



INTERNATIONAL ASSOCIATION OF DRILLING CONTRACTORS

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14 July 2008

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

Re: Crewmember Identification Documents Docket No. USCG-2007-28648

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 offer for consideration the following comments and concerns in response to the 14 May 2008 (73 FR 27778) *Federal Register* notice of proposed rulemaking regarding crewmember identification documents.

IADC questions the true need for additional identification documents for offshore workers located on the U.S. Outer Continental Shelf (OCS) in the Gulf of Mexico. We have inferred that the Coast Guard does not consider a location on the U.S. OCS to be considered a “foreign port or place,” for the purposes of this rulemaking, and ask for your confirmation that this term refers to a port or place outside of U.S. jurisdiction.

Inasmuch as the U.S. Customs and Border Protection (CBP) does not require passports or other nationality forms of identification for OCS workers, except those that have entered a foreign port or place (outside of US jurisdiction), we feel that this same approach should also be applicable to this rulemaking. This point was clearly explained in their proposed rulemaking, published in the 26 June 2007 *Federal Register* (72 FR 35088), which stated “...the offshore workers who work aboard MODUs attached to the U.S. OCS, and who travel to and from MODUs, would not need to possess a passport or other designated document to re-enter the United States if they do not enter a foreign port or place.” [Section V- Paragraph J]

Therefore, we do not believe it is appropriate, irrespective of the flag, for a MODU lawfully engaged in oil and gas activities on the U.S. OCS, which has not travelled outside of U.S. waters, for its personnel to present anything other than what is currently acceptable for their transport to and from their MODU.

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

Sincerely

A handwritten signature in cursive script that reads "John Pertgen". The signature is written in black ink and is positioned above the typed name and title.

John Pertgen
International Association of Drilling Contractors
Assistant Director, Offshore Technical
and Regulatory Affairs