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Mark A. Wright
Vice President – Southern Region

November 7, 2022

Mr. Douglas Blakemore
Chief, Bridge Administration Branch
U.S. Coast Guard, Eighth Coast Guard District
Hale Boggs Federal Building
500 Poydras Street
New Orleans, LA 70130-3310

Re: Drawbridge Operation Regulation; Bay
St. Louis, Bay St. Louis, MS
(Docket No. USCG-2022-0299)

Dear Mr. Blakemore:

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. On behalf of AWO's more than 300 member companies, we appreciate the opportunity to comment on the Coast Guard's issuance of the temporary deviation for how the CSX Transportation railroad drawbridge operates across Bay St. Louis.

In the notification of temporary deviation, CSX Transportation requests to operate this bridge remotely from their railroad terminal in Mobile, Alabama. AWO members have expressed safety concerns. While AWO members understand the value of technological enhancement, recent incidents have suggested that the remote operations merit greater scrutiny. There have been at least three allisions involving towing vessels and remotely operated bridges in the last year. AWO understands that all three may have involved some remote operation errors. We believe it is imperative that the U.S. Coast Guard fully investigate each incident and determine whether protocols should be developed to ensure greater risk mitigation for mariner safety before any deviation for remote operations is granted.

Our industry is concerned about the safety, environmental, and economic impacts of an increased number of remote-controlled bridge operations on U.S. navigable waterways. Since one of the Coast Guard's missions is to facilitate commerce, we believe the agency is in the best position to monitor and oversee remote-controlled operations to minimize the risk to

mariners, vessels, and commodities that move on the water. AWO requests that the Coast Guard start by developing a process to monitor these operations, inform stakeholders of the safety risks, and regulate bridge operations to minimize the risk to safe operation of vessels on navigable waterways.

Thank you again for the opportunity to comment. We look forward to continued engagement on this important navigation safety issue.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mark A. Wright".

Mark A. Wright
Vice President – Southern Region