

Rolan Rouss Draft Proposal #3

Proposal to amend to 12 AAC 75.400. Transporter Activity Report, to simplify the transporter activity report process.

Amend 12 AAC 75.400 Transporter Activity Report, as follows:

(a) Each transporter activity report required by AS 08,54.650 must be on a form provided by the department, titled Transporter Activity Summary Report, dated _____ 2016, and adopted by reference. This form is established by the board for review of the information required by AS 08,54.650.

(b) On the day a client is transported, a transporter shall collect the names and hunting license numbers of each member of each party, and the date and location of the transport activity, and enter that information on a summary form (ref: transporter activity annual summary report form _____ 2016) provided by the department.

(c) Immediately after transporting the client out of the field, the transporter shall complete the applicable remaining portions of the transporter activity report (the date and location).

(d) For the purposes of this report, "a party" is defined as one or more big game hunters traveling together to the same destination. A transporter is not required to report parties transported to/from a camp operated by a big game guide, or parties transported to/from another big game transporter, or parties transported to/from a private property or vessel owned by a member of the party.

(e) The transporter shall retain the transporter activity annual summary report form at the transporter's main business premises and make it available for inspection upon request by an agent of the board or department or any state or federal enforcement agent authorized to enforce guiding, game, or game management statutes or regulations.

(f) The transporter shall file the transporter activity summary report form annually with the department before Jan. 31 of the year following the transport activity.

In adopting this amendment to AAC 75.400 the board will create a new simplified transporter activity report form ("the form titled Transporter Activity Summary Report, dated _____ 2016") that will be a summary of all big game hunting parties transported by a transporter in each calendar year. This amendment eliminates the current policy of completing and filing an individual form for each hunting party. It will not require number of animals harvested or estimated weight of meat to be reported.

This new report form will only be required to be filed annually.

The department may develop an online filing form to further simplify the filing process, improve data entry efficiency, and reduce cost.

Who is likely to benefit?

- 1) Transporters, by reducing unnecessary paperwork.

2) Div. of Licensing staff and the State of Alaska, by reducing unnecessary and redundant paperwork and the associated cost.

3) The BGCSB by more efficient and comprehensive data collection.

Who is likely to suffer? No one. The data that the BGCSB wants to collect will still be collected. Enforcement personnel will still have immediate access to the information they need for their tasks. Big game harvest data is already being collected by ADF&G and is available to other State agencies.

What will happen if nothing is done? The Div. of Licensing will continue to require, and transporters will continue to complete, unnecessary paperwork and pay unjustifiably high filing fees.

The existing supporting statute is:

AS 08.54.650. Transporter License.

(2)(c) A transporter shall provide an annual activity report on a form provided by the department. An activity report must contain all information required by the board by regulation.

Discussion: Instead of increasing fees across the BGCSB system, the Division ought to be looking for opportunities for cost reduction. Transporter Activity Reports should be evaluated for effectiveness and modified or streamlined to reduce expense. TARs are collecting some resource information from hunters that is already being collected by ADF&G on harvest tags and hunter surveys, and the ADF&G information is available in a searchable database. Coordination and data sharing between Div. of Licensing, AK State Troopers, and ADF&G will save the Division and transporters time and money.

Although some board members state that the TAR information is necessary for “resource management”, in fact, its main use is for enforcement actions. To have value as an enforcement reference, the TAR (which currently is a sworn statement by the transporter) should only include information that is verifiable by the transporter (name, address and hunting license copied from client’s license, dates and location of transport services), not number of animals harvested and estimated weight of meat.

Filling out and filing a TAR for each party is an expensive and time consuming burden for transporters. The real-world value of transporter report data is for occasional use by enforcement personnel. If the BGCSB wants accurate and comprehensive information on hunting activity and insists on making transporters collect it, then they ought to concentrate on making the task less burdensome by developing a simplified report that does not collect what ADF&G is already collecting, and consider making it an online form so the data entry task is done when it is filed.

The new \$50 transporter activity report filing fee is guaranteed to result in fewer reports being filed by transporters. Transporters who are currently reporting all their big game transports will reduce their participation in the TAR reporting system, or drop their transporter license by exercising the air taxi exemption, simply to avoid the abusive cost.