

MARINE MAMMAL COMMISSION  
4340 East-West Highway, Room 700  
Bethesda, MD 20814-4447

28 May 2009

Ms. Diana Hynek  
Departmental Paperwork Clearance Officer  
Department of Commerce, Room 7845  
14th and Constitution Avenue, NW  
Washington, DC 20230

Dear Ms. Hynek:

The Marine Mammal Commission has reviewed the notice regarding reporting requirements under the Marine Mammal Protection Act (74 Fed. Reg. 15459). As stated in the notice, section 118 of the Act mandates that the owner or operator of a vessel participating in a commercial fishery report any injuries to or deaths of marine mammals resulting from fishing activities. The information collected is needed to determine the impact of commercial fishing on marine mammal populations and is used to categorize commercial fisheries in one of three categories, according to their frequency of incidental take.

The incidental take, or bycatch, of marine mammals in fisheries is recognized as one of the most serious direct threats to marine mammal stocks. As such, the collection of this information is critical to meeting the goals of the Marine Mammal Protection Act and should be continued. According to the Service, the annual burden on respondents is minimal, and there is no cost to the public for this data collection program. Thus, the Commission sees no need to alter current reporting practices.

Thank you for the opportunity to comment on this matter.

Sincerely,



Timothy J. Ragen, Ph.D.  
Executive Director