

November 20, 2017

Rear Admiral John P. Nadeau
Assistant Commandant for Prevention Policy (CG-5P)
U.S. Coast Guard, Stop 7501
2703 Martin Luther King Jr. Ave., S.E.
Washington, D.C. 20593-7501

Subject: United States Coast Guard Transportation Worker Identification Credential
Reader Requirements Final Rule; 81 *Fed. Reg.* 57652, August 23, 2016.

Dear Admiral Nadeau:

The U.S. Coast Guard published the Transportation Worker Identification Credential (TWIC) Reader Requirements Final Rule on August 23, 2016, requiring certain Maritime Transportation Security Act (MTSA)-regulated facilities to perform electronic TWIC inspections. On May 15, 2017, the American Chemistry Council, American Fuel and Petrochemical Manufacturers, and International Liquid Terminals Association petitioned the Commandant to undertake rulemaking to revise this final rule to delay its effective date and align its applicability to facilities that handle Certain Dangerous Cargos (CDCs) in bulk with previous Coast Guard interpretation, as per Policy Advisory Council 20-04, and the proposed rule.

The industry trade organizations noted below remain concerned with the lack of clarity regarding our members' compliance obligations to plan for, purchase and install electronic TWIC readers at certain MTSA-regulated facilities. While the Coast Guard has provided verbal assurances that it will formally delay the effective date of the rule and reconsider its TWIC reader requirements, we have yet to see an official notice to this effect. We are now less than 10 months from the effective date of the final rule and industry still has no clear understanding of whether it will need to comply with the requirements of this rule by August 23, 2018. In fairness to the regulated community, we request that the Coast Guard promptly publish a notice proposing to extend the effective date of the final rule to at least three years from the date of publication, and informing the public of the Coast Guard's plans for future TWIC Reader regulation.

Our members remain dedicated to properly securing their marine facilities and look forward to the Coast Guard's action on this matter.

Sincerely,

Agricultural Retailers Association
American Chemistry Council
American Fuel and Petrochemical Manufacturers
American Petroleum Institute
Chlorine Institute
Compressed Gas Association

The Fertilizer Institute
Institute of Makers of Explosives
International Liquid Terminals Association
Louisiana Chemical Association
National Association of Chemical Distributors

cc: Captain Jennifer Williams
Director, Inspections and Compliance
U.S. Coast Guard

Captain Ryan Manning
Chief, Office of Port & Facility Compliance
U.S. Coast Guard