



National Association of Charterboat Operators

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Sitka Charter Boat Operators Assn.
Sportfishing Association of California
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Thumb Area Charter Captains Assn.
Virginia Charter Boat Assn.
Westport Charterboat Association

Docket Management Facility,
U.S. Department of Transportation
400 Seventh Street SW., Room PL-401
Washington, DC 20590-0001.
Sent VIA: Fax 202-493-2251.

February 1, 2007

RE: Docket # TSA-2006-24191 and Docket #Coast Guard 2006-24196

Dear Sir or Madam:

NACO is the national association that represents over 3,300 charter boat owner/operators across the United States. We are the premier voice for the United States charter boat industry and wish to add additional comments on behalf of our membership regarding the TWIC fees.

While we accept the fact that TSA has established in this final rule a standard TWIC fee at \$139-\$159 we question the rational used to increase the replacement card fee from \$36 as in the NPRM to \$60. The NPRM states The Card Production cost increased by approximately 39% based on two factors. First in order to produce cards more rapidly during the initial enrollment, additional shifts were required at the card production facility. This decision was made in order to address comments to the NPRM that cards needed to be produced as quickly as possible. Clearly a replacement card will not be issued under the same circumstances as cards produced during initial enrollment. Therefore the extra cost burden for additional shifts has no bearing on a replacement card fee. We oppose using the rational for initial card production to justify the exorbitant increase in the replacement card fee. The NPRM also states that a fee has been added to cover future technology-related product improvements to the TWIC system and credential. We agree with your statement that technology improvements occur rapidly and improve efficiency, however we disagree with your assessment that technological improvements increase costs. Clearly, the competitive market place for all technology in our rapidly changing environment produces greater efficiency at less cost not more to the consumer. We feel that the proposed 67% increase for the replacement card fee is unjustified and unwarranted while increasing the economic burden to mariners.

We appreciate your consideration of our comments.

Sincerely,

Captain Robert F. Zales, II
President

cc: Denise Krepp