



**Government Affairs**

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February 16, 2010

Dana A. Goward  
Director, Assessment, Integration and Risk Management  
U.S. Coast Guard  
West Building Ground Floor, Room W12-140  
1200 New Jersey Avenue, SE, Washington, DC 20590-0001

re: Docket Number USCG 2009-0701

Dear Mr. Goward,

BoatU.S. is the nation's largest organization of recreational boaters, with more than half a million members nationwide. We appreciate the opportunity to comment on the U.S. Coast Guard's proposed interim policy on the sharing of information collected by a nationwide Automatic Identification System (AIS).

Recreational boating is an extremely popular outdoor family activity in this country, with an estimated 12 million registered boats in the United States and 70 million participants in a year.

At this time, AIS is required on many commercial craft but it is an optional piece of safety equipment for the recreational boat. In the last few months, Class B AIS have become available in the U.S, and their prices have come down to the \$600 level (uninstalled). As a result, we are seeing that some coastal and offshore recreational boaters are interested in voluntarily carrying this equipment to improve their situational awareness, thereby improving their safety and peace of mind. Some chose "receive only" units, while others have "transmit and receive" units. It is a very new tool for these cruisers, and one that is not widely understood.

The current Request for Comments raises an array of confidentiality concerns with regard to the recreational boating public. As boaters employ the transmit button they should understand they are sharing their boat's movement data with other mariners (and the USCG). We doubt that they are

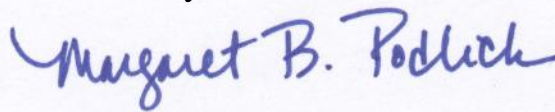
aware that this data as well as historical movement data, could be requested by a person, a group, or a business via a Freedom of Information Act (FOIA) request. If this data becomes available to the general public, we feel that there may be a substantial backlash from the boaters, reducing the amount of AIS use and the number of transmissions, which runs counter to the U.S. Coast Guard's goals. It also raises questions as to who might wish to use this data and to what end? For example, should an offshore raft manufacturer use a subset of this data to send marketing materials to offshore boaters? Should NOAA or the National Marine Fisheries Service use this data to articulate who has gone to a sanctuary area that does not allow powered boats or fishing?

Perhaps one way to address this confidentiality concern on the part of the recreational boaters is to segregate data, and it's availability to various entities? Should different data be available for Class A and Class B AIS units?

We understand that the U.S. Coast Guard is keenly interested in knowing more about the movements of vessels within our coastal waters. We recommend that the U.S. Coast Guard narrowly confine the use of this data for safety and homeland security purposes.

Thank you for the opportunity to comment on this matter. Please let us know if we can provide any additional information.

Sincerely,



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