



16711/Serial No. 195

JAN 14 2011

The American Waterways Operators (AWO)
801 North Quincy Street
Suite 200
Arlington, VA 22203

Dear Ms. Carpenter,

This letter is to document the Coast Guard's approval of AWO's proposed Alternative Planning Criteria (APC) titled, "Emergency Towing Alternative Planning Criteria." Provided the provisions outlined in this letter are agreed to and fully executed, this APC is "approved" for a period not to exceed two years from the date of this letter.

The provisions contained in your December 7, 2010 submission formally document the long standing tradition of towing vessel mutual assistance on the rivers of the Eighth and Ninth Coast Guard Districts and provide a way-ahead for meeting full compliance with the emergency towing vessel requirements of the Salvage and Marine Firefighting Requirements; Vessel Response Plans (VRP) for Oil; Proposed Rule.

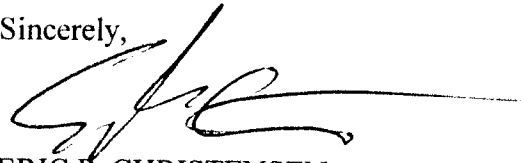
Please note, the portion of your APC that describes the notification process to be used in the event of an incident requiring emergency towing is an area that will require improvement before AWO's APC receives subsequent approval. Due to the remoteness of some areas covered by this APC, we recommend that AWO research the development of a central notification center/process that will quickly identify emergency towing vessels that can assist a tank vessel covered by this APC.

In addition, regulations require that the entire VRP is exercised every three years, including exercising the AWO APC. Any lessons learned should be fully documented and addressed prior to the resubmittal of this APC.

In order to ease the administrative burden of updating existing VRPs, the VRP Program will accept incorporation of AWO's APC by reference in the VRP to the version maintained on AWO's website. The Coast Guard Homeport website will also list the most current revision of the AWO APC. The Coast Guard requires the APC to be updated when there is a change to the list of companies whose resources support the APC. We also require to be notified in writing immediately if a current AWO member leaves the organization or is in any other way not privy to this APC. Finally, AWO should annually verify through "point in time snapshots" that sufficient AWO membership is available to support this APC for the covered areas.

I applaud AWO for taking the initiative to work with my staff and Coast Guard District Eight to develop an acceptable APC. I encourage AWO to continue to consult with the Coast Guard to improve upon the provisions contained in this APC prior to its expiration. Please feel free to contact Ms. Patricia Adams at 202-372-1227 or patricia.k.adams@uscg.mil if you have any questions regarding this letter.

Sincerely,



ERIC P. CHRISTENSEN
Captain, U.S. Coast Guard
Chief, Office of Vessel Activities

Copy: LANTAREA (P)
Commander, Coast Guard District 8 (dp)
Commander, Coast Guard District 9 (dp)