



801 North Quincy Street  
Suite 200  
Arlington, VA 22203

Jennifer A. Carpenter  
Executive Vice President & COO

PHONE: 703.841.9300 Ext. 260  
EMAIL: [jcarpenter@americanwaterways.com](mailto:jcarpenter@americanwaterways.com)

July 23, 2018

CAPT Ryan Manning  
Chief, Office of Port & Facility Compliance  
U.S. Coast Guard  
2700 Martin Luther King Jr. Avenue, SE  
Washington, DC 20032

Re: Transportation Worker Identification  
Credential (TWIC) Reader  
Requirements, Delay of Effective  
Date (Docket No. USCG-2017-0711)

Dear CAPT Manning:

The American Waterways Operators is the national trade association for the tugboat, towboat and barge industry. AWO's more than 320 member companies own and operate barges and towing vessels 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.

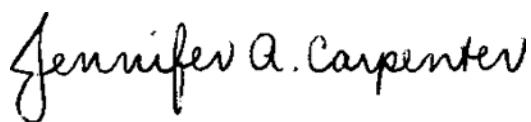
On behalf of AWO's member companies, thank you for the opportunity to comment on the U.S. Coast Guard's June 22 notice of proposed rulemaking to delay the effective date for certain facilities affected by the agency's Transportation Worker Identification Credential (TWIC) reader requirements. For more than 15 years, AWO has worked in partnership with the Coast Guard to ensure high standards of maritime domain awareness and security. Immediately after September 11, 2001, we developed a Model Vessel Security Plan for towing vessels, more than a year before such plans were required by law. When the Maritime Transportation Security Act was enacted in November 2002, AWO worked with the Coast Guard to transform the Model Vessel Security Plan into one of the first Coast Guard-approved Alternative Security Programs. AWO members work hard to transport our nation's cargo safely and securely, and we take pride in the fact that our American-owned, American-crewed, American-built vessels are the "eyes and ears on the waterways" for the Coast Guard.

AWO commends the Coast Guard for the pragmatic approach it has taken to address industry concerns by proposing to delay the implementation of the TWIC reader requirement by three years for certain facilities, including barge fleeting areas. Throughout the rulemaking process, it has been clear that the Coast Guard has used the public comments it received to refine its approach and develop a proposal that is based on risk and fits the operational realities of different types of marine transportation workplaces. However, the final rule published in August 2016 created confusion and concern about the definition of Risk Group A and the applicability of the TWIC reader requirement to certain facilities. Rather than taking a “one size fits all approach,” the Coast Guard’s sensible proposal recognizes that not every facility has the same risk profile, and that the agency needs more time to study the issues industry has raised and promulgate improved guidance.

As the Coast Guard reevaluates and refines the risk methodology for the TWIC reader requirements, AWO again urges the agency to reconsider the necessity of imposing the burden of electronic TWIC inspection on barge fleeting facilities with shoreside access and secure areas. Given the physical characteristics, operational profile and remote location of many barge fleeting areas, and the existing security measures in place to control access, AWO continues to believe—as stated in our June 2013 comments—that a TWIC reader requirement is not appropriate. We recommend that the Coast Guard’s analysis during the delay period include a reassessment of the risk profile of barge fleeting facilities and the costs and benefits of requiring readers, and we urge the agency to modify the requirement if it imposes costs that exceed its benefits.

Thank you for the opportunity to comment. We would be pleased to answer any questions or provide further information as the Coast Guard sees fit.

Sincerely,

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

Jennifer A. Carpenter