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Jennifer A. Carpenter
Executive Vice President & Chief Operating Officer

March 26, 2018

Mr. Jonathan Smith
U.S. Coast Guard
Office of Marine Environmental Response Policy
2703 Martin Luther King Jr. Ave, SE, STOP 7516
Washington, DC 20593

Re: 2016.1 National Preparedness for
Response Exercise Program
(PREP) Guidelines (Docket No.
USCG-2017-0894)

Dear Mr. Smith:

The American Waterways Operators is the national trade association for the tugboat, towboat and barge industry. AWO's 350 member companies own and operate barges and towing vessels operating on the U.S. inland and intracoastal waterways; the Atlantic, Pacific and Gulf coasts; and the Great Lakes. Our industry's 5,500 towing vessels and 31,000 barges comprise the largest segment of the U.S.-flag domestic fleet. The tugboat, towboat and barge industry provides family-wage jobs and ladders of career opportunity for more than 50,000 Americans, including 38,000 positions as mariners on board our vessels, and supports more than 300,000 jobs in related industries nationwide. Each year, our vessels safely, securely and efficiently move more than 760 million tons of cargo critical to the U.S. economy, including petroleum products, chemicals, coal, grain, steel, aggregates, and containers. Tugboats also provide essential services in our nation's ports and harbors, including shipdocking, tanker escort and bunkering.

On behalf of AWO's member companies, thank you for the opportunity to comment on the revisions to the 2016 PREP Guidelines proposed by the Coast Guard and the Preparedness for Response Exercise Program Compliance, Coordination, and Consistency Committee (PREP 4C). AWO members operate both unmanned and manned tank barges, as well as towing vessels carrying oil as fuel, which are subject to oil spill response plan exercise requirements and may utilize the PREP Guidelines.

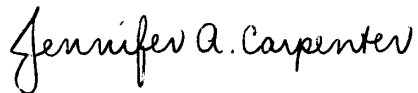
AWO commends the Coast Guard and PREP 4C for their responsive revisions to the 2016 PREP Guidelines. Version 2016.1 addresses many of the concerns raised by industry following the Guidelines' release. AWO supports the revisions and appreciates PREP 4C's practical approach to pollution prevention and response preparedness.

Notably, revising the requirement for an annual Remote Assessment and Consultation (RAC) exercise per vessel to a requirement for a triennial RAC exercise per plan will relieve a significant burden on industry, without diminishing preparedness. The revisions to the Guidelines also allow for RAC drills and Qualified Individual (QI) drills to be combined, which will enhance exercise efficiency and improve overall plan holder readiness. Finally, removing the exception and allowing salvage and marine firefighting RAC drills to receive fleet credit will greatly improve the ability of plan holders to manage and coordinate their response programs in a practical way.

AWO does recommend that PREP 4C refine the language contained in Section 3.4 – DRILL – Remote Assessment and Consultation – Manned Vessel. Specifically, Section 3.4, Records Location, is confusingly worded: “Record must also be maintained at the U.S. location of the QI, the vessel owner or operator, the IMT, or the SMFF provider, as designated in the VRP.” The text is unclear as to whether the records should be located *at each*, or *at only one* of the listed locations. AWO recommends that the guidelines reflect regulatory requirements pertaining to VRP location at 33 CFR §155.1030, which require the plan to be kept at the QI location and onboard the vessel.

AWO appreciates the Coast Guard’s consideration of these comments as it works with PREP 4C to finalize the first change to the 2016 PREP Guidelines. We would be pleased to discuss these comments further or provide additional assistance as needed.

Sincerely,

A handwritten signature in black ink that reads "Jennifer A. Carpenter". The signature is written in a cursive, flowing style.

Jennifer A. Carpenter
Executive Vice President & COO