



# National Association of Charterboat Operators

P.O. Box 2990 Orange Beach, AL 36561  
Phone (251-981-5136) Fax (251-981-8191)  
info@nacocharTERS.org www.nacocharTERS.org

**Bobbi M. Walker**  
Executive Director

**Bob Zales, II**  
Panama City Boatman Assn.  
President

**Ed O'Brien**  
Maryland Charter Boat Assn.  
First Vice-President

**Tom Becker**  
Mississippi Charter Boat Captains  
Second Vice-President

**Chuck Schumacher**  
Chicago Sportfishing Assn.  
Secretary

**Ron Maglio**  
Michigan City Charterboat Assn.  
Treasurer

## Member Associations :

Alaska Charter Association  
Beach Haven Charter Fishing Assn.  
Black River Charter Guides Assn  
Cape Cod Charter Boat Assn  
Cape May County Party & Charter Boat  
Captree Boatman Open & Charter Boats  
Charterboat Assn. Of Puget Sound  
Chicago Sportfishing Assn.  
Deep Creek Charterboat Assn.  
Destin Charterboat Assn  
Eastern Lake Erie CharterBoat Assn.  
Florida Guides Association, Inc.  
Genesee Charterboat Assn, Inc.  
Golden Gate Fishermen's Assn.  
Homer Charter Assn.  
Ilwaco Charter Assn.  
Indiana's North Coast Charter Assn.  
Kenosha Charterboat Assn.  
Key West Charter Boatmen's Assn.  
Lake Michigan Sportfishing Assn.  
Marathon Guides Association  
Marco Island Charter Captain's Assn.  
Maryland Charterboat Assn.  
Michigan Charterboat Assn.  
Michigan City Charterboat Assn.  
Mississippi Charterboat Captain's Assn.  
Orange Beach Fishing Assn.  
Panama City Boatmen Assn  
Pennsylvania Lake Erie Charter Captain  
Pensacola Charterboat Assn.  
Petersburg Charterboat Assn.  
Port Aransas Boatmen Inc.  
Prince William Sound Charter Boat Assn  
Seward Charterboat Assn.  
Sitka Charter Boat Operators Assn.  
Sportfishing Association of California  
Steinhatchee Charterboat Assn  
Thumb Area Charter Captains Assn.  
Virginia Charter Boat Assn.  
Westport Charterboat Association

March 30, 2007

Docket management Facility  
U.S. Department of Transportation  
400 Seventh St S.W., Room 401  
Washington, D.C. 20590-0001  
By fax: 202-493-2251.

**Re: USCG-2007-27415; Transportation Worker Identity Credential (TWIC) Biometric Reader Specification and TWIC Contactless Smart Card Application**

Dear Sir or Madam:

NACO is a national association of over 3,300 charter boat owner and operators across the United States. We are the premier voice for our industry and on behalf of our membership we wish to comment on the federal register notice USCG-2007-27415 regarding TWIC.

Our members own and operate for-hire fishing, sightseeing, diving, sailing, and excursion vessels that range in size from very small guide vessels carrying no more than 4 persons to larger fishing and excursion vessels that carry less than 150 persons. Typically these vessels are one owner/operator independent small businesses. They generally operate from private and public docks that currently do not have to comply with any of the homeland security port security plans.

Due to the typical operation of these vessels we do not feel placing a card reader on these vessels should be required. Clearly, when I board my own vessel and have hired my own deckhand, when one or more is required, I do not need to swipe my TWIC card and be burdened with additional paper work and record keeping that would verify I am me. Many of our vessels do not have weather tight facilities where a card reader could even be placed without exposure to the elements, which would cause the reader to malfunction or not work at all. To this point, any card reader power requirement and memory system may not even be available. We respectfully request that vessels that carry less than 150 passengers, both inspected and uninspected that operate from private and public marinas not subject to a port security plan, not be required to install a TWIC card reader.

We would also like to offer the following suggestions regarding the TWIC card:

### **Should additional security measures be included in the specifications?**

Any additional requirements will make the system slow and cumbersome. The information in the TWIC cards should have all the necessary identification and if the template is stolen or lost then the information on the card would not match the fingerprints. A PIN number would be hard to remember after a long period of non-use and slow the process down when speed is needed to access a facility of vessel.

### **What, if any, privacy concerns exist if the fingerprint template is obtained by an unauthorized individual?**

PDF 417 is the bar code standard for this program and it contains all the information on the holder of his particular card. It is his database for the card readers and this information would not match another card holder and would show

as a duplicate fingerprint.

**How would the recommended specifications impact facility and vessel security and operations?**

The specifications built into this program have accounted for the lessons learned after Hurricane Katrina when there was no contact due to towers and radios out. Any designed system should be capable of accepting TWIC card information either electronically or manually to ensure safe and efficient operations.

**How would the recommended specifications impact existing physical access control systems?**

The recommended specifications should increase the security of the access point and reduce the chance of unauthorized access and speed up the process.

**Alternative Designs to consider.**

The chance of more problems would be enhanced if other designs were used and again would decrease the level of control that is needed for this program to work.

**How would the recommended specifications impact product, system, and operational costs?**

Any recommended changes would cost more and possible degradation of the end product could be affected.

**How quickly could the recommended specifications be incorporated into the design and manufacture of access control equipment?**

This could be lengthy and costly depending on the depth of recommended specifications.

Our recommendations for 1 through 7 are for the design and operation of the TWIC card since all licensed mariners will be required to hold this card. We fully support the TWIC card concept and the MMC concept. As stated above, we feel strongly that the requirement to apply a card reader to our vessels would be excessive, over burdensome, costly, and inefficient while providing no improvement in our national maritime security. We encourage you to exempt our type vessels from any card reader requirement.

We thank you for this opportunity to comment on this issue and look forward to our continued cooperation.

Sincerely,

Captain Robert F. Zales, II  
President

BMW/sim