



INTERNATIONAL ASSOCIATION OF DRILLING CONTRACTORS

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2 November 2009

Executive Secretary
Marine Safety and Security Council (CG-0943)
United States Coast Guard Headquarters
2100 Second Street, SW.
Washington, DC 20593-0001

Re: USCG NPRM (74 FR 44632) - Standards for Living Organisms in Ships' Ballast Water
Discharged in U.S. Waters

Dear Executive Secretary:

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 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.

Pursuant to 33 CFR 1.05, we hereby petition the United States Coast Guard to initiate a supplemental rulemaking to your 28 August 2009 NPRM (74 FR44632) to define the term "U.S. waters."

IADC believes that the Coast Guard may have inadvertently used the term "U.S. waters," in lieu of the NPRM-defined term "Waters of the United States," in no less than four areas (specifically: §151.1512, §151.2005, §151.2025, and §151.2035) of the NPRM. We strongly believe that use of the correct term is critical to the enforcement and application of the proposed rulemaking and do not want any uncertainty in its meaning or any misunderstanding of the term as it may be used in the regulations.

Please feel free to contact me by phone at (713) 292-1945 [ext 203] if you have any questions regarding this correspondence.

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