



National Association of Charterboat Operators

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January 26, 2018

The Honorable Duncan Hunter
Chairman

The Honorable John Garamendi
Ranking Member

Coast Guard and Maritime Transportation Subcommittee
U.S House of Representatives
507 Ford HOB
Washington, DC 20515
By Fax: 202-225-0235, (202) 225-5914

Re: SEC. 302. Clarification of logbook and entry requirements.

Dear Chairman Hunter and Ranking Member Garamendi:

NACO is a nonprofit 501 (c) (6) Association representing For Hire Charter Boat Owners and Operators across the United States. We represent USCG uninspected and Inspected passenger carrying vessels that provide fishing, diving, sailing, excursions, dinner cruises, and other passenger carrying vessels. We have a substantial number of members who own and operate USCG Certificated vessels.

The 2010 Coast Guard Authorization Act included a new requirement for USCG Inspected Passenger carrying vessels to provide and keep onboard new logbooks to include a dozen types of entries from maintaining crew working hours to providing injury and damage reports. These logbooks were intended for vessels on an international voyage and travel from an Atlantic to Pacific port but the language was applied to all USCG COI Passenger vessels. The 2010 requirement created an unnecessary and burdensome regulation for small family business operations and the USCG has yet to implement rulemaking on the 2010 Act.

The current Senate Coast Guard Authorization Act (S.1129) includes Section 302 that repeals the 2010 rule and works to eliminate the burdensome and costly requirement. The House Coast Guard bill does not mirror the Senate version. We understand the 2 bills are currently undergoing conference for a final bill and respectfully request the House version be modified to match the Senate version so this unnecessary requirement can be eliminated. USCG Certificated Passenger carrying vessels already maintain records on shore that contain all employment records, passenger counts, voyage information and injuries and vessel collisions are reported on USCG form 2692 which has been required for many years.

Several months ago President Trump requested every agency to provide a list of regulations and requirements that created burdensome requirements for small family businesses so some could be considered for elimination to help small family businesses survive and prosper. The 2010 requirement is one such regulation. We respectfully ask that you include language to match the Senate version to end this requirement.

Thank you for your hard work and consideration of this matter.

Sincerely,
Bob Zales, II

Capt Bob Zales, II
President

Cc: Coast Guard and Maritime Transportation Subcommittee Members