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Docket Management Facility (M-30)
U.S. Department of Transportation
West Building Ground Floor, Room W12-140
1200 New Jersey Avenue SE
Washington, DC 20590-0001

Re: Docket No. USCG-2013-1047 Draft Guidance for Interpreting Regulations for Marine Casualty Reporting

Via electronic submission to: <http://www.regulations.gov/>

To whom it may concern:

On January 13, 2014, the United States Coast Guard (USCG) announced the availability of draft guidance in the form of a Navigation and Vessel Inspection Circular (NVIC) entitled "Title 46, Code of Federal Regulations (CFR), Part 4 Marine Casualty Reporting Procedures Guide with Associated Standard Interpretations." The American Petroleum Institute (API) provides the following comments for consideration.

The API is a national trade association that represents over 600 members involved in all aspects of the oil and natural gas industry, including exploring for and developing oil and natural gas resources in the Gulf of Mexico (GOM) - a vital part of our nation's economy. The oil and natural gas industry supports 9.8 million U.S. jobs and 8 percent of the U.S. economy, delivering \$86 million a day in revenue to our government.

Our members recognize that offshore operations must be conducted safely and in a manner that protects the environment. The offshore industry in the Gulf of Mexico has a long history of safe operations that have advanced the energy security of our nation, and the energy resources in the region are also crucial to our nation's economy.

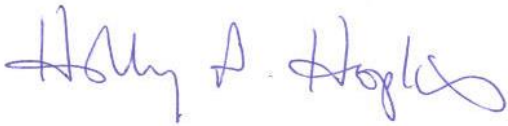
Our comments are submitted without prejudice to any member company's right to have or express different or opposing views, and we have encouraged all of our members to submit comments on the proposal.

Efforts by the USCG to clarify the intent of its regulation and its administrative requirements as well as moving towards a robust program of transparent and consistent reporting of casualties should be supported. The draft guidance for “interpreting regulations for marine casualties reporting” has three issues that do not appear to lead towards that robust program as intended:

- The definition of a “reduction of maneuverability” unfairly penalizes vessel operators who voluntarily install redundant critical equipment and systems in excess of regulatory minimums. A normal disengagement of a redundant system does not impact the safe maneuvering of the vessel and should not be subject to reporting.
- To avoid unnecessary administrative effort, short duration issues that do not impact the maneuverability of the vessel should not be subject to reporting.
- For reporting purposes, the draft NVIC appears to give non-crew members who are temporarily on board, providing services, the same status as crew members. Access to information about these personnel once they leave the vessel will make it difficult and impractical for a vessel operator to determine if an event is reportable.

API appreciates you allowing us to comment on the draft NVIC. If you have any questions, please contact me by phone at (202)682-8439, or by e-mail at hopkinsh@api.org.

Sincerely,

A handwritten signature in blue ink, reading "Holly A. Hopkins". The signature is fluid and cursive, with the first name "Holly" being the most prominent.

Holly A. Hopkins