



## **TRANSPORTATION WORKER IDENTIFICATION CREDENTIAL**

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### **Eliminate the Second Trip to the TWIC Enrollment Center**

Current Transportation Security Administration regulations require applicants for a Transportation Worker Identification Credential (TWIC) to make at least two separate trips to an enrollment center in order to obtain a TWIC: first to enroll for, and then to pick up, their card. For some applicants, the nearest enrollment center is hundreds of miles away, requiring a time consuming and expensive round trip. When other identity documents such as passports and merchant mariner credentials can be returned to qualified applicants by mail, TWIC applicants should not be required to go through such a costly and laborious process to receive their cards.

The Coast Guard Authorization Act of 2010, signed into law by President Obama in October 2010, requires the Government Accountability Office to conduct a study to determine the feasibility of preserving the “chain of trust” in the TWIC application process without requiring applicants to return to the enrollment center to pick up and activate their TWIC. In addition to reducing the burden on American workers who have paid more than \$132 for the card and complied with time-consuming TWIC enrollment procedures, eliminating the second trip to the enrollment center would help to compensate for the eventual closure of enrollment centers as the TWIC program moves into the sustainment phase.

### **TWIC Card Readers Are Not Needed on Towing Vessels**

A May 2006 TSA/Coast Guard notice of proposed rulemaking (NPRM) proposed to require electronic card readers on nearly all vessels, despite the fact that card readers add little security value on vessels with small crews, such as towing vessels. Congress responded to significant public concern over this requirement through a provision in the 2006 SAFE Port Act, which requires the Secretary of Homeland Security to establish a crew size threshold for card reader requirements. The Congressionally established Towing Safety Advisory Committee (TSAC) has recommended that card readers not be required on vessels with 14 crewmembers or fewer.

In March 2009, the Coast Guard published an advance notice of proposed rulemaking (ANPRM) that proposed that crewmembers on vessels with less than 14 crewmembers be granted “recurring unescorted access” without the use of a vessel-based card reader. AWO’s comments on the ANPRM welcomed the Coast Guard’s recognition that card readers add no security value on vessels with limited crew sizes and urged changes to the proposal to make the requirements for validating and verifying TWICs more practical for towing companies. A notice of proposed rulemaking is expected to be published in 2011.

For more information on this issue, or to take action to eliminate the TWIC second trip, contact Mr. Chris Coakley at (703) 841-9300, extension 297, or via email at [ccoakley@vesselalliance.com](mailto:ccoakley@vesselalliance.com).