



**The American Waterways Operators**

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Jennifer Carpenter  
Senior Vice President - National Advocacy

July 14, 2008

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

Re: Escort Vessels in Certain U.S.  
Waters (USCG-2006-23556)

Dear Sir or Madam:

The American Waterways Operators (AWO) is the national trade association for the inland and coastal tugboat, towboat and barge industry. AWO's member companies safely and efficiently transport over 800 million tons of cargo each year, and engage in critical shipdocking, escorting and other harbor services work. The tugboat, towboat and barge industry provides the nation with a safe, secure, efficient and environmentally-friendly means of transportation for America's domestic commerce. Thank you for the opportunity to comment on this rulemaking.

AWO strongly supports the Coast Guard's proposal to withdraw its 1993 advance notice of proposed rulemaking (ANPRM) regarding the extension of escort vessel requirements under the Oil Pollution Act of 1990 to waters other than Prince William Sound and Puget Sound. AWO agrees with the Coast Guard's conclusion that rather than promulgate a national rulemaking that attempts to identify other waters or other vessels to which tug escort requirements should be applied, decisions on the need for and content of escort vessel requirements should be made by the Coast Guard at the local level through a cooperative process. One such option is the Ports and Waterways Safety Assessment (PAWSA) process, which involves public and private sector stakeholders and includes a comprehensive assessment of local conditions and possible alternative safety measures. As we emphasized in our February 1995 comments on the ANPRM, local factors and conditions are of paramount importance in identifying any additional waterways in which tug escorts could have value in improving navigation safety, and in establishing performance standards for escort vessels to meet. In this regard, we reiterate our previous comment that, in considering additional areas where tug escort requirements might be applied, it is essential that the Coast Guard clearly demonstrate that analysis of Ports and Waterways Safety Act criteria supports the determination that tug escorts will be an effective navigation safety measure in a given waterway.

The Tugboat, Towboat and Barge Industry Association

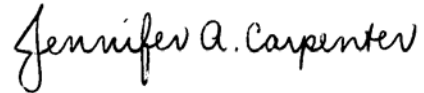
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AWO urges the Coast Guard to proceed without delay to finalize its withdrawal of the ANPRM and close docket USCG-2006-23556. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer A. Carpenter". The signature is written in black ink and is positioned below the word "Sincerely,".

Jennifer A. Carpenter