



801 North Quincy Street
Suite 200
Arlington, VA 22203

PHONE: 703.841.9300
EMAIL: jcarpenter@americanwaterways.com

Jennifer A. Carpenter
President & CEO

March 03, 2020

Rear Admiral Shepard M. Smith
Director
Office of Coast Survey
National Oceanic and Atmospheric Administration
1315 East West Highway
Silver Spring, MD 20910

Re: Sunsetting of Raster Nautical
Charts Production (Docket No:
2019-24807)

Dear Admiral Smith:

The American Waterways Operators is the national trade association for the tugboat, towboat, and barge industry. AWO's more than 300 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. 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 who safely, securely and efficiently move more than 760 million tons of cargo critical to the U.S. economy.

Thank you for the opportunity to comment on NOAA's announcement that the agency will end the production of traditional paper nautical charts and related raster products by January 2025. We appreciate your commitment to working with the U.S. Coast Guard to ensure that this production drawdown will not adversely impact navigation safety. We have surveyed our members and identified concerns about how NOAA's decision will impact their ability to continue to obtain paper charts, which many still use for navigation or as a back-up to electronic navigational charts (ENCs). Due to these members' ongoing reliance on or preference for paper charts, AWO encourages NOAA to strategically sequence its transition from traditional paper charts to ENC-based products to ensure that paper charts are widely available for those that need or choose to use them to meet U.S. Coast Guard navigation carriage requirements.

Specifically, AWO appreciates that NOAA has developed a prototype system called NOAA Custom Chart that will enable users to create and print paper charts themselves or have large format charts printed by a NOAA-certified print-on-demand (POD) agent. However, AWO urges NOAA to allow vessel operators the option to purchase traditional paper chart products

through POD agents until the Custom Chart application is fully tested, functional and operational. NOAA should work to educate paper chart users about the Custom Chart system, encourage them to use it, actively seek their input, and improve future iterations of the system to meet their needs so that they experience no disruption when traditional paper charts are discontinued.

While unimpeded access to paper charts is important for some of our members, others would prefer to use ENC's in lieu of paper charts. However, current Coast Guard policy regarding chart carriage requirements effectively prevents them from doing so. We would like to bring these issues to your attention and ask for NOAA's support to resolve them.

The Coast Guard has issued guidance on chart carriage requirements under Title 33 and Title 46 of the Code of Federal Regulations, which is outlined in Navigation and Vessel Inspection Circular (NVIC) 01-16, *Use of Electronic Charts and Publications In Lieu of Paper Charts, Maps and Publications*. *NVIC 01-16 states that ENC's are equivalent to and may be carried in lieu of paper charts. Depending on a vessel's operating area, it may display ENC data on a system that meets international equipment standards (currently, only an Electronic Chart Display and Information System, or ECDIS) or on a system of their choice. In addition, operators must have an independent back-up arrangement. According to NVIC 01-16, "Such arrangement could be a secondary system that meets the equivalency or a full folio of currently corrected paper charts."*

AWO members have two concerns with this guidance. The first concern is that costs associated with installing a second ECDIS or ENC display system as a back-up arrangement can be prohibitive, leaving paper charts as the only cost-effective alternative. The second concern, raised by members operating domestically in the coastal sector, is that ECDIS is the only ENC display system the Coast Guard will accept for vessels that transit outside the territorial sea baseline. These members' vessels are not subject to the International Convention for the Safety of Life at Sea, which would require them to be fitted with ECDIS. Between equipment, installation and subscription costs, and the costs of specialized crew training, an ECDIS can cost up to tens of thousands of dollars. AWO is committed to working with the Coast Guard to find practical options for ENC secondary systems and for ENC primary systems for vessels on domestic routes outside the territorial sea baseline that maintain the necessary level of navigational and operational safety. We respectfully request NOAA's assistance to resolve these issues.

Again, thank you for the opportunity to comment on NOAA's plan to phase out the production of traditional paper nautical charts and related raster products. We are happy to provide additional information at NOAA's request.

Sincerely,

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

Jennifer Carpenter
President & CEO