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Caitlyn E. Stewart
Vice President – Regulatory Affairs

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RADM Wayne R. Arguin Jr.
Assistant Commandant for Prevention Policy
U.S. Coast Guard
2703 Martin Luther King Jr. Avenue, SE
Washington, DC 20593-7501

RE: Mariner Credentialing Program Transformation
(Docket No. USCG-2021-0834)

Dear Rear Admiral Arguin:

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, sustainably, and efficiently. On behalf of AWO's more than 300 member companies, we appreciate the opportunity to comment on the U.S. Coast Guard's proposed changes that lay the regulatory foundation for implementation of a new information technology system to support the mariner credentialing program (MCP).

Transformation of the MCP to a new, robust, and accessible system is a national security imperative. Current processing timeframes, communication practices, and errors inhibit new mariners from entering the workforce and disenfranchise existing mariners from continuing and advancing their careers. To ensure our ability to move commercial and military cargoes domestically and internationally, America's mariner workforce must be supported by a high-functioning Coast Guard credential processing system. It is with that critical need in mind that AWO provides the following comments supporting the four proposed changes:

1. Requiring electronic payment of mandatory fees for merchant mariner credentials through Pay.gov.

AWO supports the Coast Guard's justification for eliminating the use of non-electronic forms of payment. The ability to use credit cards, debit cards, and bank automated clearing house payments through Pay.gov provides mariners with adequate flexibility to choose their preferred payment method. We appreciate the Coast Guard's current work to create clear instructions for mariners to utilize Pay.gov, and we urge the Coast Guard to work toward a seamless process in the future MCP information technology

system that integrates Pay.gov payment processes into the MCP platform instead of requiring mariners to separately access Pay.gov and complete forms to calculate required fees and make payment.

2. Removing the requirement for prospective mariners to take an oath before an authorized official.

AWO supports the Coast Guard's proposal to eliminate duplicative application requirements and costs to prospective mariners by removing the requirement to take an oath before an authorized official. The U.S. Merchant Marine is a critical component of our nation's security, and taking the oath is an important element of joining the mariner workforce. However, the added time and financial cost to verbally take the oath at a Regional Exam Center or in front of a notary is unnecessary when prospective mariners also attest in writing to the oath when completing an application for a merchant mariner credential.

3. Allowing for electronic submission of CG-718A Certificates of Discharge.

AWO supports this change that will allow for electronic forms and electronic signatures when completing a CG-718A and broadly supports a future MCP information technology system that allows vessel operators to electronically submit sea service information. We look forward to future Coast Guard-industry engagement to create and refine that process.

4. Making technical amendments to update addresses and websites, to remove antiquated terminology, and amend language to use gender-neutral terms.

AWO supports these technical amendments and broadly encourages the Coast Guard to maintain up to date regulations to ensure accuracy for the regulated community.

Thank you for the opportunity to comment. AWO is pleased to discuss these comments further or provide any additional assistance that the Coast Guard may need to implement these improvements to the MCP system.

Sincerely,



Caitlyn E. Stewart
Vice President – Regulatory Affairs