



National Association of Charterboat Operators

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Virginia Charter Boat Assn.
Westport Charterboat Association

Docket Management Facility
U.S. Department of Transportation
400 Seventh Street SW., Room PL-401
Washington, DC 20590-0001.
Sent Via Fax: 202-493-2251.

January 31, 2007

RE: Docket No. USCG-2006-24371

Dear Sir or Madam:

NACO is the national association that represents over 3,300 charter boat owner/operators across the United States. We are the premier voice for the United States charter boat industry and wish to add additional comments on behalf of our membership regarding the amended rulemaking notice for the Consolidation of Merchant Mariner Qualification Credentials.

Throughout the supplemental notice it is clear the USCG intends to maintain their historical direction and control of licensing and procedures. The supplemental notice suggests elimination of duplicity by transferring this authority, which is inconsistent with other language in the amended rule. A critical reason to maintain status quo is the high probability of affecting individuals with inconsistent criminal background checks by TSA in addition to human and electronic error. We encourage the coast guard to maintain control of the licensing and record keeping processes. We feel this will eliminate confusion and layers of bureaucracy should an error occur.

We are opposed to the USCG not reviewing TSA decisions to deny or revoke a TWIC. As we are all aware human error occurs and with no USCG or judicial review process innocent mistakes could prohibit a mariner from maintaining his rightful license/endorsement. We encourage the USCG to stay involved in the review process.

We appreciate the provision to allow greater flexibility to mariners by allowing renewal applications for an MMC anytime before their current credentials expire. However, we would suggest, as is the current practice in some USCG districts that regardless of the date of application for renewal that the renewed license/endorsement not be issued by the USCG until near the expiration date of the current license/endorsement. This measure helps alleviate last minute renewal applications, frustrations when the process bogs down, and burdens on the USCG licensing offices and enables the mariner to maintain the issuance life of the current license/endorsement.

We appreciate your consideration of our concerns.

Best Regards,

Captain Robert F. Zales, II
President

cc: Denise Krepp