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September 17, 2019

Maritime Administration
U.S. Department of Transportation
Docket Management Facility, Room PL-401
1200 New Jersey Avenue, SE
Washington, DC 20590-0001

Re: DOT Docket Number MARAD-2018-0088, Centers of Excellence for Domestic Maritime Workforce Training and Education, 83 Fed. Reg. 25109

Dear Sir or Madam:

The American Waterways Operators is the national trade association for the tugboat, towboat and barge industry. AWO's more than 300 member companies own and operate barges and towing vessels on the U.S. inland and intracoastal waterways; the Atlantic, Pacific and Gulf coasts; and the Great Lakes. The tugboat, towboat and barge industry provides family-wage jobs and ladders of career opportunity for more than 50,000 Americans, including 38,000 positions as mariners on board our vessels, who safely, securely and efficiently move more than 760 million tons of cargo critical to the U.S. economy.

AWO appreciates the opportunity to provide comments on the Maritime Administration's proposed process for designating educational institutions as Centers of Excellence for Domestic Maritime Workforce Training and Education and how the cooperative agreements program will be administered. AWO supports the goal of increasing the availability of mariner workforce training to meet the needs of the towing industry and applauds MARAD's commitment to enhancing mariner workforce training opportunities.

AWO members have attested to the growing need for entry-level professional mariners who are equipped to meet the challenges of the maritime work environment. Institutions with maritime training centers or maritime-related programs in place are uniquely situated to focus their efforts to meet our members' needs. They continue to provide tremendous opportunities to young men and women who are just beginning their careers – or exploring career paths as high school students – as well as those who are already in the industry. The need to continually replenish the mariner pipeline is critical. The institutions that offer these programs are generating proficient mariners and helping to ensure the necessary supply of mariners to fill these well-paying U.S. jobs.

Many AWO members partner regularly with community and technical colleges, many of which are members of the Community and Technical College Maritime Workforce Consortium, to meet their workforce training needs. These institutions have earned national reputations for providing high-quality maritime and industrial firefighting, radar, safety and wheelhouse training – including full mission bridge simulator courses. U.S. Coast Guard and STCW-approved maritime coursework is tailored to meet the specific needs of AWO member clients, and these institutions are making continuous improvements in their capacity to provide students with the academic and technical skills needed to be successful in the maritime, port and marine technology-related workforce.

AWO supports MARAD's proposed CoE program, through which the federal government will continue to pursue initiatives such as the facilitation of mariner training and the development of training courses necessary for both blue water and brown water operations. We encourage MARAD to ensure that those community and technical colleges that receive the CoE designation are ready to assist the maritime industry in obtaining and maintaining the highest quality workforce. The CoE designation will provide further opportunities and avenues for these institutions to expand their reach, thus benefitting the entire maritime industry.

AWO would be pleased to answer any questions or provide further information to assist MARAD as the CoE program comes online.

Sincerely,



Thomas A. Allegretti
President & CEO