full-time Facility Security Officer (FSO) is \$150,000 per year and the cost of a security guard to be \$50,000 per year at either a group A or group B facility. This "loaded" labor rate includes the costs of employee benefits (vacation, health insurance, other overhead costs). Furthermore, we assume that each FSO may not be fully employed in performing security duties; therefore, each FSO will have collateral duty and will spend 0.75 of the time involved in complying with the requirements. The remaining 6-month of this rule, we assume that half of the population of group A facilities (9) will maintain and update VSAs and VSPs. For training, the cost is estimated at \$124,720, and for the FSA, FSP and drills is \$405,458. We assume that each hour of planning, writing, or drilling cost is an average of \$100/hour, and for drafting the FSA and FSP, we assume that each group A facility will spend 80 hours in the initial year and 4 hours annually. This sums to a total of \$4,599,098 for group A facilities. See Table 8 below for summary of these costs.

⁷ The 'Facility Security' section of the MTSA currently covers facilities, which include facilities that store any ammonium nitrate or propylene oxide.

TABLE 8. TOTAL COST FOR FLEETING AREAS, GROUP A (17 FACILITIES)

Item	Number (%) estimated to purchase /draft	Qty	Initial cost per item	Total initial year 2004 cost	Annual cost per item	Total 2 nd year 2005 cost (6 mo.)	PV of 2 nd year 2005 cost (6 mo.)	Total PV rulemaking cost
Comms system	1 (5%)	1	\$400,000	\$400,000	\$40,000	\$20,000	\$18,692	\$418,492
Handheld radio	1 (5%)	12	500	6,000	50	300	280	6,280
CCTV	2 (10%)	1	260,000	520,000	26,000	26,000	24,299	544,299
Security Guard	2 (10%)	2	50,000	200,000	50,000	100,000	93,458	293,458
FSO	17 (100%)	1	112,500	1,912,500	112,500	956,250	893,692	2,806,192
Training	17 (100%)	1	5,000	85,000	5,000	42,500	39,720	124,720
FSA	17 (100%)	1	8,000	136,000	400	3,400	3,188	139,178
FSP	17 (100%)	1	8,000	136,000	400	3,400	3,188	138,178
Drill	17 (100%)	4	--	--	4,000	136,000	127,103	127,103
Total Cost				\$3,395,500			\$1,203,598	\$4,599,098

Detail may not calculate to total due to independent rounding.

For group B fleeting areas, the total cost for equipment is \$1,048,822, for personnel is \$2,035,864, for training is \$169,472, and for the FSA, FSP and drills is \$331,850. The personnel cost is based on the assumption that each FSO will have collateral duty and will spend approximately 0.25 of the time involved in complying with the requirements. We assume that each hour of planning, writing, or drilling cost is an average of \$100/hour, and for drafting the FSA and FSP, we assume that each group B facility will spend 40 hours in the initial year and 2 hours annually. The remaining 6-month of this rule, we assume that half of the population of group B facilities (16) will maintain and update VSAs and VSPs. Table 9 presents summarized costs for group B fleeting areas.

TABLE 9. TOTAL COST FOR FLEETING AREAS, GROUP B (33 FACILITIES)

Item	Number (%) estimated to purchase /draft	Qty	Initial cost per item	Total initial year 2004 cost	Annual cost per item	Total 2 nd year 2005 cost (6 mo.)	PV of 2 nd year 2005 cost (6 mo.)	Total PV rulemaking cost
Comms system	2 (5%)	1	\$300,000	\$600,000	\$30,000	\$30,000	\$28,037	\$628,037
Handheld radio	2 (5%)	12	500	12,000	50	600	561	12,561
CCTV	3 (10%)	1	130,000	390,000	13,000	19,500	18,224	408,224
Security Guard	3 (10%)	2	50,000	150,000	50,000	75,000	70,093	220,093
FSO	33 (100%)	1	37,500	1,237,500	37,500	618,750	578,271	1,815,771
Training	33 (100%)	1	3,500	115,500	3,500	57,750	53,972	169,472
FSA	33 (100%)	1	4,000	132,000	200	3,300	3,084	135,084
FSP	33 (100%)	1	4,000	132,000	200	3,300	3,084	135,084
Drill	33 (100%)	4	--	--	1,000	66,000	61,682	61,682
Total Cost				\$2,769,000			\$817,009	\$3,586,009

Detail may not calculate to total due to independent rounding.

The total cost of this temporary rulemaking for fleeting areas is presented in Table 10.

TABLE 10. TOTAL PV COST FOR FLEETING AREAS

	Year 2004	PV for Year 2005	Total PV Cost
Group A	\$3,395,500	\$1,203,598	\$4,599,098
Group B	2,769,000	817,009	3,586,009
Total Cost	\$6,164,500	\$2,020,607	\$8,185,107

The total cost of this temporary rulemaking is presented in Table 11 below.

TABLE 11. TOTAL PV RULEMAKING COST

	Total PV Cost
NOA requirements	\$80,442
MTSA	
Vessel Security	805,294
Facility Security	8,185,107
Total Cost	\$9,070,843