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Caitlyn E. Stewart  
Vice President – Regulatory Affairs

March 25, 2024

CDR Brandon Link  
U.S. Coast Guard  
Office of Port and Facility Compliance  
2703 Martin Luther King Jr. Ave. SE  
Washington, DC 20593

CDR Frank Strom  
U.S. Coast Guard  
Office of Design and Engineering  
Standards  
2703 Martin Luther King Jr. Ave. SE  
Washington, D.C. 20593

Re: Cybersecurity in the Marine  
Transportation System (Docket  
No. USCG-2022-0802)

Dear CDR Link and CDR Strom:

The American Waterways Operators (AWO) is the tugboat, towboat and barge industry's advocate, resource, and united voice for safe, sustainable, and efficient transportation on America's waterways, oceans, and coasts. Our industry is the largest segment of the nation's 40,000-vessel domestic maritime fleet and moves 665 million tons of cargo each year safely and efficiently.

AWO members know that security in the marine transportation system (MTS) is critical to the safety of our mariners and waterways as well as the continuity of the nation's maritime commerce. Cybersecurity is no different, and we commend the Coast Guard for its proactive approach to addressing cybersecurity challenges in the MTS. However, the notice of proposed rulemaking (NPRM) published by the Coast Guard on February 22 is significant and complex. More time is needed to ensure AWO's membership and other MTS stakeholders can fully understand the NPRM and its implications for the regulated community. We are aware of and strongly support requests for an extension of the comment period that have been made by several organizations representing U.S. vessel owners and operators, and we urge the Coast Guard to provide an extension to allow MTS stakeholders to provide more substantial and robust comments.

Thank you for your consideration of our request. Please feel free to contact me if you have any questions.

Sincerely,

