

NEW ENGLAND FISHERY MANAGEMENT COUNCIL

PRELIMINARY ANALYSIS OF LIMITED ACCESS QUALIFIERS

At the November 8, 2006 Whiting Committee meeting, the Committee suggested that the following be considered for limited access qualification criteria at this time:

- Requirement for possession of a valid NEMS permit (moratorium or Category K) as of the March 25, 2003 control date;
- January 1, 1993 and January 1, 1995 as starting dates for qualification time periods;
- January 1, 1981 as a starting date for qualification;
- Terminal dates of March 25, 2003 and December 31, 2005 for verified landings history;
- A range of 1,000, 10,000, 50,000, 100,000, 500,000, and 1,000,000 pounds for limited access qualification.

The following information is provided by the Whiting PDT and addresses the Committee's recommendations. Additional information about potential qualifiers under various date and poundage requirements also has been included for further analysis.

Important Data Considerations

In terms of qualifying vessels for a limited access program for the small mesh multispecies fisheries, none of the available sources of data are likely to be entirely complete, accurate, and devoid of potential problems or loopholes. The Council should be aware of the potential problems associated with the available data, as these problems are likely to result in a larger number of vessels qualifying for a limited access program than can be predicted.

Vessel Trip Reports (VTRs, Logbooks)

Since 1994, commercial fishing data have been gathered through a relatively comprehensive system of fishermen's reports, called vessel trip reports (VTRs) or logbooks. In general, VTR data are used as the primary source of trip-level information for landings by species, area fished, and days absent. The VTRs also contain data on kept pounds by species but cannot be used to estimate landed value¹. One helpful element of the VTR data is that they include information about fishing location – latitude and longitude as well as statistical area.

- The VTR program was initiated for some fisheries in 1994, but 1994 is considered to be an incomplete year in terms of logbook reporting. For fisheries that required logbook reporting at the time, VTR data are considered to be complete from 1995 onward.
- In the past, VTR data have not been used to qualify vessels for limited access programs because they are considered less reliable than data that can be confirmed through a third

¹ The implementation of Dealer Electronic Reporting in 2004 makes it more possible to link dealer records with VTRs, since the dealer is required to record the serial number from the VTR. Further, an effort is currently underway to supplement the commercial landings data with area fished and effort information from the VTRs.

party (dealer data, for example, see below). VTRs are based on self-reported information, usually estimates provided by the vessel's captain.

Dealer and Port Agent Reports (Dealer Weighouts)

Reports of fish purchases submitted by dealers are the longest and most comprehensive database available to qualify vessels for a limited access program. Dealer reports exist since the 1970s or earlier and are composed of reports submitted by dealers as well as port agents located throughout the region. Since the time period under consideration spans three different dealer reporting systems, the differences in the resulting data should be noted.

Prior to the implementation of mandatory reporting by dealers and vessels in 1994, data were collected through a voluntary system that relied on port agents collecting catch and effort data for vessels of at least five gross registered tons. This system consisted of three tiers:

- The first tier was landings data compiled from dealer weighout slips, which reported the landed weight of the catch by species, vessel and trip.
- The second tier was effort data collected through interviews with vessels operators conducted in port at the time of landings.
- The third tier was tow-by-tow data collected by port agents or contract personnel sailing on the vessels.

Since reporting was voluntary, not all trips were interviewed, and port coverage was not complete; these data do not necessarily reflect all trips made or total landings. Some smaller ports did not receive the same coverage as larger ports, and states were added to the program at different times. While the system began in 1964 with Maine, Massachusetts, and Rhode Island, other states were added later. New Jersey was added in 1978 and Maryland and Virginia in 1981. New Hampshire was added in 1982, New York in 1986, and Connecticut and Delaware in 1989. An additional issue is the inability to identify an individual vessel in the New York data when an interview did not occur. Estimates of limited access qualifiers based on earlier time periods, therefore, are likely to represent minimum estimates.

Due to the issues discussed above, the data collected after the implementation of mandatory reporting in 1994 is considered a more accurate measure of effort and landings. However, fishing location/area was dropped from the dealer reports in lieu of area-specific information collected through the VTR system, which was also implemented in 1994. The implementation of dealer electronic reporting in 2004 added the ability to link to vessel trip reports, but this data is otherwise equivalent to the data collected from 1994-2004.

The dealer information is the principal source of data on pounds and value by species and on market categories, but it cannot be used to identify area fished or to estimate fishing time. Until 1994, area was recorded on dealer weighouts, but that was based on what the dealer reported where he/she thought the fish may have been caught. For this reason, the area-specific element of the dealer data is considered to be somewhat unreliable.

- Dealer data are most often used to qualify vessels for limited access programs because they are the most comprehensive data and represent a third party confirmation for a vessel's landings. Unfortunately, however, they cannot be used to confirm areas from which fish may have been caught.
- Combining dealer and VTR data in order to incorporate the area-specific element of the VTR data cannot be accomplished in many cases. The linkage between the dealer and VTR/logbook data is not complete. Because of the different ways that dealer reports have been submitted over time (by individual dealers, port agents, and/or lumped together by some States), there are many individual trips in the logbooks that cannot be matched to a specific dealer report.

Qualification Criteria with Pre-1994 Starting Dates

Concerns were expressed by the Whiting PDT about using an earlier starting date (1981, for example) because catches were not documented by NMFS prior to 1994 when the vessel trip report (VTR, logbook) system was implemented. Earlier starting dates will likely result in more vessels qualifying with written receipts and other documentation of catches prior to the VTR system. The PDT cannot predict how many additional vessels may qualify under any of the options based on their own documentation prior to 1994 (preliminary PDT estimates of qualifying vessels are based on dealer data both prior to and after 1994; dealer data are assumed to be incomplete prior to 1994).

Potential Qualifiers for a Small Mesh Multispecies Limited Access Program

The number of potential qualifiers under a limited access program was calculated for several date ranges and landings requirements. **Total landings of all small mesh multispecies (silver hake, red hake, and offshore hake)** were calculated for each vessel using dealer weighout records.

Bearing these limitations in mind, the date ranges requested by the Committee and used in this analysis are:

1. January 1, 1981 – March 25, 2003
2. January 1, 1981 – December 31, 2005
3. January 1, 1993 – March 25, 2003
4. January 1, 1993 – December 31, 2005
5. January 1, 1995 – March 25, 2003
6. January 1, 1995 – December 31, 2005.

Table 1 reports the number of qualifiers for each date range based on minimum landings in any single year with the period. The landings levels requested by the committee were 1,000; 10,000; 50,000; 100,000; 500,000; and 1,000,000 pounds. An additional restriction was the requirement that the qualifying vessel held a valid multispecies permit as of the Control Date (March 25, 2003). Additionally, the number of vessels qualifying in the absence of the permit control date restriction is reported for each date range and landings level.

Table 1 Number of Qualifiers Based on Landings in Any Single Year Within Date Range

Minimum Qualifying Landings (lb)	1/1/1981 - 3/25/2003	1/1/1981 - 12/31/2005	1/1/1993 - 3/25/2003	1/1/1993 - 12/31/2005	1/1/1995 - 3/25/2003	1/1/1995 - 12/31/2005
Held Permit on Control Date (3/25/2003)						
1,000	743	752	560	577	514	531
10,000	424	432	319	332	297	310
50,000	271	277	190	198	173	182
100,000	211	217	148	155	130	137
500,000	68	68	44	44	34	35
1,000,000	22	22	13	13	11	12
Without Permit Control Date Restriction						
1,000	1671	1688	806	831	672	697
10,000	859	870	421	437	366	382
50,000	483	491	242	252	201	212
100,000	355	361	179	186	148	155
500,000	92	92	49	49	39	40
1,000,000	28	28	15	15	13	14

While not specifically requested, at least one Committee member suggested that alternatives to qualification based on a single year of landings be considered. Table 2 presents the number of qualifiers under several alternatives while maintaining the requirement that the vessel held a valid multispecies permit as of the March 25, 2003 Control Date, while Table 3 reports the number of qualifiers when this restriction is removed.

The criteria used in the following tables are:

- overall annual average landings for the time period (Overall Average);
- average of the five years with highest landings (High-5 Average);
- average of the three years with highest landings (High-3 Average);
- single year with the highest landings that is also used in Table 1 (High-1 Sum);
- sum of the three years with highest landings (High-3 Sum);
- sum of the five years with highest landings (High-5 Sum); and
- total landings over the period (Overall Sum).

The cells in the following tables are shaded to show similar numbers of qualifiers at different qualification levels.

As a point of reference when analyzing the number of qualifiers under each scenario:

- **264** vessels² reported landing some amount of silver hake during calendar year 2005. Of these, 107 landed more than 1,000 pounds, and 57 of these 107 vessels accounted for 95% of silver hake landings.
- **174** vessels reported landing some red hake, with 64 landing more than 1,000 pounds and 54 accounting for 95% of landings.
- **25** vessels reported landing offshore hake, with 3 landing more than 1,000 pounds and 8 accounting for 95% of total landings. Note that many offshore hake landings are combined with silver hake and not reported separately.

Finally, Table 2 and Table 3 were calculated with a wider range of minimum landings requirements for informational purposes. These additional tables appear in the **appendix** to this document.

Questions for Committee Consideration

The Whiting PDT suggests that the Pelagics Committee consider the preliminary analysis of potential limited access qualifiers and narrow down the range of alternatives that will be further developed for consideration in this amendment. There are several questions that the Committee may be able to address at this time to narrow the scope of the limited access program and flesh out more complete alternatives. The Committee should consider the best approaches for matching harvesting capacity with that of the resource/fishery.

- What kind of criteria should be utilized for a limited access program? The analysis currently includes several options: overall, high 5 average, high 3 average, etc. There may be an opportunity to simplify the alternatives if some of these options could be eliminated.
- This analysis combines landings of all small mesh multispecies for the purposes of qualification in the limited access program. The Committee should clarify whether the proposed limited access program will apply to all small mesh multispecies fishing (whiting, red hake, offshore hake).
- Should the requirement for possession of a permit as of the March 25, 2003 control date be included in all alternatives?
- Are there redundant criteria that can be eliminated at this time? Can some qualification time periods be eliminated?
- Does the Committee want to consider an area-based limited access program (versus a limited access program across the fishery as a whole)? (Note the difficulties associated with identifying area-specific landings.)
- How can the limited access program accommodate historical participants in the fishery who may have lost access to the resource in recent years?

² Vessels with unknown permit numbers and vessels with state permit numbers recorded in the dealer database were excluded.

Table 2 Number of Qualifying Vessels Based on Specified Criteria and Permit Possession on 3/25/03 Control Date

Minimum Qualifying Landings (lb)	Overall Average	High-5 Average	High-3 Average	High-1 Sum	High-3 Sum	High-5 Sum	Overall Sum
1/1/1981 - 3/25/2003							
1,000	430	617	666	743	805	811	812
10,000	217	336	365	424	506	529	540
50,000	125	200	223	271	320	336	350
100,000	72	154	177	211	258	267	282
500,000	2	33	55	68	134	154	170
1,000,000	1	9	12	22	80	106	132
1/1/1981 - 12/31/2005							
1,000	432	623	675	752	819	825	826
10,000	220	341	372	432	514	537	550
50,000	119	209	230	277	325	341	353
100,000	68	156	185	217	267	275	293
500,000	2	36	56	68	136	156	173
1,000,000	1	9	12	22	82	109	136
1/1/1993 - 3/25/2003							
1,000	369	441	476	560	618	624	625
10,000	189	235	263	319	360	369	377
50,000	107	140	161	190	229	235	236
100,000	64	99	117	148	180	189	194
500,000	6	16	30	44	79	99	113
1,000,000	1	5	6	13	47	59	66
1/1/1993 - 12/31/2005							
1,000	361	456	493	577	639	646	649
10,000	188	242	272	332	372	380	389
50,000	100	151	169	198	237	242	244
100,000	59	105	127	155	190	199	205
500,000	7	19	31	44	83	105	121
1,000,000	1	6	7	13	48	60	70
1/1/1995 - 3/25/2003							
1,000	361	402	436	514	568	571	572
10,000	177	217	245	297	334	340	343
50,000	96	129	147	173	209	217	221
100,000	59	81	99	130	163	171	172
500,000	6	13	24	34	69	81	88
1,000,000	0	4	6	11	38	51	57
1/1/1995 - 12/31/2005							
1,000	349	418	453	531	590	592	595
10,000	178	226	254	310	347	352	356
50,000	92	140	156	182	220	226	229
100,000	55	87	110	137	174	182	183
500,000	7	17	26	35	73	87	100
1,000,000	1	4	7	12	40	53	60

>1,000 vessels
600-999 vessels
300-599 vessels
100-299 vessels
50-99 vessels
25-49 vessels
10-24 vessels
1-9 vessels
0 vessels

Table 3 Number of Qualifying Vessels Based on Specified Criteria Without 3/25/03 Permit Restriction

Minimum Qualifying Landings (lb)	Overall Average	High-5 Average	High-3 Average	High-1 Sum	High-3 Sum	High-5 Sum	Overall Sum
1/1/1981 - 3/25/2003							
1,000	802	1261	1410	1671	1790	1800	1803
10,000	356	602	686	859	995	1036	1057
50,000	175	326	382	483	577	602	621
100,000	94	229	280	355	447	463	484
500,000	2	41	70	92	199	229	256
1,000,000	1	9	14	28	106	149	186
1/1/1981 - 12/31/2005							
1,000	797	1271	1423	1688	1812	1822	1825
10,000	352	609	695	870	1006	1047	1070
50,000	162	335	389	491	584	609	626
100,000	87	231	288	361	457	472	496
500,000	2	44	71	92	201	231	259
1,000,000	1	9	14	28	108	152	191
1/1/1993 - 3/25/2003							
1,000	479	591	659	806	885	893	894
10,000	229	301	340	421	473	482	490
50,000	120	162	188	242	293	301	302
100,000	69	113	134	179	219	231	237
500,000	6	19	33	49	91	113	127
1,000,000	1	5	7	15	52	64	72
1/1/1993 - 12/31/2005							
1,000	472	609	681	831	914	923	926
10,000	223	310	351	437	488	496	505
50,000	109	173	196	252	303	310	312
100,000	64	119	144	186	230	242	249
500,000	7	22	34	49	95	119	136
1,000,000	1	6	8	15	53	65	76
1/1/1995 - 3/25/2003							
1,000	439	500	552	672	742	746	747
10,000	205	255	296	366	409	415	418
50,000	107	146	165	201	245	255	259
100,000	64	91	113	148	185	195	196
500,000	6	15	27	39	79	91	98
1,000,000	0	4	7	13	42	56	62
1/1/1995 - 12/31/2005							
1,000	427	519	574	697	772	775	778
10,000	201	267	307	382	425	430	434
50,000	102	157	174	212	258	267	270
100,000	60	97	124	155	197	207	208
500,000	7	19	29	40	83	97	110
1,000,000	1	4	8	14	44	58	65

>1,000 vessels
600-999 vessels
300-599 vessels
100-299 vessels
50-99 vessels
25-49 vessels
10-24 vessels
1-9 vessels
0 vessels

APPENDIX

Additional Analysis of Potential Qualifiers

Small Mesh Multispecies Limited Access Program

**QUALIFICATION CRITERIA:
1/1/81-3/25/03 AND CONTROL DATE PERMIT**

Held Permit on Control Date (3/25/2003)

Minimum Qualifying Landings (lb)	Dealer Purchase Report Data, 1/1/1981 - 3/25/2003						
	Number of Presumed Qualifying Vessels, Based on Specified Criteria						
	Overall Average	High-5 Average	High-3 Average	High-1 Sum	High-3 Sum	High-5 Sum	Overall Sum
1	1102	1158	1166	1173	1173	1173	1173
100	721	878	929	1004	1025	1027	1027
1,000	430	617	666	743	805	811	812
5,000	269	407	449	521	595	617	631
10,000	217	336	365	424	506	529	540
25,000	161	254	287	336	385	407	422
50,000	125	200	223	271	320	336	350
100,000	72	154	177	211	258	267	282
150,000	47	127	144	174	223	237	251
200,000	28	106	122	144	206	218	228
250,000	18	91	102	129	189	200	211
300,000	13	73	92	112	177	188	198
350,000	10	61	75	101	163	183	189
400,000	5	53	66	90	147	173	185
450,000	4	46	60	77	144	166	181
500,000	2	33	55	68	134	154	170
550,000	1	28	41	60	129	146	163
600,000	1	24	31	53	122	140	154
650,000	1	19	27	44	116	138	151
700,000	1	18	26	39	109	133	148
750,000	1	17	21	36	102	127	144
800,000	1	14	19	32	96	123	142
850,000	1	11	17	28	94	118	138
900,000	1	10	16	24	92	112	137
950,000	1	10	14	23	86	109	136
1,000,000	1	9	12	22	80	106	132
2,000,000	0	0	1	4	26	53	81

>1,000 vessels
600-999 vessels
300-599 vessels
100-299 vessels
50-99 vessels
25-49 vessels
10-24 vessels
1-9 vessels
0 vessels

**QUALIFICATION CRITERIA:
1/1/81-3/25/03 WITH NO CONTROL DATE PERMIT**

Removing Permit Control Date Restriction

Minimum Qualifying Landings (lb)	Dealer Purchase Report Data, 1/1/1981 - 3/25/2003						
	Number of Presumed Qualifying Vessels, Based on Specified Criteria						
	Overall Average	High-5 Average	High-3 Average	High-1 Sum	High-3 Sum	High-5 Sum	Overall Sum
1	2635	2799	2834	2864	2864	2864	2864
100	1551	1983	2120	2341	2388	2392	2392
1,000	802	1261	1410	1671	1790	1800	1803
5,000	458	762	873	1062	1230	1261	1281
10,000	356	602	686	859	995	1036	1057
25,000	239	435	502	634	731	762	785
50,000	175	326	382	483	577	602	621
100,000	94	229	280	355	447	463	484
150,000	59	181	213	277	382	404	422
200,000	34	149	175	225	340	362	377
250,000	20	123	147	192	306	326	343
300,000	15	95	126	165	280	301	314
350,000	12	81	99	143	248	284	295
400,000	5	72	89	124	224	262	282
450,000	4	59	79	106	213	246	269
500,000	2	41	70	92	199	229	256
550,000	1	34	53	79	190	216	245
600,000	1	29	39	69	175	208	229
650,000	1	24	32	57	164	202	223
700,000	1	23	31	49	155	195	218
750,000	1	20	26	44	147	181	210
800,000	1	17	24	39	137	175	206
850,000	1	13	21	34	131	169	200
900,000	1	12	20	30	126	160	193
950,000	1	12	18	29	119	152	191
1,000,000	1	9	14	28	106	149	186
2,000,000	0	0	1	4	31	72	107

>1,000 vessels
600-999 vessels
300-599 vessels
100-299 vessels
50-99 vessels
25-49 vessels
10-24 vessels
1-9 vessels
0 vessels

**QUALIFICATION CRITERIA:
1/1/81-12/31/05 AND CONTROL DATE PERMIT**

Held Permit on Control Date (3/25/2003)

Minimum Qualifying Landings (lb)	Dealer Purchase Report Data, 1/1/1981 - 12/31/2005						
	Number of Presumed Qualifying Vessels, Based on Specified Criteria						
	Overall Average	High-5 Average	High-3 Average	High-1 Sum	High-3 Sum	High-5 Sum	Overall Sum
1	1119	1182	1190	1200	1200	1200	1200
100	724	899	948	1019	1042	1044	1045
1,000	432	623	675	752	819	825	826
5,000	272	417	457	529	600	623	637
10,000	220	341	372	432	514	537	550
25,000	159	264	293	344	391	417	432
50,000	119	209	230	277	325	341	353
100,000	68	156	185	217	267	275	293
150,000	47	129	147	178	230	248	261
200,000	28	109	124	148	213	224	235
250,000	17	91	104	134	197	209	220
300,000	12	74	94	116	185	198	209
350,000	10	63	75	103	166	187	194
400,000	7	54	67	91	149	176	187
450,000	4	47	61	78	147	168	184
500,000	2	36	56	68	136	156	173
550,000	1	32	43	60	131	148	167
600,000	1	25	34	54	124	143	160
650,000	1	22	29	46	118	141	155
700,000	1	20	26	41	111	135	152
750,000	1	17	22	38	104	129	148
800,000	1	14	22	34	98	125	145
850,000	1	11	18	30	96	120	140
900,000	1	10	16	25	94	117	139
950,000	1	10	14	23	88	113	139
1,000,000	1	9	12	22	82	109	136
2,000,000	0	0	1	4	27	54	85

>1,000 vessels
600-999 vessels
300-599 vessels
100-299 vessels
50-99 vessels
25-49 vessels
10-24 vessels
1-9 vessels
0 vessels

**QUALIFICATION CRITERIA:
1/1/81-12/31/05 WITH NO CONTROL DATE PERMIT**

Removing Permit Control Date Restriction

Minimum Qualifying Landings (lb)	Dealer Purchase Report Data, 1/1/1981 - 12/31/2005						
	Number of Presumed Qualifying Vessels, Based on Specified Criteria						
	Overall Average	High-5 Average	High-3 Average	High-1 Sum	High-3 Sum	High-5 Sum	Overall Sum
1	2684	2866	2904	2944	2944	2944	2944
100	1545	2017	2155	2372	2423	2429	2430
1,000	797	1271	1423	1688	1812	1822	1825
5,000	456	774	884	1074	1238	1271	1291
10,000	352	609	695	870	1006	1047	1070
25,000	231	445	509	644	739	774	797
50,000	162	335	389	491	584	609	626
100,000	87	231	288	361	457	472	496
150,000	56	183	216	281	389	415	432
200,000	31	152	177	229	347	368	384
250,000	19	123	149	197	314	335	352
300,000	14	96	128	169	288	311	325
350,000	11	83	99	145	251	288	300
400,000	7	73	90	125	226	265	284
450,000	4	60	80	107	216	248	272
500,000	2	44	71	92	201	231	259
550,000	1	38	55	79	192	218	249
600,000	1	30	42	70	177	211	236
650,000	1	27	34	59	166	205	227
700,000	1	25	31	51	157	197	222
750,000	1	20	27	46	149	183	214
800,000	1	17	27	41	139	177	209
850,000	1	13	22	36	133	171	202
900,000	1	12	20	31	128	165	195
950,000	1	12	18	29	121	156	194
1,000,000	1	9	14	28	108	152	191
2,000,000	0	0	1	4	32	73	111

>1,000 vessels
600-999 vessels
300-599 vessels
100-299 vessels
50-99 vessels
25-49 vessels
10-24 vessels
1-9 vessels
0 vessels

**QUALIFICATION CRITERIA:
1/1/93-3/25/03 AND CONTROL DATE PERMIT**

Held Permit on Control Date (3/25/2003)

Minimum Qualifying Landings (lb)	Dealer Purchase Report Data, 1/1/1993 - 3/25/2003						
	Number of Presumed Qualifying Vessels, Based on Specified Criteria						
	Overall Average	High-5 Average	High-3 Average	High-1 Sum	High-3 Sum	High-5 Sum	Overall Sum
1	991	1025	1039	1048	1048	1048	1048
100	614	701	753	834	858	859	859
1,000	369	441	476	560	618	624	625
5,000	232	285	323	383	428	441	449
10,000	189	235	263	319	360	369	377
25,000	139	175	203	237	278	285	286
50,000	107	140	161	190	229	235	236
100,000	64	99	117	148	180	189	194
150,000	48	70	85	111	161	167	170
200,000	33	59	69	87	144	155	157
250,000	22	50	58	72	129	140	144
300,000	18	42	50	59	117	130	136
350,000	11	34	47	54	102	120	128
400,000	9	25	41	53	93	115	122
450,000	6	21	38	49	85	106	118
500,000	6	16	30	44	79	99	113
550,000	6	14	23	39	75	92	107
600,000	6	13	15	34	69	81	96
650,000	4	10	14	27	66	77	92
700,000	4	9	13	22	60	72	86
750,000	2	8	12	20	58	70	82
800,000	1	6	10	19	54	70	78
850,000	1	5	10	16	51	68	74
900,000	1	5	9	14	50	63	71
950,000	1	5	8	14	48	59	68
1,000,000	1	5	6	13	47	59	66
2,000,000	0	0	0	1	14	25	36

>1,000 vessels
600-999 vessels
300-599 vessels
100-299 vessels
50-99 vessels
25-49 vessels
10-24 vessels
1-9 vessels
0 vessels

**QUALIFICATION CRITERIA:
1/1/93-3/25/03 WITH NO CONTROL DATE PERMIT**

Removing Permit Control Date Restriction

Minimum Qualifying Landings (lb)	Dealer Purchase Report Data, 1/1/1993 - 3/25/2003						
	Number of Presumed Qualifying Vessels, Based on Specified Criteria						
	Overall Average	High-5 Average	High-3 Average	High-1 Sum	High-3 Sum	High-5 Sum	Overall Sum
1	1581	1659	1696	1731	1731	1731	1731
100	877	1016	1110	1273	1309	1312	1312
1,000	479	591	659	806	885	893	894
5,000	295	367	422	514	576	591	600
10,000	229	301	340	421	473	482	490
25,000	160	209	254	312	359	367	368
50,000	120	162	188	242	293	301	302
100,000	69	113	134	179	219	231	237
150,000	52	78	97	131	188	197	200
200,000	36	64	78	102	168	179	181
250,000	25	55	66	84	151	162	166
300,000	21	46	55	68	134	151	157
350,000	13	37	52	63	117	137	146
400,000	10	28	44	60	107	131	139
450,000	6	24	41	55	97	120	132
500,000	6	19	33	49	91	113	127
550,000	6	17	26	43	85	104	120
600,000	6	16	18	38	78	92	108
650,000	4	13	17	30	74	85	101
700,000	4	11	16	25	68	80	95
750,000	2	9	15	23	66	78	90
800,000	1	7	12	22	59	78	86
850,000	1	6	12	18	56	74	81
900,000	1	6	11	16	55	69	77
950,000	1	5	10	16	53	65	74
1,000,000	1	5	7	15	52	64	72
2,000,000	0	0	0	1	17	28	40

>1,000 vessels
600-999 vessels
300-599 vessels
100-299 vessels
50-99 vessels
25-49 vessels
10-24 vessels
1-9 vessels
0 vessels

**QUALIFICATION CRITERIA:
1/1/93-12/31/05 AND CONTROL DATE PERMIT**

Held Permit on Control Date (3/25/2003)

Minimum Qualifying Landings (lb)	Dealer Purchase Report Data, 1/1/1993 - 12/31/2005						
	Number of Presumed Qualifying Vessels, Based on Specified Criteria						
	Overall Average	High-5 Average	High-3 Average	High-1 Sum	High-3 Sum	High-5 Sum	Overall Sum
1	1010	1052	1066	1078	1078	1078	1078
100	618	725	774	852	880	881	882
1,000	361	456	493	577	639	646	649
5,000	229	298	334	395	440	456	465
10,000	188	242	272	332	372	380	389
25,000	146	186	213	248	289	298	300
50,000	100	151	169	198	237	242	244
100,000	59	105	127	155	190	199	205
150,000	45	72	90	117	169	177	180
200,000	29	60	71	92	153	162	164
250,000	22	50	60	78	138	151	155
300,000	15	44	51	64	127	142	149
350,000	12	38	47	57	109	128	139
400,000	11	26	42	54	98	120	128
450,000	8	23	39	50	90	111	125
500,000	7	19	31	44	83	105	121
550,000	6	18	25	39	79	95	114
600,000	5	14	18	35	71	86	106
650,000	5	12	16	29	68	83	100
700,000	5	12	14	24	62	77	95
750,000	2	9	13	22	60	72	91
800,000	2	7	13	21	55	72	83
850,000	1	6	11	18	52	71	81
900,000	1	6	9	15	51	66	78
950,000	1	6	8	14	49	61	76
1,000,000	1	6	7	13	48	60	70
2,000,000	0	0	0	1	15	26	45

>1,000 vessels
600-999 vessels
300-599 vessels
100-299 vessels
50-99 vessels
25-49 vessels
10-24 vessels
1-9 vessels
0 vessels

**QUALIFICATION CRITERIA:
1/1/93-12/31/05 WITH NO CONTROL DATE PERMIT**

Removing Permit Control Date Restriction

Minimum Qualifying Landings (lb)	Dealer Purchase Report Data, 1/1/1993 - 12/31/2005						
	Number of Presumed Qualifying Vessels, Based on Specified Criteria						
	Overall Average	High-5 Average	High-3 Average	High-1 Sum	High-3 Sum	High-5 Sum	Overall Sum
1	1630	1729	1769	1814	1814	1814	1814
100	879	1054	1147	1307	1349	1354	1355
1,000	472	609	681	831	914	923	926
5,000	289	382	436	530	591	609	619
10,000	223	310	351	437	488	496	505
25,000	165	220	265	325	372	382	384
50,000	109	173	196	252	303	310	312
100,000	64	119	144	186	230	242	249
150,000	49	80	102	137	196	207	210
200,000	32	65	80	107	177	186	188
250,000	25	55	68	90	160	173	177
300,000	16	48	56	73	144	163	170
350,000	13	41	52	66	124	145	157
400,000	11	29	45	61	112	136	145
450,000	8	26	42	56	102	125	140
500,000	7	22	34	49	95	119	136
550,000	6	21	28	43	89	107	127
600,000	5	17	21	39	80	97	118
650,000	5	15	19	32	76	91	109
700,000	5	14	17	27	70	85	104
750,000	2	10	16	25	68	80	99
800,000	2	8	15	24	60	80	91
850,000	1	7	13	20	57	77	88
900,000	1	7	11	17	56	72	84
950,000	1	6	10	16	54	67	82
1,000,000	1	6	8	15	53	65	76
2,000,000	0	0	0	1	18	29	49

>1,000 vessels
600-999 vessels
300-599 vessels
100-299 vessels
50-99 vessels
25-49 vessels
10-24 vessels
1-9 vessels
0 vessels

**QUALIFICATION CRITERIA:
1/1/95-3/25/03 AND CONTROL DATE PERMIT**

Held Permit on Control Date (3/25/2003)

Minimum Qualifying Landings (lb)	Dealer Purchase Report Data, 1/1/1995 - 3/25/2003						
	Number of Presumed Qualifying Vessels, Based on Specified Criteria						
	Overall Average	High-5 Average	High-3 Average	High-1 Sum	High-3 Sum	High-5 Sum	Overall Sum
1	939	963	979	987	987	987	987
100	586	645	693	768	796	797	797
1,000	361	402	436	514	568	571	572
5,000	229	258	297	357	390	402	407
10,000	177	217	245	297	334	340	343
25,000	136	160	183	219	255	258	261
50,000	96	129	147	173	209	217	221
100,000	59	81	99	130	163	171	172
150,000	45	61	72	97	147	153	153
200,000	32	51	59	76	132	140	143
250,000	25	41	49	66	114	129	131
300,000	18	34	41	51	99	116	122
350,000	13	28	38	50	87	102	111
400,000	11	21	33	45	78	95	107
450,000	8	19	27	40	72	90	96
500,000	6	13	24	34	69	81	88
550,000	6	11	19	30	64	76	82
600,000	5	11	13	25	59	68	77
650,000	4	8	13	20	58	63	72
700,000	4	8	12	18	52	62	67
750,000	4	6	10	17	49	61	64
800,000	2	5	8	16	46	58	60
850,000	1	5	8	13	42	56	59
900,000	1	5	7	11	41	54	59
950,000	0	4	7	11	39	52	58
1,000,000	0	4	6	11	38	51	57
2,000,000	0	0	0	1	13	21	28

>1,000 vessels
600-999 vessels
300-599 vessels
100-299 vessels
50-99 vessels
25-49 vessels
10-24 vessels
1-9 vessels
0 vessels

**QUALIFICATION CRITERIA:
1/1/95-3/25/03 WITH NO CONTROL DATE PERMIT**

Removing Permit Control Date Restriction

Minimum Qualifying Landings (lb)	Dealer Purchase Report Data, 1/1/1995 - 3/25/2003						
	Number of Presumed Qualifying Vessels, Based on Specified Criteria						
	Overall Average	High-5 Average	High-3 Average	High-1 Sum	High-3 Sum	High-5 Sum	Overall Sum
1	1391	1447	1485	1516	1516	1516	1516
100	764	852	928	1073	1115	1117	1117
1,000	439	500	552	672	742	746	747
5,000	271	314	365	445	487	500	505
10,000	205	255	296	366	409	415	418
25,000	153	181	215	268	309	314	317
50,000	107	146	165	201	245	255	259
100,000	64	91	113	148	185	195	196
150,000	50	68	82	112	165	172	172
200,000	35	56	68	87	149	157	161
250,000	28	46	56	76	131	146	148
300,000	20	37	46	60	113	132	138
350,000	14	31	42	59	100	117	126
400,000	12	24	36	52	91	109	121
450,000	8	22	30	46	82	101	107
500,000	6	15	27	39	79	91	98
550,000	6	13	22	34	73	86	92
600,000	5	13	16	29	68	77	86
650,000	4	9	15	23	66	71	80
700,000	4	9	14	21	59	69	74
750,000	4	6	12	20	56	68	71
800,000	2	5	10	18	51	64	66
850,000	1	5	10	15	47	62	65
900,000	1	5	9	13	46	59	64
950,000	0	4	9	13	44	57	63
1,000,000	0	4	7	13	42	56	62
2,000,000	0	0	0	1	15	24	31

>1,000 vessels
600-999 vessels
300-599 vessels
100-299 vessels
50-99 vessels
25-49 vessels
10-24 vessels
1-9 vessels
0 vessels

**QUALIFICATION CRITERIA:
1/1/95-12/31/05 AND CONTROL DATE PERMIT**

Held Permit on Control Date (3/25/2003)

Minimum Qualifying Landings (lb)	Dealer Purchase Report Data, 1/1/1995 - 12/31/2005						
	Number of Presumed Qualifying Vessels, Based on Specified Criteria						
	Overall Average	High-5 Average	High-3 Average	High-1 Sum	High-3 Sum	High-5 Sum	Overall Sum
1	959	994	1009	1020	1020	1020	1020
100	578	674	719	790	822	823	824
1,000	349	418	453	531	590	592	595
5,000	221	271	309	369	403	418	422
10,000	178	226	254	310	347	352	356
25,000	141	171	195	231	266	271	277
50,000	92	140	156	182	220	226	229
100,000	55	87	110	137	174	182	183
150,000	42	63	77	103	156	163	163
200,000	32	53	61	81	140	148	150
250,000	21	42	51	72	124	140	144
300,000	18	38	43	56	110	129	135
350,000	14	32	39	53	93	111	122
400,000	10	23	35	47	83	102	117
450,000	8	22	30	42	77	95	109
500,000	7	17	26	35	73	87	100
550,000	6	16	22	31	68	81	92
600,000	5	13	17	27	61	74	87
650,000	4	11	16	23	60	70	81
700,000	3	11	14	21	54	67	77
750,000	3	6	12	20	51	63	70
800,000	3	5	12	19	48	61	67
850,000	2	5	10	16	44	59	65
900,000	2	5	8	13	43	57	63
950,000	2	4	8	12	41	55	60
1,000,000	1	4	7	12	40	53	60
2,000,000	0	0	0	1	15	23	34

>1,000 vessels
600-999 vessels
300-599 vessels
100-299 vessels
50-99 vessels
25-49 vessels
10-24 vessels
1-9 vessels
0 vessels

**QUALIFICATION CRITERIA:
1/1/95-12/31/05 WITH NO CONTROL DATE PERMIT**

Removing Permit Control Date Restriction

Minimum Qualifying Landings (lb)	Dealer Purchase Report Data, 1/1/1995 - 12/31/2005						
	Number of Presumed Qualifying Vessels, Based on Specified Criteria						
	Overall Average	High-5 Average	High-3 Average	High-1 Sum	High-3 Sum	High-5 Sum	Overall Sum
1	1446	1522	1563	1604	1604	1604	1604
100	757	894	970	1111	1159	1164	1165
1,000	427	519	574	697	772	775	778
5,000	260	329	380	461	503	519	523
10,000	201	267	307	382	425	430	434
25,000	158	192	228	282	322	329	335
50,000	102	157	174	212	258	267	270
100,000	60	97	124	155	197	207	208
150,000	45	70	87	118	174	182	182
200,000	35	58	70	92	157	165	168
250,000	23	47	58	82	141	157	162
300,000	19	41	48	65	124	145	151
350,000	14	35	43	62	106	126	137
400,000	10	26	38	54	96	116	131
450,000	8	25	33	48	87	106	120
500,000	7	19	29	40	83	97	110
550,000	6	18	25	35	77	91	102
600,000	5	15	20	31	70	83	96
650,000	4	12	18	26	68	78	89
700,000	3	12	16	24	61	74	84
750,000	3	6	14	23	58	70	77
800,000	3	5	14	21	53	67	73
850,000	2	5	12	18	49	65	71
900,000	2	5	10	15	48	62	68
950,000	2	4	10	14	46	60	65
1,000,000	1	4	8	14	44	58	65
2,000,000	0	0	0	1	17	26	37

>1,000 vessels
600-999 vessels
300-599 vessels
100-299 vessels
50-99 vessels
25-49 vessels
10-24 vessels
1-9 vessels
0 vessels