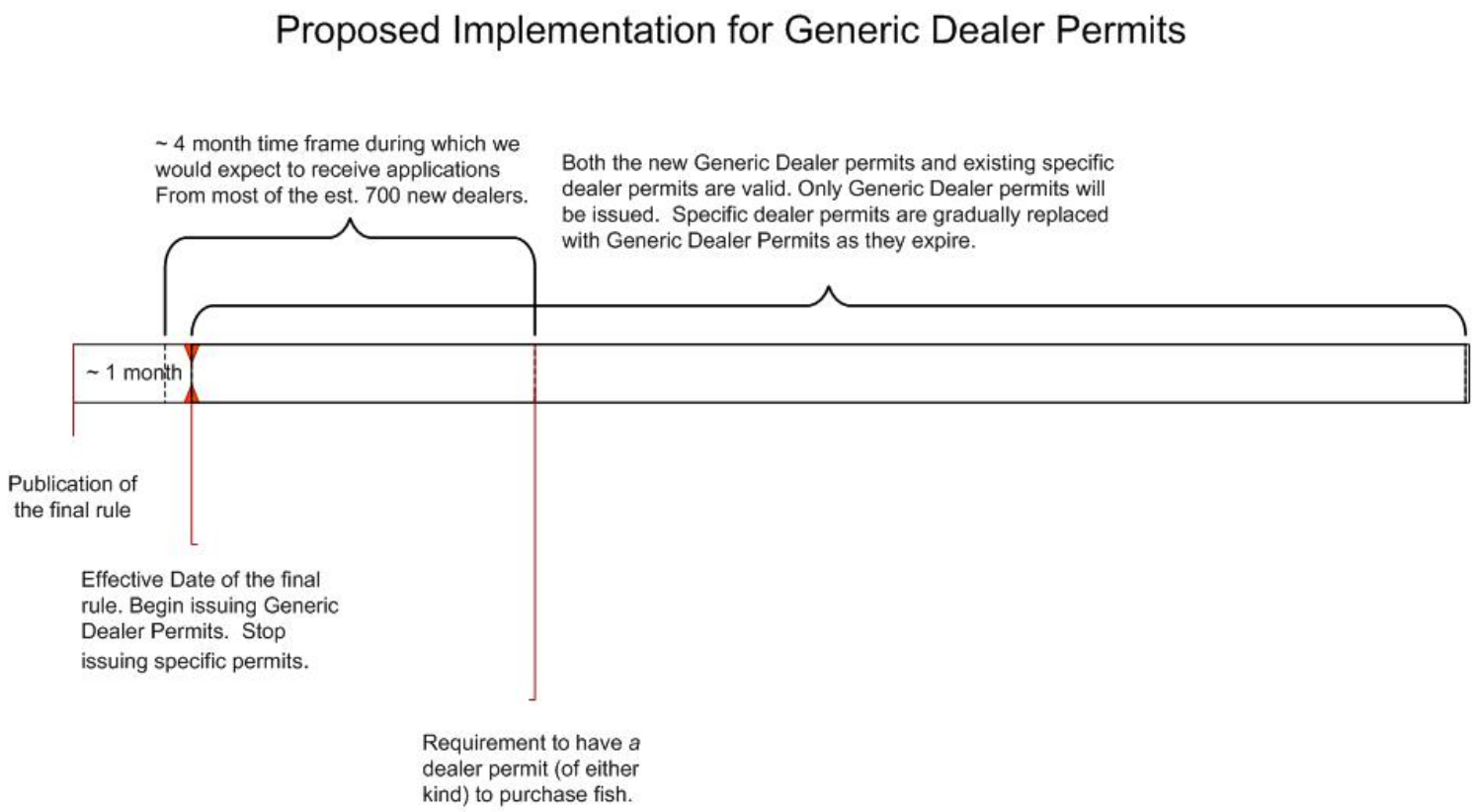
PPlan to Implement Generic Dealer Permits
as Proposed By the SERO Permits Office

To avoid having to do a big 'batch issuance' of the new Generic Dealer permits to the ~300 dealers who will presumably already have a dealer permit, I suggest we allow dealers with valid fishery specific dealer permits on the effective date of the final rule to continue to use their fishery specific dealer permits until they expire. When they apply to 'renew' their fishery specific dealer permits, we'll issue the generic dealer permits instead of 'renewing' the fishery specific permits(s). Also, I'd like to try and spread out the workload for the the est. 700 new dealers who we expect to apply for this new Generic Dealer permit. To that end, I suggest we (1) begin issuing Generic dealer permits and (2) stop issuing old dealer permits on the effective date of the final rule, but not *require* dealers to have *either* permit for the *previously unregulated fisheries* until a date ~3 or 4 months after the effective date of the final rule. On that date (3-4 months after the effective date of the final rule) lets allow that *either* the fishery specific dealer permits or the new generic dealer permits will suffice. That way, dealers who already have the fishery specific dealer permits will not need to apply for the new generic dealer permit until their old fishery specific dealer permits expire, and the estimated 700 dealers who do not have a fishery specific dealer permit will have the 3-4 months to obtain a new Generic dealer permit.

Here's a diagram that may be easier to understand: