



National Association of Charterboat Operators

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Virginia Charter Boat Assn.
Westport Charterboat Association

July 25, 2007

Docket Management Facility
U.S. Department of Transportation
400 Seventh Street, SW.
Washington, DC 20590-0001
Fax: 202-493-2251

RE: USCG 2007-28460

Dear Sir:

NACO is a national association of over 3,300 charter boat owner and operators across the United States. We are the premier voice for our industry and on behalf of our membership we wish to comment on the need to continue to operate or invest in the North American LORAN-C Radionavigation System beyond fiscal year 2007.

We urge you to continue the use of Loran C, as many mariners and our membership continue to use this system for navigation. It is extremely useful in many areas for the purpose of locating particular spots. Loran C is utilized as a back up for GPS, which makes the system important to all. We believe a sole source of navigation could cause unnecessary problems in the future as we view backup plans as vital to security. The Loran C system is a cost effective back up plan. Maintaining two complementary systems has the potential to save lives in extreme, unforeseen situations.

No positioning system is infallible. To rely solely on a space based system, subject to solar storm interference or intentional jamming by others does not offer security to mariners or aviators. The LORAN infrastructure is already in place and working, bolted firmly to the earth, presumably still protected from electromagnetic pulse (EMP), and should not, therefore, require a huge capital expenditure to continue to operate... a good value and complement to the GPS constellation.

The three scoping locations are inadequate to properly hear from the public regarding this issue as the Gulf of Mexico and eastern seaboard constituents will experience great expense and difficulty traveling to Washington, DC . Therefore, we respectfully request a minimum of 2 additional scoping hearing sites as there are numerous recreational and commercial vessel owners who depend heavily on the LORAN-C system and they need an accessible location to provide first hand information to you. We recommend a central location in the Gulf of Mexico as well as a central location on the eastern seaboard.

We appreciate your consideration and should you have any questions please do not hesitate to contact us.

Sincerely,
Bobbi M. Walker

Bobbi M. Walker
Executive Director

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