



**Comments of the Boat Owners Association of The United States  
Regarding Vessel Documentation Renewal Fees  
USCG Docket Number 2010-0990**

**May 3, 2013**

BoatU.S. is the largest organization of recreational boaters in the United States, with more than 500,000 members nationwide. For more than 45 years we have worked to ensure that our members, who own a wide array of types and sizes of boats, can continue to enjoy this healthy outdoor family recreation. We appreciate the opportunity to comment on the proposed imposition of a \$26 annual fee for the renewal of vessel documentation, as outlined in the Federal Register Notice of March 4, 2013, Docket No. USCG-2010-0990.

The choice to document a recreational boat of 5 gross tons or more is made for a wide variety of reasons. Many marine lenders require documentation to protect a security interest in a vessel. For decades, boaters who plan on traveling on their boat to different states have felt that documentation is the preferred method of demonstrating ownership. Those boaters who travel to international destinations also want documentation, since it can ease the process of clearing into other countries where it is a readily recognized form of vessel identification.

When BoatU.S. reviews fees proposed on boat ownership we consider the benefit to the boater, the governmental function served by the fee, the efficiency of the program supported by the fee, and the overall burden on the owner. While any one fee or tax could be considered *de minimus*, its cumulative affect on the affordability of boating must be considered.

We are aware of the challenges faced by the Vessel Documentation Center in continuing to provide the services required by law. In fact, as a service to our members, BoatU.S. offers assistance with vessel documentation and our vessel documentation department consistently reports significant delays in completing the process for new applicants. We also understand that the Coast Guard gives priority to commercial applicants, further increasing the delays that recreational boaters experience.

In our view, the Coast Guard should take a step back and re-evaluate the efficiency and technology currently utilized in processing initial vessel documentation applications and renewals.

For example, the Coast Guard should strongly consider changing the one year vessel documentation period and instead move to a two, three or perhaps even a five year period. Many states have evolved their boat registrations so renewals are only required on a two to three year basis without compromising the integrity of their programs. This reduces printing, postage and administrative costs to state boating agencies and lessens the burden on boat

owners. As an alternative, certificates of documentation for recreational boats could be valid until any of the information changes. This would further alleviate the government from the costs of processing renewals.

The Coast Guard should also consider developing an Internet-based method for processing all vessel documentation transactions, including renewals. Consistent with the E-Government Act of 2002 (Public Law 107-347), moving the vessel documentation process on-line is a logical step towards reducing the cost and inconvenience of this program. Given the large number of federal, state and local governmental transactions that are now securely conducted on-line, it is surprising that vessel documentation has not yet done so.

Fully recognizing the array of benefits that vessel documentation provides to boat owners, financial institutions and the federal government, we respectfully urge the Coast Guard to reevaluate this proposed fee and the overall documentation program. Greater efficiencies in the process must be achieved before imposing any new fees on recreational boat owners. BoatU.S. stands ready to provide the perspective of the recreational boat owner should the Coast Guard undertake such a review.