



INTERNATIONAL ASSOCIATION OF DRILLING CONTRACTORS

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17 July 2006

RADM Craig Bone
U.S. Coast Guard (G-P)
2100 2nd Street SW
Washington, DC 20593-0001

Re: Coast Guard and Maritime Transportation Act of 2006 (Pub. L. 109-241)

Dear Admiral Bone:

As you are aware, the International Association of Drilling Contractors is a trade association representing the interests of drilling contractors, onshore and offshore, operating worldwide. Our membership includes all the drilling contractors currently operating mobile offshore drilling units (MODUs) in the areas subject to the jurisdiction of the United States as well as all MODUs registered in the United States.

We are writing to seek clarification with regard to the recently enacted Coast Guard and Maritime Transportation Act of 2006, specifically the addition of 46 U.S.C. 8106 by §312, which indicated the applicability of Riding Gangs to a "...freight vessel of the United States **on voyages covered by** the International Convention for Safety of Life at Sea, 1974....

As you are aware, the applicability of the SOLAS Convention varies by chapter, with chapter V having the broadest applicability. We therefore request the Coast Guard's interpretation of the phrase "on voyages covered by."

We would also ask for the Coast Guard's confirmation of our interpretation of the term "riding gang member" as defined in the revised 46 U.S.C. 2101 paragraph 26a. We believe that this term would not include the normal complement of industrial personnel on an industrial vessel or MODU. We request your confirmation.

If you have any questions regarding this correspondence, please contact me by phone at: (713) 292-1945, ext 203.

Sincerely,

John Pertgen
Assistant Director, Offshore Technical
and Regulatory Affairs