

# North Pacific Fishery Management Council

Eric A. Olson, Chairman  
Chris Oliver, Executive Director



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July 1, 2014

Ms. Eileen Sobeck  
National Marine Fisheries Service  
1315 East West Highway  
Silver Spring, MD 20910-3282

Dear Ms. Sobeck:

At its April meeting, our Council received public testimony requesting that the Council consider initiating an amendment to the North Pacific regulations governing observer provider insurance coverage requirements. It is our understanding that there are inconsistencies around the nation with respect to the regulatory requirements for insurance coverage for Federal observers. The Council is interested in removing unnecessary insurance requirements from the North Pacific regulations, in an effort to reduce observer costs, and to maximize the efficiency of the Observer Program. Our staff has discussed this issue with our Regional office of NMFS, but it remains unclear whether our request should be directed to the National Observer Program Office or to the NOAA Office of General Counsel; therefore, we are directing our inquiry to your office.

The Council is requesting guidance regarding the apparent inconsistencies among regions, and the legal requirements for observer provider insurance coverage, in order to determine the appropriate path for a potential North Pacific regulatory amendment. The detailed letter from Mr. Michael Lake of Alaskan Observers, Inc., which explains the particulars of the insurance coverage issue, is attached. On behalf of the North Pacific Council, thank you for assisting in our efforts to resolve this important issue.

Sincerely,



Chris Oliver  
Executive Director

CC: Dr. Jim Balsiger  
Mr. Martin Loefflad  
Ms. Lisa Lindeman  
Mr. Michael Lake

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