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Jennifer A. Carpenter  
President & CEO

July 31, 2020

VADM David Pekoske  
Administrator  
Transportation Security Administration  
601 12th Street South  
Arlington, VA 20598

Dear Administrator Pekoske:

I am writing to you on behalf of the U.S. tugboat, towboat and barge industry to support the establishment of an online process to renew Transportation Worker Identification Credentials (TWICs). Transitioning from in-person to online TWIC renewal offers considerable potential to mitigate the impact of COVID-19 on our nation's essential critical infrastructure workforce, including mariners.

The COVID-19 pandemic has created unprecedented challenges for the Transportation Security Administration, its enrollment service providers, and our industry as we work to achieve our mutual goal of facilitating the safe, secure and efficient movement of our nation's commerce. AWO appreciates the steps TSA has taken in partnership with the U.S. Coast Guard to extend the validity of existing TWICs and exercise flexibility in the enforcement of certain TWIC requirements, ensuring that mariners whose TWICs expired between March 1 and July 31 did not risk losing their ability to work as a result.

Despite the extreme disruption and job losses the pandemic has caused in other sectors of the economy, our segment of the maritime sector has maintained a robust workforce of mariners to keep the country's supply chain moving. As you know, these mariners must maintain valid TWICs in order to be allowed access to secure or restricted areas onboard vessels or within facilities. With the expiration of TSA's temporary extension of TWIC expiration dates, mariners holding valid TWICs that expire on August 1 or later must follow standard renewal procedures, including an in-person visit to a TWIC enrollment center. This concerns us. AWO member companies are taking aggressive actions, including curtailing or suspending discretionary travel, to minimize their employees' risk of exposure to COVID-19 to protect them and the supply chains they support. Asking their employees to travel to and from the nearest open TWIC enrollment center is inconsistent with many AWO members' approach and exposes their employees to added health and safety risk.

We believe that the creation of an online TWIC renewal process would effectively mitigate this risk while maintaining TWIC integrity and security. We understand that TSA has already established a secure online renewal process for TSA PreCheck, that TWIC program staff have recommended the expansion of this system to allow TWIC holders to renew their credentials online, and that doing so is well within TSA's existing authorities. We urge you to direct your team to move forward with the establishment of an online TWIC renewal process as soon as possible.

An online renewal process for TWICs would benefit not only the towing industry, but all segments of the marine transportation industry, as well as our partners in the trucking and rail industries who move cargo to and from secure maritime facilities. And while these benefits have particular importance and urgency in our current national crisis, they would far outlast the COVID-19 pandemic by eliminating burdens of travel time and cost on individuals renewing TWICs in the future.

We urge you to move quickly to institute this process improvement that provides for both the safety of marine transportation workers and the security of the maritime transportation system during the COVID-19 pandemic. Thank you for your consideration of this request.

Sincerely,



Jennifer A. Carpenter  
President & CEO