

(From)

(Date)

Docket Management Facility
US Department of Transportation
West Building Ground Floor Room W12-140
1200 New Jersey Ave. SE
Washington DC 20590

Comments to Docket Number USCG -2004-17914

Dear Sir/Madam,

I am *(fill in your name, position, and include your license # and type and what boat you work on including tonnage, route, crew size OR what organization you belong to including a brief of what the organization does and what vessel(s) it runs)*

I am also a member of the American Sail Training Association (ASTA). The Association's primary mission is to offer Sail Training and Sea Education programs to youth and adults. The United States Senate has commended ASTA for its efforts in character building under sail and for its advancement of international goodwill.

Several of the proposed changes to 46 CFR as enumerated in the Notice of Proposed Rule Making (NPRM) will substantially reduce the pool of professional crew available to man our vessels, and therefore inhibit our ability to serve in the critical role of introducing the sea to the mariners of tomorrow. In light of this we would like to comment on the following proposed changes to 46 CFR:

1) The proposed changes in this ruling are numerous, and the future repercussions are extremely difficult to anticipate. I therefore ask that the proposed July 2010 enactment date be extended, to give the reviewing committee more time to read and consider the received comments and to enact any necessary changes.

(The following is an EXAMPLE OF COMMENT and SUGGESTED CHANGES TO THE PROPOSED NEW RULES)

2) In reference to section 12.420 General Requirements for Ratings Forming Part of a Navigational Watch (c) 1 ii "at least one half of the required experience (six months of approved service) must be obtained on vessels of at least 200 GRT/500 GT":

The original purpose of the RFPNW was to ensure that entry level seaman had the basic skills of steering and following helm orders, keep a proper lookout and keep a safe watch. To attain these skills, it is not necessary that this training take place on a vessel of 200 GRT. In our industry, there are very few vessels of that tonnage available for training. This would cause a young sailor to leave the sailing industry to get this entry level rating. **We propose that there should be no tonnage requirement for this training.**

Likewise, **we request that the tonnage required for vessels used in STCW assessments be lowered from 100 tons or greater (as specified in the proposed new rules) to 50 tons or greater**, due to lack of readily available platforms for said training.

Thank you for your time and consideration of these comments.

Sincerely,