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Brian W. Vahey  
Vice President – Atlantic Region

May 19, 2026

CAPT Loan T. O'Brien  
Chief, Office of Navigation Systems  
U.S. Coast Guard  
2703 Martin Luther King Jr. Ave SE  
Washington, DC 20593

Re: Proposal To Relocate the  
COLREGS Demarcation Line,  
Atlantic Coast, New York Harbor  
(Docket No. USCG-2025-0101)

Dear CAPT O'Brien:

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 relocate the COLREGS Demarcation Line, Atlantic Coast, New York Harbor.

AWO cares deeply about the safety of operations in New York Harbor. Our coastwise carriers share the waterway with large commercial traffic and our assist tugs coordinate closely with the pilots to ensure safe transits into and out of New York. For this reason, we support the Coast Guard's proposal to relocate the International Regulations for Preventing Collisions at Sea (COLREGS) Demarcation Line, Atlantic Coast, New York Harbor. This proposed adjustment aligns with existing navigation practices in one of the busiest waterways on the East Coast and would enhance the safety of our members' operations.

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

Sincerely,

Brian Vahey  
Vice President – Atlantic Region