

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

9 June 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 and the Magnuson-Stevens Fishery Conservation and Management Act relative to the North Pacific Groundfish Observer Program (74 Fed. Reg. 22154). As stated in the notice, the National Marine Fisheries Service's Alaska Fisheries Science Center collects information from operators of vessels and processing plants that have hosted observers in an effort to evaluate observer performance and improve the quality of data obtained. Participation in the program is voluntary.

The fishery observer program is a valuable tool in understanding the impact that fisheries may have on marine mammal stocks as well as the impact of marine mammals on fishing activities. Fisheries observers are the most reliable source of information on the interactions between fishing operations and marine mammals, and the information they provide is essential for managing such interactions. Assessing and maintaining the reliability of observer systems are necessary for maintaining their value and utility for these purposes.

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