

**Comments of the Boat Owners Association of The United States Regarding a Report on Estimating the Benefits of Reducing the Risk of Recreational Boating Accidents: Alternative Sources of Information on Fatalities, Injuries and Property Damage, USCG-2013-0437**

**August 27, 2013**

BoatU.S. is the largest organization of recreational boaters in the United States, with more than 500,000 members nationwide. As an active partner in the Coast Guard's boating safety efforts, we appreciate the opportunity to provide our views on this report and its recommendations regarding the sources of boating accident data used in determining Coast Guard regulations and policy. BoatU.S. is quite familiar with Boating Accident Reporting Database (BARD), having conducted audits of the BARD (and SARMIS) on multiple occasions. Data that accurately reflects the causes of boating accidents must be at the heart of any programs and rule changes related to recreational boating.

We want to call attention to a general concern we have with the use of accident data as justification for supporting particular regulations, programs and policies. For several years, we have noted the selective use of certain accident statistics while failing to place such statistics in a larger context. Specifically, the level of boater education for operators involved in fatal accidents is often cited as justification for increasing boating education efforts and requirements. However, the statistic is never paired with the level of boating education by the overall boating public. As a result, it is not relevant, and should not be used as more than a basic metric.

This report notes that the BARD data is the most comprehensive available on recreational boating accidents. However, it is apparent, even with the most casual review of the database, that data collection is often incomplete, and varies widely from state to state and year to year. In order for the BARD to remain a trusted data source, we believe the Coast Guard must be consistent in how it collects, analysis and presents its data. Being able to make "apples to apples" comparisons is essential to the development of regulations that will have the support of the regulated community. We therefore recommend that the Coast Guard increase efforts to train accident investigators through the state boating agencies and NASBLA, and have greater consistency in how the BARD data is portrayed from year to year.

The report also noted that there is less reliable data available on accidents that are either non-fatal or that do not meet other requirements to be considered reportable to the Coast Guard. Specifically, it states that the accuracy of data on accidents becomes increasingly unreliable as the severity of injuries and property damage decreases. Several options for addressing this unreliability are suggested, including the application of

multipliers to more reliable accident data such as BARD. From our perspective, this data uncertainty calls attention to a significant challenge faced by the Coast Guard in estimating benefit-costs as it develops new rules. The Coast Guard should carefully weigh the components used in the development of any such multipliers and their applications to accident data.

Accurate, reliable data must be at the center of the Coast Guard's boating safety efforts. This report highlights some of the challenges faced in the development of this data. Should the Coast Guard seek new data sources, we urge substantial caution be used in their development, including consideration of whether they are worth the associated costs. We recommend a renewed commitment to the current, proven data sources with an emphasis on consistent data collection and complete data disclosure. The acceptance of new regulations by the recreational boating community is highly dependent on such rules being based on good data.