



**The American Waterways Operators**

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January 11, 2010

Docket Management Facility (M-30)  
U.S. Department of Transportation  
West Building Ground Floor, Room W12-140  
1200 New Jersey Avenue, SE.  
Washington, DC 20590-0001

Re: Supplemental Notice of Proposed Rulemaking: Vessel  
Traffic Service Lower Mississippi (USCG-1998-4399)

Dear Sir or Madam:

The American Waterways Operators (AWO) is the national trade association representing the inland and coastal tugboat, towboat, and barge industry. AWO members perform most of the ship assist work and account for most of the tugboat, towboat and barge movements in the New Orleans Captain of the Port zone. For the past decade, the membership of AWO has worked to ensure that any Vessel Traffic System (VTS) that will serve the Lower Mississippi River (LMR) and Port of New Orleans is both practical and effective in reducing risk. Prior association work with the Coast Guard to develop and promulgate the use of Automated Information System (AIS) technologies has already contributed to accomplishing that goal. The supplemental notice of proposed rulemaking is one last step in that process, and as such, AWO appreciates the opportunity to comment.

AWO members believe that the previous VTS models used in the Houston and Berwick Bays VTS zones do not adequately fit the unique operating conditions of one of the most challenging bends on the Mississippi River and one of the busiest industrial ports in the world. **With such fundamental and underlying concerns, AWO recommends that the Coast Guard hold a public meeting on this issue.**

As we stated in our response to the Coast Guard's April 26, 2000, Request for Comments, AWO strongly believes that the next generation of VTS on the LMR should be minimally intrusive and conform to current vessel operations and communication practices. Widespread AIS system use since the time of the initial notice of proposed rulemaking has freed operators from constant radio communication with Vessel Traffic Centers (VTC). As a result, AWO members seek a VTS on the LMR that works with the local maritime community's operations. We recommend that the Coast Guard establish a working group under the Lower Mississippi River Safety Advisory Committee (LMRSAC) that is charged with advising about future VTS implementation. In addition, AWO strongly suggests coordinating future high-water efforts with VTC stakeholders in the Baton Rouge area, such as the Gulf Intracoastal Canal Association and LMRSAC as part of the Waterways Action Plan.

Thank you for the opportunity to comment. We would be pleased to answer any questions or provide further information as the Coast Guard sees fit.

Sincerely,

Mark A. Wright

The Tugboat, Towboat and Barge Industry Association