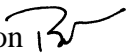


November 4, 2008

MEMORANDUM

TO: All AWO Members

FROM: Bob Clinton 

RE: Responsible Carrier Program[®] Changes

On October 17, 2008, the AWO Board of Directors approved the following changes to the Responsible Carrier Program to take effect on January 17, 2009:

Background

In response to the Executive Committee's request that the Accreditation Board develop new procedures to ensure that the process of RCP certification is tightened, actions are taken quickly, and that the process is failsafe, the Accreditation Board met at AWO headquarters on September 9 and 10. At this meeting, the Accreditation Board developed a set of preliminary recommendations to address the Executive Committee's concerns, including: deadlines mean deadlines; when the deadline is violated, a company is out of compliance with the Responsible Carrier Program; the status of "probation" should be revisited and there should be no limbo status; and, communication of these actions must be shared widely with AWO members and there must be greater transparency to the process. To accomplish these goals, the Accreditation Board recommended extensive changes to Addendums B, C, and D, and to section G of the Responsible Carrier Program.

The Executive Committee also asked that the Accreditation Board consider comments from Jeff Parker and George Leavell on the draft Audit Transition Plan. The Accreditation Board reviewed the document and incorporated the majority of Messrs. Leavell and Parker's comments. The modified Audit Transition Plan is included in this packet.

In a follow-up call on September 23, the Executive Committee considered the Accreditation Board's input, approved the Audit Transition Plan, and developed a final set of recommended changes to the Responsible Carrier Program. These changes will be presented to the Board of Directors for consideration at the October 17 Board meeting in Seattle. The Executive Committee proposes that the changes, which are summarized below, take effect 90 days after approval by the Board of Directors. Recommended modifications to Addendums B, C, D, section G of the Responsible Carrier Program, and draft changes to the language of

the *AWO Constitution & Bylaws* to support these recommendations, are also included in this memo.

Summary of RCP Changes Effective January 17, 2009

Addendum B

Addendum B is changed by adding the requirement that companies joining AWO after November 1, 2008, that cannot show documentary evidence of 12 months of full compliance with a recognized safety management system be required to undergo an initial audit within one year and two annual recertification audits thereafter before moving into a three-year audit cycle. This change is meant to provide additional oversight of companies new to a safety management system, thereby encouraging them to fully implement the RCP early on, and ensure that the program receives sufficient attention to make certain that it is being followed and not put on the shelf for three years. This change also eliminates the “loophole” whereby a member could resign or have its membership terminated and come back after only one audit with no ongoing oversight. A company will remain in “provisional” status until the completion of the second audit during this initial three-year cycle. Alternatively, a company that presents documentary evidence of full compliance with a recognized safety management system for at least 12 months prior to its new member application may undergo an AWO-certified Responsible Carrier Program audit at any time during its first year of membership, but no later than the first anniversary of acceptance of its application for membership. Upon completion of this audit, the company will no longer be in provisional status.

Changes to Addendum B also eliminate the 90-day time frame to correct deficiencies found during an audit. The Executive Committee believes that companies should begin their audit in sufficient time to correct any problems and still complete the audit by the due date. In certain circumstances, the Accreditation Board may grant a limited extension of time to correct an equipment problem or in cases where a natural disaster delays the completion of the audit. To assist members in adjusting to this significant change and improve AWO’s internal process, reminder letters will be automatically generated by AWO 180, 90, and 30 days prior to member’s recertification date and sent directly to the company’s designated representative.

These letters would explain that a member loses RCP certification on the day following the audit deadline unless the audit is completed or an extension has been requested and approved before that date.

Perhaps most significantly, probationary status is eliminated. RCP audits must be completed by the date required.

In response to AWO members’ need to ascertain the RCP status of other members with whom the member may have a business relationship, changes to Addendum B require the posting of member status in the “Members Only” section of the AWO Web site. In addition, all changes in member status will be communicated to the membership immediately via email. Changes in member Responsible Carrier Program status will also be made available to the Coast Guard, an issue that received attention at the recent House Coast Guard and

Maritime Transportation Subcommittee hearing on the New Orleans oil spill. Finally, Addendum B makes some additional changes to clarify the rules for members participating in both the RCP and ISM.

Addendum C

Addendum C is changed to establish two classes of RCP membership: Provisional and RCP-certified. This section also directs that a company's membership status be posted on the AWO Web site and that changes in status be communicated via email.

Addendum D

Addendum D is modified to include changes to the requirements for certification as an AWO-certified auditor approved by the Board of Directors in April 2008. Additionally, one item was moved from Addendum B to this section where it is more accurately aligned with the subject covered in this section. The Executive Committee also recommends that the Accreditation Board reexamine item 1 under Addendum D, which allows member company employees to be certified as RCP auditors and to conduct audits for company vendors, and consider whether this provision should be changed or eliminated.

RCP Section G

Section G is modified by adding the word "annual" to the requirement for companies to develop an internal audit procedure. This change will require that companies conduct an internal audit on an annual basis. This change should help companies identify problems regularly and help ensure that a member's third-party audit will be completed on a timely basis without any surprises.

AWO Constitutional Change

Finally, to respond to the Executive Committee's direction that existing language included in the *AWO Constitution & Bylaws* requiring a "good faith commitment" to implement the RCP was inadequate, the Accreditation Board recommends that this phrase be deleted and the additional member status designations be added.

Addendum B. Audit Recertification Protocol

(changes are noted with ~~strikethrough~~ and ***Bold italics***)

1. ***Companies joining AWO after November 1, 2008, that cannot show documentary evidence of full compliance with a recognized safety management system for at least 12 months prior to their new member application must complete an AWO-certified Responsible Carrier Program audit no later than the first anniversary of the acceptance of the company's application, and two additional AWO-certified RCP audits by the second and third anniversaries of membership. A company will remain in provisional status until the completion of its second RCP audit during this initial three-year cycle. Members that fail to complete any of the required audits by their due date will have their membership terminated.***
2. ***A company that presents documentary evidence of full compliance with a recognized safety management system for at least 12 months prior to its new member application may undergo an AWO-certified Responsible Carrier Program audit at any time during its first year of membership, but no later than the first anniversary of acceptance of its application for membership. Upon completion of this audit, the company will no longer be in provisional status.***
- ~~3.~~ ***Once a member company has completed the first audit cycle as discussed in items 1 or 2 above, AWO-certified Responsible Carrier Program (RCP) recertification audits are due every three years on the anniversary date of the completion of their recertification audit. Responsible Carrier Program (RCP) recertification audits are due every three years on the anniversary of the completion of their initial audit. Audits may be completed up to 90 days prior to the anniversary date. AWO will notify member companies 180, **90, and 30** days prior to the due date for their recertification audit.***
 - a) In lieu of the required ***annual and*** three-year recertification audits, for companies complying with both ISM and the RCP, ***after an initial AWO-certified RCP audit completed within one year of the acceptance of a company's new member application***, recertification audits may be conducted every five years, provided said audits are conducted by an ABS joint RCP/ISM certified auditor, and that the ISM annual external surveillance assessment of management, and the intermediate external assessment of vessels (conducted between the second and third anniversary dates), are completed and that the RCP Management and Vessel Checklists are completed at least every five years. (effective as of the company's next ISM audit)
 - b) ***For companies participating in ISM whose entire fleet is not required to maintain Safety Management Certificates, 10 percent of those vessels without a Safety Management Certificate must undergo an AWO-certified RCP vessel audit using the appropriate RCP vessel checklist audit at least once every three years.***

- 3. Failure of a company to complete its required RCP audit within the time allowed immediately removes the company's certification of RCP compliance and will result in immediate termination of membership.***

- 2.4. Upon completion *of an annual or* the recertification audit, members *shall* ~~must~~ send AWO a letter *and* a copy of the letter from their AWO-certified RCP auditor notifying AWO of the successful completion of their audit. ~~Companies having nonconformities that prevent completion of the audit may be granted up to 90 days to complete their audits.~~ Upon receipt of notification of *completion of a member's annual or recertification audit*, AWO will issue a new audit certificate valid for *the appropriate time period*. ~~three years from the company's anniversary date.~~
5. *The Responsible Carrier Program Accreditation Board may grant a limited extension of time beyond a company's audit due date only to allow the member company to correct equipment deficiencies necessary to complete its RCP audit, or in certain extraordinary circumstances such as weather, earthquake or other acts of God, provided that AWO:*
 - a) *Receives a written request not less than two weeks prior to the audit due date from the member company's CEO or chief operating officer, explaining in detail the circumstances surrounding the request.*
 - b) *Receives written confirmation from the company's AWO-certified auditor that the audit has been conducted and the company will be able to complete the outstanding issues immediately.*
- ~~3. Member companies that fail to complete the recertification audit *solely* due to their inability to present sufficient evidence of ongoing compliance with the documentary requirements of the program, may in lieu of having their membership terminated, immediately apply in writing to the Responsible Carrier Program Accreditation Board for probationary status.~~
- ~~A. Probationary status is a designation that is internal to AWO. If probationary status is granted (see requirements of and procedures for requesting this status below), a valid RCP certificate will be issued to the company by AWO. A company in "probationary status" will receive all rights and privileges accorded to AWO member companies in full RCP-compliant status, such as publishing the company name on a list of valid third-party audited RCP-compliant companies.~~
- ~~B. Probationary status may be granted to member companies that provide the following:~~
 - ~~i. A letter from their AWO-certified RCP auditor certifying that they have all policies and procedures required by the Responsible Carrier Program in place; and,~~
 - ~~ii. A letter from the President or Chief Executive Officer of the member company stating that his or her company will undergo an annual recertification audits of its Responsible Carrier Program in the area(s) found to be deficient. An AWO-certified third-party auditor would conduct recertification audits annually for a period of two years, due on the anniversary date of the member's last audit to ensure ongoing compliance with the documentary requirements of the Program.~~
 - ~~iii. Upon completion of each annual *recertification* audit, the President or Chief Executive Officer will forward a copy of a letter from the company's auditor to the AWO Vice President—Safety stating that the company is in compliance with the Responsible Carrier Program.~~

- C. ~~Probationary status will be withdrawn and the membership immediately terminated of any member company that fails to successfully complete its annual recertification audit within three months of the due date for such recertification audit~~
- D. ~~Any disputes of findings may be appealed by either the auditor or the AWO member company in accordance with the dispute resolution policy previously approved by the Board of Directors.~~
- E. ~~Member companies that successfully complete two consecutive annual recertification audits will be removed from probationary status and restored to the three-year recertification audit cycle.~~

Addendum C. Audit Issues

1. *AWO members participating and all carrier members required to participate in the Responsible Carrier Program, will have their membership status and RCP audit due date posted on the AWO Web site in the “Members Only” section. Membership status will be classified as follows:*
 - a. *Provisional Member – Companies that have been members of AWO for less than two years and have not yet completed their first two AWO-certified RCP audits. A new member that presents documentary evidence of full compliance with a recognized safety management system for at least 12 months prior to its new member application will be considered a provisional member until completion of its first AWO-certified RCP audit.*
 - b. *RCP- certified Member – Companies that have completed a current AWO-certified Responsible Program Audit.*
- ~~1.2.~~ Any AWO carrier member company that resigns its membership or has its membership withdrawn after April 1, 1998 must, before rejoining the association, show satisfactory documentary evidence of having completed an AWO-certified third-party audit no more than ~~90~~ **30** days prior to the date of its Carrier Member Application for reinstatement. ~~Recertification audits will be required for these members every three years from the date of the audit used for reinstatement. Companies using the ISM audit schedule in Addendum B. 1.(a) will be subject to the recertification audits required under that schedule~~
3. *For companies seeking to rejoin AWO that resigned or had their membership terminated after April 1, 1998, AWO-certified auditors may conduct and complete, at the company’s request, a full RCP audit and certify that fact directly to AWO for its use in considering the new member application. Notification of completion of the audit should be sent to the AWO Safety Department. (Relocated from item 3. paragraph 2)*
- ~~2.4.~~ An AWO-*certified* auditor hired, consulted, or otherwise engaged by an AWO member company to develop its Responsible Carrier Program shall not perform the initial certification of that member’s Responsible Carrier Program. Subsequent recertification audits may be performed by AWO-certified auditors without regard to any previous development role.
- ~~3.~~ AWO-certified auditors are prohibited from making any reference to AWO, the RCP, or to the auditor’s status as being certified by AWO, in connection with work performed for non-AWO members, including in certification letters, opinion letters and/or public statements. *(Relocated to addendum D)*

~~For companies seeking to rejoin AWO that resigned or had their membership terminated after April 1, 1998, AWO certified auditors may conduct and complete, at the company's request, a full RCP audit and certify that fact directly to AWO for its use in considering the new member application. Notification of completion of the audit should be sent to the AWO Safety Department. (*Relocated to item 3 above*)~~

- ~~4.~~ The shoreside management audit should be conducted first and vessel audits should be conducted within 30 days of the management audit. (*Relocated to item 9 below*)
5. If a company does not operate any towing vessels (but only barges), it must complete all applicable sections of the management section of the Responsible Carrier Program.
6. If a company's equipment is bareboat chartered to another company, there is no requirement for the owning company to comply with any of the provisions of the Responsible Carrier Program for the bareboat chartered equipment.
7. If a company does not own or operate any equipment, but recognizes the Responsible Carrier Program in its vetting program, that company itself is not a Responsible Carrier. The Responsible Carrier Program is a set of policies and procedures for companies that own and/or operate marine equipment, except as otherwise noted.
8. AWO Affiliate members that provide tankermen and/or vessel crewmembers to Responsible Carrier Program-certified AWO carrier members are eligible for certification as Responsible Carriers, provided that those tankermen and/or crewmembers, and the company, meet all the training requirements and other applicable sections of the Responsible Carrier Program.
- ~~4.9.~~ *The shoreside management audit should be conducted first and vessel audits should be conducted within 30 days of the management audit. (Relocated from item 4 above)*
- ~~9-10.~~ Ten (10) percent of a company's fleet is subject to a vessel audit. For a fleet of 10 boats or less, one boat would be audited; for a fleet of 11-20 boats, two boats would be audited, etc., up to a maximum of 10 boats. This approach is not meant to preclude an auditor from going aboard other available company vessels to spot-check specific equipment items or systems.
- ~~10-11.~~ In order to ensure that vessel audits capture a representative sample of a company's fleet but are performed in a cost-effective manner with minimal disruption to the company's operations, vessel availability, area of operations and other scheduling considerations should be considered in determining which vessels are to be audited. The auditor should select the boat(s) to be audited, taking into account the above considerations and the need to ensure that the sample selected is representative of the company's fleet and scope of operations.

- ~~11~~.12. Auditors must ascertain that all of a company's policies and procedures are supported by records that contain sufficient information to determine the means by which the company meets the requirements of the RCP. Auditors should also look for evidence that reflects a company's ongoing commitment to complying with the letter and the spirit of the RCP. The required documentary evidence that auditors will be looking for may include, but is not necessarily limited to, maintenance records, crew safety meeting records, vessel inspection checklists, and personnel training records.
- ~~12~~.13. The Responsible Carrier Program requires that all crewmembers be trained. Training programs do not have to be Coast Guard-approved, but must be formal and well documented.
- ~~13~~.14. Masters, mates (pilots), engineers and tankermen are required to receive training in marine firefighting and fire prevention. Deck crews are required to be trained in vessel firefighting and fire prevention. Using these broad guidelines, it is up to the company to determine the content of the training. It should be noted that the difference between marine firefighting and vessel firefighting is chiefly one of focus. Vessel firefighting should concentrate to a large degree on hands-on firefighting techniques – skills that will be necessary for the individuals that will have the primary responsibility for the actual fighting of the fire. Marine firefighting is broader: it includes greater detail and focuses on the overall firefighting response. These are skills that are essential for individuals in supervisory positions who will direct the firefighting effort. Subjects should include theory, firefighting tactics, and overarching issues such as vessel stability, personnel safety, and emergency communications. This difference recognizes the role that each crewmember must fulfill in the event of an actual emergency. Fire prevention training is required for all positions. This training can be as simple as proper storage of flammable materials, eliminating sources of ignition and good housekeeping, especially in the galley and engine room.
- ~~14~~.15. When a company has completed a Responsible Carrier Program audit (that is, when an approved auditor has determined that the company is in full compliance with the Responsible Carrier Program), the auditor should provide the company with a short letter attesting to its compliance, in addition to the completed audit tool that the company can use to refine and enhance its program. If the audit reveals nonconformities that must be corrected before the auditor can attest that the company is in full compliance with the RCP, the company should work with the auditor to correct those deficiencies. This does not constitute "failing" the audit; it simply means that the process is not complete. Once the identified deficiencies have been corrected and verified by the auditor, the company should be issued a letter from the auditor attesting to its compliance.

- ~~15~~**16.** If an auditor finds discrepancies on a boat(s) that precludes issuance of a letter of compliance, the company should be expected to correct those nonconformities throughout its fleet, not just on the vessels on which the discrepancies were found. The auditor should satisfy himself that the nonconformities have been corrected fleetwide and should not be limited to checking the same vessels if he returns for a follow-up visit to verify that the discrepancies have been corrected.
- ~~16~~**17.** AWO members who have completed an audit should send to AWO a copy of their letter from an AWO-certified auditor attesting to their compliance with the Responsible Carrier Program. AWO will then issue a certificate of compliance valid for *the appropriate time period* ~~three years~~. AWO will not receive a copy of the completed audit tool or other details on the status of a member's compliance.
- ~~17~~**18.** AWO's certification of a member's Responsible Carrier Program is contingent on that company's remaining a member in good standing of the association.
- ~~18~~**19.** If different auditors (audit companies) conduct a company's management and vessel audits, the company will need to provide letters of compliance from both auditors in order to receive a certificate of compliance from AWO.
- ~~19~~**20.** The audited company "owns" the completed audit and both the company and the auditor should retain copies of the document. Copies of the audit are provided to third parties only by the audited company or by the auditor at the audited company's request. The auditor should be available to discuss the audit results with a company's customer(s) at the audited company's request.
- ~~20~~**21.** A company is permitted to use an AWO-certified auditor to conduct an RCP audit in conjunction with another audit (e.g., ISM), effectively undergoing both audits at the same time and minimizing attendant financial costs and staff time.

Addendum D. Auditor Issues

1. An AWO member company employee who meets the specified qualifications is permitted to apply for certification to conduct RCP audits of other AWO member companies, such as company vendors or outside towers, as a cost-effective way to provide smaller companies with access to the benefits of a third-party audit. To ensure the credibility of the program, “reciprocal” audits are not permitted; that is, a qualified employee of Company A could not conduct an audit of Company B if an employee of Company B had audited Company A. In addition, a company employee is not permitted to audit his own company or a parent or subsidiary thereof.
2. *AWO-certified auditors are prohibited from making any reference to AWO, the RCP, or to the auditor’s status as being certified by AWO in connection with work performed for non-AWO members, including in certification letters, opinion letters, and/or public statements. (Relocated from addendum C)*
- ~~3. Individuals wishing to become AWO-certified Responsible Carrier Program Auditors must show satisfactory evidence of ALL the following:
 - 1) High school graduation or GED.
 - 2) Marine industry experience (experience in the barge and towing industry strongly preferred).
 - 3) Shoreside management experience.
 - 4) Successful completion of a recognized auditor training course and auditing experience of at least two years.——
 - 5) Experience that includes AT LEAST TWO OF THE FOLLOWING:
 - a.) Vessel inspection or surveying experience (e.g. employment as a Coast Guard inspector, classification society surveyor, etc.);
 - b.) Sailing experience in a licensed capacity;
 - c.) Direct responsibility for vessel maintenance, repair, operations, etc.~~
3. *Effective April 2008 individuals wishing to become AWO-certified Responsible Carrier Program Auditors must show satisfactory evidence of ALL the following:*
 - A. *High school graduation or GED.*
 - B. *Barge and towing industry, or other qualifying experience .*
 - C. *Successful completion of a recognized lead auditor training course and auditing experience of at least two years.*
 - D. *Experience that includes AT LEAST TWO OF THE FOLLOWING:*
 - i. *Vessel inspection or surveying experience (e.g. employment as a Coast Guard inspector, classification society surveyor, etc.);*
 - ii. *Sailing experience in a licensed capacity;*
 - iii. *Direct responsibility for vessel maintenance, repair, operations, etc.*

OR:

- E. At least five (5) years of acceptable professional safety experience with the following:
- iv. Primary responsibility for the prevention of harm to people, property and the environment.
 - v. Hazard recognition, evaluation and analysis, and development and implementation of controls.

Recommendations - A letter of recommendation is required from two AWO member companies in a position to evaluate applicant's suitability to conduct Responsible Carrier Program audits. If an applicant is an employee of an AWO member company, a letter of recommendation from said AWO member company is not acceptable.

This application must be completed. A resume alone will not be accepted in lieu of this application's satisfactory completion. (Use additional sheets if necessary.)

Certification - To achieve certification as an AWO-Certified Responsible Carrier Auditor, all auditors will be required to attend an orientation class and periodic recertification training presented by AWO covering the content and administration of the Responsible Carrier Program, the Responsible Carrier Audit, and the use of the Responsible Carrier Program audit instrument.

All orientation/recertification classes are held in AWO's offices in Arlington, VA.

- 4. Unanimous agreement of the voting members of the Accreditation Board is required for approval of an auditor.
- 4.5. Certified auditors will be notified by AWO in writing when a Board-approved change to the Responsible Carrier Program is made, along with guidance as to how the change is to be addressed in future Responsible Carrier Program audits.

RCP Section G.

G. Internal Audit-and Review Procedures

1. Procedures for conducting *annual* internal audits, that include, but are not necessarily limited to:
 - a) Method for identifying nonconformities
 - b) Method of tracking corrective action including:
 - (1) Assigned responsibility
 - (2) Management review
 - (3) Follow-up timeframe (e.g., 90 days)
2. Procedures to ensure compliance with applicable federal laws and regulations concerning marine safety and environmental protection
3. Personal injury investigation
4. Spill investigation
5. Vessel accident investigation
6. Communication procedures for disseminating lessons learned
7. Document control, updating, and distribution
8. Performance measurement procedures

Proposed Change to AWO Constitution and Bylaws

Additions are noted in *bold italic*. Deletions are noted by strikethrough.

ARTICLE II Membership

Section 1. Qualification –

- A. Individual U.S. – flag water transportation companies, and other companies associated with this industry, engaged in domestic transportation, including non-contiguous trade, are eligible for membership.
- B. In order to be eligible for AWO membership and to remain as members in good standing after July 1, 1998, companies that own or operate tugboats, towboats, or barges engaged in U.S. domestic transportation must ~~commitment to~~ demonstrate a ~~good faith~~ *good faith* commitment to achieve compliance with the AWO Responsible Carrier Program. ~~Such a good faith commitment shall be demonstrated as follows:~~
 1. All AWO carrier members or prospective members shall indicate, in writing, their commitment to ~~work in good faith to~~ achieve compliance with the AWO Responsible Carrier Program.
 2. ~~After November 1, 2008, All~~ *After November 1, 2008, All* ~~all new~~ *all new* AWO carrier members ~~that cannot show documentary evidence of full compliance with a recognized safety management system for at least 12 months prior to their new member application~~ *that cannot show documentary evidence of full compliance with a recognized safety management system for at least 12 months prior to their new member application* shall ~~undergo~~ *complete* a third-party Responsible Carrier Program audit within one year of joining the association, and ~~two~~ *two* subsequent *annual* recertification audits *due on the date of the acceptance of their new member application.* ~~as required by item 3. below. A company that presents documentary evidence of full compliance with a recognized safety management system for at least 12 months prior to its new member application shall complete an AWO-certified Responsible Carrier Program audit within one year of joining the association.~~
 3. ~~Following completion of the initial audit cycle discussed in item 2 above, all~~ *Following completion of the initial audit cycle discussed in item 2 above, all* ~~All~~ *All* AWO carrier members shall ~~complete an AWO-certified third-party audit every three years. successfully undergo a third-party Responsible Carrier Program recertification audit within three years of their previous RCP audit. Any nonconformities discovered during this audit must be addressed, and the company certified as in compliance with the RCP by an AWO certified auditor, within 90 days of this audit.~~ *complete an AWO-certified third-party audit every three years.*

Section 2. Classification of Members – Members shall be classified as follows:

- A. Carriers, including regulated for hire and private (including those who move only their own materials), and vessel owners who rent or charter their floating equipment to others.
- B. *Provisional members are companies that have been members of AWO for less than two years and have not yet completed their first two AWO-certified RCP audits. A new member that presents documentary evidence of full compliance with a recognized safety management system for at least 12 months prior to its new member application will be considered a provisional member until completion of its first AWO-certified RCP audit.***
- C. *RCP-certified members are those companies that have completed a current AWO-certified Responsible Program Audit.***
- B.D.** Associate members are those subsidiaries, branch offices, and sister companies of Association members that hold separate memberships in the Association. These associate members shall exercise full rights of membership.
- €.E.** Affiliate members are those associations, corporations, partnerships, and sole proprietorships sharing common interests with carrier members. One seat on the Board of Directors shall be filled by an Affiliate member nominated by the Chairman of the Board and elected by the Executive Committee.
- Đ.F.** Other members are those entities whose eligibility for membership is determined by the Board of Directors.