

Amendment 80 Non-AFA Trawl Gear Catcher/Processor

Report Prepared for Pacific States Marine Fisheries Commission
2015 and 2016 Calendar Year Data



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**INDEPENDENT ACCOUNTANTS' REPORT
ON APPLICATION OF AGREED-UPON PROCEDURES**

To Pacific States Marine Fisheries Commission
Portland, Oregon

We have performed the procedures described in the following report, which were agreed to Pacific States Marine Fisheries Commission and National Marine Fisheries Service solely to assist you in evaluating the accuracy of the information submitted through Economic Data Reports for the 2015 and 2016 calendar years. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described in the following pages either for the purpose for which this report has been requested or for any other purpose.

As part of our testing we will use sampling. Whenever sampling is involved there is the possibility that the findings might not be representative of the population from which it was drawn.

This engagement to apply agreed-upon procedures was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants (AICPA). We were not engaged to and did not conduct an audit, in accordance with auditing standards generally accepted in the United States of America, or a review in accordance with Statements on Standards for Accounting and Review Services promulgated by the Accounting and Review Services Committee of the AICPA, the objective of which would be the expression of an opinion or conclusion, respectively, on the Economic Data Reports or the submitters of those reports. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

In the contract between Pacific States Marine Fisheries and Aldrich CPAs + Advisors LLP, the terminology "audit" was used and is used in the following pages to align with the contract terms, as mentioned above the procedures performed do not constitute an audit in accordance with generally accepted auditing standards.

This report is intended solely for the information and use of the specified parties listed above and is not intended to be and should not be used by anyone other than those specified parties.

Aldrich CPAs + Advisors LLP

Lake Oswego, Oregon
May 11, 2018

BACKGROUND

Under regulations promulgated by the United States Secretary of Commerce, fishing and seafood processing businesses and associated participants in the Bering Sea and Aleutian Islands Crab Rationalization (CR), American Fisheries Act (AFA), and Amendment 80 (A80) fishery management programs, and groundfish trawl fisheries in the Gulf of Alaska (GOA Trawl), are subject to mandatory annual economic data collection censuses, referred to as Economic Data Reports (EDR). As developed by the North Pacific Fishery Management Council (Council) and implemented by National Marine Fisheries Service (NMFS), EDR requirements for regulated participants in these fisheries are specified under 50 CFR 680.6, 679.65, 679.94, and 679.110, respectively. EDRs are intended to provide employment, cost, sales and other business data to inform the Council's oversight of fishery management through improved analyses of economic performance of affected harvesters and processors participating in these Alaska fisheries, and social and economic effects on associated communities. The Council placed a high priority on data quality assurance (QA) in design of EDR programs.

Compliance with EDR submission requirements is mandatory for all subject entities as a condition of federal fishery permit issuance and renewal, and failure to submit required EDR forms in a timely manner is grounds for enforcement action by NMFS Office of Law Enforcement. In addition to these and other data QA elements, the Council specified EDR regulations to include data verification audits of EDR records, to be performed by a qualified financial auditor contracted and authorized to solicit and review financial and other supporting company records from EDR submitters, assess reported data values against supporting records, and verify accurate values.

Data collection and management of EDR programs for Alaska fisheries is administered by the Pacific State Marine Fisheries Commission (PSMFC), under a grant from National Marine Fisheries Service (NMFS) and in collaboration with NMFS Alaska Fisheries Science Center (AFSC). For each distinct category of participant in the respective fisheries, EDR questionnaire forms have been designed to collect quantitative financial and administrative information about business operations with respect to the previous calendar year. Submission due dates are June 1 for all EDR forms. Primary data validation is conducted by PSMFC during the course of data collection and employs automated database processes to identify gross and/or logical reporting errors and obtain submitter corrections where possible. Following completion of primary validation and error correction, the EDR database is further analyzed to identify a subset of records from the most recent years of EDR submissions for verification audit.

KEY PARTICIPANTS AND ROLES

The key participants in the project include:

- ▶ **National Marine Fisheries Service (NMFS)** – initiator of the audit process and end-user of the information contained in the EDRs.
- ▶ **Pacific States Marine Fisheries Commission (PSMFC)** – collector and manager of the data collected through the EDRs.
- ▶ **Aldrich CPAs + Advisors LLP (Aldrich/Auditor)** – independent accountants and consultants selected to audit and validate the information collected in the EDRs.
- ▶ Participants in the Amendment 80 rationalization program.

SCOPE OF WORK

Selection of audits and data preparation:

- ▶ NMFS selected the EDR data items from each respective EDR form to be audited for all audits (between 8 and 10 items from each sector/form).
- ▶ NMFS analyzed the EDR data submitted for anomalies and select records as appropriate for non-random audits.
- ▶ PSMFC compiled the data from selected EDRs into a tabular data report from which the Auditor validated as agreed to with PSMFC.
- ▶ PSMFC supplied the contact information and assist with making arrangements between the Auditor and the EDR submitter.

Data verification and analysis:

- ▶ The Auditor contacted and solicited supporting information from the selected EDR submitters for data items specified by NMFS.
- ▶ The Auditor reviewed and verified reported values based upon supporting information provided. For each reported data value audited, verification includes:
 - Evaluate and classify the quality of supporting documentation supplied as the basis for verification of reported EDR values
 - Evaluate methods and calculations used to derive or approximate the reported value
 - Identify and classify reporting errors
 - Where possible, identify an appropriate correction to the reported value and quantify the amount of reporting error
 - Criteria and codes for classification of qualitative results are provided below
- ▶ The Auditor followed up on missing or inaccurate data to validate and correct the data.
- ▶ The Auditor identified and confirmed with the submitter appropriate changes to data when missing or inaccurate.
- ▶ The Auditor identified general problems with the data and the data collection process (e.g., the EDR forms and instructions, submission deadlines, submitter compliance) and make recommendations for future reporting as appropriate.

TESTING METHODOLOGY

For each EDR variable and data entry selected for audit verification, Aldrich critically evaluates the support provided by the selected vessel or processor. Information is evaluated against third party support, such as invoices or fish tickets; internally-generated information, such as crew settlement sheets, general ledger details, invoices, detailed internal reports, or financial statements; and estimates made, including an assessment of the reasonableness of assumptions. Where a selected EDR data value as originally reported is based solely on the submitter's internally-generated records, auditors may request additional supporting documentation as needed to substantiate the internal records and/or verify the reported value.. Aldrich also notes when no support is available to evaluate the selected data entry.

Many of the records provided to Aldrich by vessel owners reflect the broad variation in accounting and record-keeping systems among this segment of EDR submitters.. The processor reporting tends to be more formal and standardized, reflecting the large company nature of those operations. Because the material provided is so unique, the audit process begins with a detailed review of each information packet received while comparing totals for each variable to the original EDR entry. Each supporting document is assessed for accuracy and depth of support. Estimates are accepted as long as a reasonable explanation and/or calculations are also provided. If there were no source documents available to support the value reported it was noted in the database that is submitted to PSMFC. If nothing was provided initially or upon further inquiry it was recorded as a non-response and noted in the database report. If the initially provided documentation is determined to be incomplete or insufficient, then Aldrich contacts the vessel or processor to request further documentation. Once this additional documentation is received, it is assessed and validated via the process described above.

If discrepancies are found between the original EDR submission and the supporting documentation provided, Aldrich contacts the vessel owner and/or preparer to validate the corrected value. Many times this discussion leads to the receipt of additional documentation and/or further explanation as to the methodology used to report the associated EDR values. Once all supporting documentation has been provided by EDR submitters and evaluated by auditors, the Validated Value is determined (as equal to, or a correction to, the original value) and entered into the database report.

For each audited value, Aldrich also records a qualitative assessment of the audit results as a pair of Audit Codes in the database report, based on criteria described below (see TABLE: SUPPORT ANALYSIS CODES). A distinct Audit Code is assigned to each of the Original Value and Verified Value, based on auditors assessment of the quality and/or deficiencies in supporting documentation provided, the nature of any reporting error identified for the Original Value, and the resolution of any deficiencies and/or errors as represented in the Validated Value. Audit codes 1, 1T, 5, 6, 7, 9, or 10 (denoted by "" in the table) are used to characterize the accuracy and quality of support for either Original Value or Validated Value entries. Audit codes that represent a category of reporting error and/or support deficiency identified with respect to the Original Value (2, 2T, 3, 4, 7, or 8) are coupled with a code value of 1, 1T, 5, 6, 7, 9, or 10 assigned to the Validated Value.

TABLE: SUPPORT ANALYSIS CODES

Audit codes	Documented support for Original Value	Documented support for Verified Value	Validation result
1*	Yes	Yes (same as original)	No error; reported value is clearly substantiated by complete records. [Zero handling; Original value is "0": Correct value= 0 (no correction). Original and corrected code= 1.]
1T*	Yes	Yes (same as original)	Original value is blank or 'N/A': Correct value= 0 (not counted as error for fail letters)
2	Yes	Yes (same as original)	Calculation error
2T	Yes	Yes (same as original)	Observable typographic error on the respondent's part
3	Yes	Yes (same as original)	Misinterpretation of question
4	Yes	Yes (same as original)	Estimate is based on original documentation but flawed assumptions/logic
5*	Yes	Yes (same as original)	Data cannot be reported precisely as specified in EDR form and must be estimated; estimate is based on appropriate documentation and sound assumptions/logic and is considered validated
6*	Yes	Yes (updated)	Original value was reported correctly based on original documentation, but corrected based on updated documentation
7*	No	No	Reported value is "best guess", not derived from records; no valid value is available
8	No	Yes (new)	Original value is unsubstantiated; correction based on new documentation
9*	No	No	No data reported
10*	No	No	Item "Not Applicable" to vessel

*Code can be used as the validation support code

OUTLIER AUDIT – GOA SHORESHIDE PROCESSOR EDR RECORDS

A total of 188 individual Shoreside Processor EDR data entries were selected for verification, representing 13 distinct EDR variables; within this pool, there were 20 distinct EDR forms submitted (11 from 2015 and 9 from 2016), and 13 distinct EDR submitters, from which one or more EDR entry was selected. Upon completion of the verification review, each selected data entry was assigned a code for the quality of the original support, and the validated support. The tables below provide a summary of audit results for each EDR variable selected, listing the number and percentage (%) of selected entries assigned each audit code for the original and verified value, respectively, with the associated codes defined below.

2015:

Variable 1: Stationary Floating Processor (SFP) Information

Initial Reporting			Corrected Reporting	
Support Analysis			As Corrected # of	As Corrected % of
Code	# of Processors	% of Total	Processors	Total
Unsupported	1	100%	1	100%

Support analysis code and description of support provided:

Unsupported No information was provided for this data entry.

Variable 2: Table 1 - Processing Employees

Initial Reporting			Corrected Reporting	
Support Analysis			As Corrected # of	As Corrected % of
Code	# of Processors	% of Total	Processors	Total
1	9	82%	9	82%
5	0	0%	2	18%
8	2	18%	0	0%
Total	11	100%	11	100%

Support analysis code and description of support provided:

- 1 Nine processors provided support for the initial values, which were substantiated by agreeing the amounts to the listing of processing employees.
- 5 Two of the data entries were errors that were corrected but the ending amount reported was an estimate that was reasonably supported.
- 8 Two processors reported an initial value that was unsubstantiated but corrected based on information provided.

Variable 3: Table 1 - Processing Labor Man-Hours (housed)

Initial Reporting			Corrected Reporting	
Support Analysis			As Corrected # of	As Corrected % of
Code	# of Processors	% of Total	Processors	Total
1	8	80%	8	80%
5	0	0%	2	20%
8	2	20%	0	0%
Total	10	100%	10	100%

Support analysis code and description of support provided:

- 1 Eight processors provided support for the initial values, which were substantiated by agreeing the amounts to the listing of processing labor man-hours.
- 5 Two of the data entries selected were corrected during the validation process but the ending amount reported was an estimate that was reasonably supported.
- 8 Two processors reported an initial value that was unsubstantiated but corrected based on information provided.

Variable 4: Table 1 - Processing Labor Man-Hours (not-housed)

Initial Reporting			Corrected Reporting	
Support Analysis			As Corrected # of	As Corrected % of
Code	# of Processors	% of Total	Processors	Total
1	7	64%	9	82%
2	1	9%	0	0%
5	0	0%	2	18%
8	3	27%	0	0%
Total	11	100%	11	100%

Support analysis code and description of support provided:

- 1 Seven processors provided support for the initial values, which were substantiated by agreeing the amounts to the listing of processing labor man-hours of not-housed employees.
- 2 One data entry was an error that was corrected during the validation process.
- 5 Two of the data entries were corrected during validation but the ending amount reported was an estimate that was reasonably supported.
- 8 Three processors reported an initial value that was unsubstantiated but corrected based on information provided.

Variable 5: Table 1 - Processing Labor Payment (housed)

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Processors	% of Total	As Corrected # of Processors	As Corrected % of Total
1	8	73%	8	73%
5	0	0%	2	18%
7	1	9%	1	9%
8	2	18%	0	0%
Total	11	100%	11	100%

Support analysis code and description of support provided:

- 1 Eight processors provided support for the initial values, which were substantiated by agreeing the amounts to the listing of processing labor payments of housed employees.
- 5 Two of the data entries were corrected during validation but the ending amount reported was an estimate that was reasonably supported.
- 7 One processor reported an initial value that was unsubstantiated and is a best guess.
- 8 Two processors reported an initial value that was unsubstantiated but corrected based on information provided.

Variable 6: Table 1 - Processing Labor Payment (not-housed)

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Processors	% of Total	As Corrected # of Processors	As Corrected % of Total
1	9	82%	9	82%
5	0	0%	2	18%
8	2	18%	0	0%
Total	11	100%	11	100%

Support analysis code and description of support provided:

- 1 Nine processors provided support for the initial values, which were substantiated by agreeing the amounts to the listing of processing labor payments of not-housed employees.
- 5 Two of the data entries were corrected during validation but the ending amount reported was an estimate that was reasonably supported.
- 8 Two processors reported an initial value that was unsubstantiated but corrected based on information provided.

Variable 7: Table 2 - Number of Non-processing Employees

Initial Reporting			Corrected Reporting	
Support Analysis			As Corrected # of	As Corrected % of
Code	# of Processors	% of Total	Processors	Total
1	1	20%	3	60%
3	1	20%	0	0%
8	1	20%	0	0%
Unsupported	2	40%	2	40%
Total	5	100%	5	100%

Support analysis code and description of support provided:

- 1 One processor provided support for the initial value, which was substantiated by agreeing to a listing of non-processing employees.
- 3 One processor misinterpreted the question but corrected through the validation process.
- 8 One processor reported an initial value that was unsubstantiated but corrected based on information provided.

Unsupported No information was provided for this data entry from two processors.

Variable 8: Table 2 - Total Wages and Salaries

Initial Reporting			Corrected Reporting	
Support Analysis			As Corrected # of	As Corrected % of
Code	# of Processors	% of Total	Processors	Total
1	0	0%	1	33%
8	1	33%	0	0%
Unsupported	2	67%	2	67%
Total	3	100%	3	100%

Support analysis code and description of support provided:

- 1 One of the data entries was corrected during validation and agreed to expense detail.
- 8 One processor reported an initial value that was unsubstantiated but corrected based on information provided.

Unsupported No information was provided for this data entry from two processors.

Variable 9: Table 3 - Electricity Cost

Initial Reporting				Corrected Reporting	
Support Analysis				As Corrected # of	As Corrected % of
Code	# of Processors	% of Total		Processors	Total
1	0	0%		12	100%
8	12	100%		0	0%
Total	12	100%		12	100%

Support analysis code and description of support provided:

- 1 All of the amounts submitted for this variable were corrected during the validation process.
- 8 All of the processors reported an initial value that was unsubstantiated, but corrected based on information provided.

Variable 10: Table 3 - Electricity in KW Hours

Initial Reporting				Corrected Reporting	
Support Analysis				As Corrected # of	As Corrected % of
Code	# of Processors	% of Total		Processors	Total
1	0	0%		12	100%
8	12	100%		0	0%
Total	12	100%		12	100%

Support analysis code and description of support provided:

- 1 All of the amounts submitted for this variable were corrected during the validation process.
- 8 All of the processors reported an initial value that was unsubstantiated, but corrected based on information provided.

Variable 11: Table 3 - Water Cost

Initial Reporting				Corrected Reporting	
Support Analysis				As Corrected # of	As Corrected % of
Code	# of Processors	% of Total		Processors	Total
1	3	21%		14	100%
8	11	79%		0	0%
Total	14	100%		14	100%

Support analysis code and description of support provided:

- 1 Three processors provided support for the initial values, which were substantiated by agreeing the amounts to invoices or expense account detail.
- 8 Eleven processors reported an initial value that was unsubstantiated, but corrected based on information provided.

Variable 12: Table 3 - Water Gallons

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Processors	% of Total	As Corrected # of Processors	As Corrected % of Total
1	1	7%	14	100%
2T	1	7%	0	0%
8	12	86%	0	0%
Total	14	100%	14	100%

Support analysis code and description of support provided:

- 1 One processor provided support for the initial values, which were substantiated by agreeing the amounts to invoices or expense account detail.
- 2T One processor had a typographical error that was corrected through the validation process.
- 8 Twelve processors reported an initial value that was unsubstantiated, but corrected based on information provided.

2016:

Variable 1: Shoreside Processor Information

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Processors	% of Total	As Corrected # of Processors	As Corrected % of Total
6	1	100%	1	100%

Support analysis code and description of support provided:

- 6 One processor reported an initial value that was correct, but updated based on updated documentation.

Variable 2: Stationary Floating Processor (SFP) Information

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Processors	% of Total	As Corrected # of Processors	As Corrected % of Total
Unsupported	1	100%	1	100%

Support analysis code and description of support provided:

Unsupported No information was provided for this data entry from one processor.

Variable 3: Table 1 - Processing Employees

Initial Reporting			Corrected Reporting	
Support Analysis			As Corrected # of	As Corrected % of
Code	# of Processors	% of Total	Processors	Total
1	14	100%	14	100%

Support analysis code and description of support provided:

- 1 All items submitted were correct as reported and were validated to employee listings.

Variable 4: Table 1 - Processing Labor Man-Hours (housed)

Initial Reporting			Corrected Reporting	
Support Analysis			As Corrected # of	As Corrected % of
Code	# of Processors	% of Total	Processors	Total
1	14	82%	14	82%
7	1	6%	1	6%
Unsupported	2	12%	2	12%
Total	17	100%	17	100%

Support analysis code and description of support provided:

- 1 Fourteen processors provided support for the initial values, which were substantiated by agreeing the amounts to reports of processing labor man-hours.
- 7 One processor reported an initial value that was unsubstantiated and is a best guess.

Unsupported No information was provided for this data entry by two processors.

Variable 5: Table 1 - Processing Labor Man-Hours (not-housed)

Initial Reporting			Corrected Reporting	
Support Analysis			As Corrected # of	As Corrected % of
Code	# of Processors	% of Total	Processors	Total
1	2	100%	2	100%

Support analysis code and description of support provided:

- 1 Both data entries selected were validated to be zero as reported.

Variable 6: Table 1 - Processing Labor Payment (housed)

Initial Reporting			Corrected Reporting	
Support Analysis			As Corrected # of	As Corrected % of
Code	# of Processors	% of Total	Processors	Total
1	14	82%	14	82%
7	1	6%	1	6%
Unsupported	2	12%	2	12%
Total	17	100%	17	100%

Support analysis code and description of support provided:

- 1 Fourteen processors provided support for the initial values, which were substantiated by agreeing the amounts to the payroll reports and expense listings.
- 7 One processor reported an initial value that was unsubstantiated and is a best guess.

Unsupported No information was provided for this data entry by two processors.

Variable 7: Table 1 - Processing Labor Payment (not-housed)

Initial Reporting			Corrected Reporting	
Support Analysis			As Corrected # of	As Corrected % of
Code	# of Processors	% of Total	Processors	Total
1	2	100%	2	100%

Support analysis code and description of support provided:

- 1 Both data entries selected were verified to have been reported correctly as zero.

Variable 8: Table 2 - Number of Non-processing Employees

Initial Reporting			Corrected Reporting	
Support Analysis			As Corrected # of	As Corrected % of
Code	# of Processors	% of Total	Processors	Total
1	3	50%	5	83%
3	1	17%	0	0%
8	1	17%	0	0%
Unsupported	1	17%	1	17%
Total	6	100%	6	100%

Support analysis code and description of support provided:

- 1 Three processors provided support for the initial values, which were substantiated by agreeing the totals to an employee listing.
- 3 One processor misinterpreted the question but corrected through the validation process.
- 8 One processor reported an initial value that was unsubstantiated but corrected based on information provided.

Unsupported No information was provided for this data entry from one processor.

Variable 9: Table 2 - Total Wages and Salaries

Initial Reporting			Corrected Reporting	
Support Analysis			As Corrected # of	As Corrected % of
Code	# of Processors	% of Total	Processors	Total
1	3	75%	3	75%
Unsupported	1	25%	1	25%
Total	4	100%	4	100%

Support analysis code and description of support provided:

- 1 Three processors provided support for the initial values, which were substantiated by agreeing the amounts to expense account detail.

Unsupported No information was provided for this data entry from one processor.

Variable 10: Table 3 - Water Cost

Initial Reporting			Corrected Reporting	
Support Analysis			As Corrected # of	As Corrected % of
Code	# of Processors	% of Total	Processors	Total
1	4	100%	4	100%

Support analysis code and description of support provided:

- 1 All of the data entries selected were validated to expense account detail or invoices.

Variable 11: Table 3 - Water Gallons

Initial Reporting			Corrected Reporting	
Support Analysis			As Corrected # of	As Corrected % of
Code	# of Processors	% of Total	Processors	Total
1	4	100%	4	100%

Support analysis code and description of support provided:

- 1 All of the data entries selected were validated to expense account detail or invoices.

OUTLIER AUDIT – CATCHER PROCESSOR EDR RECORDS

A total of 64 individual Trawl Catcher Processor EDR data entries were selected for verification, representing 22 distinct EDR variables; within this pool, there were 31 distinct EDR forms submitted (14 from 2015 and 17 from 2016), and 18 distinct EDR submitters, from which one or more EDR entry was selected. Upon completion of the verification review, each selected data entry was assigned a code for the quality of the original support, and the validated support. The tables below provide a summary of audit results for each EDR variable selected, listing the number and percentage (%) of selected entries assigned each audit code for the original and verified value, respectively, with the associated codes defined below.

2015:

Variable 1: Table 2.2 - Annual Fuel Use Steamloaded

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
5	4	100%	4	100%

Support analysis code and description of support provided:

- 5 Four catcher processors were validated and determined to be an estimate that was supported and reasonable.

Variable 2: Table 2.2 - Annual Fuel Use Steam Empty

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
7	1	100%	1	100%

Support analysis code and description of support provided:

- 7 One catcher processor reported an initial value that was unsubstantiated and is a best guess.

Variable 3: Table 2.3 - Freezer Space

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
5	1	100%	1	100%

Support analysis code and description of support provided:

- 5 One data entry was validated and determined to be an estimate that was supported and reasonable.

Variable 4: Table 2.5 - Days Inactive

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
1	1	100%	1	100%

Support analysis code and description of support provided:

- 1 One catcher processor provided support for the initial value, which was substantiated by agreeing the amount to the details of days inactive.

Variable 5: Table 2.5 - A80 Days Processing

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
1	1	100%	1	100%

Support analysis code and description of support provided:

- 1 One catcher processor provided support for the initial value, which was substantiated by agreeing the amount to the details of days processing.

Variable 6: Table 3 - Total Fishery Sales Units

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
1	0	0%	1	100%
8	1	100%	0	0%
Total	1	100%	1	100%

Support analysis code and description of support provided:

- 8 One catcher processor reported an initial value that was unsubstantiated but corrected based on information provided and was agreed to sales records.

Variable 7: Table 4 - Expense Other Expense

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
1	0	0%	1	100%
8	1	100%	0	0%
Total	1	100%	1	0%

Support analysis code and description of support provided:

- 8 One catcher processor reported an initial value that was unsubstantiated but corrected based on information provided and agreed to expense reports.

Variable 8: Table 4 - Expense Other Gear

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
Unsupported	1	100%	1	100%

Support analysis code and description of support provided:

- Unsupported No information was provided for this data entry.

Variable 9: Table 5 - Administration

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
1	0	0%	1	100%
8	1	100%	0	0%
Total	1	100%	1	100%

Support analysis code and description of support provided:

- 8 One catcher processor reported an initial value that was unsubstantiated but corrected based on information provided and agreed to expense detail.

Variable 10: Table 5 - Food

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
1	3	60%	3	60%
7	2	40%	2	40%
Total	5	100%	5	100%

Support analysis code and description of support provided:

- 1 Three catcher processors provided support for the initial value, which was substantiated by agreeing the amount to expense account detail.
- 7 Two submissions reported an initial value that was unsubstantiated and is a best guess.

Variable 11: Table 5 - Insurance

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
1	2	100%	2	100%

Support analysis code and description of support provided:

- 1 Two catcher processors provided support for the initial value, which were substantiated by agreeing the amounts to expense details.

Variable 12: Table 5 - Labor Other

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
7	0	0%	1	100%
8	1	100%	0	0%
Total	1	100%	1	100%

Support analysis code and description of support provided:

- 7 One submission reported an initial value that was unsubstantiated and is a best guess.
- 8 One catcher processor reported an initial value that was unsubstantiated but corrected based on information provided.

Variable 13: Table 5 - Labor Processing

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
1	1	100%	1	100%

Support analysis code and description of support provided:

- 1 One catcher processor provided support for the initial value, which was substantiated by agreeing the amounts to expense detail.

Variable 14: Table 5 - Observer

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
1	2	100%	2	100%

Support analysis code and description of support provided:

- 1 Two catcher processors provided support for the initial value, which were substantiated by agreeing the amounts to expense details.

Variable 15: Table 5 - RNM

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
1	1	50%	2	100%
8	1	50%	0	0%
Total	2	100%	2	100%

Support analysis code and description of support provided:

- 1 One catcher processor provided support for the initial value, which was substantiated by agreeing the amounts to the expense detail.
- 8 One catcher processor reported an initial value that was unsubstantiated but corrected based on information provided.

Variable 16: Table 6 - Employees Fishing

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
7	0	0%	3	100%
8	3	100%	0	0%
Total	3	100%	3	100%

Support analysis code and description of support provided:

- 8 All three data entries selected were corrected but were still based on estimates that Aldrich was not able to validate.

2016:
Variable 1: Table 2.2 - Annual Fuel Use Steamloaded

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
5	3	75%	4	100%
8	1	25%	0	0%
Total	4	100%	4	100%

Support analysis code and description of support provided:

- 5 For three catcher processors the annual fuel use was calculated based on an estimate of fuel used per day.
- 8 One catcher processor reported an initial value that was unsubstantiated but corrected based on information provided. The updated value is an estimate that was validated.

Variable 2: Table 2.2 - Annual Fuel Use Steam Empty

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
7	1	100%	1	100%

Support analysis code and description of support provided:

- 7 One catcher processor reported an initial value that was unsubstantiated and is a best guess.

Variable 3: Table 2.3 - Freezer Space

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
5	1	50%	2	100%
8	1	50%	0	0%
Total	2	100%	2	100%

Support analysis code and description of support provided:

- 5 One data entry was validated and determined to be an estimate that was supported and reasonable.
- 8 One catcher processor reported an initial value that was unsubstantiated but corrected based on information provided. The new amount reported was an estimate that was validated.

Variable 4: Table 2.5 - Days Inactive

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
1	1	100%	1	100%

Support analysis code and description of support provided:

- 1 One catcher processor provided support for the initial value, which was substantiated by agreeing the amount to the details of days inactive.

Variable 5: Table 2.5 - Days Processing

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
1	1	100%	1	100%

Support analysis code and description of support provided:

- 1 One catcher processor provided support for the initial value, which was substantiated by agreeing the amount to the details of days processing

Variable 6: Table 3 - Total Fishery Sales Revenue

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
1	3	100%	3	100%

Support analysis code and description of support provided:

- 1 All three catcher processors provided support for the initial values, which were substantiated by sales reports, detailed sales listings.

Variable 7: Table 3 - Total Fishery Sales Units

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
1	2	100%	2	100%

Support analysis code and description of support provided:

- 1 Both catcher processors provided support for the initial values, which was substantiated by sales reports, detailed sales listings.

Variable 8: Table 4 - Expense Fish Gear

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
1	1	100%	1	100%

Support analysis code and description of support provided:

- 1 One catcher processor provided support for the initial value, which was substantiated by agreeing the amount to expense account detail.

Variable 9: Table 4 - Expense Other Gear

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
Unsupported	1	100%	1	100%

Support analysis code and description of support provided:

Unsupported No information was provided for this data entry.

Variable 10: Table 4 - Expense Other Expense

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
1	1	100%	1	100%

Support analysis code and description of support provided:

- One catcher processor provided support for the initial value, which was substantiated by agreeing the amount to expense account detail.

Variable 11: Table 5 - Administration

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
1	0	0%	2	100%
8	2	100%	0	0%
Total	2	100%	2	100%

Support analysis code and description of support provided:

- Two catcher processors reported an initial value that was unsubstantiated but corrected based on information provided.

Variable 12: Table 5 - Fish Tax

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
1	2	67%	3	100%
8	1	33%	0	0%
Total	3	100%	3	100%

Support analysis code and description of support provided:

- Two catcher processors provided support for the initial values, which were substantiated by agreeing the amounts to expense account details.
- One catcher processor reported an initial value that was unsubstantiated but corrected based on information provided.

Variable 13: Table 5 - Food

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
1	1	100%	1	100%

Support analysis code and description of support provided:

- 1 One catcher processor provided support for the initial value, which was substantiated by agreeing the amount to expense account detail.

Variable 14: Table 5 - Insurance

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
1	1	25%	4	100%
2T	1	25%	0	0%
8	2	50%	0	0%
Total	4	100%	4	100%

Support analysis code and description of support provided:

- 1 One catcher processor provided support for the initial value, which was substantiated by agreeing the amount to income statement detail.
- 2T One catcher processor had a typographical error that was corrected through the validation process.
- 8 Two catcher processors reported an initial value that was unsubstantiated but corrected based on information provided.

Variable 15: Table 5 - Labor Other

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
5	1	50%	1	50%
7	1	50%	1	50%
Total	2	100%	2	100%

Support analysis code and description of support provided:

- 5 One data entry was validated and determined to be an estimate that was supported and reasonable.
- 7 One catcher processor reported an initial value that was unsubstantiated and is a best guess.

Variable 16: Table 5 - Observer

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
1	2	100%	2	100%

Support analysis code and description of support provided:

- 1 Two catcher processors provided support for the initial values, which were substantiated by agreeing the amounts to expense account details.

Variable 17: Table 5 - Packaging

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
1	1	100%	1	100%

Support analysis code and description of support provided:

- 1 One catcher processor provided support for the initial value, which was substantiated by agreeing the amount to expense account detail.

Variable 18: Table 5 - Vessel Lease

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
1	1	100%	1	100%

Support analysis code and description of support provided:

- 1 One catcher processor provided support for the initial value, which was substantiated by agreeing the amount to expense account detail.

Variable 19: Table 6 - Employees Fish

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Processors	% of Total	As Corrected # of Catcher Processors	As Corrected % of Total
7	0	0%	2	100%
8	2	100%	0	0%
Total	2	100%	2	100%

Support analysis code and description of support provided:

- 8 Two catcher processors reported an initial value that was unsubstantiated but corrected based on information provided.

OUTLIER AUDIT – GOA TRAWL CATCHER VESSEL EDR RECORDS

A total of 160 individual GOA Trawl Catcher Vessel EDR data entries were selected for verification, representing 20 distinct EDR variables; within this pool, there were 74 distinct EDR forms submitted (38 from 2015 and 36 from 2016), and 43 distinct EDR submitters, from which one or more EDR entry was selected. Upon completion of the verification review, each selected data entry was assigned a code for the quality of the original support, and the validated support. The tables below provide a summary of audit results for each EDR variable selected, listing the number and percentage (%) of selected entries assigned each audit code for the original and verified value, respectively, with the associated codes defined below.

2015:

Variable 1: Certification Page - Vessel Equip Market Value

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Vessels	% of Total	As Corrected # of Catcher Vessels	As Corrected % of Total
1	0	0%	3	43%
8	3	43%	0	0%
Unsupported	4	57%	4	57%
Total	7	100%	7	100%

Support analysis code and description of support provided:

- 8 Three catcher vessels reported an initial value that was unsubstantiated but corrected based on information provided. Value was determined by appraisals.

Unsupported No information was provided for this data entry from four catcher vessels.

Variable 2: Certification Page - Vessel Equip Replacement Value

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Vessels	% of Total	As Corrected # of Catcher Vessels	As Corrected % of Total
1	3	33%	3	33%
Unsupported	6	67%	6	67%
Total	9	100%	9	100%

Support analysis code and description of support provided:

- 1 Three catcher vessels provided support for the initial value, which were substantiated with survey reports.

Unsupported No information was provided for this data entry from six catcher vessels.

Variable 3: Table 1 - Excluder Gear Cost

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Vessels	% of Total	As Corrected # of Catcher Vessels	As Corrected % of Total
1	0	0%	1	33%
8	1	33%	0	0%
Unsupported	2	67%	2	67%
Total	3	100%	3	100%

Support analysis code and description of support provided:

- 8 One catcher vessel reported an initial value that was unsubstantiated but corrected based on information provided.

Unsupported No information was provided for this data entry from two catcher vessels.

Variable 4: Table 1 - Fuel Cost

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Vessels	% of Total	As Corrected # of Catcher Vessels	As Corrected % of Total
1	3	19%	7	44%
8	4	25%	0	0%
Unsupported	9	56%	9	56%
Total	16	100%	16	100%

Support analysis code and description of support provided:

- 1 Three catcher vessels provided support for the initial value, which was substantiated by agreeing the amount to the detail summary.
- 8 Four catcher vessels reported an initial value that was unsubstantiated but corrected based on information provided.

Unsupported No information was provided for this data entry from nine catcher vessels.

Variable 5: Table 1 - Fuel Gallons

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Vessels	% of Total	As Corrected # of Catcher Vessels	As Corrected % of Total
1	3	19%	4	25%
7	0	0%	1	6%
8	2	13%	0	0%
Unsupported	11	69%	11	69%
Total	16	100%	16	100%

Support analysis code and description of support provided:

- 1 Three catcher vessels provided support for the initial value, which was substantiated by agreeing the amounts to the detail summary or invoices.
- 8 Two catcher vessels reported an initial value that was unsubstantiated but corrected based on information provided. One of these corrections is still based on an estimate that Aldrich was unable to validate.

Unsupported No information was provided for this data entry from eleven catcher vessels.

Variable 6: Table 1 - Trawl Gear Cost

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Vessels	% of Total	As Corrected # of Catcher Vessels	As Corrected % of Total
1	2	40%	3	60%
8	1	20%	0	0%
Unsupported	2	40%	2	40%
Total	5	100%	5	100%

Support analysis code and description of support provided:

- 1 Two catcher vessels provided support for the initial value, which was substantiated by agreeing the amounts to the detail listing.
- 8 One catcher vessel reported an initial value that was unsubstantiated but corrected based on information provided.

Unsupported No information was provided for this data entry from two catcher vessels.

Variable 7: Table 2 - Crew Count

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Vessels	% of Total	As Corrected # of Catcher Vessels	As Corrected % of Total
1	1	50%	2	100%
8	1	50%	0	0%
Total	2	100%	2	100%

Support analysis code and description of support provided:

- 1 One catcher vessel provided support for the initial value, which was substantiated by agreeing the amount to the list of crew names.
- 8 One catcher vessel reported an initial value that was unsubstantiated but corrected based on information provided.

Variable 8: Table 2 - Total Captain Labor Payment

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Vessels	% of Total	As Corrected # of Catcher Vessels	As Corrected % of Total
1	5	42%	9	75%
8	4	33%	0	0%
Unsupported	3	25%	3	25%
Total	12	100%	12	100%

Support analysis code and description of support provided:

- 1 Five catcher vessels provided support for the initial value, which was substantiated by agreeing the amounts to the detail listings.
- 8 Four catcher vessels reported an initial value that was unsubstantiated but corrected based on information provided.

Unsupported No information was provided for this data entry from three catcher vessels.

Variable 9: Table 2 Total Crew Labor Payment

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Vessels	% of Total	As Corrected # of Catcher Vessels	As Corrected % of Total
1	1	20%	3	60%
8	2	40%	0	0%
Unsupported	2	40%	2	40%
Total	5	100%	5	100%

Support analysis code and description of support provided:

- 1 One catcher vessel provided support for the initial value, which was substantiated by agreeing the amount to the payroll expenses.
- 8 Two catcher vessels reported an initial value that was unsubstantiated but corrected based on information provided.

Unsupported No information was provided for this data entry from two catcher vessels.

Variable 10: Table 3 - Crew License Count

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Vessels	% of Total	As Corrected # of Catcher Vessels	As Corrected % of Total
1	2	18%	6	55%
3	1	9%	0	0%
8	3	27%	0	0%
Unsupported	5	45%	5	45%
Total	11	100%	11	100%

Support analysis code and description of support provided:

- 1 Two catcher vessels provided support for the initial value, which was substantiated by agreeing the amounts to the lists of crew names.
- 3 One catcher vessel misinterpreted the question but corrected through the validation process.
- 8 Three catcher vessels reported an initial value that was unsubstantiated but corrected based on information provided.

Unsupported No information was provided for this data entry from five catcher vessels.

2016:
Variable 1: Certification Page - Vessel Equip Market Value

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Vessels	% of Total	As Corrected # of Catcher Vessels	As Corrected % of Total
1	0	0%	4	57%
8	4	57%	0	0%
Unsupported	3	43%	3	43%
Total	7	100%	7	100%

Support analysis code and description of support provided:

- 8 Four catcher vessels reported an initial value that was unsubstantiated but corrected based on information provided. Values were based on appraisals or surveys.

Unsupported No information was provided for this data entry from three catcher vessels.

Variable 2: Certification Page - Vessel Equip Replacement Value

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Vessels	% of Total	As Corrected # of Catcher Vessels	As Corrected % of Total
1	3	30%	7	70%
7	0	0%	1	10%
8	5	50%	0	0%
Unsupported	2	20%	2	20%
Total	10	100%	10	100%

Support analysis code and description of support provided:

- 1 For three catcher vessels, the information originally submitted on the EDR was correct and substantiated by providing surveys.
- 8 Five catcher vessels reported an initial value that was unsubstantiated but corrected based on information provided. One of the corrections was still an estimate that we were not able to validate.

Unsupported No information was provided for this data entry from two catcher vessels.

Variable 3: Table 1 - Excluder Gear Cost

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Vessels	% of Total	As Corrected # of Catcher Vessels	As Corrected % of Total
1	1	33%	1	33%
Unsupported	2	67%	2	67%
Total	3	100%	3	100%

Support analysis code and description of support provided:

- One catcher vessel provided support for the initial value, which was substantiated by agreeing the amount to the expense detail.

Unsupported No information was provided for this data entry from two catcher vessels.

Variable 4: Table 1 - Fuel Cost

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Vessels	% of Total	As Corrected # of Catcher Vessels	As Corrected % of Total
1	5	45%	6	55%
7	0	0%	1	9%
8	2	18%	0	0%
Unsupported	4	36%	4	36%
Total	11	100%	11	100%

Support analysis code and description of support provided:

- Five catcher vessels provided support for the initial value, which was substantiated by agreeing the amount to expense detail or invoices.
- Two catcher vessels reported an initial value that was unsubstantiated but corrected based on information provided. One of these was corrected but was an estimate Aldrich was unable to validate.

Unsupported No information was provided for this data entry from four catcher vessels.

Variable 5: Table 1 - Fuel Gallons

Initial Reporting			Corrected Reporting	
Support Analysis	# of Catcher		As Corrected # of	As Corrected % of
Code	Vessels	% of Total	Catcher Vessels	Total
1	4	36%	5	45%
8	1	9%	0	0%
Unsupported	6	55%	6	55%
Total	11	100%	11	100%

Support analysis code and description of support provided:

- 1 Four catcher vessels provided support for the initial value, which was substantiated by agreeing the amount to the detail summary.
- 8 One catcher vessel reported an initial value that was unsubstantiated but corrected based on information provided.

Unsupported No information was provided for this data entry from six catcher vessels.

Variable 6: Table 1 - Trawl Gear Cost

Initial Reporting			Corrected Reporting	
Support Analysis	# of Catcher		As Corrected # of	As Corrected % of
Code	Vessels	% of Total	Catcher Vessels	Total
1	2	40%	3	60%
8	1	20%	0	0%
Unsupported	2	40%	2	40%
Total	5	100%	5	100%

Support analysis code and description of support provided:

- 1 Two catcher vessel provided support for the initial value, which was substantiated by agreeing the amounts to expense detail or invoices.
- 8 One catcher vessels reported an initial value that was unsubstantiated but corrected based on information provided.

Unsupported No information was provided for this data entry from two catcher vessels.

Variable 7: Table 2 - Crew Count

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Vessels	% of Total	As Corrected # of Catcher Vessels	As Corrected % of Total
1	1	100%	1	100%

Support analysis code and description of support provided:

- 1 One catcher vessel provided support for the initial value, which was substantiated by agreeing the amount to the list of crew names.

Variable 8: Table 2 - Total Captain Labor Payment

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Vessels	% of Total	As Corrected # of Catcher Vessels	As Corrected % of Total
1	5	42%	9	75%
7	0	0%	1	8%
8	5	42%	0	0%
Unsupported	2	17%	2	17%
Total	12	100%	12	100%

Support analysis code and description of support provided:

- 1 Five catcher vessels provided support for the initial value, which was substantiated by agreeing the amounts to the detail listings.
- 8 Five catcher vessels reported an initial value that was unsubstantiated but corrected based on information provided. One of these was an estimate that Aldrich was not able to validate.

Unsupported No information was provided for this data entry from two catcher vessels.

Variable 9: Table 2 Total Crew Labor Payment

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Vessels	% of Total	As Corrected # of Catcher Vessels	As Corrected % of Total
1	0	0%	4	50%
7	0	0%	3	38%
8	7	88%	0	0%
Unsupported	1	13%	1	13%
Total	8	100%	8	100%

Support analysis code and description of support provided:

- 8 Seven catcher vessels reported an initial value that was unsubstantiated but corrected based on information provided. Three of these were an estimate that Aldrich was not able to validate.

Unsupported No information was provided for this data entry from one catcher vessel.

Variable 10: Table 3 - Crew License Count

Initial Reporting			Corrected Reporting	
Support Analysis Code	# of Catcher Vessels	% of Total	As Corrected # of Catcher Vessels	As Corrected % of Total
1	1	17%	2	33%
8	1	17%	0	0%
Unsupported	4	67%	4	67%
Total	6	100%	6	100%

Support analysis code and description of support provided:

- 1 One catcher vessel provided support for the initial value, which was substantiated by agreeing the amount to the lists of crew names.
- 8 One catcher vessel reported an initial value that was unsubstantiated but corrected based on information provided.

Unsupported No information was provided for this data entry from four catcher vessels.

The quality of the information submitted in the EDRs is important, as the information will be used to analyze effect of current and future fishery management decisions associated with the Amendment 80 program and groundfish trawl fisheries in the Gulf of Alaska, on the owners of vessels and processing plants submitting EDR data as well as other stakeholders. Overall, the data verification procedures found that for the processors out of 11 submissions for 2015, 7 were well-supported, 1 was semi-supported, 1 was poorly-supported, and 2 failed. For the 9 2016 submissions, 7 were well-supported, 1 was semi-supported, and 1 failed. For the catcher processors out of 14 submissions for 2015, 6 were well-supported, 6 were semi-supported, and 2 were poorly-supported. For the 17 2016 submissions, 8 were well-supported, 7 were semi-supported, and 2 were poorly supported. For the catcher vessels out of 38 submissions for 2015, 20 were well-supported, 3 were semi-supported, and 15 failed. For the 36 2016 submissions, 16 were well-supported, 9 were semi-supported, 1 was poorly supported, and 10 failed. It was also noted that some of the variables selected were not applicable to all of the vessels or processors.

The results of the data verification procedures performed, detailed in the findings section, discuss the basis for the initial values and the support provided if the initial values were corrected based on updated documentation. Based on key objectives listed earlier in the report, several other observations noted through the data verification procedures performed are as follows:

1. The majority of support provided was consistent with the types of support provided during the EDR data verification audits conducted in previous years.
2. Most EDR respondents were in compliance with the testing procedures, and support was provided in a timely fashion and follow-up questions were addressed as requested. For the Processor submissions there were 12 selected EDR entries for which there was no response to the audit request and 3 entries that were not selected for which submitters volunteered corrected values. For the Catcher Processors there were 2 selected EDR entries for which we did not receive a response to our audit request and 10 entries that were not selected for which submitters volunteered corrected values. For the Catcher Vessels there were 70 selected EDR entries for which we did not receive a response to our information request letter and 2 entries that were not selected for which submitters volunteered corrected values.
3. Errors in submitted information did not appear to indicate a directional bias in the data. The corrected information was made as a result of new information received subsequent to the preparation of the original EDR or based on updated estimates or guidance on how to derive the variable.
4. For the next year procedures it would be helpful to receive the full EDR for each vessel or processor selected so that we can have better information to communicate with the submitters and determine the impact of corrections.
5. If possible, it would be helpful to know the reason that items were selected for all outlier selections so that we understand the direction of the potential error.
6. During our conversations with the submitters it became clear that there is confusion regarding the calculation of some of the variables and it might be helpful to consider recording a webinar or some instructional video that preparers could watch should they need guidance.

7. There were also several questions from submitters regarding the use of the information that was being validated. If possible, it might be helpful to provide some communication to the submitters regarding how their information is used and how it helps the overall industry.