



The American Waterways Operators

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Angela L. Madden
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Docket Management Facility
United States Department of Transportation
400 Seventh Street, SW
Washington, DC 20590-0001

Re: High Frequency (HF) Radio
Broadcasts of Marine Weather
Forecasts and Warnings
(USCG-2007-27656)

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 400 member companies include the owners and operators of barges and towing vessels operating on the inland and intracoastal waterways; the Atlantic, Pacific and Gulf coasts; the Great Lakes; and, ports and harbors around the country. The industry's 4,000 towing vessels and 27,000 barges safely and efficiently transport over 800 million tons of cargo each year, including more than 60 percent of U.S. export grain, vital energy sources such as coal and petroleum (including most of New England's home heating oil and gasoline), and other bulk commodities that are the building blocks of the U.S. economy. The tugboat, towboat and barge industry provides the nation with a safe, secure, low-cost, environmentally-friendly means of transportation for America's domestic commerce.

On behalf of AWO members, thank you for the opportunity to comment on the potential discontinuation of the high frequency (HF) radio broadcasts of weather forecasts and warnings. These broadcasts are crucial for the safe operation of smaller vessels, including tugboats that travel offshore. With safety in mind, mariners working on towing vessels use several methods for obtaining up-to-date weather information to increase the probability that they get the critical information they need.

The termination of the Coast Guard HF radio broadcasts will have a substantial impact on vessel operators who may not have access to high-speed Internet. The cost of high-speed connectivity, for both the hardware and service fees, is out of reach for many small operators. Because of this, Coast Guard broadcast services must be maintained.

With these overarching comments as a backdrop, we offer the following responses to the specific questions posed by the Coast Guard in the April 26 Notice and Request for Public Comment.

1. *What is your position in the maritime community?*

The American Waterways Operators is the national trade association representing the owners and operators of tugboats, towboats and barges serving the waterborne commerce of the United States.

Our mission is to promote the long-term economic soundness of the industry, and to enhance the industry's ability to provide safe, efficient and environmentally-responsible transportation through advocacy, public information and the establishment of safety standards.

2. *What are your primary sources for obtaining marine weather forecasts?*

AWO member companies primarily use Coast Guard HF radio voice and fax broadcasts, VHF weather radio, National Oceanic and Atmospheric Administration (NOAA) VHF-FM Broadcasts, National Weather Service VHF Weather Radio, NAVTEX and National Weather Service product requests via email. Some AWO members also utilize Inmarsat C/SafetyNet and Coast Guard HF radio Simplex Teletype over Radio (SITOR). Vessels that are equipped with Internet capabilities also utilize weather Web site information from NOAA.

3. *Do you use Coast Guard HF radio voice broadcasts to receive marine weather forecasts? If yes, how often? How critical are they to your safety and operation?*

Most AWO coastal member companies utilize the Coast Guard HF radio voice broadcasts on a daily basis. These transmissions are critical to the operations and safety of vessels operating in coastal commerce.

- 4. Do you use Coast Guard HF radiofax broadcasts to receive marine weather forecasts? If yes, how often? How critical are they to your safety and operation?**

Most AWO coastal member companies utilize the Coast Guard HF radiofax broadcasts and receive most products multiple times throughout the day. The fax broadcast is one of the few ways mariners can receive geographical weather charts on many of their vessels and is crucial to the operation of their vessels. For vessels without Internet capabilities, the radiofax is the only method available to receive satellite photos.

- 5. Do you use Coast Guard HF radio Simplex Teletype over Radio (SITOR)? If yes, how often? How critical are they to your safety and operation?**

Simplex Teletype over Radio (SITOR) is rarely used in the towing industry.

- 6. What alternative source(s) for obtaining marine weather forecasts would you pursue if Coast Guard HF broadcasts were no longer available?**

Outside of the Coast Guard HF broadcasts, towing vessel operators would pursue installing Internet capabilities (at a high cost) to access weather information through the NOAA Web site. Other sources of information are the NOAA VHF-FM Broadcasts, the National Weather Service email request service and NAVTEX receivers. There are other options such as satellite radio or Weather Channel Marine; however, these services are expensive and not offered throughout the industry's service area.

Getting all weather information via email would be extremely costly and place a large burden on the industry to install new computer systems onboard the vessels. The only method for receiving Internet information is via satellite while at sea. This method is extremely slow and very costly for use on a per-minute basis.

- 7. Would the loss of Coast Guard HF marine weather broadcasts affect you?**

The loss of the Coast Guard HF marine weather broadcasts could denigrate safety in the towing industry. The safety of vessels at sea would be adversely impacted and the alternatives leave gaps in service. This would be especially troublesome during hurricane season, when mariners need as much information as possible to transit safely. These broadcasts are a primary factor in protecting the lives of mariners and the environment during hurricane season and the extreme winter months on both coasts.

8. *How far seaward does your vessel primarily operate? In what geographic area(s) do you generally operate your vessel?*

AWO's 400 member companies operate on the inland and intracoastal waterways; the Atlantic, Pacific and Gulf coasts; the Great Lakes; in the noncontiguous trades to Puerto Rico, Hawaii and Alaska; and, ports and harbors around the country. Towing vessels also operate internationally travelling to Canada, Central America, South America, Korea, Russia, West Africa and the Persian Gulf. AWO operators transit the Pacific and Atlantic oceans, the Gulf of Mexico, the Gulf of Alaska, the Bering Sea and the Sea of Japan. While towing vessel operators do not expect the voice and radiofax broadcasts to encompass their entire area of operations, the broadcasts are extremely beneficial when returning to the United States.

As emphasized throughout these comments, AWO has serious concerns about the proposal to discontinue the Coast Guard HF voice and fax weather broadcasts. We strongly urge the Coast Guard to continue to provide these services until a more efficient and cost-effective method can be developed.

Thank you for the opportunity to comment. AWO would be pleased to provide further information as the Coast Guard sees fit. Please feel free to contact me at (703) 841-9300, extension 262, or via email at amadden@vesselalliance.com if AWO can be of further assistance.

Sincerely,



Angela L. Madden