

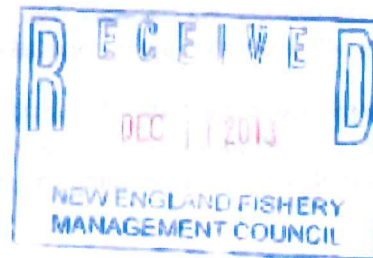


UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
NATIONAL MARINE FISHERIES SERVICE  
Northeast Fisheries Science Center  
166 Water Street  
Woods Hole, MA 02543-1026

#4

December 6, 2013

Thomas A. Nies  
New England Fishery Management Council  
50 Water Street, Mill 2  
Newburyport, MA 01950



Dear Tom:

I want to acknowledge that we understand concerns regarding patterns in observer deployment that have been raised recently and that we take these concerns seriously. Random selection of vessels for observer coverage is fundamental for a scientific sampling program. As you are aware, the Pre-Trip Notification System (PTNS) and observer deployment processes are complex. The overall process includes several phases including the PTNS trip selection and observer assignment as well as the provider acceptance process that is carried out by the three observer contracting companies. Our staff is investigating the interactions among these processes and the extent to which those interactions may affect the equitability of selection among vessels.

Several external factors complicate the performance of the PTNS and the equitability of coverage across vessels:

1. Failure to declare groundfish trips through PTNS (non-compliance)
2. Failure to cancel declared PTNS trips that did not occur
3. Non-random vessel cancellations (observer avoidance)
4. Non-random provider selection patterns across vessels within the same stratum (vessel favoritism/avoidance)

We have implemented PTNS fixes and external procedures to deal with each of these issues; however, problems continue to arise related to the first and fourth issues; these involve human or business components. For the first issue, we have matched PTNS declarations to VMS activity declarations, and determined that vessel compliance can be highly variable within an individual sector (e.g., range from 19% - 100%). If some proportions of a sector's vessels are non-compliant, compliant vessels receive a disproportionate share of the observer coverage. Non-random selection of vessels can compromise the effectiveness of the Region's monitoring programs. Although we are investigating how PTNS can be modified to address failure of vessels to declare groundfish trips through the system, the fundamental basis of that problem, non-compliance, will need to be resolved through other approaches.

With respect to the fourth issue, we have some tools to reduce the possibility of non-random selection patterns by providers. When high cancellation rates occur within a sector, selection probabilities on the remainder of the sector must be increased to achieve coverage targets. Under those conditions, providers may be offered more trips than they can cover with the observers on hand. Rather than cancelling,



cc: FH, JC, PMF, Council (12/11)

providers logically opt to deploy available observers on vessels who sail reliably from ports close to where observers are stationed. We will investigate methods to better match selection rates with provider capacity. We must also seek ways to diminish the potential for selection bias by providers, and to improve or adjust for provider acceptance and vessel cancellation rates so that PTNS target rates match desired coverage levels. This will lower the overall trip selection rate and reduce the administrative burden on the industry. We anticipate that these proposed changes and fine tuning of existing deployment procedures will reduce the apparent anomalies experienced by some sector vessels.

I would be pleased to report back during the Council's January 2014 meeting with additional details on these issues and look forward to working with the Council and Regional Office to improve the performance of our observer selection process.

Sincerely,



William A. Karp, Ph.D.  
Science and Research Director  
Northeast Fisheries Science Center

cc

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