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Final Regulatory Assessment

User Fees for Licenses, Certificates of Registry, and Merchant Mariner Documents

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1.0 INTRODUCTION

This rulemaking revises the existing user fees for Coast Guard services for merchant marine licenses, certificates of registry, and merchant mariner documents in 46 CFR parts 10 and 12 and reformats the two CFR sections in which the fees are currently published.

This assessment examines the merchant marine licensing and merchant mariner documentation fee revisions and their impacts upon industry and the public.

1.1 Background

The Omnibus Budget Reconciliation Act of 1990 amended 46 U. S. C. 2110, removed long-standing prohibitions against charging direct user fees for services provided to commercial vessels and maritime personnel, and required the Coast Guard to charge users for certain services.

The Coast Guard established user fees for the licensing of mariners and the certification of seamen in April, 1993.

On April 15, 1993, the Seafarers International Union of North America (SIU), *et al.* filed a lawsuit challenging both the Coast Guard's authority to charge and collect user fees and the reasonableness of the established fees. During the litigation the Court affirmed both the Coast Guard's authority to impose and collect user fees, and the methodology used by the Coast Guard in determining those fees.

On November 23, 1994, the Court ordered the Coast Guard to recalculate the costs of providing licensing and documentation services, reassess its published fees, and make the results available to the public for comment.

After the Coast Guard published its notice of recalculation and request for comments the District Court directed the Coast Guard to "undertake formal rulemaking proceedings, culminating in a final rule, concerning the calculation of agency costs and user fees associated with maritime licensing, certification of registry and merchant mariner documentation" no later than April 30, 1998. Although the Coast Guard and the SIU settled the litigation on September 17, 1997, the terms of the settlement required the Coast Guard to go forward with the rulemaking.

1.2 Purpose of Regulatory Analysis

Executive Order 12866 requires a rulemaking to undergo a determination for economic significance. The determination for this rulemaking considers the total combined impact of all fees paid under subtitle II of Title 46, U.S. Code. For fiscal year 1996, the total annual revenue of direct user fees under subtitle II did not exceed \$27 million and the merchant marine licensing and documentation revenues were \$4.6 million. The total revenue of direct

user fees under subtitle II of Title 46 U.S.C. for fiscal year 1997 did not exceed \$23.1 million. Neither the fees to be collected under this rule, nor the total user fee revenues for Subtitle II, will approach the \$100 million threshold that would make this an economically significant rulemaking under Executive Order 12866.

This rulemaking is not significant under the Department of Transportation Regulatory Policies and Procedures (44 FR 11040; February 26, 1979). However, the Coast Guard has prepared a separate regulatory assessment. The regulatory assessment outlines the methodology used by the Coast Guard to develop the revised user fees for merchant marine licensing and merchant mariner documentation. It also describes the expected economic impact of these revised fees on the applicants for and holders of Coast Guard licenses and merchant mariner documents (MMDs). Because the rulemaking is a revision of a deficit-reduction measure without known economic benefits to the mariner, a cost-benefit analysis was not conducted.

2.0 DEVELOPMENT OF FEES

The fee revisions were developed based on actual program costs and using the same fee-setting methodology as in the original rulemaking.

The fee revisions were developed using a two-step process. First, we determined the actual cost of providing licensing and documentation services. Second, we allocated the total costs proportionately to the various phases of licensing and documentation transactions performed during the year.

2.1 Determination Of Program Costs

The majority of the costs for licensing and documentation services are operating and personnel costs for staffing and running the 17 Regional Examination Centers (REC). In addition, there are program overhead costs associated with operating the RECs, and general and administrative support costs which must be included as they are integral to the Coast Guard's ability to provide licensing services.

Regional Examination Center personnel costs were determined by verifying the Personnel Allowance Lists (PAL) for each REC. The PAL is the Coast Guard document which lists billets or positions authorized for each Coast Guard unit. It specifies the grade of persons, the title of the position, and the number of positions authorized. The PALs were used to identify the personnel whose billets (for military) or positions (for civilians) were allocated to merchant mariner licensing and documentation (MMLD) activities.

The 1994 PAL was used to determine the numbers and grades of personnel providing services. This PAL had remained virtually static since 1993, and was a reliable source for identifying Coast Guard personnel allocations.

In 1994, there were 143.5 full time equivalents (FTE) directly allocated to providing services or administrative support for the RECs. These FTE were divided into four categories based on their duties in the MMLD program:

- Executive.
- Evaluator.
- Examiner.
- Clerical.

Personnel costs were calculated as follows for each of these four categories of personnel in MMLD transactions. The number of FTEs per position was multiplied by the sum of direct cost (salary) and indirect costs (See Appendix A). Added to personnel costs were the program overhead costs to support REC personnel as they performed their functions. The costs of telephones, computers, paper, administrative supplies, and office spaces are examples of program overhead. Without this support, the REC's would not be able to effectively function. This overhead rate, 28 percent of the REC personnel costs, was the same rate as that used in the original fee development. Because the licensing program administration had not undergone any significant changes and the REC personnel staffing had remained essentially unchanged, this factor was still valid and was used in the recalculation.

The 1988 General & Administration Distribution of Miscellaneous Personnel Expenses and Major National Programs provided the figure used to determine the General and Administration (G&A) overhead cost. This overhead includes program oversight by Headquarters and District personnel and has remained constant at 29 percent of the combined costs of personnel and unit overhead. Since Headquarters oversight costs apply to all facets of Coast Guard operations, including personnel, administration, facilities and supplies, the G&A overhead is applied to the sum of the personnel and unit overhead costs. Thus, program costs are summarized in the following manner:

$$\begin{aligned} \text{Personnel costs} &= A \\ \text{Program overhead} &= B = 28\% \text{ of } A \\ \text{General \& Administrative overhead} &= C = 29\% (A+B) \end{aligned}$$

$$\text{Total Program Costs} = A + B + C$$

The total cost of providing merchant marine licenses and documentation to the public was \$10.8 million (see appendix A).

2.2 Distribution of Costs

After determining total program costs, the next step was to proportionally distribute these costs over the various license, certificate of registry (COR), and MMD transactions.

The Coast Guard issues three primary types of documents to merchant mariners (see appendix B) :

- Licenses.
- Certificates of registry.
- Merchant mariner documents.

For each of these documents there are four basic types of transactions (see appendix B):

- Original issuance.
- Renewal.
- Endorsement or upgrade of an existing document.
- Providing a duplicate.

Each transaction normally involves three distinct phases (see appendix B):

- Evaluation.
- Examination.
- Issuance.

Each phase of every document transaction involves different REC personnel and different tasks and processing times.

The Coast Guard used 1994 REC transaction data to determine the annual number of transactions for each type of document.

The Coast Guard used a 1995 nationwide time and motion study (see appendix C) conducted by an independent contractor to determine the average times spent in each phase to process a document transaction.

All of these factors were used to calculate the percent of time spent by the four personnel categories on each phase of each transaction. These results were used together with transaction data to distribute the total program costs to each phase of every MMLD transaction (see appendix D).

2.3 Fee Schedule Development

We used the following list of criteria and goals to convert recalculated program costs into revisions of our user fees:

- Recover program costs.
- Do not overcharge.
- Adhere as closely as possible to the original methodology, unless there is a sound and reasonable justification to deviate.
- Round fees down to the nearest increment of \$5 to simplify accounting mathematics for the Coast Guard personnel and for the convenience of the mariner.
- Review the fee revisions for differences among similar activities, to either explain them or to make appropriate adjustments.

Based on the data, the recalculated costs represented the maximum cost recovery without overcharging. We then rounded these cost figures down to the nearest whole \$5 increment to achieve mathematical simplicity and convenience to the mariner. For transactions requiring the FBI criminal record check, the \$17 fee was added to the program costs before the rounding.

We examined the costs for services provided to complete each phase of document transactions. Among the various transaction phases, whenever we found ones involving nearly identical administrative processes, levels of effort and time frames for completion, we grouped them together, noted the lowest transaction phase cost, and used this cost to set the transaction phase fee for the entire group of transaction phases.

We then looked at the recalculated costs to compare similar transactions and phases to examine differences between fees. When differences were found, we tried to identify a valid rationale for the difference. If no valid reasons were identified, we lowered the fees to conform to the fees of other similar transactions or phases.

In the case of all issuance transactions, recalculation data indicated that there were differences in costs among the various licensing categories. In the original rulemaking, the costs for issuance transactions were derived in part from recalled data. When that data was used to develop fees, it led to the setting of the same fee for all issuance transactions. The recalculated time and motion data indicated a clear distinction in costs associated along certain transaction phases. Because of these distinctions, we believed that maintaining all issuance fees at the single, lowest level across the board would not meet the requirement to fully recover costs. The data presented a sound basis to make a departure from the original fee setting. Thus, issuance fees were grouped according to the document being issued or the processes involved: licenses, certificates of registry, MMDs, and endorsements. To avoid overcharging within these recalculated groupings, the lowest cost was used as the basis for revising fees. The issuance fee for all groupings is \$45.

In the original rulemaking, upper and lower level original license evaluation fees differed by \$5. Based on the recalculated costs, the fees would have differed by \$15. This prompted us

to review the evaluation processes with REC personnel to determine whether the differences warranted separate fees. We found that even though the processes differed, the levels of effort and time frames for completion were close enough to justify a single fee for all original license evaluations. In accordance with our mandate to not overcharge, the lower of the two fees, \$115, was selected as the fee for upper and lower level original license evaluations.

We had the identical situation for other than original upper and lower level licenses. In the original rulemaking, upper and lower level other than original license evaluation fees differed by \$5, but the fees would have differed by \$15. Once again, we found that even though the processes differed, the personnel involved and time frames for completion were close enough to justify a single fee for all license evaluations. In accordance with our mandate to not overcharge, we selected the lower of the two fees, \$100 as the fee for upper and lower level other than original license evaluations.

Also in the original rulemaking, radio officer license fees were categorized with renewals for all other licenses. During this recalculation, there were no direct, observed data from which the evaluation cost, and ultimately, the evaluation fee could be developed. Recognizing that there was a cost involved, we relied upon the expertise of REC personnel to help us identify a similar MMLD transaction phase from which a constructive cost could be developed to set an evaluation fee for Radio Officer renewals. According to REC personnel, the tasks that make up the evaluation phase of a Radio Officer renewal are nearly the same as those for evaluations of all other MMLD renewals. Based on this information we set the evaluation fee for renewal of a Radio Officer license at \$50, equal to the evaluation fee for all other MMLD renewals.

In the original rulemaking, the evaluation fee for an original MMD endorsed with a qualified rating was \$60 more than the evaluation fee for an original MMD without an endorsement for a qualified rating. Our recalculated costs for the simpler evaluation for an original MMD (without an endorsement) was slightly more than for the more complex evaluation of an original MMD with an endorsement for a qualified rating. We contacted experienced REC personnel to find out if there was any explanation. Based on their input, we lowered the fee for the evaluation of an original MMD (without an endorsement), and made the evaluation fee for all original MMDs, with or without an endorsement, the same \$110 amount.

Again, in the original rulemaking, CORs were divided into two distinct categories: (1) chief purser, purser, and senior assistant purser; and, (2) junior assistant purser, medical doctor, and professional nurse. When the fees of the two categories were compared, the only differences between their fees was \$5 for the evaluation of original CORs for both MMD holders and applicants. In the interest of administrative efficiency and because there would be only a minimal loss of revenue to the government, it was determined that it would be beneficial to merge these two categories and charge the lower fee for all COR applicants. All COR evaluation fees were therefore set at \$120 for an unlicensed applicant and \$105 for a licensed applicant. As a result of this change, REC personnel will no longer have to spend their time going through the process of distinguishing applicants by category.

During this recalculation, no direct cost data was available to set a COR endorsement fee. To remedy this, we developed constructive costs based on similar transactions identified by experienced REC personnel. A COR endorsement is only slightly more involved than an issuance phase for a COR re-issuance. Therefore, we set the issuance fee for a COR endorsement equal to the \$45 issuance fee for a COR re-issuance.

The fees for the issuance phase of license renewals for continuity and re-issuance of licenses, CORs and MMDs were inconsistent with other similar phase transactions. The phase transactions for these fees were identical to other issuance transactions and were therefore reduced from \$106 to \$45. We found no other evidence to support setting alternative fee levels.

The recalculated costs and the fees are displayed in appendix E.

2.4 Discussion of Fees

In the rulemaking, most fees will increase, although in several instances the Coast Guard is decreasing fees.

Licenses

There are five license transactions for which the Coast Guard is reducing the fee in one phase of the transaction:

- Original upper level license in the examination phase.
- Lower level license other than original in the examination phase.
- Upper level license other than original in the examination phase.
- Endorsement of a license in the examination phase.
- Renewal of a license, other than a radio officer in the examination phase.

All other license fees will be increased.

In one of the five license transactions in which the Coast Guard reduced a fee for one phase, the amount paid by the mariner for the complete transaction will decrease.

	P H A S E			TRANSACTION
	<u>Eval.</u>	<u>Exam.</u>	<u>Issuance</u>	<u>Net Change</u>
Original Upper Level License	↑ \$ 28	↓ \$40	↑ \$ 10	↓ \$ 2

In the case of an original upper level license, the reduction in the examination fee is greater than the increase in the evaluation and issuance fees. The mariner will pay less for a complete transaction.

In the other four transactions in which the Coast Guard is reducing a license phase fee, the amount paid by the mariner for the complete transaction will increase.

	P H A S E			TRANSACTION
	Eval.	Exam.	Issuance	Net Change
Lower Level Lic. Other Than Orig.	↑ \$35	↓ \$ 10	↑ \$ 10	↑ \$35
Upper Level Lic. Other Than Orig.	↑ \$30	↓ \$ 10	↑ \$ 10	↑ \$30
Endorsement Of A License	↑ \$ 5	↓ \$ 10	↑ \$ 10	↑ \$ 5
Lic. Renewal, other than Radio Off.	↑ \$5	↓ \$ 10	↑ \$ 10	↑ \$ 5

In all four transactions, the reduction in the examination phase fee is less than the amount of increases in the evaluation and issuance phase fees. In these cases, the mariner will pay more for a complete transaction.

For all other license transactions, the Coast Guard will increase the fee for each phase in the transaction and the amount the mariner will pay for a complete transaction will therefore be increased.

Certificates of Registry

The fees for all COR transactions will be higher than the currently published fees thus increasing the amount the mariner will have to pay to obtain these documents. In two COR transactions, the Coast Guard is setting fees for the following transaction phases that currently have no fee:

- Evaluation of a certificate of registry for a junior assistant purser, medical doctor, or professional nurse who holds a license or COR will be revised from no fee to \$105.
- Evaluation for renewal of a COR will be revised from no fee to \$50.

In the original rulemaking there was not enough cost data to establish a fee for these two transaction phases. Following the recalculation, however, cost data was available to establish fees for these two COR transaction phases, and the Coast Guard will add these fees.

Merchant Mariner Documents

The fees for all MMD transactions will be higher than the currently published fees thus increasing the amount the mariner will have to pay to obtain these documents. In the evaluation of an original MMD, the Coast Guard is revising the fee amount from no fee to \$110. In the original rulemaking establishing the fees, there was not enough cost data to establish a fee for this transaction phase. Following the recalculation, however, cost data was available to establish fees for this MMD transaction phase, and the Coast Guard will add these fees.

Generally, the fees will increase the amount a mariner pays for a MMLD transaction.

3.0 IMPACT ANALYSIS

The rulemaking is not a significant regulatory action under section 3(f) of Executive Order 12866. It is not significant under the regulatory policies and procedures of the Department of Transportation (DOT) (44 FR 11040; February 26, 1979).

3.1 Cost to Mariners

The rule will affect all mariners required to hold a license or certificate of registry under 46 CFR part 10 or a merchant mariner document under 46 CFR part 12. The 1994 REC transactions data, upon which the cost distribution was based, indicate a transaction total of 57,529. The annual cost to mariners for the licensing and documentation fees is estimated to be \$9.3 million.

3.2 Impact on the Individual

The Coast Guard anticipates the impact of the fee revisions on the individual merchant mariner to be felt most at the time the fees are paid. The impact will vary according to the fee for the service being requested. In years in which the individual merchant mariner makes no MMLD transactions, there is no impact expected from the fee revisions.

One approach for assessing the impact of the fee revisions to the individual is to annualize them over the period the documents are valid. This approach is not an attempt to minimize or downplay the up-front impact of these fees, rather it is simply another way of considering these fee revisions. In addition, this annualized approach allows this analysis to include the impact of other related licensing and documentation fees which will be considered separately in real time analysis.

Considering a hypothetical career progression of a mariner, which includes renewals, raises in grade and endorsements, a legitimate analysis of the costs borne by the mariner would cover a 10-year time span. For example, an individual who obtained an original upper level deck license requiring an examination will need to renew that license after 5 years, for a second 5-year period of validity. Over this 10-year period, the officer might need at least one endorsement, which requires a one time payment and is valid throughout the life of the license. Over the 10 years, that officer will incur a total cost of \$550 for the original license, its renewal, and the endorsement. This is a \$55 per year annualized cost to the mariner over that 10-year period. Other examples, along with examples of annualized fees for other professional licenses, are shown in appendix F.

Before this rulemaking, the mariner would still have had to pay user fees for licenses, MMDs and CORs. Using the same example above, a mariner seeking an upper level license would have paid \$542, which has a 10-year annualized cost of \$54.20. There is a \$8 difference ($\$550 - \542) between the current fee and the fee revisions. Over 10 years, this difference

annualizes to a \$0.80 per year increase. Examples of the one-time and the annualized impact of the revisions are shown in appendix G.

It is important to note that mariners who apply for an MMD incident to a license transaction or those mariners that already have a license or COR do not have to pay for the evaluation of their MMD application. The rule requires payment for only one evaluation fee, and under these circumstances, charging a fee for evaluating an MMD would constitute double-payment. Therefore, there is no fee. Further, if the administration of an open-book exercise for an MMD is required in addition to license open-book exercises for concurrent renewal of these documents, only one examination fee is paid. In both cases, even though there are two separate transactions, the mariner is impacted by only one fee.

3.3 Industry Salary and Employment Data

The U.S. Maritime Administration (MARAD) provided a listing of typical salaries for persons employed in the marine industry in 1996. This information is listed in the table below.

<i>Officer Ratings</i>	<i>Monthly Base Wage</i>	<i>87% Overtime</i>	<i>Total</i>
Third Assistant Engineer	\$3246	\$2936	\$6311
Third Mate	\$3246	\$2936	\$6311
Radio Officer	\$4565	\$3972	\$8537
<i>Crew Ratings</i>			
Able Seaman	\$2237	\$1946	\$4183
QMED	\$3182	\$2768	\$5950
Engine Utility	\$2312	\$2012	\$4372
Chief Cook	\$2338	\$2034	\$4372
Food Handler	\$1553	\$1351	\$2904

"Information Concerning Employment and Training in the U.S. Merchant Marine"; Maritime Administration (MARAD)

According to MARAD, the 1996 sailing workforce was comprised of 27,973 seamen. We expect that the number of seamen who will leave the industry rather than pay the license and merchant mariner document fee revisions to be practically non-existent. The economic state of the industry is expected to have a far greater influence on the decision to leave or enter the profession.

3.4 Comparison with Other Professional Fees

The revised fees will be paid at the time services are rendered, and not in installments. Therefore, the Coast Guard acknowledges that the burden of the fees on the mariner will be felt most during the business or tax year that the payment is made. However, for the comparison of these fees with those of other professions, the Coast Guard annualized all for the sake of clarity.

The comparison of licensing and documentation fees with other professional licensing fees is shown in appendix F. For example, Colorado's Board of Professional Engineers requires \$279 for a professional engineer license with examination, which yields an annualized cost of \$139.50. The biennial renewal fee is \$137 which is equal to an annualized renewal cost of \$68.50. The initial certified public account license in the State of Utah costs \$455. The annual renewal fee for that license costs \$40. The Virginia Board of Optometry fee of \$245 to become a licensed optometrist with examination and an annual renewal fee of \$150.

The fee revisions were also analyzed as a percentage of typical annual salary and compared them to the same type of percentages for other professions. These percentages are presented in Appendix H.

3.5 Impact on Small Businesses

Under the Regulatory Flexibility Act (5 USC. 601 *et seq.*), the Coast Guard must consider whether this rulemaking will have a significant economic impact on a substantial number of small entities. "Small entities" include small businesses, not-for-profit organizations that are independently owned and operated and are not dominant in their fields, and governmental jurisdictions with populations of less than 50,000.

The fee revisions in the rulemaking will impact the individual mariner, which for the most part will not affect small entities. However, some license holders both own and operate their vessels as small businesses. For those individuals, the rule has small entity implications. However, these revised fees represent, at most, an increased business expense of less than \$20 per year. This impact is not expected to be significant.

As a business, sole proprietors can claim their licensing and documentation user fees as a business expense and also, pass along the expense of the licensing fees to the consumer in the form of higher rates. Due to the ability of sole proprietors to claim the fee revisions as a business expense and the ability to pass the impact of these fees to the consumer, we do not find that the fee revisions, if adopted, will have a significant impact on a substantial number of small entities. Further, as it is only the revised fees that will impact the small entity due to the rulemaking, no significant impact is expected.

APPENDIX A -- Cost Structure

<i>Executive</i>				
Position Cost	#FTE	(Salary)	+ Indirect Costs*)	= Program
O4	3	X (\$64,222	+ \$9923)	= \$222,435
O3	7.5	X (\$58,016	+ \$9923)	= \$509,543
CWO	2.5	X (\$61,360	+ \$9923)	= \$178,208
GS12	7	X (\$59,748	+ \$3525)	= \$442,911
GS11	2.5	X (\$49,847	+ \$3525)	= \$133,430
GS9	1	X (\$40,960	+ \$3525)	= \$44,485
			Sub-total	= \$1,531,011
			Program Overhead @ 28%	= \$428,683
			G & A Overhead @ 29%	= \$568,311
			Executive Total	= \$2,528,005

<i>Evaluator</i>				
Position Cost	#FTE	(Salary)	+ Indirect Costs)	= Program
O3	4.5	X (\$58,016	+ \$9923)	= \$305,726
O2	3	X (\$43,992	+ \$9923)	= \$161,745
E8	1	X (\$46,229	+ \$8221)	= \$54,450
E7	1	X (\$39,817	+ \$8221)	= \$48,038
E6	2	X (\$34,014	+ \$8221)	= \$84,470
GS11	2.5	X (\$49,847	+ \$3525)	= \$133,430
GS9	9	X (\$40,960	+ \$3525)	= \$400,365
GS8	7	X (\$38,588	+ \$3552)	= \$294,791
GS7	12	X (\$34,735	+ \$3552)	= \$459,120
GS6	5	X (\$33,244	+ \$3552)	= \$183,845
GS5	1	X (\$29,810	+ \$3552)	= \$33,538
			Sub-total	= \$2,159,314
			Program Overhead @ 28%	= \$604,608
			G & A Overhead @ 29%	= \$801,538
			Evaluator Total	= \$3,565,460

* (Includes: Transfers, training, transportation, medical, office eqpt. etc.)

Examiner

Position Cost	#FTE	(Salary)	+ Indirect Costs)	= Program
W-4	1.5	X (\$61,360	+ \$9923)	= \$106,925
E9	3	X (\$54,965	+ \$8221)	= \$189,558
E8	2	X (\$46,229	+ \$8221)	= \$108,900
E7	7.5	X (\$39,817	+ \$8221)	= \$360,285
E6	5	X (\$34,014	+ \$8221)	= \$211,175
E5	1	X (\$28,746	+ \$8221)	= \$36,967
GS7	5	X (\$34,735	+ \$3552)	= \$191,300
GS6	3	X (\$33,244	+ \$3552)	= \$110,307
			Sub-total	= \$1,315,416
			Program Overhead @ 28%	= \$368,317
			G & A Overhead @ 29%	= \$488,283.
			Examiner Total	= \$2,172,016

Clerical

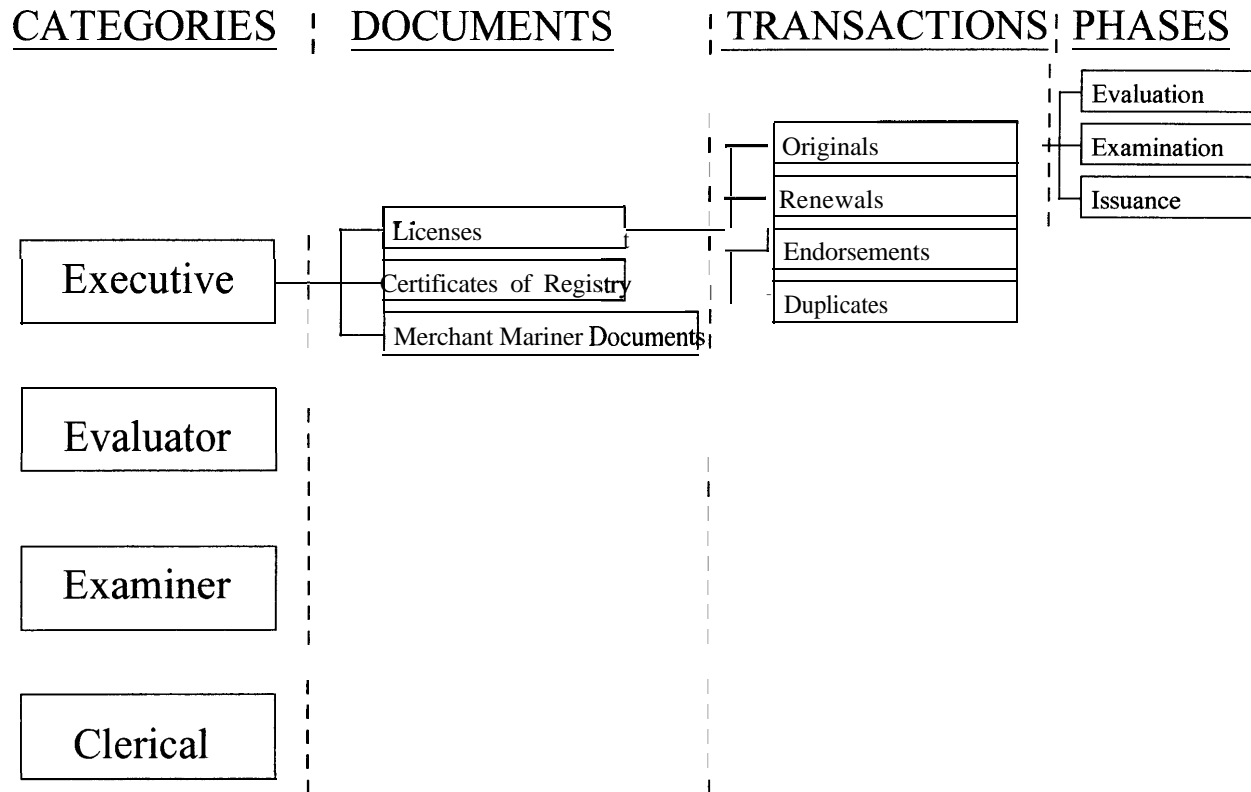
Position Cost	#FTE	(Salary)	+ Indirect Costs)	= Program
GS6	27	X (\$33,244	+ \$3525)	= \$992,163
GS5	10	X (\$29,810	+ \$3525)	= \$333,350
E5	1	X (\$28,746	+ \$8221)	= \$36,967
E4	6	X (\$23,595	+ \$8221)	= \$190,896
			Sub-total	= \$1,553,976
			Program Overhead @ 28%	= \$435,113
			G & A Overhead @ 29%	= \$576,836.
			Clerical Total	= \$2,565,925

Total Program Cost (in million)

Executive	+ Evaluator	+ Examiner	+ Clerical	= Total
\$2.53	+ \$3.57	+ \$2.17	+ \$2.57	= \$10.84

APPENDIX B

EXAMPLE OF THE PHASES OF AN ORIGINAL LICENSE PERFORMED BY THE EXECUTIVE PERSONNEL CATEGORY



APPENDIX C

SUMMARY OF THE TIME-MOTION STUDY

BALTIMORE	GRADE												
	CATEGORY	EVALUATION			EXAMINATION			ISSUANCE					
		EXEC.	EVAL.	EXAM.	CLER.	EXEC.	EVAL.	EXAM.	CLER.	EXEC.	EVAL.	EXAM.	CLER.
LICENSE													
Upper Level	1	8.8	0	23.2	N/A	N/A	N/A	N/A	18.6	0	0	0	0
Lower Level	6.4	36	0	9.2	0	0	530	0	N/A	N/A	N/A	N/A	N/A
Renewal/Endorsement	1.53	14.1	0	20.4	0	0	330	0	8.53	2.26	0	0.80	
CERTIFICATE OF REGISTRY													
Radio Officer	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	N/A
Sr. Purser, Jr. Purser, etc.	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	N/A
MD, Prof. Nurse	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	N/A
Renewal	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	N/A
MERCHANT MARINER DOCUMENT													
Endorsed with qualified rating	0	29.5	0	0.19	0	84.8	5.96	0	0	3.34	0	0.19	
Without qualified rating	0	50.4	0	0.71	-----	-----	-----	-----	0	11.1	0	1.42	
Renewal	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	N/A
OTHER FEES													
Dup/Repl Lic., COR, MMD	N/A	N/A	N/A	N/A	-----	-----	-----	-----	0	43	0	0	0

Charleston	PHASE											
	EVALUATION				EXAMINATION				ISSUANCE			
	EXEC.	Eval.	EXAM.	CLER.	EXEC.	Eval.	EXAM.	CLER.	EXEC.	Eval.	EXAM.	CLER.
LICENSE												
Upper Level	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Lower Level	N/A	N/A	N/A	N/A	0	0	269	0	N/A	N/A	N/A	N/A
Renewal/Endorsement	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CERTIFICATE OF REGISTRY												
Radio Officer	N/A	N/A	N/A	N/A					0	23	0	0
Sr. Purser, Jr. Purser, etc.	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A
MD, Prof. Nurse	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A
Renewal	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A
MERCHANT MARINER DOCUMENT												
Endorsed with qualified rating	0	38	0	0	N/A	N/A	N/A	N/A	0	0	0	20
Without qualified rating	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A
Renewal	0	13	0	0	-----	-----	-----	-----	N/A	N/A	N/A	N/A
OTHER FEES												
Dup/Repl Lic., COR, MMD	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A

Honolulu	PHASE												
	CATEGORY	EVALUATION				EXAMINATION				ISSUANCE			
		EXEC.	EVAL.	EXAM.	CLER.	EXEC.	EVAL.	EXAM.	CLER.	EXEC.	EVAL.	EXAM.	CLER.
LICENSE													
Upper Level	15	17	0	4	N/A	N/A	N/A	N/A	1	0	3	22	
Lower Level	7.5	10.5	0	4.5	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Renewal/Endorsement	6	30.3	0	35	N/A	N/A	N/A	N/A	2.33	0	0	28	
CERTIFICATE OF REGISTRY													
Radio Officer	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	
St. Purser, Jr. Purser, etc.	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	
MD, Prof. Nurse	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	
Renewal	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	
MERCHANT MARINER DOCUMENT													
Endorsed with qualified rating	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Without qualified rating	0	23.1	0	7.85	-----	-----	-----	-----	0	0	0	22.2	
Renewal	0	19	0	0	-----	-----	-----	-----	0	0	0	23	
OTHER FEES													
Dup/Repl Lic., COR, MMD	N/A	N/A	N/A	N/A	-----	-----	-----	-----	0	9.5	0	10	

Hou n	PHAS											
	CATEGORY	EVALUATION			EXAMINATION			ISSUANCE				
		EXEC.	EVAL.	EXAM. CLER.	EXEC.	EVAL.	EXAM. CLER.	EXEC.	EVAL.	EXAM. CLER.		
	LICENSE											
	Upper Level	0	26	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Lower Level	6.33	34.8	0	4.5	N/A	N/A	N/A	0	16	0	4.25
	Renewal/Endorsement	0	25	0	0	N/A	N/A	N/A	0	25.8	0	0
	CERTIFICATE OF REGISTRY											
	Radio Officer	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Sr. Purser, Jr. Purser, etc.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	MD, Prof. Nurse	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Renewal	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	MERCHANT MARINER DOCUMENT											
	Endorsed with qualified rating	0	17.2	0	0	0	0	100	0	23.4	3.06	1.2
	Without qualified rating	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0	29.5	0	0
	Renewal	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0	30	0	0
	OTHER FEES											
	Dup/Repl Lic., COR, MMD	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0	24	0	0

Juneau	PHASE												
	CATEGORY	EVALUATION			EXAMINATION			ISSUANCE					
		EXEC.	EVAL.	EXAM. CLER.	EXEC.	EVAL.	EXAM. CLER.	EXEC.	EVAL.	EXAM. CLER.	EXEC.	EVAL.	EXAM. CLER.
LICENSE													
Upper Level	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Lower Level	0	105	0	22	0	300	65	0	N/A	N/A	N/A	N/A	N/A
Renewal/Endorsement	1.66	55	0	10	N/A	N/A	N/A	N/A	20	0	0	10	10
CERTIFICATE OF REGISTRY													
Radio Officer	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Sr. Purser, Jr. Purser, etc.	0	20	0	20	0	0	0	0	0	0	0	25	25
MD, Prof. Nurse	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Renewal	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
MERCHANT MARINER DOCUMENT													
Endorsed with qualified rating	10	40	0	40	0	170	7.5	0	0	0	0	45	45
Without qualified rating	10	25	0	32.5	0	0	0	0	0	0	0	28.3	28.3
Renewal	15	20	0	15	0	0	0	0	0	0	0	25	25
OTHER FEES													
Dup/Repl Lic., COR, MMD	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Los Angeles/Long Beach	PHASE												
	CATEGORY	EVALUATION				EXAMINATION				ISSUANCE			
		EXEC.	Eval.	EXAM.	CLER.	EXEC.	Eval.	EXAM.	CLER.	EXEC.	Eval.	EXAM.	CLER.
LICENSE													
Upper Level	18	0	0	0	0	0	323	0	N/A	N/A	N/A	N/A	
Lower Level	29.5	0	0	0	0	0	308	0	0	0	0	33.5	
Renewal/Endorsement	18	6	0	0	N/A	N/A	N/A	N/A	0	0	0	74.5	
CERTIFICATE OF REGISTRY													
Radio Officer	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	
Sr. Purser, Jr. Purser, etc.	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	
MD, Prof. Nurse	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	
Renewal	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	
MERCHANT MARINER DOCUMENT													
Endorsed with qualified rating	0	75	0	0	0	0	157	0.5	0	0.5	0	38.5	
Without qualified rating	N/A	N/A	N/A	N/A	-----	-----	-----	-----	0	0	0	61	
Renewal	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	
OTHER FEES													
Dup/Repl Lic., COR, MMD	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	

TABLE

Memphis	EVALUATION													
	CATEGORY	EVALUATION				EXAMINATION				ISSUANCE				
		EXEC.	EVAL.	EXAM.	CLER.	EXEC.	EVAL.	EXAM.	CLER.	EXEC.	EVAL.	EXAM.	CLER.	
LICENSE														
Upper Level	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Lower Level	45	0	0	0	28	0	118	0	0	0	0	27.5	0	0
Renewal/Endorsement	22	5	0	0	N/A	N/A	N/A	N/A	0	12	11.5	0	0	0
CERTIFICATE OF REGISTRY														
Radio Officer	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Sr. Purser, Jr. Purser, etc.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
MD, Prof. Nurse	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Renewal	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
MERCHANT MARINER DOCUMENT														
Endorsed with qualified rating	N/A	N/A	N/A	N/A	0	0	79.5	0	9.25	17	8.25	0	0	0
Without qualified rating	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Renewal	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	32	0	0	0	0	0
OTHER FEES														
Dup/Repl Lic., COR, MMD	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Miami	PHASE											
CATEGORY	EVALUATION				EXAMINATION				ISSUANCE			
	EXEC.	EVAL.	EXAM.	CLER.	EXEC.	EVAL.	EXAM.	CLER.	EXEC.	EVAL.	EXAM.	CLER.
LICENSE												
Upper Level	N/A	N/A	N/A	N/A	0	0	1011	0	N/A	N/A	N/A	N/A
Lower Level	0	9.8	0	0	0	0	285	0	2	0	0	33
Renewal/Endorsement	113	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CERTIFICATE OF REGISTRY												
Radio Officer	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A
Sr. Purser, Jr. Purser, etc.	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A
MD, Prof. Nurse	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A
Renewal	N/A	N/A	N/A	N/A	-----	-----	m-w-----	-----	N/A	N/A	N/A	N/A
MERCHANT MARINER DOCUMENT												
Endorsed with qualified rating	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Without qualified rating	13	36	0	0	-----	-----	-----	--a-----	0	0	0	17.5
Renewal	N/A	N/A	N/A	N/A	-----	-----	-----	-----	0	0	0	16
OTHER FEES												
Dup/Repl Lic., COR, MMD	N/A	N/A	N/A	N/A	-----	-----	-----	-----	9	17	0	37

New Orleans	PHASE												
	CATEGORY	EVALUATION				EXAMINATION				ISSUANCE			
		EXEC.	EVAL.	EXAM.	CLER.	EXEC.	EVAL.	EXAM.	CLER.	EXEC.	EVAL.	EXAM.	CLER.
LICENSE													
Upper Level	13	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Lower Level	34	0	0	0	0	0	227	0	1	13	22.6	0	
Renewal/Endorsement	0	13	0	0	N/A	N/A	N/A	N/A	0	1	10	0	
CERTIFICATE OF REGISTRY													
Radio Officer	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	
Sr. Purser, Jr. Purser, etc.	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	
MD, Prof. Nurse	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	
Renewal	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	
MERCHANT MARINER DOCUMENT													
Endorsed with qualified rating	15	12	0	0	0	0	41	0	7	19	0	0	
Without qualified rating	4.4	15	5.2	0	-----	-----	-----	-----	0	12.5	0	0	
Renewal	20.3	9	0	0	-----	-----	-----	-----	0	18.5	0	0	
OTHER FEES													
Dup/Repl Lic., COR, MMD	N/A	N/A	N/A	N/A	-----	-----	-----	-----	0	21	5	0	

New York	PHASE												
	CATEGORY	EVALUATION				EXAMINATION				ISSUANCE			
		EXEC.	EVAL.	EXAM.	CLER.	EXEC.	EVAL.	EXAM.	CLER.	EXEC.	EVAL.	EXAM.	CLER.
LICENSE													
Upper Level	N/A	N/A	N/A	N/A	0	0	125	2	1.5	0	0	25.5	
Lower Level	1.33	24.3	0	5.33	0	0	251	0	1	0	0	17	
Renewal/Endorsement	0	28.2	0	2.75	N/A	N/A	N/A	N/A	0.75	0	0	11.2	
CERTIFICATE OF REGISTRY													
Radio Officer	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	
Sr. Purser, Jr. Purser, etc.	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	
MD, Prof. Nurse	N/A	N/A	N/A	N/A	-----	-----	VW-----	-----m	N/A	N/A	N/A	N/A	
Renewal	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	
MERCHANT MARINER DOCUMENT													
Endorsed with qualified rating	0	3	0	16	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Without qualified rating	N/A	N/A	N/A	N/A	-----	-----	-----	-----	0	1.5	0	30.5	
Renewal	0	0	0	8	-----	-----	-----	-----	0	3	0	19.3	
OTHER FEES													
Dup/Repl Lic., COR, MMD	N/A	N/A	N/A	N/A	-----	-----	-----	-----	0.5	0	0	73.5	

Portland	PHASE											
CATEGORY	EVALUATION				EXAMINATION				ISSUANCE			
	EXEC.	Eval.	EXAM.	CLER.	EXEC.	Eval.	EXAM.	CLER.	EXEC.	Eval.	EXAM.	CLER.
LICENSE												
Upper Level	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0	8	0	0
Lower Level	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0	0	2.5	9
Renewal/Endorsement	6.5	11	0	0	N/A	N/A	N/A	N/A	0	0	0	12
CERTIFICATE OF REGISTRY												
Radio Officer	N/A	N/A	N/A	N/A	-----	-----	-----	---m-w--	N/A	N/A	N/A	N/A
Sr. Purser, Jr. Purser, etc.	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A
MD, Prof. Nurse	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A
Renewal	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A
MERCHANT MARINER DOCUMENT												
Endorsed with qualified rating	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0	33	0	0
Without qualified rating	N/A	N/A	N/A	N/A	-----	-----	-----	-----	0	0	0	40
Renewal	0	9	0	0	-----	-----	-----	-----	N/A	N/A	N/A	N/A
OTHER FEES												
Dup/Repl Lic., COR, MMD	N/A	N/A	N/A	N/A	-----	-----	-----	-----	9.4	10.6	0	14.2

Puget Sound (Seattle)	PHASE												
	CATEGORY	EVALUATION				EXAMINATION				ISSUANCE			
		EXEC.	EVAL.	EXAM.	CLER.	EXEC.	EVAL.	EXAM.	CLER.	EXEC.	EVAL.	EXAM.	CLER.
LICENSE													
Upper Level	0	33.6	0	0	0	0	722	0.37	2.5	0	0	21.5	
Lower Level	0	27.1	0	0	0	0	1109	0	0.75	0	0	37	
Renewal/Endorsement	0	41.6	0	5.6	0	0	445	2.33	0	0	0	33.6	
CERTIFICATE OF REGISTRY													
Radio Officer	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	
Sr. Purser, Jr. Purser, etc.	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	
MD, Prof. Nurse	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	
Renewal	N/A	N/A	N/A	N/A	_____	_____	_____	_____	0	0	0	40	
MERCHANT MARINER DOCUMENT													
Endorsed with qualified rating	0	10.1	0	0	0	0	264	0.42	N/A	N/A	N/A	N/A	
Without qualified rating	N/A	N/A	N/A	N/A	-----	-----	-----m-v-	-----	0	0	0	36.7	
Renewal	N/A	N/A	N/A	N/A	-----	-----	-----	-----	0.6	0	0	35.2	
OTHER FEES													
Dup/Repl Lic., COR, MMD	N/A	N/A	N/A	N/A	-----	-----	-----m--v-	-----	0	0	0	13	

Saint Lou	PHASE												
	CATEGORY	EVALUATION				EXAMINATION				ISSUANCE			
		EXEC.	EVAL.	EXAM.	CLER.	EXEC.	EVAL.	EXAM.	CLER.	EXEC.	EVAL.	EXAM.	CLER.
LICENSE													
Upper Level	N/A	N/A	N/A	N/A	0	0	498	0	0	12	0	0	
Lower Level	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0	0	0	5	
Renewal/Endorsement	0	13	0	0	0	10	0	0	0.33	16	0	2	
CERTIFICATE OF REGISTRY													
Radio Officer	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	
Sr. Purser, Jr. Purser, etc.	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	
MD, Prof. Nurse	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	
Renewal	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	
MERCHANT MARINER DOCUMENT													
Endorsed with qualified rating	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Without qualified rating	0	22	0	0	-----	-----	-----	-----	0	30	0	0	
Renewal	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	
OTHER FEES													
Dup/Repl Lic., COR, MMD	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	

San Francisco	PHASE											
CATEGORY	EVALUATION				EXAMINATION				ISSUANCE			
	EXEC.	Eval.	EXAM.	CLER.	EXEC.	Eval.	EXAM.	CLER.	EXEC.	Eval.	EXAM.	CLER.
LICENSE												
Upper Level	0	30.2	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Lower Level	0	25.6	0	0	0	0	500	0	N/A	N/A	N/A	N/A
Renewal/Endorsement	0	41.6	0	5.6	0	0	106	0	N/A	N/A	N/A	N/A
CERTIFICATE OF REGISTRY												
Radio Officer	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A
Sr. Purser, Jr. Purser, etc.	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A
MD, Prof. Nurse	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A
Renewal	N/A	N/A	N/A	N/A	-----	-----	-----	-----	0	0	0	26
MERCHANT MARINER DOCUMENT												
Endorsed with qualified rating	0	5	0	0	N/A	N/A	N/A	N/A	0	0	0	24
Without qualified rating	0	8	0	0	-----	-----	-----	-----	0	0	0	31.5
Renewal	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A
OTHER FEES												
Dup/Repl Lic., COR, MMD	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A

Iololo	FEE												
	CATEGORY	EVALUATION				EXAMINATION				ISSUANCE			
		ELEC.	EVAL.	EXAMIN.	CLEK.	ELEC.	EVAL.	EXAMIN.	CLEK.	ELEC.	EVAL.	EXAM.	CLEK.
LICENSE													
Upper Level	N/A	N/A	N/A	N/A	0	0	603	0	0	1.5	0	7	7
Lower Level	0	22	0	0	0	0	396	0	0	1.8	0	7.6	7.6
Renewal/Endorsement	0	6.33	0.33	5	0	0	131	0	0	3.25	0	7.87	7.87
CERTIFICATE OF REGISTRY													
Radio Officer	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	N/A
Sr. Purser, Jr. Purser, etc.	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	N/A
MD, Prof. Nurse	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	N/A
Renewal	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	N/A
MERCHANT MARINER DOCUMENT													
Endorsed with qualified rating	N/A	N/A	N/A	N/A	0	0	111	0	0	2	0	26	26
Without qualified rating	0	3	0	3	-----	-----	-----	-----	0	2	0	17	17
Renewal	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	N/A
OTHER FEES													
Dup/Repl Lic., COR, MMD	N/A	N/A	N/A	N/A	-----	-----	-----	-----	N/A	N/A	N/A	N/A	N/A

APPENDIX D

COST DISTRIBUTION EXPLANATION

For all categories of personnel involved, we multiplied the time they took to perform a particular phase of a document transaction by the number of those document transactions that occurred during the previous year to generate the total annual time they spent on each phase (0).

$$\textcircled{1} \text{ Time}_{\text{phase in personnel category}} * \# \text{ of Documents} = \text{Annual Time}_{\text{phase in personnel category}}$$

Then, we took the total amount of time spent by each personnel category and divided it into the time they spent on each document transaction phase (2). From this, we obtained a percentage of time each personnel category spent on every phase of each document transaction.

$$\textcircled{2} \text{ Annual Time}_{\text{phase in personnel category}} \div \text{Total Time}_{\text{in personnel category}} = \% \text{ Time}_{\text{spent on phase in personnel category}}$$

We took the cost of each personnel category generated from the PAL salary and overhead costs and multiplied it by the percent of time spent on each document transaction phase (0). This developed a total cost for each phase of each of the document transactions performed by the four personnel categories.

$$\textcircled{3} \% \text{ Time}_{\text{spent on phase in personnel category}} * \text{cost}_{\text{personnel category}} = \text{Cost}_{\text{phase in personnel category}}$$

For each phase, we added the costs of the four personnel categories to obtain the total cost for each phase of every document transaction (0).

$$\textcircled{4} \text{ Repeat Steps } \textcircled{1}, \textcircled{2}, \textcircled{3} \text{ for a phase in all four personnel categories} = \text{Total Cost}_{\text{phase}}$$

Finally, we took this total cost of each document transaction phase and divided it by the annual number of document transactions to find the cost of each phase in a single document transaction (0).

$$\textcircled{5} \text{ Total Cost}_{\text{phase}} * \# \text{ of Documents} = \text{Cost of phase}_{\text{for a single Document Transaction}}$$

APPENDIX E

RECALCULATED COSTS OF PROVIDING SERVICE AND FEES

Licenses and Certificates of Registry

CFR Section— 46 CFR 10.109	Published Fee	Recalculated Program costs	Revised Fees
(a) For Licenses.			
(1) Upper Level:			
(i) For evaluation for an original license	\$87	\$119 ⁷	\$115
(ii) For evaluation for a license other than an original, including a raise in grade of a license	\$70	\$102	\$100
(iii) For administration of an examination, including allowable retests	\$150	\$110	\$110
(iv) For administration of a limited examination required under subpart D of this part, including allowable retests	\$55	\$45 ²	\$45
(v) For issuance of a license	\$35	\$62	\$45
(2) Lower level:			
(i) For evaluation for an original license	\$82	\$136 ³	\$115
(ii) For evaluation for a license other than an original, including a raise in grade in a license	\$65	\$119	\$100
(iii) For administration of an examination, including allowable retests	\$ 80	\$98	\$95
(iv) For administration of a limited examination required under subpart D of this part, including allowable retests	\$55	\$45	\$45
(v) For issuance of a license	\$35	\$51	\$45
(3) Radio Officer:			
(i) For evaluation for an original license	\$62	\$128 ⁴	\$ 65
(ii) For evaluation for a license other than an original, including a raise in grade in a license	\$45	\$111	\$50
(iii) For issuance of a license	\$35	\$61	\$45
(b) For endorsements, except the radar observer endorsement, subsequent to the issuance of the license.			
(1) For evaluation for single or multiple endorsements	\$45	\$50	\$50
(2) For administration of examinations, including allowable retests	\$55	\$45	\$45
(3) For issuance of single or multiple endorsements to an existing license	\$35	\$46	\$45
(c) For renewal of a license.			
(1) For evaluation for renewal of a license:			
(i) Except for a radio officer	\$45	\$50	\$50
(ii) For a radio officer	\$45	n/a	\$50
(2) For administration of an open-book exercise if required under §10.209 of this part	\$55	\$45	\$45
(3) For issuance of a renewed license	\$35	\$ 46	\$45
(4) For issuance of a renewed license, without evaluation or examination, for continuity purposes only	\$35	\$ 46 ⁵	\$45

Licenses and Certificates of Registry (Continued)

CFR Section— 46 CFR 10.109	Published Fee	Recalculated Program costs	Revised Fees
(d) For Certificates of Registry.			
(1) For Chief Purser, Purser, and Senior Assistant Purser:			
(i) For evaluation of an unlicensed applicant for a certificate of registry	\$62	\$123 ⁶	\$120
(ii) For evaluation of an applicant who holds a license or certificate of registry issued under this part	\$45	\$106	\$105
(iii) For issuance of a certificate of registry	\$35	\$179	\$45
(2) For Junior Assistant Purser, Medical Doctor, and Professional Nurse:			
(i) For evaluation of an unlicensed applicant for a certificate of registry	\$17	\$128 ⁷	\$120
(ii) For evaluation of an applicant who holds a license or certificate of registry issued under this part	No Fee	\$111	\$105
(iii) For issuance of a certificate of registry	\$35	\$61	\$45
(3) For renewal of a Certificate of Registry:			
(i) For evaluation for renewal of a certificate of registry	No Fee	\$50 ⁸	\$50
(ii) For issuance of a renewed certificate of registry	\$35	\$46	\$45
(e) For reissue of a license or certificate of registry issued under this part where a fee is required in § 10.2 19	\$35	\$106	\$45
(f) For endorsements to existing license, a raise in grade of a license, an additional license, or certificate of registry where further evaluations are not required	No Evaluation Fee	n/a	No Fee
(g) For endorsements to an existing license, a raise in grade of a license, or an additional license where further examinations are not required	No Examination Fee	n/a	No Fee

Notes:

¹ Program costs are equal to cost of evaluating an upper level license applicant for a license other than an original plus the cost of an FBI criminal record check.

² Program costs are the same as the costs associated with administering an open-book exercise for renewal of a license.

³ Program costs are equal to cost of evaluating a lower level license applicant for a license other than an original plus the cost of an FBI criminal record check.

⁴ Program costs are equal to cost of evaluating a Radio Officer license applicant for a license other than an original plus the cost of an FBI criminal record check.

⁵ Program costs are the same as the costs associated with the issuance of a renewed license.

⁶ Program costs are equal to the cost of evaluating a licensed Chief Purser, Purser, or Senior Purser Certificate of Registry applicant plus the cost of an FBI criminal record check.

⁷ Program costs are equal to the cost of evaluating a licensed Junior Assistant Purser, Medical Doctor, or Professional Nurse Certificate of Registry applicant plus the cost of an FBI criminal record check.

⁸ Program costs are the same as the costs associated with the evaluation of a license renewal applicant

Merchant Mariner's Documents

CFR Section— 46 CFR 12.02-18(a)	Published Fee	Recalculated Program costs	Revised Fees
(1) For evaluation for an original document (does not apply if applicant holds a license or certificate of registry issued under part 10 of this chapter)	\$17	\$128 ⁷	\$110
(2) For evaluation for a merchant mariner's document endorsed with a qualified rating			
(i) For an original merchant mariner's document:	\$77	\$115 ²	\$110
(ii) For a merchant mariner's document other than an original	\$60	\$98	\$95
(iii) Where further evaluation is not required, such as when a merchant mariner's document is issued incident to a license transaction	No Fee	n/a	No Fee
(3) For administration of examination	\$40	\$144	\$140
(4) For issuance of a document	\$35	\$53	\$45
(5) For duplicate of a merchant mariner's document issued in this part where a fee is required in § 12.02-23	\$35	\$106	\$45
(6) For a duplicate continuous discharge book, record of sea service, or copies of certificates of discharge	\$10 ³	\$106	\$10 ³
(7) For renewal of a merchant mariner's document:			
(i) For evaluation for renewal of a merchant mariner's document endorsed with a qualified rating	\$45	\$50	\$50
(ii) For evaluation for renewal of a merchant mariner's document when submitted with a license where a renewal evaluation fee already applies	No Fee	n/a	No Fee
(iii) For evaluation for renewal of a merchant mariner's document without qualified rating endorsement	No Fee	n/a	\$50
(iv) For administration of open-book exercises required by § 12.02-27	\$40	\$45	\$45
(v) For administration of MMD open-book exercises when required in addition to license open-book exercises for concurrent renewal of these documents	Only the license exercise fee in § 10.109(c)(2) will apply ⁴	\$45 ⁵	No Fee ⁶
(vi) For issuance of a renewal of a merchant mariner's document including those issued for continuity purposes only	\$35	\$46	\$45

Notes:

¹ Program costs are equal to cost of evaluating an applicant for a merchant mariner's document without qualified rating endorsement plus the cost of an FBI criminal record check.

² Program costs are equal to the cost of evaluating an applicant for an original merchant mariner's document with qualified rating endorsement plus the cost of an FBI criminal record check.

³ Payment of fee is not required if loss is caused by shipwreck or other casualty; other casualty includes damage to a ship caused by collision, explosion, tornado, wreck, flooding, grounding, beaching or fire (see § 12.02-23).

⁴ Fee published in 46 CFR 10.109(c)(2) for administration of an open-book exercise for renewal of a license is equal to \$55.

⁵ Program costs are the same as the costs associated with the administration of an open-book exercise for renewal of a license

⁶ Payment of fee is not required for open-book exercise for renewal of MMD since payment is made during concurrent open-book exercise for renewal of license.

APPENDIX F

COMPARISON OF TYPICAL ANNUAL COSTS OF MARINE LICENSE AND MERCHANT MARINER DOCUMENTATION FEES WITH OTHER PROFESSIONS

	Initial Fee	Approximate Annualized Initial Cost	Renewal Fee	Annualized Renewal Cost
1. Upper Level* Marine License	\$270	\$54	\$140	\$28
2. Radio Officer* Marine License	\$170	\$34	\$95	\$19
3. Cert. Of Registry*	\$165	\$33	\$95	\$19
4. Merchant Mariner* Document With Qualified Rating	\$295	\$59	\$140	\$28
5. Virginia* * Optometrist's License	\$245	\$245	\$150	\$150
6. Colorado** Professional Engineer's License	\$279	\$140	\$134	\$67
7. Utah*** Certified Public Account License	\$455	\$228	\$40	\$20
8. Pennsylvania** Master Plumber's License	\$200	\$200	\$150	\$150
9. New York**** Electrician's License	\$200	\$200	\$75	\$75

* Includes all applicable evaluation, examination and issuance phase fees. License or Document valid for five (5) years.

** Initial license includes examination. License renewed annually.

*** License must be renewed every two (2) years.

**** License renewed annually.

APPENDIX G

ANNUALIZATION OF MMLD USER FEE REVISIONS

	Published Fee*	Revised Fee*	Revision Difference	Annualized Revisions* *
1. Upper Level License Original	\$272	\$270	(\$2)	(\$0.40)
2. Lower Level License Original	\$197	\$255	\$58	\$11.60
3. Renewal of a License***	\$135	\$140	\$5	\$1.00
4. Radio Officer License Original	\$97	\$170	\$73	\$14.60
5. Radio Officer License Renewal	\$90	\$95	\$5	\$1.25
6. Cert. of Registry (Purser)	\$80	\$150	\$70	\$14.00
7. Merchant Mariner Document With Qualified Rating	\$152	\$295	\$143	\$28.60
8. Merchant Mariner Document Renewal With Qualified Rating	\$120	\$140	\$20	\$4.00

* Sum of Evaluation, Examination, and Issuance Phase Fees

** Over a five (5) year period

*** Except for Radio Officer

APPENDIX H

ANNUALIZED FEES AS PERCENTAGE OF ANNUAL SALARY

	License Fee	Annualized License Fee	Renewal Fee	Annualized Renewal Fee	Total Annualized Fees*	Salary**	Fee as % of Annual Salary
Upper Level Officer	\$270	\$54/year	\$140	\$28/year	\$41/year	\$13,599	0.30%
Radio Officer	\$170	\$34/year	\$95	\$19/year	\$27/year	\$15,337	0.17%
Chief Purser w/COR***	\$165	\$33/year	\$95	\$19/year	\$26/year	\$10,500	0.24%
Mariner w/MMD****	\$295	\$59/year	\$140	\$28/year	\$44/year	\$6,877	0.63%
Optometrist	\$245	\$245/year	\$150	\$150/year	\$198/year	\$80,000	0.25%
Professional Engineer	\$279	\$140/year	\$134	\$67/year	\$103/year	\$53,200	0.19%
Certified Public Accountant	\$455	\$228/year	\$40	\$20/year	\$124/year	\$48,800	0.25%
Business Contractor	\$400	\$200/year	\$200	\$100/year	\$150/year	\$70,000	0.21%
Plumber	\$170	\$170/year	\$120	\$120/year	\$145/year	\$27,560	0.53%
Electrician	\$200	\$200/year	\$75	\$75/year	\$138/year	\$29,848	0.46%

* For one original license and one renewal.

** Salary data derived from the Bureau of Labor Statistics' Occupational Outlook Handbook.

*** Unlicensed applicant.

**** With qualified rating.