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Sent: Thursday, September 13, 2012 2:11 PM

To: Duval, Michelle **Subject:** comment

I would like to make a few comments on the reporting of South Atlantic Species and am not able to attend today for public comment

The reporting of our fishery has to be brought up to a real time reporting system, with all the quotas just being guessed at, it seems that if we are to abide by these quotas and keep going over them because of guessing the landings then this should be a high priority of the council to put the demand on the federal dealers to do the reporting in a no less than 72 hour period after the landing by the vessel. I have heard a lot of complaining by other dealers that this is a burden, my reaction has been that it will do nothing but help your fishermen and your business also, it will stop the early closure before the quota is met and stop the going over of the quota which will eventually come back to haunt us. If it is to much burden for the federal dealer to do this job, maybe they should not be a federal dealer.

The Blue Fin Data system seems to be the best reporting system that has been ask of the Federal Dealers so far, it is user friendly and after just 30 minutes of fine tuning it to have the species named what the fish is called in your area it turns into a very simple time saving reporting system. It also makes it very easy to place captains with vessels and fills in all required fields after you have fine-tuned it to your fishermen and fishing vessels. I have helped Claude Petersen who is with Bluefin Data System and with Amy Dukes who is with SCDNR to make sure all species are on the system and also to keep the fishermen and vessels data correct. I believe the system will help to keep the

double reporting from being an issue if the federal dealer is the source of your landings toward the quota. We all fill out a state form in South Carolina which 1 copy goes to the state, 1 to the fishermen, and 1 for the dealer to keep on record. These forms are designed to be a Trip Ticket for the landing, showing lbs and money generated, and to make sure there is no double reporting by state and Federal dealers only the Federal dealers reporting should be used towards the quota and the states information used to verify that the dealer is reporting honestly. There should be no excuses from a Federal Dealer as to not being able to report.

The Bluefin system is easily taught and with just a mandatory education course in a few areas every dealer would be pleased at the simplicity of the system. Many fishermen who come thru our part of town from different states tell me that the federal dealer that purchases their catch from where they are at put all grouper (scamps, gags, and Black grouper) under 1 category ... gag grouper. The education on how this false reporting is doing nothing but hurting the fishermen and their federal dealer business should be once again a top priority of the council so proper data and early quota closures can be a thing of the past. If this Blue Fin Reporting system is to confusing to be used, there is always the old fashion way of just having someone sit at a desk and call all the Federal Dealers and get the info direct, I would think this would take very little time, or again just set up a fax line and mandate the Federal Dealers send the totals every Monday. Place the burden of reporting to where it belongs.. The Federal Dealers... it will do nothing but help their business and the commercial fishermen.

I have listened this week to what I could of the council meetings and missing most of them because of work, I just can comment on only a few of the things I have heard. Raising the size limit on HogFish and Grey Trigger Fish to 14 inches is a very good idea, has the council ever seen a 12 inch trigger or hogfish? I wanted to be able to bring a 12 inch Hogfish and Trigger to show just how small of a fish this is and how little commercial value they have. Most Hogfish are landed by dive boats which in no means am I against, but being able to choose between such a small fish or 1 that may weigh as much as three 12 inch fish should be a consideration by the council and the divers.

Also to hear that such a back-log of otoliths on most species by the scientist, and not being able to get up to date data still does not stop the council from making new rules or raising the quota on species that we as fishermen know are abundant seems very unfair to all involved in our South Atlantic fishery. A big push should be on the council's agenda to mandate this science be finished before enacting any more rules made by false or lack of information, using the term Best Data Available should make the council hang its head in shame when the science and data is there.

Thank you

Wayne Mershon

Kenyon Seafood

Federal Dealer SA #1051