



# National Association of Charterboat Operators

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Virginia Charter Boat Assn.  
Westport Charterboat Association

September 25, 2007

John Schwartz,  
Office of Transportation Threat Assessment and Credentialing (TSA-19),  
TWIC Transportation Security Administration  
601 South 12th Street  
Arlington, VA 22202- 4220  
*Sent Via facsimile (703) 603-0409*

**RE: Docket No. TSA-2006-24191; USCG-2007-27415**

Dear Mr. Schwartz,

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 above referenced federal register notice 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 port security plans.

We respectfully suggest that any requirement for small passenger vessels to comply with the TWIC card and proposed implementation of TWIC card readers on small passenger vessels will not significantly enhance national security. In fact, we suggest that the increased burden of compliance and substantial additional costs to the small passenger vessel sector will only serve to harm the many small passenger vessel owners. Due to the typical operation of these vessels, we do not feel that the requirement of a TWIC card and the placing of a card reader on these vessels should be necessary. 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 the additional paper work and record keeping that would verify I am me. Many vessels do not have weather tight facilities where a card reader could even be placed without much 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. Since homeland security will not be enhanced by requiring small passenger vessel owners to hold TWIC cards and card readers will be burdensome, costly, and ineffective in increasing security, we respectfully request that vessels that carry less than 150 passengers, both inspected and uninspected and who operate from private and public marinas not be subject to the requirement of TWIC cards nor be required to install a TWIC card reader. We encourage you to exempt our type vessels from any TWIC card and TWIC card reader requirement.

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

Sincerely,

*Robert F. Zales, II*

Captain Robert F. Zales, II  
President