



# National Association of Charterboat Operators

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Virginia Charter Boat Assn.  
Westport Charterboat Association

November 7, 2006

Docket Management Facility  
U.S. Department of Transportation  
FAX; 202-493-2251

RE: USCG-2005-22732

Dear Sirs,

NACO is a national association of charter boat owners and operators. We are the premiere Association that represents charter boat interest. We wish to comment on the federal register notice announcing voluntary interim measures for increased passenger and vessel weight when determining the number of passengers permitted that was issued on November 2, 2006.

NACO wishes to express our appreciation for consideration of our previous comments and the MOA partnership that we share with the USCG.

Although we recognize the cause of the voluntary guidelines are related to a pontoon boat accident, which was due to a sudden unexpected extreme weather event, we find it difficult to comprehend how you regulate for unanticipated extreme weather events. However, we do support the clarification of guidance for this voluntary requirement.

NACO looks forward to working with the Coast Guard as you more formally address stability issues caused by increases in passenger and vessel weight for all domestic vessels. Should you have any questions please do not hesitate to contact me.

Sincerely,

Captain Bob Zales, II  
President



