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Thomas M. Horgan
Manager – Midcontinent Office

June 6, 2016

CAPT Richard Timme
Commander, Sector Ohio Valley
600 Martin Luther King Jr. Place
Louisville, KY 40202-2242

Re: Sector Ohio Valley Annual and Recurring
Safety Zones
(Docket No. USCG-2015-1029)

Dear CAPT Timme:

The American Waterways Operators is the national trade association for the U.S. tugboat, towboat, and barge industry. AWO's members account for 80 percent of the barge tonnage and two-thirds of the towing vessel horsepower in this critical industry segment, moving cargoes essential to the American economy on the inland rivers, the Atlantic, Pacific and Gulf coasts, and the Great Lakes. According to the U.S. Army Corps of Engineers, total freight traffic on the Ohio River exceeded 220,000 short tons in 2014.¹

We thank Sector Ohio Valley for the opportunity to comment on the Annual and Recurring Safety Zones Update. Timely and robust communication regarding known or potential river closures affecting vessel traffic is appreciated by the towing industry and its customers. This proactive outreach is an integral part of ensuring reliable commercial transportation. We thank the Coast Guard for its diligence in publishing notices of safety zones and other interruptions in commercial traffic. We suggest that one part of this process could be improved -- engaging with industry before permits are issued. It is critical that industry stakeholders provide input and are provided with reasonable time to respond to and plan for events.

With regard to the Annual and Recurring Safety Zones Update itself, the document could be improved by including more detail on the duration of the listed safety zones. An example is the two-day closure at Rice's Landing, PA, scheduled for the second weekend in June. It would

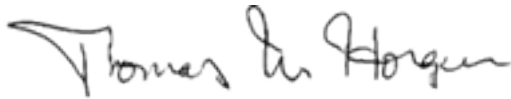
¹ U.S. Army Corps of Engineers, *Waterborne Commerce of the United States: Part 2 – Waterways and Harbors Gulf Coast, Mississippi River System and Antilles*, pg. 58.

increase the facilitation of commerce if towing companies knew whether to plan for a full 48-hour closure or two separate daytime closures.

In addition, the Coast Guard should avoid the presumption that publication in the *Federal Register* constitutes sufficient notice to the maritime industry regarding safety zones. We ask that the Coast Guard further develop advance communications with navigation groups and increase broadcasts during the events themselves.

Thank you again for the opportunity to comment on Sector Ohio Valley's Annual and Recurring Safety Zones Update. AWO appreciates the Coast Guard's ongoing commitment to promote our mutual goals -- a safe and efficient transportation system. We would be pleased to discuss these comments further or to provide additional information as you see fit.

Sincerely,

A handwritten signature in black ink that reads "Thomas M. Horgan". The signature is written in a cursive style with a large, stylized initial 'T'.

Thomas M. Horgan