



# INTERNATIONAL ASSOCIATION OF DRILLING CONTRACTORS

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10 December 2007

Docket Management Facility (M-30)  
U.S. Department of Transportation  
West Building Ground Floor  
Room W-12-140  
1200 New Jersey Avenue SE  
Washington, DC 20590-0001

Re: Docket No.USCG-2005-22612, Long Range Identification and Tracking of Ships

To whom it may concern:

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 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 pleased to offer the following comments and concerns in response to the 3 October 2007 (72 FR 56600) *Federal Register* entry regarding your proposed rulemaking on Long Range Identification Tracking (LRIT).

IADC fully supports your actions to implement the LRIT for the purpose of improving maritime security and safety without undue delay. Additionally, we applaud your plan to establish a national data center for U.S. flagged ships while still allowing it to be used by other contracting governments.

We would express concern regarding the permission and allowable times for an LRIT to be turned off. In particular, this proposed rulemaking fails to address US flagged vessels, especially MODUs, undergoing repairs in a foreign port or drydock or in laid up status, all of which are situations that could effectively minimize unnecessary LRIT transmissions and their associated costs. Correspondingly, we should emphasize that this point was also addressed in the IMO report MSC 88/WP.8 with positive support from a considerable number of governments. We do not believe that the incorporation by reference of SOLAS V/19-1.7 in the proposed 33 CFR 169.220 serves to clearly address this issue.

Another IADC concern regards the timely notification and authorization to secure the LRIT when a MODU becomes engaged in drilling operations. This proposed rule merely stipulates informing the U.S. Coast Guard's Operations System Center (OSC) when LRIT equipment is


switched off or fails to operate. However, it is unclear as to when contact should be made, if the contact is intended to obtain authorization, or even if the OSC should be utilized for both authorization and notification when a MODU changes status.

In light of our above concerns, we recommend that provisions be added to the rulemaking which clarify how and when a U.S. vessel, in particular a MODU, is to provide notice and/or obtain authorization to switch off their LRIT system, when notice should be provided and/or authorization should be obtained, and if the contact with the OSC is the sole contact that need be made. Additionally, this rule should specifically include provisions to address periods when a vessel is located in a foreign port or drydock for repairs or in laid up status, as well as when a MODU becomes engaged in drilling operations.

IADC also recommends that this rulemaking should explicitly address the ‘non-mandatory’ requirement imposed by the Commander, Eighth Coast Guard District which mandates installation of ‘locating devices’ on all MODUs, both self propelled and non-self propelled, while operating in the U.S. Gulf of Mexico. This strongly endorsed “suggestion,” which mandates installation of a system of equivalent technology to the LRIT, was promulgated to provide improved pinpointing of MODUs for more effective search and rescue actions and pollution response during and after hurricane situations. As the system currently functions, the costs of the Coast Guard’s access to the location information are borne by the MODU owner, whereas, LRIT queries would be an expense borne by the U.S. Coast Guard. IADC believes that the Coast Guard should, at a minimum, accept voluntary fitting of LRIT-compliant systems as meeting the Eight Coast Guard District’s mandate for fitting of a locating device allowing the Coast Guard to assume the transmission cost of the information.

If you have any questions regarding these comments or recommendations, please contact me by phone at: (713) 292-1945, ext. 203.

Sincerely

A handwritten signature in black ink that reads "John Pertgen". The signature is written in a cursive, flowing style.

John Pertgen  
Assistant Director, Offshore Technical  
and Regulatory Affairs