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Brian W. Vahey  
Vice President – Atlantic Region

April 16, 2026

Mr. Gregory P. Hitchen  
Supervisory Bridge Management Specialist  
Northeast Coast Guard District  
1 South Street, Battery Park  
New York, NY 10004

Re: Drawbridge Operation Regulation;  
Newark Bay, Between the City of Newark  
and City of Bayonne, NJ (Docket No.  
USCG-2025-0805)

Dear Mr. Hitchen:

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. As the largest segment of the nation's 40,000-vessel domestic maritime fleet, our industry safely and efficiently moves 665 million tons of cargo each year and enables the flow of goods on the inland and intracoastal waterways; the Atlantic, Pacific and Gulf coasts; and the Great Lakes. Thank you for the opportunity to comment on the U.S. Coast Guard's proposal to amend the operating regulations governing the Lehigh Valley Drawbridge across Newark Bay.

AWO has long had concerns about the safety of remote bridge operations. We have seen and reported an alarming number of allisions and near-miss events involving remotely operated bridges closing on vessels with little or no effective warning. Each of these events carries the potential for significant property damage, environmental harm, and loss of life.

Despite these concerns, we remain ready to collaborate with the Coast Guard and bridge operators to address safety risks associated with remote operations. We were pleased to accept Conrail's invitation to visit its North Jersey Dispatch Center in March. During our visit, our members asked questions about how Conrail manages its remotely operated bridges and learned more about the role remote bridge operators play in facilitating maritime commerce.

We were very much encouraged by Conrail's responses to our questions. They have implemented many mitigating measures to improve bridge operation safety beyond what the traditional onsite "tender" has traditionally used. While our discussion helped eliminate most of the towing industry's concerns about the Lehigh Valley Bridge specifically, we continue to

believe that remote bridge operations pose certain inherent risks. AWO offers the following recommendations to Conrail's proposal:

1. **Public Review of Remote Operations and Contingency Plans:** AWO encourages the Coast Guard to share information submitted in accordance with the agency's *Bridge Remote/Automated Operation Request Guide* in future Federal Register notices regarding remote bridge operation proposals. Recognizing the sensitivity of certain information contained within this guide, AWO believes "Section 4: Remote Operations plan" and "Section 5: Contingency plan" provide particularly valuable insight for our members in evaluating remote operation proposals, and urge that this information be broadly shared with stakeholders.
2. **Investigation and Transparency:** AWO urges the Coast Guard to fully investigate incidents, near-misses, and operational delays associated with remote bridge operations and to share data from test periods—including delays, communication issues, and system failures—with waterways users.
3. **Operational Reliability and System Failure Response Time:** AWO strongly believes the Coast Guard should treat any failure of a critical safety component of a remote operation system as an operational failure, regardless of whether that component is required by statute. This would cover any failure resulting in loss of visibility, communications, or AIS functionality. When operations fail, we support a defined timeline for response. Specifically, AWO requests that the Coast Guard require qualified personnel to return the bridge to local, physical operation within 60 minutes of any failure or degradation of the remote system.
4. **Automatic Identification System (AIS):** AWO supports the inclusion of AIS broadcasting of bridge status as part of operational requirements for remote bridge operations. We request that AIS functionality be maintained continuously to provide mariners with real-time situational awareness.
5. **Minimizing Impacts on Maritime Commerce:** AWO strongly believes that remote bridge operations are only successful when they do not impede the free flow of maritime commerce in a manner consistent with 33 CFR 116. AWO requests that when final rules are published authorizing remote operation, the Coast Guard include any subsequent data on vessel delays or incidents in the Federal Register. If remote operations lead to continued operational delays for maritime commerce, we urge the Coast Guard not to authorize remote operations until a test period of at least 6 months can be sustained without any delays to maritime commerce. Additionally, if delays begin again after the Coast Guard authorizes remote operation to resume, we urge the Coast Guard to require a bridge tender to operate the bridge on site until delays are resolved for a period of 6 months.
6. **Nationalization of Bridge Delay Reporting Form.** AWO strongly supports the nationalization of the Coast Guard Great Lakes District's Bridge Delay Reporting Form to ensure that delay information is consistently captured and relayed to relevant

regulatory agencies for the record and for any necessary follow-up investigations or enforcement actions.

As remote bridge operations become more commonplace, it will be increasingly necessary for the Coast Guard to demonstrate oversight – and to help facilitate intermodal communications – to a greater degree than we have seen from the agency to date. We believe the reason why Conrail has been successful in mitigating many of the towing industry’s safety concerns compared to other rail operators is because they have actively engaged with the Coast Guard’s Northeast and East Districts in developing their remote operations plans. This level of coordination should be enforced by the Coast Guard rather than left up to individual rail operators to engage as they see fit.

AWO appreciates the opportunity to comment and would welcome the opportunity to provide additional input as this rulemaking proceeds.

Sincerely,

A handwritten signature in cursive script that reads "Brian W. Vahey". The signature is written in black ink and is positioned above the typed name and title.

Brian Vahey  
Vice President – Atlantic Region